



COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
400 NORTH STREET  
HARRISBURG, PA 17120

GLADYS BROWN DUTRIEUILLE  
CHAIRMAN

October 1, 2020

The Honorable Tom Wolf  
Governor of Pennsylvania  
Room 225 Main Capitol Building  
Harrisburg, Pennsylvania 17120

Dear Governor Wolf:

In accordance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA),<sup>1</sup> the Pennsylvania Public Utility Commission (Commission) respectfully submits this 2020 Annual Report regarding the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program, also known as “Newline”). The TDD Program and the PMAS Program are operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry (L&I) pursuant to Sections 6701.3 and 6701.3(a) of UTPMAA, respectively. Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge. The Commission administers the TRS surcharge fund pursuant to Section 6701.4(c) of UTPMAA.

The attached report discusses the following aspects of the programs: 1) Calculation and Statement of the TRS surcharge pursuant to Section 6701.4(c); 2) TDD Program, account balances, revenues, disbursements, and expenses; 3) PMAS Program, account balances, revenues, disbursements, and expenses; 4) OVR reported information; and 5) Commission Conclusion. An electronic version of this report is available on the Commission’s website.<sup>2</sup>

Very truly yours,

A handwritten signature in cursive script that reads "Gladys Brown Dutrieuille".

Gladys Brown Dutrieuille  
Chairman

Enclosure

cc: Pennsylvania Telecommunications Relay Service, Docket No. M-00900239  
2020 TRS Annual Legislative Report, Docket No. M-2020-3015212

<sup>1</sup> Section 5(e) of Act 34 of 1995, as amended by Act 174 of 2004, 35 P.S §§ 6701.1 – 6701.4.

<sup>2</sup> [http://www.puc.pa.gov/utility\\_industry/telecommunications/telecommunications\\_relay\\_service.aspx](http://www.puc.pa.gov/utility_industry/telecommunications/telecommunications_relay_service.aspx)



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CHAIRMAN

October 1, 2020

The Honorable John Fetterman  
Lieutenant Governor of Pennsylvania  
Room 200 Main Capitol Building  
Harrisburg, Pennsylvania 17120

Dear Lieutenant Governor Fetterman:

In accordance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA),<sup>1</sup> the Pennsylvania Public Utility Commission (Commission) respectfully submits this 2020 Annual Report regarding the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program, also known as “Newline”). The TDD Program and the PMAS Program are operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry (L&I) pursuant to Sections 6701.3 and 6701.3(a) of UTPMAA, respectively. Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge. The Commission administers the TRS surcharge fund pursuant to Section 6701.4(c) of UTPMAA.

The attached report discusses the following aspects of the programs: 1) Calculation and Statement of the TRS surcharge pursuant to Section 6701.4(c); 2) TDD Program, account balances, revenues, disbursements, and expenses; 3) PMAS Program, account balances, revenues, disbursements, and expenses; 4) OVR reported information; and 5) Commission Conclusion. An electronic version of this report is available on the Commission’s website.<sup>2</sup>

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GLADYS BROWN DUTRIEUILLE  
CHAIRMAN

October 1, 2020

TO THE MEMBERS OF THE GENERAL ASSEMBLY  
OF THE COMMONWEALTH OF PENNSYLVANIA:

In accordance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA),<sup>1</sup> the Pennsylvania Public Utility Commission (Commission) respectfully submits this 2020 Annual Report regarding the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program, also known as “Newsline”). The TDD Program and the PMAS Program are operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry (L&I) pursuant to Sections 6701.3 and 6701.3(a) of UTPMAA, respectively. Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge. The Commission administers the TRS surcharge fund pursuant to Section 6701.4(c) of UTPMAA.

The attached report discusses the following aspects of the programs: 1) Calculation and Statement of the TRS surcharge pursuant to Section 6701.4(c); 2) TDD Program, account balances, revenues, disbursements, and expenses; 3) PMAS Program, account balances, revenues, disbursements, and expenses; 4) OVR reported information; and 5) Commission Conclusion. An electronic version of this report is available on the Commission’s website.<sup>2</sup>

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**ANNUAL REPORT ON THE FISCAL STATUS AND OPERATIONS OF  
THE TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM  
AND  
THE PRINT MEDIA ACCESS SYSTEM PROGRAM**

**SUBMITTED BY  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**OCTOBER 1, 2020**

In compliance with Section 6701.4(e), of the Universal Telecommunications and Print Media Access Act (UTPMAA),<sup>1</sup> the Pennsylvania Public Utility Commission (Commission or PUC) respectfully submits this 2020 Annual Report<sup>2</sup> relating to the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program).

Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge.<sup>3</sup> The Commission administers the TRS Fund pursuant to Section 6701.4(c) of UTPMAA. The TRS surcharge is collected from all landline telecommunications customers and some fixed Voice over Internet Protocol (VoIP) telecommunications customers in Pennsylvania.<sup>4</sup>

The TDD Program distributes and provides telecommunication devices for people with disabilities who qualify under the UTPMAA. The TDD Program is overseen by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry (L&I), pursuant to Section 6701.3 of the UTPMAA. OVR currently contracts with the Institute on Disabilities at Temple University (IDT), in Philadelphia, Pennsylvania, to manage the TDD Program. Pennsylvania's Initiative on Assistive Technology (PIAT), an IDT program, provides assistive technology services and resources.<sup>5</sup>

The PMAS Program provides access via telephone to print media for persons who are blind. The PMAS Program is operated by L&I's Bureau of Blindness and Visual

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<sup>1</sup> Act 34 of 1995, as amended by Act 174 of 2004, 35 P.S. §§ 6701.1 – 6701.4.

<sup>2</sup> An electronic version of this report is available on the Commission's website:

[http://www.puc.pa.gov/utility\\_industry/telecommunications/telecommunications\\_relay\\_service.aspx](http://www.puc.pa.gov/utility_industry/telecommunications/telecommunications_relay_service.aspx)

<sup>3</sup> 35 P.S. § 6701.4(c) provides that the TDD Program *shall* be funded by the TRS surcharge and that the PMAS Program *may* be funded by the TRS surcharge. Initially, the PMAS Program was funded through special grants; however, beginning in July 2006, it has been funded entirely from the TRS surcharge. Print media does not contribute to the TRS Fund.

<sup>4</sup> 73 P.S. § 2251.6(1)(ii) (PUC jurisdiction over VoIP for purposes of TRS fees is preserved under the 2008 VoIP Freedom Act.)

<sup>5</sup> <https://www.temple.edu/instituteondisabilities/programs/>.

Services (BBVS) and overseen by OVR pursuant to Section 6701.3(a) of the UTPMAA. Access is currently provided through the National Federation of the Blind (NFB) reading service, known as “NFB Newsline.”

The Commission provides assistance to OVR, BBVS, and PIAT in accordance with the UTPMAA.

On May 25, 2015, at Docket No. P-2015-2484229, OVR filed a Petition with the Commission seeking funding from the TRS surcharge to fund a two-year wireless pilot program entitled “Wireless Expansion Initiative: Promoting Telecommunications Equity for People with Disabilities in Pennsylvania” (WEI Pilot). OVR asserted that the WEI Pilot would provide needed data for a potential expansion of the TDD Program to include the availability, distribution, and funding of adaptive wireless equipment to income-eligible persons with disabilities within Pennsylvania.

By Order entered July 8, 2015, the Commission granted OVR’s Petition, allowing the WEI Pilot to proceed with funding from the TRS surcharge.<sup>6</sup> Following completion of the WEI Pilot and its review by OVR and Commission Staff, the Commission, by Opinion and Order entered February 27, 2019, adopted a permanent and ongoing wireless expansion initiative program as a funded component of the Pennsylvania TRS and TDD Program.<sup>7</sup> A copy of that Opinion and Order is attached as Public Utility Commission Attachment A.

### **CALCULATION OF THE TRS SURCHARGE AND USE OF THE TRS FUND FOR THE TDD PROGRAM AND THE PMAS PROGRAM**

Local Exchange Carriers (LECs) report their respective wireline access line counts as of December 31<sup>st</sup> by filing an Annual Access Line Summary Report with the Commission. Certain LECs also report their fixed VoIP lines.<sup>8</sup> The Commission sets the amount of the monthly TRS surcharge on each residential and business access line. The monthly TRS surcharge is reviewed annually and adjusted as necessary based on the number of wireline telephone access lines in service, the financial status of the TRS Fund, and the projected expenses of the TRS, the TDD Program, and the PMAS Program. OVR submits projected annual budgets for the TDD Program and the PMAS Program.

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<sup>6</sup> *Petition of Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania et al.*, Docket Nos. P-2015-2484229, M-00900239, and M-2015-2460700 (Order entered July 8, 2015).

<sup>7</sup> *Petition of Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania et al.*, Docket Nos. P-2015-2484229, M-00900239, and M-2018-2640814 (Order entered February 27, 2019).

<sup>8</sup> See 73 P.S. § 2251.6(1)(ii).

Section 6701.4(c) provides, in pertinent part, that:

(c) Additional use of [TRS] surcharge. – The [TDD] Program shall be funded and the [PMAS] program may be funded by the [TRS] surcharge, as calculated by the commission on an annual basis under the methodology established by the commission in order[s] entered May 29, 1990, and July 9, 1990, at Docket Number M-00900239, and as subsequently modified by the commission. . . . A portion of the surcharge may be used to fund the [PMAS] Program. The surcharge shall not be used to fund administrative costs of [TRS], [the TDD] Program or the [PMAS] Program.

The Commission calculates the TRS surcharge component for each program separately on a per wireline access line percentage basis. At its June 18, 2020, Public Meeting, the Commission considered an annual TRS surcharge recalculation for the twelve-month period beginning July 1, 2020 through June 30, 2021 at Docket Nos. M-2020-3015209 and M-00900239. The Commission's action on this matter resulted in a 2-2 vote. As a result, the recommended TRS surcharge recalculation was neither approved nor rejected by the Commission. Notwithstanding, the 2019-2020 monthly TRS surcharge amount of \$0.08 per residence and business access line remains in place until a majority of Commissioners act unanimously in setting a new surcharge. A copy of the Commission's Order entered on May 23, 2019, at Docket No. M-2019-3006851, approving the 2019-2020 TRS surcharge and TDD Program and PMAS Program allocation percentages of the surcharge rate, is attached as Public Utility Commission Attachment B. Copies of the Commissioners' statements regarding the 2020-2021 surcharge are attached as Public Utility Commission Attachment C.

### **TDD PROGRAM**

On May 7, 2020, OVR filed a budget with the Commission for the TDD Program for the ensuing year. The TDD Program budget for July 1, 2020, through June 30, 2021, as submitted by OVR, is \$671,417, compared to \$477,316 for the budget year 2019-2020. OVR's 2020-2021 budget proposal estimated that the costs for the TDD Program will be \$39,847 for traditional equipment and \$216,157 for traditional consumer education and outreach services. The 2020-2021 TDD Program budget also includes WEI expenses of \$286,270 for equipment and \$129,143 for consumer education and outreach. In addition, the budget calculations showed the unit cost and quantity of each type of telecommunications device projected to be distributed in the prospective budget year.

Based on the bills submitted to and paid from the TDD Program sub-account for the 2019-2020 TDD Program year, the TDD Program account began the 2020-2021 program year with a sufficient surplus to provide for the statutory TDD Program elements and maintain an adequate cash flow reserve.

**TDD Program Sub-Account**  
For the period of July 1, 2019 to June 30, 2020

<b>Beginning Balance on July 1, 2019</b>	<b>\$1,075,177.48</b>
Revenue from the TRS surcharge	\$375,838.41
Earned net investment income	\$15,401.11
Distributed equipment costs	(\$20,312.71)
Consumer education and outreach	(\$204,773.96)
WEI pilot program equipment	(\$64,133.60)
WEI pilot program education & outreach	(\$41,410.02)
Fiduciary fees (US Bank Institutional Trust & Custody)	(\$2,640.37)
<b>Ending Balance on June 30, 2020</b>	<b>\$1,133,146.34</b>

The Commission is allocating 10 percent of the total TRS surcharge revenues to the TDD Program for the 2019-2020 TRS surcharge recalculation year (M-2019-3006851). *See* Public Utility Commission Attachment B.

**PMAS PROGRAM**

On May 7, 2020, OVR, BBVS filed a budget with the Commission for the PMAS Program for the ensuing year. The PMAS Program budget for July 1, 2020, through June 30, 2021, as submitted by BBVS, is \$188,000, as compared to \$195,676 for the budget year 2019-2020. BBVS' 2020-2021 budget proposal estimated that the costs will include twenty-seven participating newspapers (increase of two from last year), annual service fee, annual newspaper maintenance and distribution fee, Pennsylvania Specific Alerts service, marketing and outreach, and a one-year telecommunications subscription fee for the system over which users can hear selected print media being read aloud.

Based on the bills submitted to and paid from the PMAS Program sub-account for the 2019-2020 PMAS Program year, the PMAS Program sub-account began the 2020-2021 year with a sufficient surplus to provide for the statutory PMAS Program elements and maintain an adequate cash flow reserve.

**PMAS Program Sub-Account**  
For the period of July 1, 2019, to June 30, 2020

<b>Beginning Balance on July 1, 2019</b>	<b>\$603,293.47</b>
Revenue from the TRS surcharge	\$187,919.27
Earned net investment income	\$9,003.18
NFB Newsline annual element costs	(\$172,510.75)
Fiduciary fees (US Bank Institutional Trust & Custody)	(\$1,549.25)
<b>Ending Balance at June 30, 2020</b>	<b>\$626,155.92</b>

The NFB Newline invoice payment historically was made annually in October for the entire contract year. BBVS now has a quarterly invoice and payment arrangement with NFB Newline. This new payment arrangement spreads the expense over the contract year which requires a lower fund balance at the start of a PMAS Program year. The Commission is allocating 5 percent of the total TRS surcharge revenues to the PMAS Program for the 2019-2020 TRS surcharge recalculation year.

### **OVR INFORMATION**

Pursuant to Section 6701.4(e)(2), OVR submitted to the Commission information on the TDD Program. The OVR submission is attached as Public Utility Commission Attachment D.

### **PUBLIC UTILITY COMMISSION CONCLUSION**

The Commission has been responsive to the needs of the residents of Pennsylvania who depend upon the TDD Program and the PMAS Program and is compliant with the directives of the UTPMAA. The Commission will continue to be attentive to OVR's implementation of the TDD Program and PMAS Program and the Commission's funding oversight and responsibilities relative to the TDD Program and PMAS Program.

The Commission's Bureau of Audits, with the assistance of OVR, conducts audits of the TDD Program and the PMAS Program. The objectives and scope of the audits are to determine that only qualified individuals received TDD Program equipment; that the consumer educators properly and accurately charged the fund for services provided; that only qualified bidders were awarded contracts through the Request for Proposals process; that equipment and service contractors properly invoiced the TRS Fund; and that all monies withdrawn from the TDD Program sub-account and PMAS Program sub-account were only used for qualifying TDD Program and PMAS Program services and equipment.

On July 13, 2020, at Docket No. D-2020-3020696, the Bureau of Audits initiated an ongoing audit of the TDD Program and PMAS Program for the twelve-month periods ended 6/30/2019, 6/30/2018, and 6/30/2017. The prior audit report for the twelve-month periods ended 6/30/2016, 6/30/2015, and 6/30/2014, which included one procedural finding, was released at Public Meeting on August 29, 2019 and is available at Docket No. D-2018-3001207.

