Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Modernizing the 911 Framework	)	PS Docket No. 26-197
	)	

COMMENTS OF INTERNATIONAL DEAF EMERGENCY

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SUMMARY

The Notice asks what 911 should become as communication moves beyond voice. For people who are Deaf, DeafBlind, or hard of hearing, that is not a future question. Many of them already communicate mainly by text and by sign language video, and the 911 system has reached them only through intermediaries or through narrow, separately adopted rules. IDE asks the Commission to use this proceeding to make accessibility part of the framework itself, rather than a set of exceptions to it. Specifically, IDE asks the Commission to:

1. Keep "accessible" in the first core objective and state what it means: a person can reach 911 and converse in a modality they can use, without a relay intermediary as a precondition (paras. 11-12).
2. Make the first scope criterion modality-neutral: real-time, two-way conversation by voice, text, or video, including sign language (paras. 14, 16).
3. Draw the line between services that must support 911 and services that merely facilitate it by capability, not label, and keep native 911 free of any enrollment requirement (paras. 17-18).
4. Require that 911 disclosures and consumer education reach Deaf, DeafBlind, and hard of hearing consumers in accessible form (paras. 19-21).
5. Treat automatically initiated 911 communications and AI tools with accessibility safeguards (paras. 16, 22).
6. Assess feasibility of accessible modalities against NG911 capability, and treat accessibility as a matter of phasing, not as a "true limitation" (paras. 23-25).
7. Add accessibility elements to any harmonized baseline of 911 capabilities: a text path, a callback reachable in the caller's modality, continuity across transfers and modality changes, and DeafBlind-compatible output (paras. 26-29).
8. Confirm that the accessibility statutes the Notice already cites remain an independent basis for 911 accessibility rules, whatever happens to the four-factor test (para. 31).

I. Interest of International Deaf Emergency

International Deaf Emergency (IDE) is a Deaf-led 501(c)(3) nonprofit organization in Silver Spring, Maryland, that has worked in disaster risk reduction with Deaf communities since the 2010 Haiti earthquake. Its president, who signs these comments, is Deaf. IDE builds Deaflare, a reference application for accessible emergency alerting for Deaf, DeafBlind, and hard of

hearing users. Deaflare is in its testing phase and will be free to use. It receives and presents public alerts. It is not a 911 service: it does not carry 911 calls or texts itself. IDE holds a Memorandum of Agreement with FEMA's IPAWS program, signed August 25, 2026.

IDE is on the record in the Commission's related proceedings: comments on alerting modernization (PS Docket Nos. 15-91, 15-94, and 25-224, ECFS Filing 26110073861, August 31, 2026); reply comments on direct video calling to 911 in the NG911 proceeding (PS Docket Nos. 21-479 and 13-75, ECFS Filing 26110075390, September 3, 2026) ("IDE NG911 Reply"); a written ex parte presentation on American Sign Language WEA templates (PS Docket Nos. 15-91, 15-94, and 25-224, ECFS Filing 26110076556, September 14, 2026); reply comments on alerting modernization (PS Docket Nos. 15-91, 15-94, and 25-224, ECFS Filing 26110079993, October 8, 2026); and a September 2026 comment on the information collection for the TTY-to-real-time-text transition and its 911 consumer notices (OMB Control No. 3060-1248). These comments build on that record.

II. Core objectives: keep "accessible," and say what it means (paras. 11-12)

IDE supports the three core objectives in paragraph 11, and in particular the word "accessible" in the first: "Ensuring the public has access to reliable, resilient, accessible, secure, and consistent 911 communications across platforms". The Consumer and Governmental Affairs Bureau has already quoted that objective in its discussion of emergency services in the Commission's 2026 CVAA biennial report to Congress (DA 26-1083, para. 21, at 10). The objective should be kept, and it should be defined, because every later question in the Notice (scope, feasibility, harmonization) will be answered against it.

Paragraph 12 asks whether any objective should be updated. IDE proposes that the first objective state that "accessible" means, at minimum, that a person who is Deaf, DeafBlind, hard of hearing, or has a speech disability can reach 911 and communicate in a modality they can use (voice, text, or video, including sign language), and that relay through an intermediary is an available path, not a precondition. The two coexist: a caller who prefers relay keeps it, and a PSAP that cannot yet answer in the caller's modality may route to relay as a disclosed fallback; what the definition rules out is making relay the only way in. That definition follows the Commission's own reasoning: it adopted text-to-911 because of "the unique value of text-to-911 for the millions of Americans with hearing or speech disabilities" (Notice n.46, quoting the T911 Order), and it has found that NG911 multimedia "improves accessibility for persons who are deaf, hard of hearing, deafblind, or have a speech disability" (Notice n.35, citing the NG911 Transition Order, para. 156).

