

# FCC to Require Video Conferencing Providers, Equipment and Software to Include Accessibility Features

December 16, 2024

The Federal Communications Commission's second report and order and further notice of proposed rulemaking (FNPRM) increases accessibility to video conferencing and Telecommunications Relay Service (TRS) for individuals with disabilities. The FCC found COVID accelerated the adoption and incorporation of video conferencing into many facets of life. While telephone service has long been accessible to people with disabilities, not all video conferencing software enables features that assist people with disabilities to connect with others. The FCC adopted rules to expand the features that video conferencing providers offer to facilitate greater access to these services.

The FCC's new rules apply to interoperable video conferencing services (IVCS), which are defined as services that provide "real-time video communications, including audio, to enable users to share information of the user's choosing," such as livestreaming and video conferencing platforms. Certain video conferencing platforms already include accessibility features like real-time captions, but the FCC's new rules will require improvements to some of those features, while also requiring all IVCS to expand access to accessibility features.

The following is a summary of the new requirements for IVCS providers, which will become effective on January 12, 2027.

## New and modified obligations

- IVCS providers must make captioning available on their video conferencing platforms (unless that is not achievable).
- IVCS providers must enable the connection of IVCS users to third-party captioning services and display such captions on the user's video conference screen (unless these requirements are not achievable), rather than on a separate platform.
- IVCS providers must enable the use of sign language interpretation provided by third parties and transmit user requests for sign language interpretation to Video Relay Service providers. Additionally, call participants who require sign language must have the option to reconfigure their video windows to assist with accessibility (i.e., pinning an interpreter and speaker side-by-side).
- The FCC prohibits exclusivity agreements between TRS providers and IVCS providers and emphasized that IVCS providers may not impede the ability of users to request service from their preferred TRS provider.

## Performance objectives for captions

- At least one mode with captions must be made available. Those captions should appear "accurately" and "synchronously."
  - **Accurately** means that "captioning matches the spoken words of a conversation, in the order spoken, verbatim, without summarizing or paraphrasing, sufficiently to enable a user to understand what is being said."
  - **Synchronously** means that "to the greatest extent possible, the captions begin to appear at the time that the corresponding speech or sounds begin and end approximately when the speech or sounds end, are delivered fast enough to keep up with the speed of those words and sounds, and remain displayed long enough to be read by the user."

## Other IVCS performance objectives

- IVCS providers must provide user interface control functions that allow users to activate and adjust the display of captions,

speakers and signers.

- To **adjust the display of captions** means that “a video conference participant can alter the size, font, and on-screen location of captions and adjust the color and opacity of both the captions and the caption background.”
- To **adjust the display of speakers and signers** means that “video conference participants can minimize or hide extraneous windows, expand the windows of their choice, or relocate particular windows; and edit their own display names before or after joining a video conference.”

## Further notice of proposed rulemaking

The FCC also seeks comment on the following matters:

- Amending IVCS standards to address different types of accessibility needs (e.g., user control, volume) and features based on a more expansive category of disabilities.
- The current landscape of text-to-speech and speech-to-speech products and services commercially available and used by individuals with speech disabilities.
- Recommended changes to performance objectives addressing sign language interpretation, speech disabilities, audio description, visual image description, cognitive and mobility disabilities, and user control accessibility features.
- Whether additional amendments are required to ensure the accessibility of IVCS equipment and software.
- The potential demand for other forms of TRS in IVCS.

Comments and reply comments for the FNPRM are due on February 3, 2025, and March 3, 2025, respectively.

This content is provided for general informational purposes only, and your access or use of the content does not create an attorney-client relationship between you or your organization and Cooley LLP, Cooley (UK) LLP, or any other affiliated practice or entity (collectively referred to as "Cooley"). By accessing this content, you agree that the information provided does not constitute legal or other professional advice. This content is not a substitute for obtaining legal advice from a qualified attorney licensed in your jurisdiction, and you should not act or refrain from acting based on this content. This content may be changed without notice. It is not guaranteed to be complete, correct or up to date, and it may not reflect the most current legal developments. Prior results do not guarantee a similar outcome. Do not send any confidential information to Cooley, as we do not have any duty to keep any information you provide to us confidential. When advising companies, our attorney-client relationship is with the company, not with any individual. This content may have been generated with the assistance of artificial intelligence (AI) in accordance with our AI Principles, may be considered Attorney Advertising and is subject to our [legal notices](#).

## Key Contacts

Tamar E. Finn Washington, DC	tfinn@cooley.com +1 202 728 7129
Henry Wendel Washington, DC	hwendel@cooley.com +1 202 776 2943
J.G. Harrington Washington, DC	jgharrington@cooley.com +1 202 776 2818

This information is a general description of the law; it is not intended to provide specific legal advice nor is it intended to create an attorney-client relationship with Cooley LLP. Before taking any action on this information you should seek professional counsel.

Copyright © 2023 Cooley LLP, 3175 Hanover Street, Palo Alto, CA 94304; Cooley (UK) LLP, 22 Bishopsgate, London, UK EC2N 4BQ. Permission is granted to make and redistribute, without charge, copies of this entire document provided that such copies are complete and unaltered and identify Cooley LLP as the author. All other rights reserved.