### **ATTACHMENTS (4):**

**Public Utility Commission Attachment A:** Commission Opinion and Order entered February 27, 2019, adopting a permanent and ongoing wireless expansion initiative program as a funded component of the Pennsylvania TRS and TDD Program (Docket Nos. P-2015-2484229, M-00900239, and M-2018-2640814)

**Public Utility Commission Attachment B:** Commission Order entered May 23, 2019, approving the current TRS surcharge and TDD Program and PMAS Program allocation percentages of the surcharge rate (Docket No. M-2019-3006851)



**Public Utility Commission Attachment C:** Commissioner Statements: Chair Dutrieuille; Vice Chair Sweet; Commissioners Coleman and Yanora, from Public Meeting June 18, 2020, Docket No M-2020-3015209

**Public Utility Commission Attachment D:** TDD Program Information Submitted by OVR

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

Public Meeting held December 20, 2018

Commissioners Present:

Gladys M. Brown, Chairman  
Andrew G. Place, Vice Chairman  
Norman J. Kennard  
David W. Sweet  
John F. Coleman, Jr.

Petition of the Department of Labor & Industry  
Office of Vocational Rehabilitation for a Proposed  
Pilot for Distribution of Telecommunications  
Relay Service Wireless Equipment to People with  
Disabilities in Pennsylvania

Docket No. P-2015-2484229

Petition of the Pennsylvania Telephone  
Association Requesting the Commission to  
Approve Implementation of Pennsylvania Relay  
Service for Deaf, Hearing, or Speech-Impaired  
Community within the Commonwealth of  
Pennsylvania

Docket No. M-00900239

Recalculation of the Pennsylvania Annual  
Telecommunications Relay Surcharge

Docket No. M-2018-2640814

**OPINION AND ORDER**

**BY THE COMMISSION:**

By this Opinion and Order, the Commission adopts a permanent and ongoing wireless expansion initiative program (WEI) as a funded component of the Pennsylvania Telecommunications Relay Service (TRS) and the Telecommunications Device Distribution Program (TDDP).

## I. Background

On July 8, 2015 the Commission entered its Order (*July 2015 Order*) in the above-referenced proceeding at Docket No. P-2015-2484229.<sup>1</sup> The *July 2015 Order* granted a Petition (Petition) from the Office of Vocational Rehabilitation (OVR), Department of Labor and Industry (L&I) authorizing the funding of a pilot project involving the distribution of wireless equipment to income-eligible persons with disabilities within Pennsylvania.

The *July 2015 Order* approved a WEI Pilot within the legal and policy framework of the existing telecommunications device distribution program that is administered by OVR-L&I and is funded by the Pennsylvania Telecommunications Relay Service Fund (TRS Fund or Fund).<sup>2</sup> As contemplated in the *July 2015 Order*, following completion of the WEI Pilot and its review by the OVR and Commission staff, the Commission takes the next step to make permanent and ongoing the WEI program as set forth below.

The Commission does this by granting OVR's initial budget in its entirety as set out in the OVR Report that was filed with the Commission in June 2018.<sup>3</sup> Such an action relies on the public interest and legal findings we made in the *July 2015 Order*

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<sup>1</sup> *Petition of Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunication Relay Service Wireless Equipment to People with Disabilities in Pennsylvania et al.*, Docket Nos. P-2015-2484229, M-00900239 *et al.*, (Order entered July 8, 2015) (*July 2015 Order*).

<sup>2</sup> The Commission administers the Pa. TRS Fund. *See also* 35 P.S. § 6701.4(c).

<sup>3</sup> *In re: Petition of the Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania*, Docket No. P-2015-2484229, Amended Report of Department of Labor and Industry, Office of Vocational Rehabilitation (June 13, 2018) (hereinafter OVR Report).

establishing the WEI Pilot and reflects OVR's experience with the WEI Pilot addressed in the OVR Report.

OVR proposed a three-year budget in which the distributed equipment is proposed to be replaced every three years.<sup>4</sup> OVR proposes a budget of \$199,393 for the first year of the program consisting of \$70,750 for initial start-up costs and another \$129,143 of which \$62,390 is for equipment and \$66,753 is for non-equipment costs. Budget Years 2 and 3 would remain at the \$129,143 with identical allocations of \$62,390 for equipment and \$66,753 for non-equipment costs.

At an anticipated cost of \$547 per wireless device, this translates to providing roughly 114 devices annually. OVR's proposed incremental increase in device distribution is based on programs in Missouri and Colorado, which, when expanding their TRS programs to include wireless communications, encountered increases in device distribution of approximately 30%. Based on those states' experiences, OVR proposes a similar increase for Pennsylvania's TDDP to include wireless devices, although those states have half the population of Pennsylvania.

The Commission accepts this initial OVR budget recommendation at this time for two reasons. First, there is a need to focus on implementation and outreach at the outset. Thereafter, however, OVR should be looking to lower the expense related to administration of the program and increase the proportion of expense associated with the distribution of equipment, effectively lowering the non-equipment costs as a percentage of the overall budget. Second, this is the only budget proposed in support of OVR's Petition. The Commission believes that it is appropriate to require OVR to commit to evaluating the budget with those parameters in mind and submitting the same to the

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<sup>4</sup> OVR Report at 33.

Commission timed to coincide with the Commission's evaluation of a TRS and TDDP budget and the annual TRS surcharge recalculation, typically in May/June of each year.

The OVR budget the Commission adopts today is an initially small but important step towards enhancing communications capabilities to low-income Pennsylvanians with disabilities given Pennsylvania's demographics. However, given the potential universe of persons in Pennsylvania that may be eligible to participate in WEI,<sup>5</sup> the Commission will require OVR to review its budget and assess its program annually to evaluate how well it is effectuating its purpose. The Commission will also require that OVR operate the program on a more geographically balanced basis across Pennsylvania as proposed in using the Assistive Technology Resource Centers (ATCRs) or a functional equivalent. OVR shall present its findings and proposals in conjunction with the Commission's annual calculation of the TRS surcharge in May/June of each year.

A wireless equipment distribution program better ensures compliance with Pennsylvania law requiring the Commission to support a TRS program to facilitate communications for persons with disabilities by wire or radio. This is warranted because communications for impaired citizens by wire or radio must be reasonably comparable to the communications by wire or radio available to non-impaired citizens. Under this program, the Commission is supporting a wireless device distribution program in which the qualified consumer must still buy the underlying wireless access service. Like the current TDDP, however, the Commission is approving a budget that provides equipment

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<sup>5</sup> As one example, the Pennsylvania demographic and economic information from the 2016 American Community Survey data of the U.S. Census Bureau shows that for a poverty determination Pennsylvania's population of 12,369,671 citizens, 30.2%, or 3,736,519, are at or below 200% of poverty and 3.7%, or 469,694 from a 12,579,598 non-institutionalized population have hearing difficulties. Applying the 30.2% poverty level figure to the population with hearing difficulties, about 141,847 Pennsylvanians could be eligible to participate in the WEI expanded program.

with adaptations to qualified individuals that is necessary to provide equal access to communications in today's market.

To appreciate this action in context, it is important to summarize the development of TRS in Pennsylvania over the past 28 years. That summary explains why this incremental proposal is the logical extension of the Commission and Commonwealth commitment to TRS in Pennsylvania. The proposal to limit spending to the OVR budget in the initial phase is fiscally responsible because it can be funded from the existing access line surcharge and budget and be adjusted as OVR provides additional information based on its actual experience in Pennsylvania.

### **History of the TRS Fund**

Our *July 2015 Order* addressed the history and implementation of the current TRS program up until that time. As we stated then, the Commission established TRS service in response to a petition by the Pennsylvania Telephone Association (PTA) urging the Commission to create a program because that was consistent with the law and the public interest. The TRS service established by the Commission has been supported by a monthly fee on wireline access lines. This ensures the delivery of adequate and equivalent access to services by end-user consumers with physical impairments under applicable federal law.<sup>6</sup> Thereafter, Act 34 of 1995, 35 P.S. §§ 6701.1-6701.4 (Act 34), codified the operation of relay service and the Commission's oversight of the TRS Fund and surcharge mechanism in Pennsylvania.

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<sup>6</sup> Federal Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101 *et seq.*

Act 34 also established the TDDP, a device distribution program funded by the TRS Fund.<sup>7</sup> TDDP supports the distribution of equipment to facilitate telecommunications although neither the rates or operations for that equipment are regulated by, or subject to, the Commission’s jurisdiction. Responsibility for managing the TDDP is vested with OVR. The responsibility for financial oversight and disbursements in support of the TDDP program rests with the Commission pursuant to the submission of annual budgets from OVR.

Act 174 of 2004, 35 P.S. § 6701.3a, moreover, established the Print Media Access System Program (PMASP) that is also funded by the TRS Fund.<sup>8</sup> PMASP is a service that facilitates access to printed media information for consumers although neither the rates nor related services are regulated by, or subject to, the Commission’s jurisdiction. The statutory provisions addressing this information service are now referred to as the Universal Telecommunications and Print Media Access Act (UTMPAA).<sup>9</sup> The UTMPAA also requires the Commission to report annually on the TRS Fund, the TDDP, and the PMASP programs supported from the TRS surcharge to the General Assembly. 35 P.S. § 6701.4.

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<sup>7</sup> TDDP provides equipment to enable eligible low-income persons to use telecommunications relay services. The statute was amended by Act 181 of 2002 to be more inclusive of persons with disabilities by expanding the definition of “persons with a disability” to include all disabilities that prevent a person from using standard telecommunications equipment.

<sup>8</sup> PMASP is a newspaper reading service for persons with certain vision and physical disabilities. Administrative responsibility is vested in OVR. The Commission is responsible for the financial oversight and disbursements supporting this newspaper access program under relevant OVR budgetary submissions although the Commission does not regulate rates or delivery of newspapers in Pennsylvania or similar information services.

<sup>9</sup> *See* 35 P.S. § 6701.

The Commission subsequently established Captioned Telephone Relay Service (CAP-Tel), a telecommunications service, in Pennsylvania in response to suggestions from our Telecommunications Relay Advisory Board (TRS Board) about consumer need for this service. The Commission did so by contract pursuant to a request for proposals process. Cap-Tel permits consumers to communicate using modern technology that relies, in part, on Internet Protocol (IP). The Commission also issued an advisory letter on July 9, 2014 that authorized funding for the distribution of IP-enabled wireline devices through the TDDP to eligible end-users in response to changing technology.

The quality of service provided by our certificated TRS provider is subject to the Commission's jurisdiction. Hamilton Relay Service, Inc.<sup>10</sup> (Hamilton Relay), the current certificated traditional relay provider, submits the estimated annual traditional relay minutes of use (MOUs) and charges. Hamilton Telecommunications Company<sup>11</sup> (Hamilton Telecommunications), an affiliate of Hamilton Relay, provides Cap-Tel pursuant to a contract with the Commission and submits the estimated annual Cap-Tel MOUs. OVR submits the annual TDDP and PMASP budgets. The TRS Fund covers the TRS Board activities and Fund Administrator costs as well.

The Pennsylvania relay service costs (including the intrastate Cap-Tel) are recovered through the monthly TRS surcharge set by the Commission and currently assessed by the Local Exchange Carriers (LECs) on wireline residence and business customers.<sup>12</sup> The TRS Fund and the monthly surcharge are reviewed by staff and set by

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<sup>10</sup> See *Application of Hamilton Relay*, Docket No. A-2014-2447601 (December 4, 2014).

<sup>11</sup> See RFP-2012-2, Bp8=2304702 (May 24, 2012).

<sup>12</sup> See 52 Pa. Code §§ 63.31-63.37.



the Commission annually, typically to be effective in June of each year.<sup>13</sup> Additionally, the Commission's Bureau of Audits periodically audits the TDDP pursuant to the Memorandum of Understanding executed between L&I and the Commission at Docket No. M-00900239F0004.<sup>14</sup>

The WEI Pilot was part of the Commission's long-standing commitment to support the communications needs of disabled persons in Pennsylvania.<sup>15</sup> The *July 2015 Order* adopting the WEI Pilot program reflected a determination that a wireless device distribution program furthered the statutory mandate to facilitate communications by eligible impaired consumers using wire and radio in the Commonwealth and was in the public interest. The Commission recognized that any program established following the results of the WEI Pilot must also be consistent with that Pennsylvania law and could be supported from the current TRS Fund and surcharge in Pennsylvania.

### **The WEI Pilot**

Among other duties, the OVR is responsible for providing services designed to increase the independence and employability of individuals in Pennsylvania

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<sup>13</sup> Staff shall include the wireless device program in their review and calculation of the surcharge presented for disposition at Public Meeting.

<sup>14</sup> See, e.g., *A Report on the Telecommunications Device Distribution Program and Print Media Access System Program Audits for the Twelve-Month Period Ended June 30, 2015 and June 30, 2012*, Docket No. D-2014-2406981.

<sup>15</sup> On May 24, 1990, the Commission entered an Opinion and Order approving the joint petition of the PTA and AT&T Communications, Inc. for approval to implement a Telecommunications Relay Service for Deaf, Hearing and/or Speech impaired citizens of the Commonwealth of Pennsylvania and to issue AT&T a certificate of public convenience authorizing the delivery of TRS service supported by a surcharge on consumer's telephone bills. The Telecommunication Act of 1996 (TA-96) subsequently clarified that Section 153 encompassed intrastate communications within the authority of the Federal Communications Commission (FCC), effectively authorizing the FCC to certify that Pennsylvania TRS programs comply with federal mandates.

with hearing, visual, speech, or other disabilities. Recent American Community Survey (ACS) data indicate that approximately 3.7 percent of Pennsylvanians have difficulty hearing and, of that number, approximately 30.2% would be eligible for support because they are at or below 200% of the federal poverty level. This translates into 469,694 Pennsylvanians with hearing difficulties and, of those, approximately 141,847 are below the 200% poverty level and are eligible to benefit from this program.

As part of those responsibilities to multiple communities, OVR is also in charge of administering the TRS TDDP.<sup>16</sup> In its Petition, OVR requested approval to use the TRS Fund support to conduct a two-year, two-phase TDDP Pilot that would distribute wireless devices to eligible participants to obtain more data on public interest and benefit attributable to a wireless equipment program.<sup>17</sup> The OVR averred that expanding the TRS to include modern technology would increase communications options using both standard wireline as well as specialized wireless features and applications.<sup>18</sup> A wireless device distribution program would also allow participants to receive emergency notifications in real time. In short, they asserted that a wireless distribution program would provide equivalent communications capabilities through more modern technology and that a pilot project might potentially be useful as a way of examining how to establish a permanent program on a statewide basis consistent with Pennsylvania law.<sup>19</sup>

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<sup>16</sup> 35 P.S. § 6701.3a.

<sup>17</sup> Qualified participants in the pilot program had to be a disabled resident of the Commonwealth who was not younger than six, should have had telephone service, was able to learn how to use a telecommunications device, and had an income not more than 200% of the federal poverty level (FGPI). These requirements were consistent with other requirements imposed under Pennsylvania law. 35 P.S. § 6701.3.

<sup>18</sup> At the time, wireless equipment distribution programs were already underway in 11 states. This has grown to 17 states since then. The OVR Report relies, in part, on experiences in two of those states.

<sup>19</sup> 35 P.S. § 6701.2 authorizes a program to distribute equipment that operates by wire or radio (wireless) and provide eligible persons the ability to communicate by wire or radio as discussed in more detail below.

The Commission published the Petition in the *Pennsylvania Bulletin* for comment. Comments in favor of the pilot were filed by the Office of Consumer Advocate (OCA), the Honorable Representative Edward C. Gainey, 24<sup>th</sup> Legislative District, L&I's Advisory Council for the Deaf and Hard of Hearing (L&I Advisory Council), the Commission's TRS Advisory Board, L&I's Office of the Deaf and Hard of Hearing (ODHH), and the Hearing Loss Association of Pennsylvania (HLAA-PAA). No comments opposed the legality or overall purpose and substance of the pilot.