III. Scope: the first criterion should be modality-neutral (paras. 14, 16)

Paragraph 16 asks whether "real-time, two-way voice" still identifies the services that should be subject to the 911 framework, and whether it should extend to services outside "voice" or "voice-equivalent." IDE answers yes, and proposes the replacement: real-time, two-way conversational communication by voice, text, or video, including sign language. The criterion names the modality, not the market: it would not by itself sweep in every product with a chat feature, because the Notice's other criteria (a significant user population, consumer expectations, and the line between supporting and facilitating 911 discussed in Section IV) still decide which services are covered. Its purpose is narrower: a service should never fall outside the framework only because the conversation it carries is typed or signed rather than spoken.

The Commission's own history already points there. TTY qualifies only as a "voice equivalent" (Notice n.48). Text-to-911 was adopted "without applying the scope criteria" (Notice n.46; but see Notice para. 4 and n.13). TRS 911 obligations came from legislation, not from the scope test (Notice para. 4 and n.14). Each time, the voice criterion had to be worked around to reach Deaf and hard of hearing callers. A criterion that names conversation, not sound, would end the need for the workaround. For a Deaf signer, a two-way video call is the real-time conversation; it is not a supplement to one.

Paragraph 14 asks how much weight to give to whether "there is a significant current or potential population of 911 users." IDE asks the Commission not to let population size decide whether an accessible modality is covered. The users are real and are calling today, through intermediated channels. IDE's NG911 Reply cited FCC data released under FOIA, as reported by CSD, that nearly 55,000 VRS calls were placed to 911 in 2025 (CSD Comments at 12, PS Docket No. 21-479), and the 988 Lifeline's experience of roughly 30,000 direct video callers in its first ten months, as the Commission reported from its public forum (FCC 26-39 para. 191 and n.536) (IDE NG911 Reply, Section I). A test that asks how many people use a modality will always undercount people for whom 911 has never offered that modality directly.

Paragraph 14 also asks whether to analyze services one by one or by capability. IDE supports a capability-based analysis, for the reason in Section VIII below: a Deaf caller's access should not depend on which regulatory box the service sits in.

IV. PSTN interconnection, apps, and services that facilitate 911 (paras. 17-18)

IDE agrees with the Notice that PSTN interconnection is a weak proxy today (para. 17). Many people who are Deaf hold more than one number for relay and texting (see Section VIII), and for many of them video and messaging applications are part of everyday conversation.

Paragraph 18 asks what distinguishes services that "merely facilitate communications to 911" from those that should support full 911 access. IDE proposes the same line it asked the Commission to draw for software that reads public alert data: capability, not label (IDE reply comments, ECFS Filing 26110079993, Section VIII). A service that lets users hold real-time conversations should be expected to support 911 in that same modality, whatever it is called. A service that only informs or prepares the user (an accessibility application that shows whether the local 911 authority accepts text or video, or that explains what to expect) facilitates access and should not be pulled into full 911 obligations for doing so.

Two protections, both already in IDE's NG911 Reply (Section V.D), should hold in any new framework. First, native 911 access must never require enrollment in a third-party application, including IDE's own: applications are an on-ramp for their users, never a gate for anyone else. Second, information that helps a caller choose a modality, such as PSAP readiness to accept text or video, should be public and machine-readable, as Communication Service for the Deaf asked in the NG911 proceeding (CSD Comments at 22, PS Docket No. 21-479). Missing, stale, or uncertain readiness data must never delay or prevent a conventional 911 connection.

V. Consumer expectations and disclosures (paras. 19-21)

Paragraph 20 asks what consumers expect from different services. The Commission has already acknowledged that "it is simply unreasonable to expect 9-1-1 callers to know or remember when they are required to do something differently during a 9-1-1 call based on their particular device or location" (Notice n.53, quoting the MLTS/RAY BAUM'S Order, internal quotation omitted). That burden falls hardest on Deaf, DeafBlind, and hard of hearing callers, who must also know whether their local PSAP takes text, whether video will reach anyone, and whether a relay call will be routed correctly. The reasonable expectation for these callers is simple: if a device or service lets them converse in a modality every day, they can reach 911 in that modality, or they are told plainly, in advance, in a form they can read or watch, that they cannot.

Paragraph 21 asks whether the Commission has a role in consumer education and in disclosures. IDE answers yes, with one condition: every 911 disclosure and education obligation in a modernized framework should require accessible formats, including American

Sign Language video, captions, plain language, and formats that work with screen readers and refreshable braille displays. The Commission's TTY-to-RTT order (FCC 16-169) already requires 911 notices "through effective and accessible channels of communication" and encourages outreach "in accessible formats including, but not limited to, large print, Braille, videos in American Sign Language and that are captioned and video described." IDE's September 2026 comment on that collection asked the Commission to state whether the mandatory 911 notices were ever given. A harmonized framework should make the accessible-format expectation mandatory and verifiable.

