

Access Ready, Inc.

AccessReady.org

Air Force Sergeants Association

HQAFSA.org

America's Warrior Partnership

AmericasWarriorPartnership.org

American Association of People with Disabilities

AAPD.com

American Speech-Language-Hearing Association

ASHA.org

American Veterans

AmVets.org

ANCOR

ANCOR.org

Association of University Centers on Disabilities

ACUD.org

Black Veterans Empowerment Council

BVECinc.org

Blinded Veterans Association

BVA.org

Code of Support Foundation

CodeOfSupport.org

Council of State Administrators of Vocational Rehabilitation

CSAVR.org

Disability Belongs™

DisabilityBelongs.org

Disability Rights Advocates

DRALegal.org

Dixon Center for Military and Veterans Services

DixonCenter.org

Easterseals DC MD VA

Easterseals.com/DCMDVA

Global Alliance of Speech-to-Text Captioning

SpeechToTextCaptioning.org

Home Care Association of America

HCAOA.org

Jewish War Veterans of the United States

JWV.org

K9s For Warriors

K9sForWarriors.org

Luke's Wings

LukesWings.org

National Association for Black Veterans

NABVET.org

National Association of Councils on Developmental Disabilities

NACDD.org

National Coalition for Homeless Veterans

NCHV.org

National Council on Independent Living

NCIL.org

National Disability Rights Network

NDRN.org

National Military Family Association

MilitaryFamily.org

Paralyzed Veterans of America

PVA.org

Semper K9 Assistance Dogs

SemperK9.org

TREA: The Enlisted Association

TREA.org

The Viscardi Center

ViscardiCenter.org

United Spinal Association

UnitedSpinal.org

Vets First

VetsFirst.org

Vietnam Veterans of America

VVA.org

World Institute on Disability

WID.org

Wounded Warrior Project

WoundedWarriorProject.org



July 30, 2024

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairwoman Rosenworcel,

The Clear2Connect Coalition represents more than 30 national disability advocacy groups and Veterans Service Organizations. We write to emphasize the significant value and impact of an Internet Protocol Captioned Telephone Service (IP CTS) compensation formula that permits IP CTS providers to sustain “functionally equivalent”¹ services.

With regard to automatic speech recognition (ASR)-only captioning, we commend the FCC’s consideration of precise service quality metrics and recognition of potential bias that may affect caption quality and accuracy. Further, we appreciate the FCC’s optimistic outlook on future artificial intelligence enhancements and perspective that a single compensation formula for both Communications Assistant (CA)-assisted (i.e., human captioners) and ASR-only IP CTS may cause providers to favor the less expensive ASR-only mode. However, decreasing ASR-only IP CTS compensation rates threatens providers’ economic viability and the long-term viability of IP CTS overall.

As you know, approximately 600,000 Americans, including people with disabilities, veterans, and seniors, rely on the IP CTS program to stay connected to family members, friends, professional colleagues, and health care providers, among others. For these Americans, communications-related disabilities are often not the only condition impacting their ability to engage in conversation. Specifically, veterans who have tinnitus are also more likely to experience post-traumatic stress disorder, depression, and/or anxiety.² Accessible, accurate, and quality phone conversations with close relatives, trusted peers, and health care providers are, therefore, imperative.

Equitable and effective communication access is not only critical, but also a fundamental right under the Americans with

¹ See 47 U.S.C. § 225 (a)(3), as amended by section 103 of P.L. 111-260.

² Prewitt, A., Harker, G., Gilbert, T. A., Hooker, E., O’Neil, M. E., Reavis, K. M., Henry, J. A., & Carlson, K. F. (2021). Mental health symptoms among veteran VA users by tinnitus severity: A population-based survey. *Military Medicine*, 186(Suppl 1), 167–175. <https://doi.org/10.1093/milmed/usaa288>

Disabilities Act of 1990, the Telecommunications Act of 1996, and the 21st Century Communications and Video Accessibility Act of 2010. Americans with communications-related disabilities deserve an IP CTS program that is held to the highest standards of functional equivalence—a requirement providers are unable to meet if they are inadequately compensated.

25 percent of ASR-only captioned telephone calls consist of errors every 1 in 6 words (i.e., 83.3 percent accurate). When accuracy falls below 98 percent, the transcription is deemed unintelligible and unusable.³ Presently, ASR-only mode is insufficient to ensure IP CTS users experience functional equivalence when making a phone call. A decrease in compensation rates will inhibit IP CTS providers from funding the service as it exists today and investing in the research and development efforts necessary to advance the quality and accuracy of ASR in the future. Without such investments now, ASR cannot improve to a point where ASR-only captioning is a sufficient option within three years.

In addition, while more than 12 million Americans report having hearing disabilities, the utilization rate of IP CTS is only at five percent—far below optimal levels.⁴ Proposed rate reductions will disincentivize providers from marketing this vital service to the growing IP CTS-eligible population, diminishing opportunities for industry growth and furthering disparities among low-income and/or racial and ethnic minority communities.

IP CTS is a necessity for so many Americans. Rates must allow IP CTS providers to enhance captioning quality and accuracy through research and development and serve as many IP CTS-eligible Americans as possible by investing in marketing and outreach. We request the FCC consider the value of the IP CTS program and the impact lower rates will have on both IP CTS providers and consumers as it makes a final determination.

Respectfully,
The Clear2Connect Coalition
Clear2Connect.org

Signatories:

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American Speech-Language-Hearing Association
ASHA.org

Black Veterans Empowerment Council
BVECinc.org

Blinded Veterans Association
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³ Romero-Fresco, P., & Pérez, J.M. (2015). Accuracy rate in live subtitling: The NER Model. In: R.B. Piñero, & J.D. Cintas, (Eds) *Audiovisual translation in a global context*. Palgrave Macmillan: London. https://doi.org/10.1057/9781137552891_3

⁴ See 47 U.S.C. § 225 (b)(1).

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Additional Signatories:

Autistic Women & Nonbinary Network
AWNNetwork.org