### **The July 2015 Order**

The *July 2015 Order* established the WEI Pilot implemented through Temple University as Administrator of the TDDP on behalf of OVR under Commission oversight. The WEI Pilot was a two-year pilot project designed to test the availability and use of wireless devices by a limited number of eligible Pennsylvanians with disabilities for a limited timeframe in which wireless devices would be supported from and distributed to eligible end-users through the existing TDDP.<sup>20</sup>

The WEI Pilot, *inter alia*, provided for:

- Recruitment and selection of 60 eligible participants over the two-year, two-phase project;
- Distribution of selected wireless/mobile devices equipped with appropriate applications and software;
- Outreach, training, surveys, and personal interview evaluation activities;

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<sup>20</sup> See generally 35 P.S. § 6701.3.

- Remote system software updating for the distributed wireless devices by an equipment administrator; and
- Monitoring, measurement, and evaluation of the use of these devices and their use.

OVR sought, and the *July 2015 Order* approved, funding from the TRS Fund for the relevant costs of the WEI Pilot. This included the costs of the wireless device equipment distribution and the costs for managing the overall TDDP WEI Pilot through its two-year duration. The estimated costs of the pilot were approximately \$85,000 for the first year of the WEI Pilot<sup>21</sup> in which Phase I would seek to enroll 30 eligible<sup>22</sup> individuals. The *July 2015 Order* established Phase II based on the results of Phase I which also would seek to enroll 30 eligible individuals based on slightly different selection criteria. Temple University held mandatory meetings to explain the pilot and provide training to assist pilot participants. Temple University also conducted case studies and “longitudinal” surveys to assess the needs and trends that surfaced during the TDDP Pilot.

As with the current distribution program, participants were responsible for some costs. Like the TDDY program, the WEI Pilot still required the participant to pay for the cost of the underlying wireless connectivity service(s) to enable the wireless devices to function.<sup>23</sup> Participants were also responsible for any travel expenses

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<sup>21</sup> The budget table in the WEI Proposal disclosed a projected outlay requirement of \$83,233.38 for “Grant Year 1” or Phase I of the TDDP Pilot.

<sup>22</sup> The criteria for eligibility in the TDDP pilot are those that are statutorily mandated at 35 P.S. § 6701.3.

<sup>23</sup> The WEI Proposal explicitly states “Individuals [TDDP Pilot participants] will need to describe how they will access wi-fi service (in their home or in the community e.g., public library) and understand that the program will not pay for such wireless access services.” OVR Petition, WEI Proposal at 8.

associated with program orientation and training in Darby and Philadelphia, Pennsylvania. This latter requirement negatively impacted OVR's ability to fulfill the full proposed enrollment.

The *July 2015 Order* and OVR Report demonstrate universal support regarding the merits of the WEI Pilot and the desire for statewide access to wireless technologies, communications, and devices by eligible persons with disabilities. The Commission recognized that federal authority over TRS mandates availability within a state and that federal certification of such programs requires corresponding compliance with federal requirements. These requirements include a prohibition on actions that discourage or impair the technology providing TRS.

The Commission agreed with the comments that public benefits accruing to eligible participants under the proposed WEI Pilot promoted the public interest and satisfied Pennsylvania's obligation under federal and state law to provide adequate and equivalent access to communications access for Pennsylvanians with disabilities. The Commission recognized that it possessed the necessary administrative flexibility to deal with these matters and to seek timely and appropriate legislative changes if and when such changes become necessary.

The Commission concluded that the TRS program serves the public interest and that such action was consistent with Section 225(d)(2), 47 U.S.C. § 225(d)(2), of federal law and ensured compliance with the certification requirements under Section 225(f), 47 U.S.C. § 225(f). After commending L&I, OVR, and Temple University in their efforts to refine policies for increased TRS access to wireline and wireless telecommunications services under Pennsylvania and federal law, the Commission noted that an advisory letter had been issued on July 9, 2014 which also authorized the funding of IP-enabled wireline devices to eligible end-users.

The Commission also concluded that a WEI Pilot fit within the definitions of TRS services by radio and wire under Pennsylvania law and that the scope of the WEI Pilot was consistent with the applicable statutory parameters of the UTPMAA as well as federal law.

Based on those determinations and conclusions, the *July 2015 Order* authorized TRS funding for the WEI Pilot for actual costs up to \$85,000 for Phase I and up to \$90,000 for Phase II. The *July 2015 Order* added the caveat that if there were cost overruns OVR could petition for additional TRS funding, curtail the scope of the pilot program to stay within the approved funding or find alternate funding. The Commission recognized certain concerns with the future funding for the TRS Program but declined to address future funding of a TDDP wireless device program on a permanent statewide basis from the TRS Fund but agreed to address that in collaboration with OVR and Temple University.

The *July 2015 Order* also established a subaccount within the TRS Fund for the WEI Pilot given that neither of these sums impaired the solvency of the TRS Fund on a one-time basis. The TDDP portion of the TRS Fund had an appropriate monetary reserve that was sufficient to absorb the projected implementation cost of the proposed wireless pilot.<sup>24</sup>

Moreover, consistent with the Commission's statutory oversight of the TRS Fund and the public interest in this program, and to ensure compliance with federal law, the *July 2015 Order* required monthly billing detailing the costs incurred. OVR was required to submit detailed monthly bills for costs incurred for the TDDP Pilot to Commission staff in a manner that followed the current TDDP bill payment procedures.

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<sup>24</sup> 2014 Annual Report pursuant to the UTPMAA to the General Assembly, dated October 1, 2014, [http://www.puc.pa.gov/Telecom/pdf/TDD\\_Program\\_Legis\\_Rpt2014.pdf](http://www.puc.pa.gov/Telecom/pdf/TDD_Program_Legis_Rpt2014.pdf).

Commission staff would submit TDDP Pilot bills for payment in the same manner in which TDDP bills are currently paid. The TDDP Pilot expenses were subject to the Memorandum of Understanding between L&I and the Commission. The Commission required submission of the OVR Report on the Pilot Program from OVR and further instructed staff to submit a report following submission of the OVR Report.

### **Subsequent Developments**

On June 13, 2018, following completion of the WEI Pilot established by the *July 2015 Order*, OVR filed an amended response and recommendations in an OVR Report. The OVR Report provided detailed amended information requested by the Commission on monetary support, the practices in other states, and on the feasibility of creating a permanent wireless equipment distribution program based on the recently completed WEI Pilot.<sup>25</sup> The OVR Report outlined the public interest in a wireless distribution program relying, in part, on the benefits and experiences documented by the pilot participants. OVR recommends making the program permanent.<sup>26</sup>

The Commission staff identified several options: (1) provide standard wireless equipment without special adaptations or training through the TDD Program; (2) provide the adaptations for standard wireless equipment and provide specialized wireless equipment and training through the TDD Program; or (3) decline to provide wireless equipment through the TDD Program and maintain the TDD Program as it was prior to the pilot.

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<sup>25</sup> *Petition of Department of Labor & Industry, Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania*, Docket No. P-2015-2484229 (July 8, 2015); *OVR Additional Information on Wireless TDDP Program* (June 13, 2018).

<sup>26</sup> OVR Report at 33.

Option 2 was thought to more closely mirror the existing TDD Program by providing adaptations and specialized equipment needed to make telecommunications capabilities accessible although the program does not provide the underlying service or basic equipment available off the shelf. It was further noted that when the adaptation or accommodation is intrinsic to the device, such as an IP-enabled captioning telephone that works with IP-enabled circuits and services — with a regular captioning telephone capable of working only with traditional wireline connections — then the IP-enabled captioning telephone equipment is provided.<sup>27</sup>

## II. Disposition

The Commission hereby creates a permanent and ongoing wireless distribution program in Pennsylvania supported from the current TRS fund. The *July 2015 Order* concluded that the pilot wireless equipment distribution program was within the existing TDDP program and was fully consistent with applicable Pennsylvania and federal statutes, effectively obviating concerns with Commission jurisdiction. It is worth reiterating, again, that Pennsylvania’s Universal Telecommunications and Print Media Access Act that also governs the operation and funding of TDDP, includes the following definitions:

**“Telecommunication device.”** Equipment necessary for a person with a disability to engage in communication by wire *or radio* with another person with a disability or with a hearing individual.

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<sup>27</sup> Report of staff at 14.



**“Telecommunications relay service.”** Telephone transmission services that provide the ability for a person with a disability to engage in communication by wire *or radio* with a hearing individual in a manner that is functionally equivalent to the ability of a person who does not have a disability to communicate using voice communication services by wire *or radio*. The term includes services that enable two-way communication between an individual who uses a telecommunication device or other nonvoice terminal device and an individual who does not use such a device.

35 P.S. § 6701.2 (emphasis added).

We concluded in the *July 2015 Order*, and reiterate today, that the availability of wireless devices under the TDDP mechanism for eligible persons with disabilities meets the statutory standard for communication by “radio” or “wire” under our statute. This is because mobile wireless devices for end-user consumers operate on the basis of available radio frequencies that are managed by commercial wireless service providers.<sup>28</sup>

These provisions and our precedent clearly establish the Commission’s legal authority to support a permanent and ongoing wireless device distribution program under Pennsylvania and federal law.

The Commission recognizes the challenge of supporting wireless and wireline device distribution programs solely by surcharging wire access lines with no accompanying support from wireless services even though Pennsylvania law requires the

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<sup>28</sup> See also *July 2015 Order* at 12-13.

Commission to facilitate communications by wire and radio. However, the resolution of whether wireless service providers can be required to fund a wireless device program under this existing statutory language should not preclude action today. The Commission has a separate legal mandate to facilitate communications by wire or radio irrespective of funding sources. The Commission has authority to support a wireless device program, particularly given the clear public interest and support for such a program determined in the *July 2015 Order* and the results from the WEI Pilot, the OVR Report, and staff review.

Today's action simply effectuates a state-mandated communications assistance program, including equipment, through wire or radio to a very discrete class of beneficiaries – low-income, deaf, hearing, speech impaired, or some combination thereof, to citizens of Pennsylvania. The WEI Pilot we adopted in the *July 2015 Order* simply updates the ways of meeting that mandate to recipients of the program given the statute, changing consumer needs, and technology. Our *July 2015 Order* recognized that a permanent device program might be necessary and appropriate although we deferred action on that issue until we had completed the WEI Pilot and further considered the experience from that pilot.

Although a permanent wireless distribution program is legal and clearly consistent with the public interest, the Commission's implementation of that mandate must be prudent. The initial budget for a permanent program requested by OVR stays well within the funding parameters of the existing monthly \$0.08 per access line surcharge and avoids imposing unacceptable or unsustainable burdens on the existing Fund or those consumers who support that Fund. For these reasons, we believe that approving OVR's initial budget proposal in the OVR Report is appropriate. While that

budget may change if the need demonstrated by OVR changes, the initial OVR budget approval supports a permanent program within the existing surcharge.<sup>29</sup>

The Commission agrees with the OVR Report that support for a suite of wireless equipment and adaptations is necessary, given the intertwined nature of wireless equipment and the adaptations needed to use that equipment. The OVR Report properly addresses the change in consumer expectations, technology, and the proliferation of devices in the market for non-impaired citizens.

The fact that different adaptations are already provided in Cap-Tel wireline distributed equipment today supports a similar approach for wireless devices. Consumers will receive the device with the needed adaptations to operate it, but they must buy the underlying wireless access service. Given the lower-incomes required for participation in the TDDP, it is worth reiterating our support for the FCC's Lifeline Program because it provides \$9.25 in monthly support so that low-income consumers can buy voice or broadband Internet access service.

This action is not without precedent. Our *July 2015 Order* formally authorized the funding of the WEI pilot project in the following:

In our evaluation of the proposal for a TDDP Pilot to explore accessible wireless options, we are guided by the UTPMAA, which vests administrative oversight of TDDP operations in OVR. *See* 35 P.S. § 6701.3. We are also guided by federal law governing TRS [telecommunications

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<sup>29</sup> If future developments indicate otherwise, OVR can address those developments in conjunction with submission of their annual budget for TRS-supported operations. While supplemental budgets in the interim may be appropriate, it is better to submit any adjustments in the OVR budget to coincide with our review and approval of a TRS program budget and the surcharge ancillary to supporting that budget.

relay service], particularly the prohibition contained in Section 225(d)(2) of the federal Communications Act of 1934 as amended, 47 U.S.C. § 225(d)(2), against discouraging or impairing the development of new technology.

*July 2015 Order* at 5. Our *July 2015 Order* found that the WEI pilot project was fully “within the applicable statutory parameters of the UTPMAA” and that it was also “entirely consistent with applicable federal law.” *July 2015 Order* at 13.

The OVR Report has been formally endorsed by the Commission’s TRS Advisory Board during its formal May 9, 2018 meeting.<sup>30</sup> OVR’s recommendation contains projected costs that assume a 30% increase in equipment distribution related costs based on prior experience in Colorado and Missouri or a total of 402 wireline and wireless devices. The OVR Report estimate relies on states who implemented a wireless equipment distribution program that are far smaller than Pennsylvania. OVR’s estimate for a total of 402 devices of which at least 114 will be for new wireless devices is a good start given that the device cost has dropped to a projected average figure of \$547 compared to the pilot-program cost of \$1,273 per device although both are higher than the average wireline device cost of \$135.<sup>31</sup>

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<sup>30</sup> A Kay Tyberg, Chair of the TRS Advisory Board stated the following in her July 5, 2018 letter communication to the Commission: “After due consideration of the findings and recommendations in the report [OVR Report], the Board advises the Public Utility Commission of its desire that the TDDP be expanded statewide to include wireless telecommunications devices – only; (NOT voice or data services) for Pennsylvanians with disabilities who meet all other TDDP eligibility criteria.”

<sup>31</sup> The significant cost difference was attributed to the wireless devices in a permanent program compared to the pilot program and traditional devices arises because wireless devices, particularly devices with support/service plans, cost 90% more than traditional landline equipment. As indicated in the table below, Pennsylvania’s TDDP program averages \$135 per participant in equipment cost. The wireless initiative averaged \$1,273 per participant in equipment costs. By providing equipment without service/support packages, OVR’s expects to reduce this average equipment cost to \$547 per recipient. See OVR Report at 34.

The OVR Report also provides data supporting the need to support additional administrative costs, demonstration equipment, and an Assistive Technology Lending Library at regional ATRCs. The projected equipment distribution totals \$70,750 in one-time start-up costs and \$129,143 in yearly program-related expenses for a total of \$199,893 for the first year of operation. This estimate contains an annual \$13,000 cost for Education Outreach and focuses on information sessions, online access, and a modestly staffed customer service operation.

The eligibility requirements are identical to those for the existing TRS Program. They require Pennsylvania residency, 200% or less of the federal poverty guideline, access to Wi-Fi or a wireless service with a data plan (purchased by the consumer), and the ability to learn how to use the equipment. There are no direct public awareness and outreach costs to inform the public about this program although there are Education Outreach costs that will apparently focus on the eligible population. OVR anticipates replacing the equipment distributed on a 3-year cycle.

While the Commission can consider several options to move this program forward, for the reasons stated, the Commission concludes that the option to create a permanent program using the very modest incremental need projected in the OVR Report is best. This option relies on OVR's research and data. While this does not reflect specific and more recent ACS census data for Pennsylvania's population, a modest program is preferable at the outset unless and until OVR provides more robust reporting and budgetary analyses.

