

Updates to Telecommunications Relay Services & Accessibility Frameworks Promise Significant Changes to FCC Programs

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Over the past year, the Federal Communications Commission (FCC) has made significant changes to its accessibility initiatives, particularly with Telecommunications Relay Services (TRS), which provide methods for people who are deaf, hard of hearing, deafblind, or have speech disabilities to communicate by telephone. Under Chairman Brendan Carr's leadership, the FCC has emphasized collaboration with consumer groups, technology providers, and accessibility advocates to ensure that TRS and related accessibility services keep pace with technological advancements and evolving consumer needs. The Commission has also prioritized modernizing the agency's TRS rules to better align with modern communications and usage, including through its *Delete, Delete, Delete* proceeding. Most recently, on January 29, the Commission adopted a Notice of Proposed Rulemaking (NPRM) seeking comment on reforms to improve the provision of certain internet protocol (IP)-based TRS.

Below we discuss key updates to the Commission's accessibility efforts and TRS programs.

The FCC Has Reworked Its Advisory Committees Engaged on Accessibility and Other Consumer Protection Issues

In July 2025, the FCC issued a Public Notice consolidating its disability and accessibility initiatives by merging the former Disability Advisory Committee (DAC) into the Consumer Advisory Committee (CAC). The Commission concurrently renamed the new committee the Consumer Protection and Accessibility Advisory Committee (CPAAC or "Committee") to better reflect its newly expanded purpose. In doing

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so, the FCC designated CPAAC with the responsibility of “provid[ing] advice and recommendations to the Commission on a wide array of consumer protection and accessibility matters specified by the Commission.” According to its charter, the list of topics that the Committee may consider includes:

- “Consumer protection and education;
- Implementation of statutes, Commission rules, and policies to protect consumers from illegal robocalls;
- Promoting consumer participation and input into Commission rulemaking proceedings and other decision-making processes; and,
- Impact of new and emerging communications technologies on consumers, including those in underserved areas;
- Communications access for people with disabilities; and
- Video Programming Access for people with disabilities.”

At its inaugural meeting in September 2025, CPAAC reviewed previous CAC and DAC initiatives, provided general updates on accessibility and consumer protection, and outlined priorities for its current term. Chairman Carr announced that CPAAC is currently prioritizing efforts to combat illegal robocalls and improve accessibility in modern communication systems.

During prior FCC Chairwoman Rosenworcel’s tenure, the DAC provided guidance on several key accessibility topics such as artificial intelligence (AI) for live captioning, online gaming accessibility, and TRS. Examples of past accessibility initiatives include:

- In February 2025, the FCC adopted a final rule implementing multichannel video programming closed captioning requirements to make display settings readily accessible to individuals who are deaf and hard of hearing.
- In September 2024, the FCC adopted items centered around video conferencing to further ensure the accessibility of modern communications tools.

In contrast, the CAC focused solely on consumer protection issues. Notably, the CAC created two dedicated working groups: one evaluating the technical aspects of AI, and the other focusing on consumer education and outreach initiatives.

As CPAAC continues to develop the specifics of its long-term agenda, its inaugural meeting underscores the Committee’s commitment to integrating the work previously undertaken by DAC and CAC. CPAAC’s most recent meeting occurred on February 24, where it voted on recommendations from its Robocall Mitigation Efforts Working Group.

The FCC Is Prioritizing Modernization for the TRS Program

Background

Title IV of the Americans with Disabilities Act (codified as Section 225 of the Communications Act) requires the FCC to “ensure that interstate and intrastate telecommunications relay services are available, to the extent possible and in the most efficient manner, to hearing-impaired and speech-impaired individuals in the United States.” The FCC provides TRS through several forms that use either traditional telephone lines (“analog” TRS) or internet-based services (iTRS). These offerings include: Text-to-Voice teletypewriter (TTY); Speech-to-Speech Relay Service; Shared Non-English Language Relay Services; Captioned Telephone Service; Internet Protocol (IP) Captioned Telephone Service (CTS); IP Relay Service; and Video Relay Service (VRS).

The TRS program consists of two components: (1) a state-based program in which states can provide analog TRS upon FCC certification, and (2) a federal program in which internet-based providers can receive FCC certification to provide nationwide iTRS offerings. If a state does not have an FCC-certified analog TRS program, the provision of intrastate analog TRS in that state falls under the Commission’s direct supervision. TRS is funded by mandatory contributions from telecommunications providers into state and federal funds.

Recent Efforts to Modernize and Rework TRS

Recent actions by the FCC demonstrate a push toward modernization for TRS programs. First, the Commission continues to grant certifications to iTRS providers employing fully automated captioning solutions, signaling a willingness to embrace non-human assisted or fully automated services. The Commission also has placed an emphasis on modernizing TRS rules to better align with modern communications and usage. For example, as a part of its *Delete, Delete, Delete* proceeding, in June 2025 the FCC proposed to modify the TRS rules to remove a rule requiring TTY-based TRS to be capable of communicating with the now-obsolete American Standard Code for Information Interexchange (ASCII) protocol.

Entering 2026, the FCC looks to expand on these efforts with two major rulemaking items:

- In November 2025, the FCC adopted an NPRM proposing to phase out the mandatory status of analog TRS under state programs and facilitate a transition to IP-based relay alternatives.
 - Citing declining usage of analog TRS, the NPRM seeks to align TRS with the modern communications landscape. The NPRM also explores potentially certifying a national analog relay provider, streamlining the TRS provider certification process, and further eliminating obsolete TRS rules. Comments were due February 2, 2026. Reply comments are due March 3, 2026.
- At its January 2026 Open Meeting, the FCC adopted an NPRM soliciting comment on potential enhancements for IP-based TRS.
 - The NPRM specifically outlines proposed reforms to IP Relay, IP CTS, and VRS, as well as administrative measures designed to streamline the TRS program. The NPRM seeks comment on rules intended to improve VRS by incorporating captioning functionality into VRS platforms and further evaluating the application of automatic speech recognition technology for speech-to-text conversion. It also seeks input on appropriate billing procedures when a provider offers both IP

Relay and IP CTS through an integrated platform. Comments and Reply Comments will be due 30 days and 60 days after date of publication in the Federal Register, respectively.

For more information, please contact one of the authors listed on this blog post. Wiley's Telecom, Media & Technology Telecommunications & Broadband Services practitioners can assist clients in navigating the complex requirements associated with the evolving TRS landscape.