

RTT / 911 PRA COMMENT, OMB CONTROL NO. 3060-1248. DUE TUESDAY 15 SEPTEMBER 2026.

International Deaf Emergency (IDE) is a Deaf-led 501(c)(3) nonprofit in Silver Spring, Maryland. Its constituency, Deaf, hard-of-hearing and DeafBlind consumers, is the population this collection exists to protect. IDE supports approval with the clarifications below and asks for no new report and no new filing from any respondent.

1. Practical utility. The supporting statement says no party has requested a TTY waiver since the last approval, yet it assigns the 911 customer-notice burden to all 608 wireless providers. IDE asks that approval be conditioned on the statement recording how many providers currently hold a waiver and whether the required notices were issued. If the answer is none, the statement should say so and correct the hours.

2. Burden accuracy. The notice limb accounts for 37,696 of 70,528 annual hours while the same statement says no waivers are being sought; both cannot describe the same respondents. The accessible-format guidance names Braille and ASL video that is captioned and audio described, but the 40-hour and 10-hour estimates do not disaggregate a single hour for producing them. IDE asks the statement to identify what portion is attributed to accessible formats.

3. Clarity. The required notice lists text-based alternatives to 911 but does not name real-time text, the technology this proceeding exists to introduce. IDE asks that the notice content include real-time text and, in one line, how the customer turns it on, and that the collection record which national consumer organizations were consulted in developing the notice.

4. DeafBlind consumers. IDE asks that machine-readable electronic text, compatible with screen readers and refreshable braille displays, be named among the accessible formats.

5. Burden minimization. Every request is a statement in the supporting statement or one line in a record already kept once a year. IDE supports removal of the six-month report and offers to help develop, at no cost, a model consumer notice and accessible-format package that any provider, including small ones, could adopt as-is.

IDE's president is Deaf. Please direct follow-up to emmanuel.jacq@ideafe.org or by videophone through video relay service.

Emmanuel Jacq, President, International Deaf Emergency, 9466 Georgia Avenue, Silver Spring, MD 20910.