The Commission also believes that OVR's budget must extend to a broader geographic reach in Pennsylvania. We agree with the OVR Report that the program must support funding ATRCs or their regional equivalent. This ensures that eligible citizens in those areas have access to information and training as easily as those residing in urban

areas. Unlike the WEI Pilot, where the funding and distribution was operated from Darby and Philadelphia, the ATRCs operate throughout Pennsylvania and their input and expertise will be critical to ensuring a Commonwealth-wide program.

Our decision to approve the OVR budget for the initial three years recognizes two facts. First, in approving this program on a permanent basis, the Commission is acting between the annual recalculations of the TRS surcharge that occurs in June of each year. Second, any budgetary change may be reflected in these annual recalculations. Any resource need arising in the future can be addressed by filings timed to coincide with the Commission's annual establishment of a TRS budget and the surcharge recalculation that occurs in time for the establishment of a surcharge in June. Any need arising under the approved OVR budget that occurs under the existing surcharge before the next surcharge recalculation can be met by using any surplus that has arisen this year and then from any accumulated surplus. The use of any accumulated surplus must be tempered by possible FCC regulatory developments, including the allocation of federal TRS program costs to Pennsylvania, and a prudent reserve.

At a minimum, however, the OVR budget for continuation and expansion of the WEI approved today will be used for future funding with the opportunity to consider additional requests, along with supporting information, as the need arises;  
**THEREFORE,**

**IT IS ORDERED:**

1. That the Commission hereby adopts a permanent and ongoing wireless equipment distribution program as a funded component of the Pennsylvania Telecommunications Relay Service and the Telecommunications Device Distribution Programs;

2. That the Department of Labor & Industry Office of Vocational Rehabilitation has the funding authority to implement the wireless equipment distribution program on the initial and subsequent 3-year cycles presented in the Office of Vocational and Rehabilitation Report of the Wireless Expansion Initiative Pilot dating from entry of this Opinion and Order in the current funding year and thereafter timed as part of the Commission's annual TRS surcharge recalculation, unless interim adjustments are presented and adopted;

3. That the funding for the initial 3-year cycle of this permanent and ongoing wireless equipment distribution program as proposed in the OVR Report is approved as filed unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;

4. That the funding total for the wireless equipment distribution program in the initial 3-year cycle is approved at \$458,179 unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;

5. That the annual budget for a wireless equipment distribution program in any subsequent year that is proposed will be considered as part of the Commission's annual TRS surcharge recalculation;

6. That the Office of Vocational Rehabilitation projected one-time start-up non-equipment costs of \$70,750 for the initial year of the 3-year cycle is approved as proposed in the OVR Report unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;

7. That the Office of Vocational Rehabilitation projected anticipated costs of \$129,143 for the initial year of the 3-year cycle is approved as proposed in the OVR Report unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;

8. That the Office of Vocational Rehabilitation projected anticipated cost of \$129,143 for Year 2 and Year 3 of the initial 3-year cycle is approved as proposed in the OVR Report unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;

9. That the funding and the actions hereby authorized for the distribution of wireless equipment to eligible persons with disabilities does not preclude or otherwise prohibit the simultaneous availability or distribution of wireline devices to the same persons under the Telecommunications Device Distribution Program;

10. That the Commission's Telecommunications Relay Service Advisory Board and the Office of Special Assistants, in consultation as necessary with the Bureaus of Technical Utility Services and Law, continue to monitor and report to the Commission on the operation and surcharge funding for Pennsylvania's Telecommunications Relay Service and Telecommunications Device Distribution Programs under state and federal law, including this ongoing and permanent wireless equipment distribution program;

11. That the Office of Vocational Rehabilitation prepare an annual evaluation of the budget for Commission consideration with the goal of increasing within the overall budget the proportion of the TRS budget related to the distribution of wireless devices and decreasing the proportion related to administration;

12. That the Office of Vocational Rehabilitation prepare an annual evaluation of the budget for Commission consideration with the goal of increasing the geographic reach of the wireless device distribution;



13. That this Opinion and Order be served upon the Secretary of the Department of Labor and Industry, the Office of Vocational Rehabilitation, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Commission's Telecommunications Relay Service Advisory Board; and

14. That a copy of this Opinion and Order be published in the *Pennsylvania Bulletin* and posted on the Commission's website.

**BY THE COMMISSION,**

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive, flowing style.

Rosemary Chiavetta  
Secretary

(SEAL)

ORDER ADOPTED: December 20, 2018

ORDER ENTERED: February 27, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Public Meeting held May 23, 2019

Commissioners Present:

Gladys Brown Dutrieuille, Chairman  
David W. Sweet, Vice Chairman  
Norman J. Kennard  
Andrew G. Place  
John F. Coleman, Jr.

Recalculation of the Pennsylvania  
Telecommunications Relay Service Surcharge

M-2019-3006851  
M-00900239

**ERRATA NOTICE**

This is to advise all parties of record that the Order entered on May 23, 2019, in the above-captioned proceeding contains an error on page three.

In the Order, footnote nine was omitted. Please find the corrected Order attached for your records.

The Order on the PA PUC website will be corrected as indicated above.

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

Public Meeting held May 23, 2019

Commissioners Present:

Gladys Brown Dutrieuille, Chairman  
David W. Sweet, Vice Chairman  
Norman J. Kennard  
Andrew G. Place  
John F. Coleman, Jr.

Recalculation of the Pennsylvania  
Telecommunications Relay Service Surcharge

M-2019-3006851  
M-00900239

**ORDER**

**BY THE COMMISSION:**

In accordance with our May 29, 1990 Order at Docket No. M-00900239 establishing the Pennsylvania Telecommunications Relay Service (TRS or Relay)<sup>1</sup> and surcharge funding mechanism (TRS surcharge) and subsequent Commission orders and legislation,<sup>2</sup> we have completed the annual recalculation of the TRS surcharge as it will apply only to residential and business wireline access lines for July 1, 2019, through June 30, 2020. The TRS surcharge rate for residential and business access lines shall be set at \$0.08 per month.

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<sup>1</sup> Additional information on TRS may be found at [http://www.puc.pa.gov/utility\\_industry/telecommunications/telecommunications\\_relay\\_service.aspx](http://www.puc.pa.gov/utility_industry/telecommunications/telecommunications_relay_service.aspx)

<sup>2</sup> See Act 34 of 1995, 35 P.S. §§ 6701.1 – 6701.4 (the statutory provisions were amended by Act 181 of 2002 to be more inclusive of persons with disabilities), establishing the Telecommunication Device Distribution Program (TDDP) to be funded by the TRS surcharge and which codified Relay and use of the TRS surcharge funding mechanism; and Act 174 of 2004, 35 P.S. § 6701.3a, which established the Print Media Access System Program (PMASP) which may be funded in part or in whole by the TRS surcharge. PMASP is a reading service for persons with certain vision-related physical disabilities. The law is now called the “Universal Telecommunications and Print Media Access Act.”

## **Background**

The annual TRS surcharge recalculation is dependent on data from several sources. Local Exchange Carriers (LECs<sup>3</sup>) submit annual wireline access line counts pursuant to 52 Pa. Code § 63.37. The traditional relay provider, Hamilton Relay, Inc.,<sup>4</sup> submitted the estimated minutes of use and charges for July 1, 2019, through June 30, 2020. Hamilton Telephone Company d/b/a Hamilton Telecommunications submitted the estimated minutes-of-use report for the Captioned Telephone Relay Service<sup>5</sup> (CTRS). The Office of Vocational Rehabilitation (OVR), Department of Labor and Industry, submitted the 2019-2020 TDDP budget and the 2019-2020 PMASP budget. The surcharge also funds TRS Advisory Board activities and Fund administration costs. U.S. Bank,<sup>6</sup> the Fund Administrator, provided a statement of the financial status of the Fund.<sup>7</sup>

## **Calculation for 2019 – 2020**

Combined residential and business wireline access lines reported by LECs for 2018 and adjusted for Centrex lines are estimated to be 4,240,000. Based upon the number of access lines, projected program costs (Relay, CTRS, TDDP, and PMASP), anticipated Pennsylvania TRS Advisory Board<sup>8</sup> expenses, TRS Fund administration costs, and the financial status of the TRS Fund, the 2019-2020 TRS surcharge rate for residential and business access lines will remain at the current rate of \$0.08 per month.

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<sup>3</sup> LECs include both incumbent and competitive local exchange carriers.

<sup>4</sup> Hamilton Relay, Inc. (Hamilton) holds the TRS Certificate of Public Convenience to provide TRS throughout the Commonwealth of Pennsylvania. The Commission approved Hamilton's Application by order entered December 4, 2014 at Docket No. A-2014-2447601.

<sup>5</sup> Hamilton Telecommunications, an affiliate of Hamilton Relay, provides CTRS pursuant to contract which ends June 30, 2019. The Commission is currently conducting RFP-2019-1 for CTRS services in Pennsylvania.

<sup>6</sup> As a result of mergers, acquisitions, and name changes, Fund administration has been handled by Hamilton Bank (1990), CoreStates Bank N.A. (1995), First Union National Bank (1999), Wachovia Bank, N.A. (2002), and U.S. Bank Institutional Trust & Custody (2006).

<sup>7</sup> Separate accounts are maintained for the portions of the surcharge allocated to Relay, TDDP, and PMASP. TRS Advisory Board expenses, CTRS, and outreach activities are funded from the Relay account; TRS Fund administration costs are drawn from each respective account.

<sup>8</sup> The Pennsylvania TRS Advisory Board was established pursuant to Commission Order entered May 29, 1990.

The TRS Advisory Board's By-Laws and quarterly meeting schedule can be found at:

[http://www.puc.pa.gov/utility\\_industry/telecommunications/telecommunications\\_relay\\_service/trs\\_advisory\\_board.aspx](http://www.puc.pa.gov/utility_industry/telecommunications/telecommunications_relay_service/trs_advisory_board.aspx)

This rate is the same as the current rate and will not require the LECs to file tariff supplements. Despite a net positive position in the TRS fund, the Commission has retained this rate over the past several years to provide for a cautious approach to uncertainty related to potential federal funding changes.<sup>9</sup> That rate also ensures that the program has adequate resources to support the Wireless Expansion Initiative (WEI). All TRS surcharge revenues shall continue to be remitted to the Fund Administrator.<sup>10</sup>

Effective July 1, 2019, the monthly surcharge allocation for each fund account will be as follows:<sup>11</sup>

	2019-2020	
	Monthly Surcharge Percentage	
	<u>Residence %</u>	<u>Business %</u>
Relay	85.0	85.0
TDDP	10.0	10.0
PMASP	<u>5.0</u>	<u>5.0</u>
Total Percentage	100.0	100.0

### **Operations for 2019 – 2020**

We shall continue our active oversight of the operations of the Pennsylvania Telecommunications Relay Service. Further, in accordance with 35 P.S. §§ 6701.3a & 4, we shall continue to collaborate with OVR and its TDDP administrator<sup>12</sup> to ensure adequate funding for distribution of TDDP equipment to qualified Pennsylvanians.

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<sup>9</sup> See, e.g., *Recalculation of the Pennsylvania Telecommunications Relay Service Surcharge*, Docket Nos. M-2018-2640814, M-00900239 (Order entered June 13, 2018); *Recalculation of the Pennsylvania Telecommunications Relay Service Surcharge*, Docket Nos. M-2017-2582552, M-00900239 (Order entered June 27, 2017). See also *In re Misuse of Internet Protocol (IP) Captioned Telephone Service, et al.*, CG Docket Nos. 13-24 and 03-123 (FCC, Rel. June 8, 2018), Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, *slip op.* FCC 18-79.

<sup>10</sup> U.S. Bank Institutional Trust & Custody, Attn: Dina Buccieri, 50 S. 16<sup>th</sup> Street, Suite 2000, Philadelphia, PA 19102. Remittances are payable to the “PA Relay Service Fund” and designated for Relay. Bank wire instructions can be found on the remittance form.

<sup>11</sup> The TRS surcharge appears as a single line item on customers’ bills but actually has three components (Relay, TDDP traditional and WEI, and PMASP).

<sup>12</sup> As of January 1, 2007, the TDDP is administered by Pennsylvania’s Initiative on Assistive Technology, Institute on Disabilities, Temple University.

Further, we shall continue to assist OVR in its mission to ensure adequate funding for PMASP.

### **Audits**

The Bureau of Audits (Audits) released its most recent TRS Audit Report on June 14, 2017 at Docket No. D-2016-2556222 for the twelve-month periods ended February 29, 2016, February 28, 2015, February 28, 2014, and February 28, 2013. Audits has finished an audit of the TDDP and the PMASP for the twelve-month periods ended June 30, 2016, June 30, 2015, and June 30, 2014, at Docket No. D-2018-3001207 and expects to release the audit report in May 2019.

### **Service of Paper Copies**

In the past, our practice has been to serve the annual TRS surcharge recalculation order on every LEC in the Commonwealth in addition to each Relay service provider, the Office of Vocational Rehabilitation, the Office of Consumer Advocate, the Office of Small Business Advocate, the Pennsylvania Telephone Association, and the Fund Administrator. Consistent with the TRS surcharge recalculation order entered May 23, 2013, at Docket No. M-2013-2341301, we now serve paper copies of the annual TRS surcharge recalculation order only when there is a change in the TRS surcharge rate or other provision in the order requiring that the LECs file a tariff supplement or take other action. As this order does not change the TRS surcharge rate, paper copies of the order will not be served. Additionally, we will continue to publish the order in the *Pennsylvania Bulletin* and on the Commission's website.

### **Conclusion**

The Commission has completed the annual recalculation of the TRS surcharge rate. Consistent with our prior determinations regarding the fund, the TRS surcharge rate for residential and business access lines to be applied beginning July 1, 2019, through June 30, 2020, will remain at \$0.08 per month. We also note that paper copies of this order will not be served on the LECs as there is no change in the set surcharge rate or to

impose new requirements on the LECs requiring tariff changes in response to this Order;  
**THEREFORE,**

**IT IS ORDERED:**

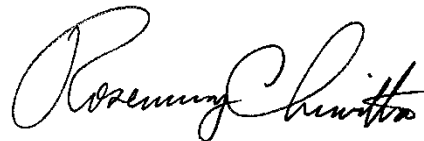
1. That for the period of July 1, 2019, through June 30, 2020, the TRS surcharge rate for residential and business access lines shall be set at \$0.08 per month, unless the Commission takes further action to revise the TRS surcharge rate prior to June 30, 2020.

2. That all local exchange carriers are directed to use the attached blank remittance form to remit the monthly TRS surcharge collections to the Fund Administrator. The blank remittance form shall be posted to the Commission's web site. All local exchange carriers are required to collect and remit the TRS surcharge revenue with the completed remittance form monthly by the 20th of each month.

