

RCCCI Filing Instructions

The Federal Communications Commission (FCC or Commission) requires service providers and equipment manufacturers that are subject to Section 255, 716, or 718 of the Communications Act to maintain records of the efforts they take to implement these accessibility requirements.

Each year by April 1, covered entities must file their annual recordkeeping certifications and required contact information through the FCC's online portal: "Recordkeeping Compliance Certification and Contact Information Registry" (RCCCI Registry) at <https://apps.fcc.gov/rccci-registry/>.¹ Covered entities must file three pieces of information in the RCCCI:

- (1) certification of their annual recordkeeping compliance;
- (2) their current contact information for consumers; and
- (3) their current U.S. agent for service contact information.²

Who is required to file?

Any entity that provides services and equipment covered by Section 255, 716, or 718 of the Communications Act must submit its recordkeeping compliance certification and contact information annually and update that information as needed.

Section 255 and the Commission's implementing rules apply to the following:

- (a) any provider of telecommunications service, interconnected VoIP, voicemail, or interactive menu service;
- (b) any manufacturer of telecommunications or interconnected VoIP equipment or customer premises equipment; and
- (c) any telecommunications carrier.³

Section 716 and the Commission's implementing rules apply to the following, with some exceptions:

- (a) any provider of advanced communications services;⁴ and
- (b) any manufacturer of equipment used for advanced communications services.⁵

¹ 47 U.S.C. § 618; *see also* 47 CFR § 14.31(b). The RCCCI Registry is the sole means for filing annual recordkeeping compliance certifications and contact information, and for updating contact information as required.

² Failing to file all three of these items may subject the covered entity to enforcement action. All three items must be properly filed to comply with 47 CFR § 14.31(b).

³ *See* 47 CFR §§ 6.1, 7.1.

⁴ "Advanced communications services" means interconnected VoIP service, non-interconnected VoIP service, electronic messaging service, and interoperable video conferencing service. 47 U.S.C. § 153(1); 47 CFR § 14.10(c).

⁵ 47 U.S.C. § 617(a)(1); 47 CFR § 14.1(a).

Section 718 applies to:

- (a) manufacturers of telephones used with public mobile services that include an Internet browser in such telephones; and
- (b) providers of mobile service that arrange for the inclusion of a browser in telephones to sell to customers.⁶

Recordkeeping Requirements

Entities subject to Sections 255, 716, and 718 are required to maintain, in the ordinary course of business and for a reasonable period, records of the efforts they have taken to implement Sections 255, 716, and 718, including the following:

- information about the manufacturer's or provider's efforts to consult with individuals with disabilities;
- descriptions of the accessibility features of its products and services; and
- information about the compatibility of such products and services with peripheral devices or specialized customer premises equipment commonly used by individuals with disabilities to achieve access.⁷

Where can I find the accessibility recordkeeping and contact information reporting rules?

The recordkeeping and contact information reporting rules are found at www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-14/subpart-D/section-14.31.

How do I file through the FCC Online Portal?

Access the web-based RCCCI Registry by going to <https://apps.fcc.gov/rccci-registry/>. There, you will find more information about the RCCCI Registry filing requirements: (1) a recordkeeping compliance certification; (2) contact information for consumers; and (3) U.S. agent for service contact information.

You will need an FCC Registration Number (FRN) and password to log in to the RCCCI Registry. The login screen has links to help you determine whether your company has been assigned an FRN, to register with the FCC if you need an FRN, and to contact tech support if you forgot your FRN password.

New Filers:

When you log into the RCCCI Registry, you will see instructions for viewing, editing, and deleting existing records, and for entering new records.

Click on the “**New Recordkeeping Compliance Certificate**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), select the time period covered by the recordkeeping compliance certification, select and complete the appropriate declaration, and enter the contact information of the declarant. Submit the completed certification.