VI. Automatic 911 communications, device data, and AI (paras. 16, 22)

Paragraph 16 asks whether it matters that a consumer actively initiates the communication, and which device data matter most. Many automatically initiated communications of the kind described in the Notice (paras. 8-9), such as smartphone crash detection, place voice calls or play recorded voice messages. A Deaf or DeafBlind person whose wearable or vehicle places an automatic call cannot hear the call-taker who answers it, and may not know the call was placed. IDE asks that, where a device or service initiates a 911 communication automatically, the framework require that the user be told in a non-auditory form that a call is in progress, and that a text path be offered where the originating service supports one.

IDE also asks the Commission to seek comment on an opt-in, user-controlled data element that tells the PSAP the caller's preferred communication modality (for example, American Sign Language video, text, or text for a refreshable braille display). It would let the PSAP answer in the right modality the first time. The element should name what the network must carry (video or text), not how the caller's own device renders it: a DeafBlind caller reads 911 text on a braille display or as vibration, but what the PSAP needs to know is that the conversation must be in text. It must be voluntary, under the user's control, and never a condition of service.

Paragraph 22 asks about AI. The Commission's 2026 CVAA biennial report records consumer organizations' concern that AI-enabled communications tools and automated captioning may not "consistently produce accurate results," and that technologies should be "developed, tested, and evaluated with input from individuals with disabilities to ensure accuracy, reliability, transparency, and meaningful accessibility" (DA 26-1083, paras. 34-35, at 16). IDE asks the Commission to carry one rule from its NG911 Reply into this framework: automated sign-language translation (and, IDE now adds, automated speech translation) must not be the sole path on a live 911 call unless independent testing has shown it accurate enough for emergency use, across dialect variation, latency, and failure disclosure, with an immediate human fallback (IDE NG911 Reply, Section III). The same rule should apply to automatic speech recognition and automated captioning wherever they stand between a Deaf or hard of hearing caller and

the call-taker. "Accurate enough" should rest on published, task-specific criteria for emergency conversation, not on general-purpose benchmarks, and the human fallback must be reachable without ending the call.

VII. Feasibility: judge accessible modalities against NG911, and phase rather than exclude (paras. 23-25)

Paragraph 25 asks how to assess feasibility "in light of the ongoing NG911 transition, which will permit 911 Authorities to accept new types of communications." For text and video, the answer from the NG911 record is that feasibility is now largely a matter of deployment, not invention. In the NG911 proceeding, NENA stated that it "supports the implementation of multimedia calling capabilities for 9-1-1, including video, in the near term" and that "the technology may be readily available," and iCERT and NASNA acknowledged that NG911 Phase 2 "provides the technical foundation necessary to exchange [NENA] i3-compliant location information, data, and media, such as video" (IDE NG911 Reply, Section I, quoting NENA Comments at 11 and iCERT/NASNA Comments at 10).

Paragraph 25 also asks how to distinguish "true limitations" from those that only affect timing. IDE asks that the absence of an accessible modality at a given PSAP be treated as a timing question, answered with defined fallbacks, not as a limitation that removes the obligation. The NG911 record already describes one fallback, proposed there as an arrangement to be built and coordinated between PSAPs and VRS providers rather than a capability that exists today: automatic transfer to VRS when no sign-language-fluent call-taker is available, with no re-dial by the caller. IDE proposed the second, a step down from video to real-time text on the same session when bandwidth fails, rather than a dropped call (IDE NG911 Reply, Sections III and V.C). A fallback must fit the caller: a step down to text helps only a caller who can use text, so where it cannot, the session should be preserved and connected to a human-assisted path such as relay, and the change announced to the caller. Both are phasing tools of exactly the kind paragraph 25 lists ("alternative implementation approaches, phased deployment, or the ability to coordinate with other providers").

The direct video calling questions in the NG911 Second Further Notice (FCC 26-39, paras. 190-99) remain pending, and the CVAA biennial report notes that alternative formats such as DVC require coordination of 911 Authorities and the Department of Justice (DA 26-1083, n.81, at 11). IDE asks the Commission to say that this Notice does not pause that work, and that any harmonized framework will take in its outcome, including the voluntary pilot the NG911 record supports (IDE NG911 Reply, Sections I and IV).