3. That a copy of this Order be published in the *Pennsylvania Bulletin*.

4. That a copy of this Order be posted to the Commission's website.

**BY THE COMMISSION**



Rosemary Chiavetta  
Secretary

(SEAL)

ORDER ADOPTED: May 23, 2019

ORDER ENTERED: May 23, 2019

**REMITTANCE FORM FOR MONTHLY TRS SURCHARGE COLLECTIONS**

Effective July 1, 2019 through June 30, 2020

M-2019-3006851

All local exchange carriers are required to collect and remit the TRS surcharge revenue monthly, by the 20<sup>th</sup> of each month using the following format for the monthly remittance:

**Pennsylvania TRS Surcharge**

For the Month Ending \_\_\_\_\_

Number of **Residential** access lines \_\_\_\_\_  
X \$0.08 per line \_\_\_\_\_

Allocated:  
TRs Relay 85.0 percent \_\_\_\_\_  
TDDP 10.0 percent \_\_\_\_\_  
PMASP 5.0 percent \_\_\_\_\_

Number of **Business** access lines \_\_\_\_\_  
X \$0.08 per line \_\_\_\_\_

Allocated:  
TRs Relay 85.0 percent \_\_\_\_\_  
TDDP 10.0 percent \_\_\_\_\_  
PMASP 5.0 percent \_\_\_\_\_

**Total Remittance** \_\_\_\_\_

Make check payable to: **Pennsylvania TRS Fund**

<b>Mail Report and payment to:</b>	<b>Wire Instructions:</b>
U.S. Bank Institutional Trust & Custody Attn: Dina Buccieri 50 S. 16 <sup>th</sup> Street, Suite 2000 Philadelphia, PA 19102	<b>BANK</b> U.S. Bank N.A <b>ADDRESS</b> 60 Livingston Avenue, St Paul MN 55107-2292 <b>ABA</b> 091 000 022 <b>BNF</b> ITC Depository South & East <b>ACCOUNT</b> 173 103 781 832 <b>OBI</b> PA Relay <b>ATTN:</b> Dina Buccieri

**Remittance for:**  
Company Name: \_\_\_\_\_  
Utility Code: \_\_\_\_\_  
Contact Person: \_\_\_\_\_  
Voice Phone Number: (\_\_\_\_) \_\_\_\_\_ FAX: (\_\_\_\_) \_\_\_\_\_  
E-mail address \_\_\_\_\_

*Authorized Signature:* \_\_\_\_\_ *Date:* \_\_\_\_\_

Please direct any questions regarding the TRS Surcharge remittance to Mr. Eric Jeschke at (717) 783-3850 or ejeschke@pa.gov.



**PENNSYLVANIA PUBLIC UTILITY COMMISSION**  
**Harrisburg, Pennsylvania 17120**

**Pennsylvania Telecommunications  
Relay Service (TRS) Annual  
Surcharge Recalculation**

**Public Meeting held June 18, 2020  
3015209-TUS  
Docket No. M-2020-3015209**

**STATEMENT OF CHAIRMAN GLADYS BROWN DUTRIEUILLE**

Before us for consideration today is a staff recommendation to establish the annual surcharge used to fund Pennsylvania's Telecommunications Relay Service (TRS). TRS is a state-funded service authorized by the FCC under federal law to ensure that visually or hearing-challenged persons or other similarly situated citizens can communicate over the telecommunications network like other citizens.

I am loath to change the surcharge status quo while we are in the midst of a pandemic and an historic economic downturn because there may be an increased need for the program as the year's extraordinary events play out. However, be aware that I will closely track the fund's balance over this next year with an eye toward possibly recommending a lower surcharge when this matter comes to us for review next year.

**DATE: June 18, 2020**



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**Gladys Brown Dutrieuille**  
**CHAIRMAN**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, Pennsylvania 17105-3265**

**Recalculation of the Pennsylvania  
Telecommunications Relay Service  
Surcharge**

**Public Meeting held June 18, 2020  
3015209-TUS  
Docket No. M-2020-3015209**

**STATEMENT OF VICE CHAIRMAN DAVID W. SWEET**

The Telecommunications Relay Service (TRS) Program has three components: relay, device, and print. Codified in state law, it assists Pennsylvania residents at or below 200% of the federal poverty level who, through a certified disability, cannot communicate independently. Assistance may be provided by wire or radio through adaptive equipment or other intervention. Program participants must purchase the underlying communications service. The Federal Communications Commission (FCC) certifies our state program, and it complies with the federal Americans with Disabilities Act and Telecommunications Act of 1996. State policy is to provide qualified individuals functionally equivalent access to communications services that the rest of society enjoys.

My colleagues assert, as they have previously, that we are fiscally irresponsible not to reduce the surcharge. They contend we should not only eliminate the \$0.96/year surcharge but also refund some amount to customers because the surplus has grown over the past three years. My colleagues reference refunds we ordered following our investigation of revenue implications associated with the federal Tax Cuts and Jobs Act of 2017 as an example of fiscal responsibility. I fully supported the scope of our tax investigation into telecommunications carriers, over the dissent of my colleagues. We have yet to order refunds to any telecommunications customers.

For three years we have had specific reasons not to reduce the \$0.08. Those reasons continue to prevail. On the federal side, in November 2019 the FCC shifted more than half of its federal funding obligation for Internet Protocol Captioned Telephone Relay Service (IP CTS) from the INTERstate to INTRAsate jurisdiction. As a result, \$539 million of the current \$913 million expense funded by the FCC TRS assessments for IP CTS will now be based on an assessment of INTRAsate revenues. Carriers whose intrastate revenues were not assessed for IP CTS under the federal TRS mechanism will now have those revenues assessed by the FCC. It is premature, if not irresponsible, to conclude that this new assessment on INTRAsate revenues will not have a deleterious effect on our own state program.

As to our state program, a matter more directly within our control, if there is any fiscal irresponsibility associated with a growing surplus, I suggest it is not in continuing the surcharge at \$0.08. Rather, it is in failing to invest those funds in a stagnant TRS Program that increasingly fails to fulfill its mission.

Year-over-year the TRS Program has served an increasingly smaller pool of recipients through an increasingly smaller distribution of devices, and it has provided increasingly fewer relay minutes of use. In just the last three reported years, the numbers of traditional devices distributed and eligible recipients both declined substantially, with only 180 eligible recipients receiving devices in the most

recent reported year, a decrease of over 50% in 3 years.<sup>1</sup> Is it a surprise that the surplus grows when the TRS programs provide fewer services? By any measure, participation is waning. If left to its current designs, the surcharge level will be moot as no one will be left using or benefitting from the program.

The anemic state of the TRS is not because the program is not needed. It is. For that reason, in 2015 we authorized a pilot Wireless Expansion Initiative (WEI) expected to include 60 participants, 30 each in two separate phases. In 2019 we approved the WEI as a permanent device component. We also approved a Department of Labor and Industry Office of Vocational Rehabilitation (OVR) projected budget, the only budget before us. It was estimated to fund the distribution of 114 devices, which, as estimated then, potentially could reach 0.08% of a limited pool of hearing- and income-eligible recipients.<sup>2</sup>

In this year's WEI budget, OVR proposed an increase designed to fund 505 devices.<sup>3</sup> I commend OVR for presenting an improved budget and our staff for considering OVR's increase in its calculation. However, the program remains inchoate and anemic, programmatically and financially.

In general, TRS historic budgeting and spending numbers are inconsistent, but by any standard they are not encouraging. Even with this year's modest budget increase, the percentage of potential individuals that could be served through the WEI remains less than ½ of 1%.<sup>4</sup> To be an effective communications tool, there has to be substantial improvement in the reach of the WEI. And we as a Commission need to acknowledge that as long as the WEI remains underfunded and underutilized, the TRS surplus will grow in indirect proportion to the overall efficacy of the TRS program itself.

I believe the OVR, with input from the TRS Board and support of our staff, has the means to responsibly improve utilization of the surcharge to fund the WEI. I again ask OVR to improve the reach and efficacy of the WEI to facilitate the overall improvement of the currently underperforming TRS Program. With a reasonable budget, we can quell the growth of the surplus, responsibly use the surcharge for its intended purposes, and return the TRS to a meaningful status. To this end, I also commend our current relay service provider for requesting approval to implement a Real Time Text (RTT) pilot for 50 qualified individuals to test new digital technology for use in existing TRS service. A matter on today's agenda, the RTT pilot would replace outdated analog equipment developed 50 years ago that no longer functions well with modern telecommunications technology.

We have tools in place to reinvigorate the TRS programs. All we have to do is use them. Can we serve the entire eligible population? Of course not. But all assistance programs operate within budgets capped by limited resources. This is no different.

The TRS surplus should be directed towards resuscitating the program rather than used as an excuse to witness its expiration from disuse.



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**David W. Sweet, Vice Chairman**

**Date: June 18, 2020**

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<sup>1</sup> Source: Commission Annual TRS Reports to the Governor and General Assembly; OVR Budgets.

<sup>2</sup> Source: 2019 WEI Order at 4-5; 114 devices/141,847 hearing- and income-eligible population only.

<sup>3</sup> Source: OVR July 1, 2020-June 30, 2021 proposed budget.

<sup>4</sup> 505 devices/141,847 could provide service to 0.36% of that limited pool of hearing- and income-eligible population.

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
HARRISBURG, PENNSYLVANIA 17120**

**Recalculation of the Pennsylvania and  
Telecommunications Relay Service Surcharge**

**Public Meeting June 18, 2020  
3015209-TUS  
Docket No. M-2020-3015209**

**JOINT STATEMENT OF COMMISSIONER JOHN F. COLEMAN, JR. AND  
COMMISSIONER RALPH V. YANORA**

Before the Commission is the establishment of the Pennsylvania Telecommunications Relay Service (TRS or Relay) surcharge funding mechanism (TRS surcharge) for the period July 1, 2020 through June 30, 2021.

The TRS surcharge recovers the costs of providing calling services and equipment to individuals that are deaf, hard of hearing, deaf-blind or have difficulty speaking to make and receive telephone calls. The TRS surcharge funds three individual programs: the relay service itself, the Telecommunications Device Distribution Program (TDDP),<sup>1</sup> and the Print Media Access System Program.<sup>2</sup> The current contribution rate to fund these programs is \$0.08 per line per month.

The surcharge is assessed only upon the customers of wireline Incumbent Local Exchange Carriers (ILECs) and Competitive Local Exchange Carriers (CLECs). The TRS program is laudable and my colleague and I support its continued existence.

Given the current cash balance of the TRS fund, we believe it is inappropriate to keep the TRS surcharge rate for residential and business access lines at \$0.08 per month for the upcoming year, and it is most definitely not in the public interest to keep the surcharge at this level. As of April 1, 2020, the \$0.08 surcharge rate applied over the past several years has worked to produce a surplus in the TRS fund that now approaches \$14 million, an increase of almost \$2 million from last year's \$12 million surplus. This surplus is so large that it could safely fund TRS programs for over five years with no surcharge at all.

This Commission would never allow utilities to over-collect to such an extent and not return the overcollection to the affected customers. To this point, it did just that with the tax savings resulting from the Tax Cuts and Jobs Act of 2017. In fact, we believe it would be entirely appropriate for the Commission to consider refunding a reasonable amount of this gross excess during the financial crisis triggered by the COVID-19 pandemic.

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<sup>1</sup> This program provides specialized telecommunications devices at no charge to qualifying persons who are deaf or hard of hearing, or with speech and language disorders, or with a physical disability that prevents them from using standard telecommunication equipment.

<sup>2</sup> This program is a reading service for persons with certain vision-related physical disabilities.

We both agree that facilitating access to TRS for some of Pennsylvania's most vulnerable citizens is a laudable objective. However, reducing the TRS surcharge to \$0.00 for the next year, would not impede that objective, given the sizeable surplus that can fund these programs for years to come. Moreover, because the TRS surcharge is set on an annual basis, any need for additional funding can be adequately addressed next year or in future surcharge years.

In prior surcharge years, one of the main arguments used to support keeping the TRS surcharge at \$0.08 was a concern that the Federal Communications Commission (FCC) might shift certain federal TRS program costs to the states. However, the FCC has decided it will not shift the burden of intrastate IP-CTS to the states, thereby removing the speculation and uncertainty surrounding this issue.<sup>3</sup>

We understand many of Pennsylvania's Seniors continue to subscribe to basic telephone service, and thus are subject to this surcharge. The relief we support here today, though small on an individual customer basis, is not on an aggregate basis and would be an additional benefit to some of our most vulnerable Pennsylvanians.

For these reasons, we do not support keeping the TRS surcharge rate at \$0.08 per line per month for surcharge year 2020-21. Rather, given the amount of the TRS fund surplus, we would lower the TRS surcharge rate to \$0.00 per line per month for the period July 1, 2020 through June 30, 2021 and reevaluate the surcharge next year.



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**JOHN F. COLEMAN, JR.**  
**COMMISSIONER**



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**RALPH V. YANORA**  
**COMMISSIONER**

**Date: June 18, 2020**

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<sup>3</sup> *In the Matter of Misuse of Internet Protocol (IP) Captioned Telephone Services*, CG Docket 03-123 and CG Docket No 13-24, Report and Order adopted November 22, 2019, released November 25, 2019.



September 14, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RE: **Docket Number M-2020-3015212**  
2020 Annual Legislative Report to the General Assembly

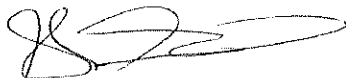
- Telecommunication Devices Distribution Program (TDDP)
- Wireless Expansion Initiative
- Print Media Access System Program (PMASP)

Dear Ms. Chiavetta:

Attached is the information requested by the Pennsylvania Utility Commission (PUC) from the Office of Vocational Rehabilitation (OVR) for inclusion in the Annual Report to the governor and Pennsylvania Legislature.

If you have any questions, please do not hesitate to contact Howard Albrecht at [halbrecht@pa.gov](mailto:halbrecht@pa.gov) or 717-787-8504.

Sincerely,



Shannon Austin, M.S., CRC, CWDP, OWDS  
Executive Director  
Office of Vocational Rehabilitation

Attachments: Temple University TDDP Annual Report 2019-2020  
NFB Annual Newslines Report 2019-2020

cc: Kim Singleton, Temple University TDDP  
Sandy McNally, Temple University TDDP  
Eric Jeschke, PUC  
Rod Alcidonis, BBVS  
Jill Moriconi, HGAC  
Howard Albrecht  
Karen Walsh-Emma  
NEWSLINE LOU File 2019-2020  
Temple University TDDP File-Year V (Document# 4000019493)

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OVR's Mission: To assist Pennsylvanians with disabilities to secure and maintain employment and independence.  
Department of Labor & Industry | Office of Vocational Rehabilitation  
1521 N. Sixth Street | Harrisburg, PA 17102-1104  
V. 717.787.5244 | F. 717.772.1629

[www.dli.pa.gov/OVR](http://www.dli.pa.gov/OVR) | Facebook: @PAVocRehab | Twitter: @PA\_OVR | Instagram: @PA\_OVR | LinkedIn: PA OVR  
*Auxiliary aids and services are available upon request to individuals with disabilities.  
Equal Opportunity Employer/Program*

## Print Media Access System Program (PMASP)

NFB-NEWSLINE®, offered by the National Federation of the Blind, provides the Print Media Access System Program to those who cannot read regular newsprint. Anyone who cannot read conventional newsprint can qualify for this service that is free to its subscribers.

This service is available in forty-five states and the District of Columbia, providing:

- Five hundred local and national newspapers
- Spanish-language newspapers available to all subscribers
- Over ninety magazines including AARP
- Associated Press (national & state) and United Press newswire service updated every hour
- The capability of delivering a newspaper via e-mail directly to a subscriber's inbox
- Local TV listings
- Jobs Listings (Career Builder added in 2010, USA Jobs in 2016)
- Retail ads (Target added in 2011, Walmart added in 2016)
- Emergency weather alerts, including weather forecast
- Availability twenty-four hours a day, seven days a week with local as well as toll-free access
- Service is available on NFB-NEWSLINE Mobile, iPhone app, and an Amazon Alexa skill was added in November 2019

Through the Commonwealth's partnership with NFB-NEWSLINE, a subscriber can choose that day's, the previous day's, or the previous Sunday's issue of any newspaper in the service and choose a section and article using a standard touch-tone telephone. Pennsylvania's participating newspapers provide the subscriber with access to all content when traveling throughout the United States.