Click on the “**New Contact Information for Consumers**” tab at the top of the screen. Enter

⁶ 47 U.S.C. § 619(a).

⁷ 47 U.S.C. § 618(a)(5)(A); *see also* 47 CFR §§ 14.30(b), 14.31(a).

your company name, select your company type(s) (optional), and enter the contact information of the person authorized to resolve accessibility problems. You may also enter your name, job title, and e-mail address (“submitter information”) to receive a filing confirmation by e-mail. Submit the contact information.

Click on the “**New U.S. Agent for Service Contact Information**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), and enter the contact information for the U.S. agent designated for service of complaints. You may also enter your name, job title, and e-mail address (“submitter information”) to receive a filing confirmation by e-mail. Submit the contact information.

Click on the “**Records**” tab at the top of the screen. You should now have three records for your company (a recordkeeping compliance certification, contact information for consumers, and U.S. agent for service contact information). You may wish to print a copy of that screen for your records.

Returning Filers:

When you log into the RCCCI Registry, you will see instructions for viewing, editing, and deleting existing records, and for entering new records.

You will also see a “summary view” of all of the records submitted under your FRN.

Click on the reference number next to your “Contact Information for Consumers” record. Review the contact information. If edits are needed, click on “edit” in the upper right corner. To save your changes, click on the “update” button at the bottom of the screen.

Click on the “**Records**” tab at the top of the screen. Click on the reference number next to your “U.S. Agent for Service Contact Information” record. Review the contact information. If edits are needed, click on “edit” in the upper right corner. To save your changes, click on the “update” button at the bottom of the screen.

Click on the “**New Recordkeeping Compliance Certificate**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), select the time period covered by the recordkeeping compliance certification, select and complete the appropriate declaration, and enter the contact information of the declarant. Submit the completed certification.

Click on the “**Records**” tab at the top of the screen. You should now have multiple records for your company (recordkeeping compliance certifications covering multiple time periods, contact information for consumers, and U.S. agent for service contact information). You may wish to print a copy of that screen for your records.

Do I need to complete, submit, and maintain all three pieces of information in the RCCCI Registry?

Yes. You must complete, submit, and maintain all three pieces of information in the RCCCI Registry to comply with the Commission’s rules:

- (1) annual recordkeeping compliance certifications;
- (2) current contact information for consumers; and
- (3) current U.S. agent for service contact information.

Filing fewer than three of these items may result in an enforcement action.

Do I need to submit new contact information records every year?

No. While new recordkeeping certifications must be filed every year, new contact information records do not need to be filed every year. Instead, once filed, contact information records (for consumers and for the U.S. agent for service) must be edited and updated within 30 days of any material change. The filing of the annual recordkeeping certification provides a natural opportunity to ensure that contact information records have been appropriately updated.

Do I need to prepare a separate document containing my company's certification and contact information for electronic filing in the RCCCI Registry?

No. When you go to the online RCCCI Registry, it will ask you to certify and enter your contact information, so no separate documents or attachments are necessary to satisfy the requirements of 47 CFR § 14.31(b).

Does our U.S. agent for service need to be an attorney?

No. Your agent for service of informal and formal complaints filed under Sections 255, 716, or 718 of the Communications Act must be located within the U.S., but may be your registered agent, an in-house or outside attorney, or a responsible person who is a non-attorney, including a designated company employee or the same person who you have designated to receive complaints directly from customers.

Why is filing important?

Failure to file a certification and failure to keep information current is a violation of the Commission's rules and may subject the filer to forfeiture or other penalties. In addition, if an informal complaint is not served to the correct address, it could delay or prevent the applicable manufacturer or service provider from timely responding. Failure to respond to a complaint or order of the Commission may subject a party to sanctions or other penalties.

What if I have questions or need assistance?

For further information or to obtain assistance with submitting your recordkeeping compliance certification and contact information, contact Robert McConnell, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 769-0760 or e-mail Robert.McConnell@fcc.gov.