VIII. Harmonization: accessibility belongs in the baseline (paras. 26-29)

Paragraph 28 offers, as one example, "a baseline set of functional 911 capabilities for all providers," naming location, callback number, and routing. IDE supports a baseline and asks that it include four accessibility elements, each tied to a capability the service already has:

1. A text path. Any service that supports real-time or near-real-time text in everyday use should support text to 911 in that service, with real-time text where the service supports it.
2. A callback the caller can answer. The Notice explains that PSAPs "use callback numbers to reach disconnected callers" (para. 3). For Deaf, DeafBlind, and hard of hearing users, a callback number is not enough unless the PSAP knows how the caller can be reached. The Commission's CVAA biennial report notes that these users "must typically utilize at least two different telephone numbers," one for relay and one from a mobile provider, which "risks texts being sent to a relay service and calls being placed to a number only used for text services" (DA 26-1083, para. 23, at 11). The baseline should require that callback information identify a number and modality at which the caller can actually be reached.
3. Continuity across transfers and modality changes. Location, callback information, and everything already communicated must survive a transfer, and any change of modality must be announced to the caller in a visual, textual, or braille-compatible form, never made silently (IDE NG911 Reply, Section III).
4. DeafBlind-compatible output. Where a service supports screen readers and refreshable braille displays in everyday use, its 911 path should too, so that no service loses that support at the 911 door. That preserves existing access; it does not create it. IDE therefore also asks that the baseline set a separate objective: every covered 911 interface should work with the assistive technologies its users rely on, including screen readers and braille displays, on an implementation schedule the Commission justifies service by service. Call-state changes (connected, on hold, transferred, disconnected) should also be available as distinct, configurable vibration signals, redundant with on-screen text (IDE NG911 Reply, Sections V.A and V.B). IDE has specified such signals in its draft Three Senses Alerting Standard. The 911 call-state signals in that draft have not yet been tested with users; structured testing of the standard with Deaf and DeafBlind participants is being organized. IDE offers it as input, not as a finished specification.

Each of these elements can be measured. IDE asks the Commission to pair the baseline with participatory testing, with Deaf, DeafBlind, and hard of hearing users, of a short set of outcomes: whether the connection succeeds, how long it takes to reach effective two-way

communication, whether the callback reaches the caller, whether information survives a transfer, and how the call recovers from a failure. "Accessible" then becomes something a provider can demonstrate and the Commission can verify.

Paragraph 29 asks how much flexibility to keep. IDE agrees that obligations should fit each service's capabilities, and asks for one limit: flexibility may change the timing of an accessibility element, but it should not remove an element the service already supports for everyday communication. A service that carries text and video every day should not be allowed to offer 911 by voice only.

IX. Legal authority (para. 31)

The ordering clause relies on, among other provisions, section 225 of the Communications Act and section 106 of the Twenty-First Century Communications and Video Accessibility Act (47 U.S.C. § 615c) (Notice para. 37), and the Notice lists the CVAA among the emergency communications statutes behind the framework (Notice n.66). Section 106(g) of the CVAA, 47 U.S.C. § 615c(g), gives the Commission "the authority to promulgate regulations to implement the recommendations proposed by the Advisory Committee, as well as any other regulations, technical standards, protocols, and procedures as are necessary to achieve reliable, interoperable communication that ensures access by individuals with disabilities to an Internet protocol-enabled emergency network, where achievable and technically feasible." IDE reads the closing qualification as the statute's own answer to paragraph 25: feasibility governs timing and method, which is why Section VII asks for phased obligations with defined fallbacks rather than for exclusions. IDE does not suggest that each authority the Notice cites independently supports every obligation proposed here; it asks only that the accessibility authorities be read together, as the Commission has done before. The Commission's TRS 911 rules and its text-to-911 rules were adopted in large part on accessibility grounds and without the four-factor test (Notice para. 4 and n.14; n.46; but see Notice para. 4 and n.13). IDE asks the Commission to state that, whatever it decides about the scope criteria, these accessibility authorities remain an independent basis for 911 accessibility obligations, so that a narrower or redesigned scope test can never be read to withdraw them.

X. Conclusion

IDE respectfully asks the Commission to: (1) keep "accessible" in the first core objective and define it as reaching 911 and conversing in a modality the person can use, with relay available but not required; (2) replace the voice criterion with real-time, two-way conversation by voice, text, or video, including sign language, and not let population size decide whether an accessible modality is covered; (3) draw the line between supporting and facilitating 911 by

capability, not label, keep native 911 free of any enrollment requirement, and make PSAP readiness data public and machine-readable; (4) require accessible formats, including ASL video, captions, plain language, and braille-compatible text, for every 911 disclosure and education obligation; (5) require a non-auditory notice and, where supported, a text path for automatically initiated 911 communications, and bar untested automated translation as the sole path on a live call; (6) treat accessible modalities as phased obligations with defined fallbacks, and confirm that this Notice does not pause the direct video calling work in PS Docket No. 21-479; (7) add a text path, a reachable callback, continuity across transfers and modality changes, and DeafBlind-compatible output to any harmonized baseline; and (8) confirm that section 225 and the CVAA remain an independent basis for 911 accessibility rules. IDE offers its Deaf and DeafBlind community networks and its implementation experience to the Commission and to any working group that takes these questions up.

Respectfully submitted,

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