Get NFB-NEWSLINE using Amazon Alexa:

Now you can access NFB-NEWSLINE hands-free on any product that is Alexa capable. This even includes the Windows 10 app and Alexa smart phone app that can function without the use of an Echo or Echo Dot.

Enable the skill by saying "Alexa, open National Federation" and log in to NFB-NEWSLINE with your voice, using Alexa to help guide you through the steps and navigate your favorite publications. Many of the same options that are available through web and telephone are available as commands for Alexa as well. Alexa can store your favorites, email you articles, alter the reading voice, volume, or speed, and much more. Simply say, "Alexa, ask National Federation" and then the desired command to use the service.

NFB-NEWSLINE Pennsylvania participating newspapers include:

- *Allentown Morning Call*
- *Altoona Mirror*
- *Beaver County Times*
- *Bucks County Courier Times*
- *Butler Eagle*
- *Centre Daily Times (State College)*
- *Citizens' Voice*
- *Daily American*

- *Erie Times News*
- *Hanover Evening Sun*
- *Harrisburg Magazine*
- *Intelligencer*
- *LNP Always Lancaster Online*
- *Lebanon Daily News*
- *Patriot News*
- *Philadelphia Daily News*
- *Philadelphia Inquirer*
- *Pittsburgh Post-Gazette*
- *Pittsburgh Tribune Review*
- *Pocono Record*
- *Reading Eagle*
- *Times Tribune*
- *Wilkes-Barre Times Leader*
- *Williamsport Sun Gazette*
- *York Dispatch*

As of June 30, 2020, there are 4,205 subscribers to this service throughout the Commonwealth. All customers of the Office of Vocational Rehabilitation, Bureau of Blindness & Visual Services are offered the opportunity to subscribe to this service. In addition, individuals are offered the opportunity to subscribe when enrolling in the Books for the Blind and Physically Handicapped Program, administered by the Library of Congress and cooperating network libraries.

For the seventh year in a row, during the 2019 holiday season, NFB-NEWSLINE presented circulars for several national chains, allowing subscribers to take advantage of holiday sales. The sales circulars of the additional four retailers were from Best Buy, Kohl's, Staples, and Walgreens, in addition to the always available Target and Walmart retail ads. As with last year, the access to sales circulars for these retailers was very popular.

#### New Content:

Several new items were added to NFB-NEWSLINE including all of the convention materials for the National Federation of the Blind's annual convention held in Las Vegas, and American Council of the Blind's convention. Convention materials included the full agendas, registration information, and hotel information. Fourteen new publications have been added to the service as well, this includes:

- *Axios* – (breaking news online)
- *Baltimore* – (magazine)
- *Chronicle of Philanthropy* – (magazine)
- *City Pages* – (Minnesota)
- *Girl's Life* – (magazine)
- *Highlights* – (magazine)
- *National Geographic Kids* – (magazine)
- *Grand Junction Sentinel* – (Colorado)
- *Findlay Courier* – (Ohio)
- *Sun Journal* – (Maine)
- *Slate* – (breaking news online)



- *Advocate* – (magazine)
- *Politico* – (breaking news online)
- *Mental Floss* – (breaking news online)

#### Training Sessions:

As a new facet of our service, NFB-NEWSLINE has been offering monthly training calls via the Zoom meeting platform, covering a range of topics to help current or potential subscribers get the most out of the service. These calls provide extensive training and tips as well as time for attendees to ask questions. Previous topics have included: NFB-NEWSLINE mobile, Victor Reader Stream, Amazon Alexa, Google Home, web news on demand access, and job listings.

#### Feed Your Mind

On October 17, 2019, there was a four-hour training segment for OVR staff. NFB-NEWSLINE training was provided for all staff who chose to attend. A presentation was given detailing all the general concepts in addition to a detailed NFB-NEWSLINE demonstration.

#### Activity Detail During the Period:

July 1, 2019 to June 30, 2020

Content Access Frequency: 49 seconds

Our statistics indicate that a subscriber from Pennsylvania accessed NFB-NEWSLINE to obtain a piece of information every 49 seconds during the year.

Category	First Quarter FY2019	Second Quarter FY2019	Third Quarter FY2019	Fourth Quarter FY2019	12 month period from July 1, 2019 to June 30, 2020
Users:	4,123	4,147	4,179	4,205	4,205
New applications:	28	20	28	26	102
E-mail Newspapers Delivered:	17,084	23,364	21,546	30,309	92,303
Calls Received:	24,749	25,324	24,280	27,065	101,418
State Newspapers Accessed:	59,690	68,535	71,039	74,629	273,893
Television Listings Accessed:	5,945	6,808	6,028	5,461	24,242
Number of Minutes:	336,817	344,287	344,804	396,562	1,422,470
Local Call Percentage:	63.09	58.42	58.17	61.19	64.42

#### Newspaper Usage Report

Please find below a chart containing the names of the Pennsylvania publications along with the number of times that they were accessed between July 1, 2019 and June 30, 2020.

Content Name	First Quarter FY2019	Second Quarter FY2019	Third Quarter FY2019	Fourth Quarter FY2019	12 month period from July 1, 2019 to June 30, 2020
Local Weather and Emergency Alerts	6,957	6,367	5,512	5,824	24,660
<i>Allentown Morning Call</i>	4,917	4,570	4,878	4,867	19,232
<i>Altoona Mirror</i>	2,208	2,069	1,868	1,831	7,976
Associated Press Pennsylvania	7,380	9,748	10,014	10,672	37,814
<i>Beaver County Times</i>	751	755	617	882	3,005
<i>Bucks County Courier Times</i>	1,336	1,360	1,640	1,707	6,043
<i>The Butler Eagle</i>	777	921	1,135	962	3,795
<i>Centre Daily Times</i>	919	1,254	1,482	1,273	4,928
<i>Citizens' Voice</i>	818	1,134	1,183	937	4,072
<i>Daily American</i>	793	587	532	680	2,592
<i>Erie Times News</i>	4,890	6,463	6,713	6,128	24,194
<i>Hanover Evening Sun</i>	296	368	608	831	2,103
<i>LNP Always Lancaster Online</i>	3,396	3,689	3,603	4,762	15,450
<i>Lebanon Daily News</i>	1,071	1,541	2,103	2,049	6,764
Pennsylvania Local Channel	442	409	521	512	1,884
<i>Patriot-News</i>	1,571	1,716	1,933	1,861	7,081
Philadelphia Online	3,389	5,202	4,928	5,806	19,325
<i>Pittsburgh Post-Gazette</i>	7,451	7,650	7,523	8,343	30,967
<i>Pittsburgh Tribune Review</i>	8,215	12,740	11,603	12,086	44,644
<i>Pocono Record</i>	794	747	994	964	3,499
<i>Reading Eagle</i>	1,847	511	1,155	1,874	5,387
<i>Times Tribune</i>	535	391	607	724	2,257
<i>Wilkes-Barre Times Leader</i>	1,338	1,210	1,236	1,226	5,010
<i>Williamsport Sun Gazette</i>	1,380	1,202	1,236	1,500	5,318
<i>York Dispatch</i>	954	754	263	482	2,453

Actual costs incurred during the period (July 1, 2019 to June 30, 2020)

Please refer to the four quarterly invoices for this period for detail:

NFB-NEWSLINE annual service fee for July 1, 2019 to June 30, 2020: \$44,000.

The Newspapers included with the annual service fee are:

- *Centre Daily Times*
- *Hanover Evening Sun*
- *Lebanon Daily News*
- *LNP Lancaster Always Online*
- *Patriot News*
- *Philadelphia Inquirer*
- *Philadelphia Daily News*
- *Wilkes-Barre Times Leader*
- *York Dispatch*

Annual newspaper maintenance and distribution fee: \$75,000 (July 1, 2019 to June 30, 2020).  
This includes fifteen newspapers at \$5,000 each.

- *Allentown Morning Call*
- *Altoona Mirror*
- *Beaver County Times*
- *Bucks County Courier Times*
- *Butler Eagle*
- *Citizens Voice*
- *Daily American*
- *Erie Times News*
- *Harrisburg Magazine*
- *Pittsburgh Post-Gazette*
- *Pittsburgh Tribune Review*
- *Pocono Record*
- *Reading Eagle*
- *Times Tribune*
- *Williamsport Sun Gazette*

Marketing and Outreach: \$45,000 (July 1, 2019 through June 30, 2020).

Marketing and Outreach tasks will consist of the following: subscriber registration and follow-up, including the distribution of materials needed for instruction for new subscribers in print, Braille, or audio format; distribution of brochures and other promotional materials at community events and exhibits; and the staffing of a help desk to answer calls from subscribers and those requesting NFB-NEWSLINE information and materials. Additionally, administration of the state specific channel for Pennsylvania and posting of items of interest to the blindness community in the commonwealth will be included in this fee.

One-year Pennsylvania telecommunications fee: \$9,276 (July 1, 2019 to June 30, 2020).  
A pro-rated fee assessed to each state based on usage for the contract period for NFB-NEWSLINE telecommunications service.

Total invoice: \$173,276.00 (July 1, 2019 - June 30, 2020)

Submitted by:

Scott A. White  
Director of Sponsored Technology Programs  
National Federation of the Blind  
[Swhite@nfb.org](mailto:Swhite@nfb.org)  
410-659-9314 extension 2231  
September 1, 2020

ANNUAL REPORT TO THE GENERAL ASSEMBLY  
ACT 181-2002:  
TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM  
Docket Number M-2020-3015209

IN OVERSEEING THE TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM (TDDP), THE OFFICE OF VOCATIONAL REHABILITATION (OVR) REPORTS THE FOLLOWING FISCAL YEAR ACTIVITIES BEGINNING JULY 1, 2019 TO JUNE 30, 2020:

Background:

Act 181-2002 provided for the creation of the Telecommunication Device Distribution Program. The Act authorizes the collection of funds as calculated by the PA Public Utility Commission (PUC) on an annual basis in order to pay for telecommunication equipment for eligible applicants. The Act identifies OVR in the Department of Labor and Industry as responsible for the oversight of the TDDP but does not allow for administrative costs to be levied against the surcharge funds.

The Institute on Disabilities at Temple University, as designated by PUC, continues to administer the TDDP. Administrative activities were funded by OVR with payment ending June 30, 2020. At present, Temple University Institute on Disabilities is covering the cost of these administrative activities, but this is not sustainable.

ELIGIBILITY REQUIREMENTS FOR THE TDDP:

- Be a resident of Pennsylvania.
- Qualify as a person with a disability or disabilities that prevents him/her from making or receiving telephone calls independently. An Audiologist, Licensed Physician, Speech Language Pathologist, Physician's Assistant, Vocational Rehabilitation Counselor, Registered Nurse Practitioner, Optometrist, Ophthalmologist or a Service Professional (public or private agency that serves deaf, hard of hearing and deafblind, Center for Independent Living employee, credentialed Assistive Technology Professional) must certify the disability.
- Have current landline telephone service and be capable of using the requested device(s).
- If applying for wireless equipment: have a current mobile plan or be able to obtain a mobile plan after the equipment is received and provide proof of service/activation.
- Be six years of age or older.
- Have an individual (not including family/household income) gross income of 200% of the Federal Poverty Level (FPL) or less (currently \$25,520 per year for a single individual).

## OPERATION OF THE PROGRAM:

- During the fiscal year July 1, 2019 through June 30, 2020, the Institute on Disabilities provided the day-to-day operations of the TDDP. The Institute on Disabilities has a proven track record of providing assistive technology devices and services to Pennsylvanians with disabilities of all ages, as the lead agency for the implementation of the federal Assistive Technology Act in Pennsylvania (TechOWL, formerly known as Pennsylvania's Initiative on Assistive Technology) and since 2012, as the certifying entity in Pennsylvania for the National Deaf-Blind Equipment Distribution Program, funded through the 21<sup>st</sup> Century Telecommunications Act. The Institute also serves as the Commonwealth of Pennsylvania's contractor for the implementation of the state-funded program, Pennsylvania's Assistive Technology Lending Library.
- On February 27, 2019, PUC published an Order approving the Wireless Expansion Initiative (WEI) allowing TDDP to fulfill requests for wireless devices. The WEI launched on July 1, 2019. The eligibility requirements are stated above.
- The cross-disability Assistive Technology Advisory Committee (ATAC) for Pennsylvania's Initiative on Assistive Technology serves in an advisory capacity for the TDDP program. The ATAC is established by statute under the federal Assistive Technology Act.

## APPLICATION FORMS:

- Applications are distributed by request through the US Mail, as well as through email and in person. Applications can also be completed on or downloaded from the TechOWL website: <https://techowlpa.org/service/tddp/>. Applications are also distributed through the statewide network of Assistive Technology Resource Centers (ATRCs) and TDDP Information Centers. During this program year, TechOWL received and reviewed a total of 171 individual, wireline applications. Of these, 146 were determined eligible, and 4 were determined ineligible. As of June 30, 2020, eligibility determinations were still in process on approximately 6 incomplete applications. In addition, 50 applicants who submitted incomplete applications and did not respond to repeated requests for information were marked inactive; this number included people from the end of the previous program year. An application is deemed inactive when the applicant does not respond to repeated contact attempts from TDDP to provide missing documentation or other information.
- During this program year, TechOWL received and reviewed a total of 216 individual, wireless applications. Of these, 180 were determined eligible, and 18 were determined ineligible. As of June 30, 2020, eligibility determinations were still in process on approximately 8 incomplete applications. In addition, 18 applicants who submitted incomplete applications and did not respond to repeated requests for information were marked inactive.

## EQUIPMENT DISTRIBUTED TO APPLICANTS:

- Wireline equipment distributed to 144 eligible applicants between July 1, 2019 – June 30, 2020 is detailed in ATTACHMENT 1-Devices Distributed, page 1.

- Wireless equipment distributed to 78 eligible applicants between July 1, 2019 – July 30, 2020 is detailed in ATTACHMENT 1-Devices Distributed, page 2.

FUNDING:

- The market value of the TDDP fund as of June 30, 2020 was \$1,133,199.64. The US-Bank Account Summary for the period ending June 30, 2020 is attached and referenced as ATTACHMENT 2-Bank Statement ending 6-30-2020.

VENDORS:

- From July 1, 2019 to June 30, 2020 the program used the following three (3) vendors to supply equipment for the TDDP:
  - Teltex, Inc. - Kearney, MO
  - WCI - Weitbrecht Communications, Inc., Santa Monica, CA
  - Raz Mobility – Tysons Corner, VA
- The vendors supplied equipment from the pre-approved list as well as devices approved through the Exceptions Process, as applicable. The agreements with these vendors extend until June 30, 2021. An equipment price list is included in this report as ATTACHMENT 3 – Equipment Price List 19-20.

Fund disbursements to vendors during the period July 1, 2019 through June 30, 2020 are as follows:

Teltex for Wireline Equipment	\$11,120.61
WCI for Wireline Equipment	\$1,534.25
Subtotal for Wireline Equipment	\$12,654.86
Teltex for Wireless Equipment	\$50,143.00
Raz Mobility for Wireless Equipment	\$10,842.00
Subtotal for Wireless Equipment	\$60,985.00
Total vendor disbursements:	\$73,639.86

These disbursements also include payments for wireline equipment ordered toward the end of the previous program year (July 1, 2018 -June 30, 2019).

