

**Date sent:** Monday, February 28, 2011  
**Subject:** FCC Enforcement Advisory - Reminding TRS Providers of Emergency Calling Requirements

On February 16, 2011, the Enforcement Bureau Commission issued the attached advisory reminding providers of their obligations to comply with Commission rules governing the provision of VRS and IP Relay regardless of the technology used to make a call. In particular, VRS providers must comply with the Commission's emergency call handling rules. The emergency call handling rules for IP Relay and VRS providers include, among other things, the following requirements:

- IP Relay and VRS providers must transmit all 911 calls -- as well as automatic number identification (ANI, generally the caller's 10-digit number), the caller's registered location, the name of the Internet-based TRS provider, and the communications assistant's (CA's) identification number for each call -- to the public safety answering point (PSAP), or other appropriate local emergency authority that serves the caller's registered location;
- IP Relay and VRS providers must answer incoming emergency calls before any non-emergency call, *i.e.*, prioritize the emergency calls and move them to the top of the queue;
- IP Relay and VRS providers must route all 911 calls through the use of ANI, and, if necessary, pseudo-ANI, via the dedicated wireline E911 network to the PSAP, or appropriate local emergency authority that serves the caller's registered location;
- If the Internet-based TRS is capable of being used from more than one location, the IP Relay and VRS provider must offer the consumer one or more methods of updating his or her registered location at will and in a timely manner. At least one of those methods must allow the user to update his or her registered location from the equipment he or she uses to access the Internet-based TRS;
- In the event that one or both legs of the emergency call (*i.e.*, either between the TRS user and the CA or between the CA and the PSAP/other emergency authority) is disconnected, the IP Relay or VRS provider must immediately re-establish contact with the TRS user and/or the appropriate PSAP or other emergency authority.

The link to the attached document is [www.fcc.gov/cgb/dro/headlines.html](http://www.fcc.gov/cgb/dro/headlines.html).