

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Consideration
of The Relay Missouri Fund

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File No. TO-2024-0033

STAFF NOTICE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) providing notice of federal filings that may lead to potential guidance to states regarding analog relay service. Staff states as follows:

1. Staff filed a Recommendation on March 1, 2024, to take no action to phase-out analog relay service citing a need to revise Missouri statutes and greater guidance at the federal level. The Missouri Commission acknowledged Staff’s recommendation in its *Order Regarding the Deaf Relay Service and Equipment Distribution Fund Surcharge* issued March 21, 2024. This case was closed April 21, 2024.

2. A white paper was subsequently filed by four accessibility advocacy organizations with the Federal Communications Commission (“FCC”) on August 12, 2024, regarding the transition of users of analog Telecommunications Relay Service to Internet Protocol (IP)-based services.¹ The Missouri Commission is a member of one of the organizations, the National Association for State Relay Administration. Missouri is one of ten states supplying relay-related data used in the white paper and Missouri’s Case No. TO-2024-0033 is also cited in the white paper.²

¹ *Transition of Legacy Relay Users Reliant on Analog to IP-Based Telephony Relay Solutions*; A White Paper; August 12, 2024. Submitted by TDIAccess, Inc.; National Association for State Relay Administration, Gallaudet University and Telecommunications Access of Maryland.

² The data supplied by Missouri is aggregated with nine other states on page 5 of the white paper. Missouri’s Case No. TO-2024-0033 is cited on pages 6 and 15 of the white paper.

3. The FCC has issued a Public Notice seeking comment about the white paper.³ Comments were due January 17, 2025, with reply comments due February 8, 2025.

4. The Missouri Commission submitted comments to the FCC on January 17, 2025. The comments provide detailed information about Missouri's history and experience with relay service and suggest issues for the FCC to address.

5. Staff submits a copy of the white paper, the FCC's Public Notice and the comments of the Missouri Commission for inclusion in the case file for this docket to indicate the FCC is currently considering providing guidance to states regarding analog relay service. Although state relay issues have been presented to the FCC to address, it remains unclear when or if the FCC will provide guidance. Nevertheless, Staff will continue to monitor this FCC docket for further guidance.

WHEREFORE, Staff prays that the Commission will accept this filing; and will grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Ron Irving

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³ FCC Public Notice; Comment Sought on White Paper Regarding Transition of Analog Relay Services to Internet Protocol (IP)-Based Alternatives; CG Docket No. 03-123; DA 24-1209; December 3, 2024.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 28th day of January, 2025, to all counsel of record.

/s/ Ron Irving