CONSUMER EDUCATION AND OUTREACH:

Subcontracts with eight (8) regional Assistive Technology Resource Centers (ATRCs) to provide “local” activities related to consumer outreach, education and training began on July 1, 2019. In addition to coordinating statewide consumer education and outreach efforts, the TechOWL serves as an ATRC for southeastern Pennsylvania. Between July 2019 and June 2020 TechOWL staff (including but not limited to, the Consumer Educator), and ATRCs participated in 62 outreach activities, including 2 statewide events, held in 39 counties, and reaching over 6,220 Pennsylvanians. The list of activities is included in this report as ATTACHMENT 4-Consumer Education Outreach Events.

Total fund disbursements (July 1, 2019 to June 30, 2020) to Temple University for Consumer Education and Outreach activities for TDDP (wireline) were \$117,767.32. Total fund disbursements (July 1, 2019 to June 30, 2020) to Temple University for Consumer Education and Outreach activities for the Wireless Expansion Initiative were \$53,852.62. These figures include remaining amounts due for July 2018 to June 2019.

#### CONTINUING AND EMERGING BARRIERS TO ACCESS TO TELECOMMUNICATIONS FOR PEOPLE WITH DISABILITIES:

- Underestimated interest in Wireless Expansion Initiative (WEI). Wireless equipment requests exceed allotted wireless equipment budget. As a result, a waiting list for wireless equipment was started in January 2020.
- With the state closures due to the COVID-19 pandemic, some consumers were unable to obtain necessary supporting documents to complete their application. Staff assisted as best they could remotely. Cancellation of scheduled events due to COVID-19 curtailed Consumer Education and Outreach efforts.

#### ACCOMPLISHMENTS (July 1, 2019 to June 30, 2020):

- During this program year, all of the recipients from TDDP and WEI (12 consumers from 9 counties) who requested assistance with their TDDP equipment received support from ATRCs. Altogether, 9 hours of device support were provided via telephone support or in person.
- Nine (9) new Information Centers were added this program year. There are now 47 Information Centers. There were 38 existing Information Centers and 9 additions.
- Satisfaction surveys were mailed to equipment recipients. Overall satisfaction rate for wireline and wireless consumers is 79% (highly satisfied).
- Articles were published in seven newsletters reaching 22,775 people. Three (3) press releases reached 40,175 people. Nine (9) mailings containing TDDP and WEI information were sent to organizations and professionals, including but not limited to: senior centers, behavioral health agencies, Area Agencies on Aging, senior citizen groups, community service providers, home health agencies, hearing loss professionals, state representative offices, local municipalities, and churches. These mailings and publications reached at least 2,446 Pennsylvanians, and social media posts reached over 20,491 people based on number of views.
- All policies and procedures were reviewed and updated to include the Wireless Expansion Initiative.

#### ATTACHMENTS:

- ATTACHMENT 1 – Devices Distributed
- ATTACHMENT 2 – Bank Statement ending 6-30-2020
- ATTACHMENT 3 - Equipment Price List 19-20
- ATTACHMENT 4 – Consumer Education Outreach Events 19-20
- Referenced Attachment - TDDP Application Form



Attachment B  
TDDP Equipment Ordered

July 1, 2019 to June 30, 2020

Traditional Wireline Device Name	Unit Price	Quantity Ordered	Value of Equipment Ordered
Clarity Alto, Amplified Telephone	\$115.00	6	\$ 690.00
Clarity AltoPlus, Amplified Telephone	\$125.00	11	\$ 1,375.00
Clarity HA-40, In-Line Handset Amplifier	\$15.00		\$ -
Clarity JV35, Talking Amplified Telephone	\$80.00	11	\$ 880.00
Clarity JV35W, Talking Amplified Telephone	\$87.00	2	\$ 174.00
Serene Innovations HD-40P, Amplified Photo Telephone	\$40.00		\$ -
Serene Innovations HD-60J, Amplified Large Button Telephone	\$85.00	5	\$ 425.00
Clarity XLC2+, Amplified Cordless Telephone	\$92.00	13	\$ 1,196.00
Panasonic KX-TGM430B, Amplified/Cordless/Bluetooth/Ans.Machine	\$120.00	11	\$ 1,320.00
Panasonic KX-TGM450S, Amplified/Cordless/Ans. Machine	\$130.00	44	\$ 5,720.00
CapTel 2400i, (Touch Screen) Captioned Telephone	\$90.25	6	\$ 541.50
CapTel 840 Plus, Captioned Telephone	\$90.25	12	\$ 1,083.00
CapTel 840i, Captioned Telephone	\$90.25	3	\$ 270.75
CapTel 880i, Captioned Telephone	\$90.25	5	\$ 451.25
Ultratec Superprint 4425, TTY	\$350.00		\$ -
Ultratec Uniphone 1140, VCO/HCO/TTY	\$210.00	1	\$ 210.00
ActiVocal Vocally 3 Freedom	\$175.00	6	\$ 1,050.00
Reizen, Big Button Speakerphone	\$25.00	3	\$ 75.00
Serene Innovations RCx1000, Remote Hands-Free Telephone	\$425.00	4	\$ 1,700.00
Clearsounds CR2000, Loud Ring Signaler	\$39.00	17	\$ 663.00
Silent Call, Omni-Page Vibrating Signaler Kit	\$125.00		\$ -
Sonic Alert TR75VR, Flashing Light Signaler	\$30.00	7	\$ 210.00
Headset with Microphone	\$65.00	2	\$ 130.00
Lapel Microphone	\$45.00	2	\$ 90.00
Serene Innovations HD-40S with outgoing amplified speech	\$95.31	1	\$ 95.31
<b>TOTALS</b>		172	\$ 18,349.81

\*Ablephone 5000, Voice Activated Dialer is now called ActiVocal Vocally 3 Freedom

Attachment B  
TDDP Equipment Ordered

July 1, 2019 to June 30, 2020

Wireless Device Name	Unit Price	Quantity Ordered	Value of Equipment Ordered
Apple iPhone 8 (4.7 inch screen)	\$ 914.00	10	\$ 9,140.00
Apple iPhone 8 Plus (5.5 inch screen)	\$ 1,034.00	34	\$ 35,156.00
Samsung Galaxy S9 Smart Phone	\$ 749.00	10	\$ 7,490.00
Lucia Mobile Phone	\$ 389.00	11	\$ 4,279.00
Apple iPad 4G Tablet	\$ 684.00	10	\$ 6,840.00
Samsung Galaxy S4 Tablet 64GB 10.5 inch display (Verizon)	\$ 869.00	3	\$ 2,607.00
Samsung Galaxy S4 Tablet 64GB 10.5 inch display (AT&T)	\$ 899.00		\$ -
Samsung Galaxy S4 Tablet 64GB 10.5 inch display (Sprint)	\$ 899.00		\$ -
Serene Innovations SA-40 HearAll Cellphone Amplifier	\$ 85.00		\$ -
Smart Signaler: Serene Innovations RF200 Alerting Device	\$ 67.00	17	\$ 1,139.00
Smart Signaler: Sonic Bomb Bluetooth Bed Shaker	\$ 45.00	7	\$ 315.00
<b>TOTALS</b>		102	\$ 66,966.00

Attachment 3  
Equipment Price List

Device Name	Unit Price
Clarity Alto, Amplified Telephone	\$115.00
Clarity AltoPlus, Amplified Telephone	\$125.00
Clarity HA-40, In-Line Handset Amplifier	\$15.00
Clarity JV35, Talking Amplified Telephone	\$80.00
Clarity JV35W, Talking Amplified Telephone	\$87.00
Serene Innovations HD-40P, Amplified Photo Telephone	\$40.00
Serene Innovations HD-60J, Amplified Large Button Telephone	\$85.00
Clarity XLC2+, Amplified Cordless Telephone	\$92.00
Panasonic KX-TGM430B, Amplified/Cordless/Bluetooth/Ans. Machine	\$120.00
Panasonic KX-TGM450S, Amplified/Cordless/Ans. Machine	\$130.00
CapTel 2400i, (Touch Screen) Captioned Telephone	\$90.25
CapTel 840 Plus, Captioned Telephone	\$90.25
CapTel 840i, Captioned Telephone	\$90.25
CapTel 880i, Captioned Telephone	\$90.25
Ultratec Superprint 4425, TTY	\$350.00
Ultratec Uniphone 1140, VCO/HCO/TTY	\$210.00
ActiVocal Vocally 3 Freedom	\$175.00
Reizen, Big Button Speakerphone	\$25.00
Serene Innovations RCx1000, Remote Hands-Free Telephone	\$425.00
Clearsounds CR2000, Loud Ring Signaler	\$39.00
Silent Call, Omni-Page Vibrating Signaler Kit	\$125.00
Sonic Alert TR75VR, Flashing Light Signaler	\$30.00
Headset with Microphone	\$65.00
Lapel Microphone	\$45.00
Serene Innovations HD-40S with outgoing amplified speech	\$95.31

Attachment A  
TDDP Consumer Education Outreach Events

Type of Consumer Outreach Event	ATRC	Date(s) Held	Event Name/Sponsor	Estimated Attendance	County of Event
Presentation	UCPNE	7/9/19	Northeast Aging Network	38	Lackawanna
Presentation	UCPC	7/11/19	VisionCorps Low Vision Support Group	16	Adams
Presentation	CLASS	7/16/19	CLASS Comm Device User Group	6	Allegheny
Presentation	UCPC	7/18/19	VisionCorps - York	10	York
Expo	LIFT	7/19/19	LIFT Expo	260	Elk
Presentation	TRPIL	7/24/19	UPMC Health Ed Advisory Committee	26	Allegheny
Presentation	UCPNE	7/24/19	Honesdale Senior Center	30	Wayne
Presentation	LVCIL	7/29/19	Neston Heights Apts	5	Northampton
Presentation	LVCIL	7/31/19	W. Turner Street Apts	4	Lehigh
Expo	CLASS	8/6/19	Senator Vogal Senior Fair	500	Beaver
Presentation	UCPNE	8/7/19	St. Francis Commons (Vets)	10*	Lackawanna
Expo	CLASS	8/13/19	Paving the Way to Health	50	Westmoreland
Expo	UCPC	8/14/19	VisionCorps Low Vision	80	Lancaster
Expo	CRJ	8/19/19	Ryan Bizzarro Senior Fair at MIHS	150	Erie
Expo	CRJ	8/22/19	Disability Expo at VFI	150	Erie
Expo	CILNPA	8/23/19	Rep. Borowicz Sr. Fair	350	Clinton
Expo	UCPNE	8/24/19	Women's Veterans Expo	150	Luzerne
Expo	PIAT	8/27/19	Center for Blind/Visually Impaired	100	Chester
Presentation	UCPNE	9/11/19	Wyoming Senior center	27	Wyoming
Presentation	UCPC	9/12/19	McConnellsburg Sr. Center	16	Fulton
Presentation	UCPNE	9/19/19	Dunmore Sr. Center (Indian)	17*	Lackawanna
Expo	CILNPA	9/19/19	Reps. Everett and Yaw Sr. Fair	550	Lycoming
Expo	CRJ	9/20/19	Corry Senior Expo	150	Erie
Expo	UCPC	9/20/19	Rep. Kauffman Sr. Expo	300	Franklin
Expo	UCPNE	9/20/19	Lackawanna Senior Expo	463	Lackawanna
Expo	UCPNE	9/22/19	Write Center Health Fair	200	Lackawanna
Expo	UCPNE	9/25/19	Keystone Health Fair	150	Lackawanna
Expo	TRPIL	9/26/19	Washington Co Senior Fair	445	Washington
Expo	CRJ	9/27/19	Harborcreek Senior Expo	150	Erie
Expo	LIFT	10/5/19	LIFT Fine Arts and Culinary Event	350	Elk
Presentation	UCPNE	10/7/19	WIN/LINK	20	Wayne
Expo	CRJ	10/11/19	Eastside YMCA Health and Wellness Fair	100	Erie
Expo	UCPCPA	10/17/19	Rep Regan Sr. Expo	45	Cumberland

## Attachment A

July 1, 2019 - June 30, 2020

## TDDP Consumer Education Outreach Events

Expo	UCPNE	10/18/19	Senior Expo hosted by Rep Mullins	243	Lackawanna
Presentation	UCPCPA	10/21/19	McAlisterville Sr. Center	10	Juniata
Expo	UCPCPA	10/22/19	Sen. Tartaglione's Disability Awareness Day	20	Dauphin
Presentation	CLASS	10/24/19	Freeport Senior Center	32	Armstrong
Expo	CLASS	10/24/19	Senator Pittman, Reps Struzzi & Dush Senior Fair	50	Indiana
Expo	PIAT	10/26/19	Triumph Baptist Church Senior Expo	125	Philadelphia
Expo	UCPNE	10/31/19	Ladore Senior Expo	300	Wayne
Presentation	CLASS	11/3/19	Hear Well Center	3	Allegheny
Presentation	LVCIL	11/5/19	Presentation-BBVS	3	Lehigh
Presentation	CLASS	11/6/19	Hearing Loss Association of Pittsburgh	14	Allegheny
Expo	PIAT	11/13/19-11/14/19	Office of Deaf & Hard of Hearing Expo	70	Statewide
Presentation	CLASS	11/15/19	Women's Center and Shelter TDDP Presentation	40	Allegheny
Presentation	UCPNE	11/19/19	Susquehanna Human Service Forum	6	Susquehanna
Presentation	CLASS	11/22/19	DON Services TDDP Info Center Orientation	2	Westmorland
Presentation	UCPNE	12/5/19	Pike County Area Agency on Aging	7	Pike
Presentation	UCPNE	12/5/19	Pike County Senior Center	17	Pike
Presentation	UCPNE	12/10/19	Northeast Aging Network Alliance	30	Lackawanna
Presentation	TRPIL	12/11/19	Mt. Morris Senior Center	14	Greene
Presentation	CLASS	1/6/20	Two Lick Valley Senior Center	25	Indiana
Presentation	TRPIL	1/9/20	Mountain Citizens Action Group Senior Center	31	Fayette
Presentation	CLASS	1/15/20	Challenges Options in Aging	13	Lawrence
Presentation	PIAT	1/21/20	TDDP 101 for PATTAN	40	Statewide
Presentation	PIAT	2/11/20	New Courtland Senior Services	7	Philadelphia
Presentation	TRPIL	2/12/20	Hydman Senior Center	8	Bedford
Presentation	TRPIL	2/19/20	Johnstown Senior Center	74	Cambria
Presentation	TRPIL	3/11/20	Haydentown Senior Center	16	Fayette
Presentation	TRPIL	5/18/20	TDDP Facebook Live: Remote Demo Process	36	Washington
Presentation	TRPIL	6/1/20	TDDP Facebook Live Mobile Equip Accessibility	47	Washington
Presentation	TRPIL	6/15/20	TDDP Facebook Live Mobile Accessories	46	Washington
			Total Attendance (estimated)	6220	
			Number of Events	62	
			Events reaching underserved populations	2	
			Counties Reached	33	
			Statewide Events	2	

TDDP Consumer Education Outreach Events

	<b>Legend: Assistive Technology Resource Centers</b>		
PIAT=PA Initiative on Assistive Technology	UCPNE=United Cerebral Palsy of Northeastern PA		
CRI=Community Resources for Independence	LIFT=Life and Independence for Today		
CLASS=Community Living and Support Services	LVPIIL=Lehigh Valley Center for Independent Living		
UCPC=United Cerebral Palsy of Central PA	TRPIL=Transitional Paths to Independent Living		
CILNCPA=Center for Independent Living of North Central PA			



RETURN TO: TechOWL Free Special Phone Program  
1755 N. 13<sup>th</sup> Street / Student Center, Ste. 411S  
Philadelphia, PA 19122  
Tel: 800-204-7428 / TTY: 866-268-0579  
Fax: 215-204-6336 / Email: TDDP@temple.edu

### APPLICATION FOR FREE SPECIAL PHONES

\*We highly recommend a device demonstration or loan since there is a **no exchange** policy.

- I will call to schedule an equipment demonstration or loan.
- I do not want an equipment demonstration or loan.

Do you already own equipment similar to what you are requesting from TechOWL?  Yes  No

If yes, what? \_\_\_\_\_

If yes, please check one answer below:

My equipment:

- is broken or only works sometimes
- is borrowed
- does not meet my needs because: \_\_\_\_\_

I will use this device at: (check all that applies)

- Home
- School
- Work

### APPLICANT INFORMATION (PLEASE PRINT)

#### Personal Information (to be completed by applicant)

Name (Last) \_\_\_\_\_ (First) \_\_\_\_\_ (MI) \_\_\_\_\_

Address (P.O Box not accepted): \_\_\_\_\_

City \_\_\_\_\_ Zip \_\_\_\_\_ County \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Date of Birth \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Email \_\_\_\_\_

#### Person assisting you with application, if any

Name \_\_\_\_\_ Phone (\_\_\_\_\_) \_\_\_\_\_

Email \_\_\_\_\_

#### Name of parent or guardian (for applicants under 18 years old)

Name (Last) \_\_\_\_\_ (First) \_\_\_\_\_ (MI) \_\_\_\_\_

Phone (\_\_\_\_\_) \_\_\_\_\_ Email \_\_\_\_\_

## APPLICANT ANNUAL INCOME AND FAMILY MEMBERS

You must attach the applicant's most current proof of income. Examples of proof of income include W-2's, 1099s or award letters from retirement and/or Social Security income. If you need a copy of your Social Security income statement, please call 1-800-772-1213.

Number of people living at this (applicant's) address including applicant: \_\_\_\_\_

### OTHER APPLICANT INFORMATION (REQUIRED)

Reason for using the Free Special Phone Program

- I cannot afford equipment  
 This equipment is only available through the Free Special Phone Program  
 I could use other programs, but the system is too complex and/or the wait is too long

How did you hear about us?

- friend/relative     support person     web     brochure/flyer  
 presentation/exhibit by \_\_\_\_\_  other (specify) \_\_\_\_\_

**If applying for a Free Wireless Device, please complete the following questions:**

Do you currently subscribe to a mobile plan?     Yes     No

If yes, what is the name of the mobile provider? \_\_\_\_\_

If no, are you able to obtain a mobile plan?     Yes     No

Have you ever used a wireless device?     Yes     No

Do you currently use any of the following types of technology? (Check all that apply):

- Hearing aid                                     Relay (IP, VRS, TTY,                                     Other (List) \_\_\_\_\_  
 Cochlear Implant                                    STS, VCO, HCO, \_\_\_\_\_  
 Speech generating device                                    Captioned Telephone)                                     Not applicable/don't use

**PLEASE NOTE: YOU MUST OBTAIN AND MAINTAIN AN AGREEMENT WITH A MOBILE PHONE COMPANY IF YOU ARE APPLYING FOR A FREE WIRELESS DEVICE.**

#### OPTIONAL

Race:     Black or African-American     Asian or Asian-American     White or Caucasian  
 American-Indian or Alaska Native     Other (specify) \_\_\_\_\_  
 Prefer not to answer

Ethnicity:     Hispanic     Non-Hispanic

Gender:     Male     Female     Other     Prefer not to answer



### APPLICANT'S STATEMENT AND SIGNATURE

**IMPORTANT: Submit application no later than 30 days after you have signed and dated it.**

- I certify that all information provided on this application and supporting documents is true, complete and correct.
- I understand that if I purposely provide false information, I may be subject to legal action.
- Program officials have my permission to verify the information provided.
- I certify that I have read, understand and accept all conditions set forth in this application and have the ability to learn to use the equipment selected.
- I understand that I may not sell, give, or lend to another person any equipment provided to me by the program.
- For free wireless devices only: I will be responsible for all services related to the equipment, including activation fee, monthly service plan, software and app updates, and will use the device to access phone and telecommunications-related services, such as video relay, email and texting.

Applicant signature \_\_\_\_\_ Date \_\_\_\_\_

Parent/legal guardian/signature \_\_\_\_\_ Date \_\_\_\_\_  
(if applicant is under 18 )

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**\*Demonstration Centers:** If you are having trouble making a decision about which equipment might work for you, please contact or visit one of the Assistive Technology Regional Centers (ATRCs).

You can also request a device to try out from our Lending Library.  
Visit: [TechOWLpa.org](http://TechOWLpa.org)      Email: [TDDP@temple.edu](mailto:TDDP@temple.edu)      Call: 800-204-7428

**CERTIFICATION OF DISABILITY**  
(PLEASE PRINT LEGIBLY OR TYPE)

**All information must be completed by a professional.**

**Applicant Name**

(Last) \_\_\_\_\_ (First) \_\_\_\_\_ (MI) \_\_\_\_\_

**Please check one.**

I am a(n):

- |  |  |
|--|--|
| <input type="checkbox"/> Audiologist                         | <input type="checkbox"/> Optometrist   |
| <input type="checkbox"/> Physician                           | <input type="checkbox"/> Ophthalmologist   |
| <input type="checkbox"/> Speech-Language Pathologist         | <input type="checkbox"/> Service Professional (public or private agency that serves deaf, hard of hearing and deafblind, Center for Independent Living employee, credentialed Assistive Technology Professional) |
| <input type="checkbox"/> Physician's Assistant               |  |
| <input type="checkbox"/> Vocational Rehabilitation Counselor |  |
| <input type="checkbox"/> Registered Nurse Practitioner       |  |

**Please check the disability(ies) being certified:**

- |  |                                     |
|--|-------------------------------------|
| <input type="checkbox"/> cognitive*      | <input type="checkbox"/> low vision |
| <input type="checkbox"/> deaf            | <input type="checkbox"/> blind      |
| <input type="checkbox"/> deafblind       | <input type="checkbox"/> physical*  |
| <input type="checkbox"/> hard of hearing | <input type="checkbox"/> speech     |

\*If you marked cognitive or physical disability, please explain why the applicant needs a specialized phone and/or wireless device.

**Certifying Professional**

Full Name \_\_\_\_\_ Title \_\_\_\_\_

Agency \_\_\_\_\_

PA Professional License Number, if applicable \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

Email \_\_\_\_\_

I certify that the applicant named above has the disability indicated, and that they require this technology to independently access telecommunication services.

Signature of Certifier \_\_\_\_\_ Date \_\_\_\_\_

**BEFORE YOU SUBMIT YOUR APPLICATION,  
READ THIS LIST AND CHECK THE BOXES TO ENSURE YOUR APPLICATION IS  
COMPLETE. FAILURE TO SUBMIT ALL THE ITEMS WILL RESULT IN A DELAY.**

- Completed application with all questions answered and all blanks filled in.
- Completed Disability Certification (filled out by a certifying professional).
- Completed Equipment Selection Sheet with one piece of equipment and/or one signaler that will work for you.

**Submit photocopies of documents with the following information:**

- Proof of PA residency with the applicant's name and current street address (current driver's license, non-driver ID, utility bill, dated Social Security correspondence, copies of W-2s, school report card, or other documentation pre-printed with the applicant's name and current street address).
- Proof of applicant's income (Examples of proof of income include W-2's, 1099s or award letters from retirement and/or Social Security income. If you need a copy of your Social Security income statement, please call 1-800-772-1213). Your **most recent** information is required.
- For a free home phone: Proof of **most recent** telephone service bill (e.g. If you sign your application in May, include the April bill.)
- For a free wireless device: If you have a mobile service plan, include page 1 from your current phone bill with this application. (e.g. If you sign your application in May, include the April bill.) You are still eligible even if you don't have a mobile service plan at this time. You have agreed to obtain a mobile service plan in the Applicant Statement and Signature section of the application. The program will follow-up to request confirmation.

**Keep a copy of your entire completed application for your records.**

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**WHAT HAPPENS NEXT?**

- We process your application.
- We send you a letter saying your application is eligible, incomplete or denied.
- The letters come from Temple University. It is NOT a bill or junk mail.
- Tell us if you have changed your contact information.
- This whole process can take up to 4-8 weeks. Please be patient with us!

**TechOWL**

**Tel: 800-204-7428**

**Email: TDDP@temple.edu**

The Free Special Phone Program (Pennsylvania's Telecommunication Device Distribution Program) is implemented by TechOWL, a program of the Institute on Disabilities at Temple University, in conjunction with the PA Office of Vocational Rehabilitation (OVR) and the PA Public Utility Commission (PUC).

January 2020

## Eligibility Criteria

### ■ PERSON WITH A DISABILITY

- This disability prevents a person from making or receiving telephone calls independently. A qualified professional must complete the certification of disability.

### ■ INCOME LIMITS

- We only use the applicant's proof of income. This does not include family/household income.

FINANCIAL ELIGIBILITY CRITERIA GUIDELINES	
<i>(as of January 20, 2020)</i>	
size of family unit	GROSS INCOME <small>(200% of federal poverty guidelines)</small>
1	\$25,520
2	\$34,480
3	\$43,440
4	\$52,400
5	\$61,360
6	\$70,320
7	\$79,280
8	\$88,240

### ■ AGE

- Six (6) years or older.

### ■ RESIDENCE

- Resident of Pennsylvania.

### ■ RESOURCES

- Must have an existing landline telephone service and/or
- Must certify to obtain a wireless service agreement to use with the wireless device.
- Must be able to learn how to use requested equipment.

### ■ EQUIPMENT OWNERSHIP AND RESPONSIBILITY

- Your selection is FINAL and CANNOT BE EXCHANGED. It is your property and responsibility. A durable, protective case and/or screen protector for your wireless device is not included with your equipment. It is highly recommended that you purchase one.

Information will be kept confidential except as required by law.

All equipment is covered by a limited manufacturer defect warranty. If it is defective or stops working, the recipient contacts the vendor for repairs. Repairs for damages due to abuse or neglect are not covered. Stolen equipment can be replaced only when a police report of theft is provided.

**If you need help completing this application, or need it in an alternate form, please contact us:**

**phone: 800-204-7428**  
**fax: 215-204-6336**  
**email: [TDDP@temple.edu](mailto:TDDP@temple.edu)**  
**web: [TechOWLpa.org](http://TechOWLpa.org)**

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## Free Special Phone Equipment Selection

You must submit your equipment selection with your application.

**Category A: Select only ONE device from any row below that best fits your needs.\*\***

### AMPLIFIED PHONES


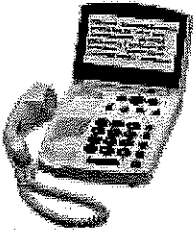
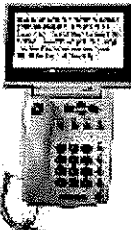
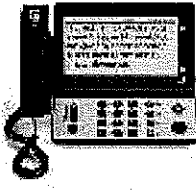


- |   |   |  |  |   |   |
|---|---|--|--|---|---|
|  |  |                   |  |  |  |
| <input type="checkbox"/> Clarity Alto   | <input type="checkbox"/> Clarity AltoPlus   | <input type="checkbox"/> Clarity JV35<br><input type="checkbox"/> Clarity JV35W<br>(white buttons) | <input type="checkbox"/> Serene Innovations HD-40P                                 | <input type="checkbox"/> Serene Innovations HD-60J                                  | <input type="checkbox"/> Clarity HA40 In-line Handset Amplifier                     |

### AMPLIFIED CORDLESS PHONES

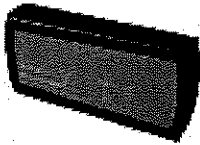

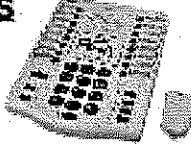
- |   |   |   |
|---|---|---|
|  |  |  |
| <input type="checkbox"/> Clarity XLC2+  | <input type="checkbox"/> Panasonic KX-TGM430B (bluetooth)                         | <input type="checkbox"/> Panasonic KX TGM450S                                       |

### CAPTIONED PHONES and TTYs

(\*high speed internet needed)

- |  |  |  |   |   |
|--|--|--|---|---|
|  |  |  |  |    |
| <input type="checkbox"/> CapTel 840 PLUS (analog or wifi compatible)               | <input type="checkbox"/> CapTel 840i*  | <input type="checkbox"/> CapTel 880i* (large display)                              | <input type="checkbox"/> CapTel 2400* (touch screen display)                        | <input type="checkbox"/> Superprint 4425 TTY  |
|  |  |  |   |  |
|  |  |  |   | <input type="checkbox"/> Uniphone 1140 TTY/HCO/VCO                                    |

### OTHER PHONES

- |   |   |   |   |
|---|---|---|---|
|  |  |   | Optional microphone (pick one)<br><input type="checkbox"/> Lapel <input type="checkbox"/> Headset |
| <input type="checkbox"/> ActiVocal Vocally 3 Freedom Voice Dialer                   | <input type="checkbox"/> Reizon Big Button Speakerphone                             | <input type="checkbox"/> Serene Innovations RCx1000 Remote Control Hands-free Speakerphone (switch available by recommendation) |   |

**Category B: Select only ONE signaler below.**

### SIGNALERS

- |   |   |   |   |
|---|---|---|---|
|  |  |  | <input type="checkbox"/> NONE (No device from Category B needed.) |
| <input type="checkbox"/> ClearSound CR200 Loud Ring Signaler                        | <input type="checkbox"/> Sonic Alert TR75VR Flashing Light Signaler                 | <input type="checkbox"/> Silent Call Vibrating Signaler OmniPage Kit (receiver shown) |   |

For details go to: <https://techowlpa.org/service/tddp>

\*\*If none of the listed equipment will meet your needs, please contact TechOWL.

TEL: 800-204-7428 VOICE: 866-268-0579 TTY / EMAIL: TDDP@temple.edu

# Free Wireless Devices and Equipment Selection

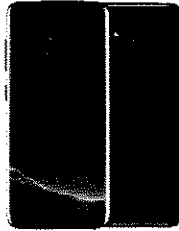
You must submit your equipment selection with your application.

**Category A: Select only ONE device from any row below that best fit your needs. \*\***

## PHONES



- iPhone 8  
(4.7 Inch Screen)  
OR
- iPhone 8 Plus  
(5.5. Inch Screen)

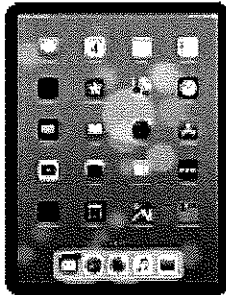


- Samsung  
Galaxy S9  
Smart Phone

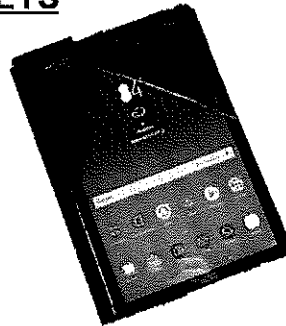


- Lucia  
Mobile Phone

## TABLETS



- iPad 4G  
Tablet



- Samsung Galaxy  
S4 Tablet  
only compatible with
- Verizon
- AT&T
- Sprint

## CELLPHONE AMPLIFIER



- Serene Innovations  
SA-40 HearAll  
Cellphone Amplifier

**Category B: Select only ONE signaler below.**



- Smart Signaler:  
Serene Innovations  
RF200 Alerting  
Device



- Smart Signaler:  
Sonic Bomb  
BT Bed Shaker

- NONE  
(No device from  
Category B needed.)

For details go to: <https://techowlpa.org/service/tddp>

\*\*If none of the listed equipment will meet your needs, please contact TechOWL.

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