

January 3, 2018

Via Electronic Filing (ECFS)

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, D.C. 20554

RE: Notification of Substantive Change to Minnesota's
Telecommunications Relay Services Program (CG Docket No. 03-123)

Dear Ms. Dortch,

Pursuant to Code of Federal Regulations, title 47, section 64.606, paragraph (f), the Minnesota Department of Commerce – Telecommunications Access Minnesota respectfully submits notification of substantive change to Minnesota's Telecommunications Relay Services (TRS) program.

On November 14, 2017, Minnesota's TRS provider, Sprint, issued a letter to the Minnesota Department of Commerce stating that they will be changing the way that they handle misdialed Minnesota Relay calls. Sprint stated that due to a number of businesses publishing state relay (711 and toll-free) numbers on their public relations materials without the proper explanation of what relay services are, it has resulted in a high number of hearing callers unintentionally dialing state relay services instead of the entity they wish to reach. This has caused a great deal of confusion for hearing callers who misdial and reach Minnesota Relay.

In the past, relay communications assistants have had to spend time explaining to the hearing caller why they reached a relay service instead of the entity that they were trying to contact. To reduce the amount of time communications assistants spend explaining to hearing callers who misdial relay, Sprint has established a new process. When an inbound voice call is answered at the relay center, the communications assistant asks the voice caller "May I have the number you are calling?"

If the communications assistant is able to determine from the caller's response that the caller did not intend to connect to the relay service, the communications assistant will state, "You have reached the relay service for the deaf. One moment for more information." The communications assistant will then transfers the call to a recorded message that states:

You have dialed the phone number for State Relay Services. State Relay services are intended to facilitate telephone communications for people who have a hearing loss or speech difficulty. Please hang up and look for the correct phone number for the agency or company you are attempting to reach. Additional information about State Relay services is available at www.sprintrelay.com. Thank you. Good bye.

The Department of Commerce (Minnesota Relay) has approved the new misdial process, which began on January 1, 2018. However, we have requested that Sprint provide the state with a report on any consumer inquiries regarding the new process for the first 60 days after implementation. If the state discovers that the new process is not in the best interest for our consumers, we may elect to opt out of the new misdial process.

On November 16, 2017, Sprint issued a letter to the Minnesota Department of Commerce stating, in part:

Sprint is discontinuing the use of 9XX numbers while remaining in compliance with FCC regulations. FCC regulation 47 CFR 64.604(a)(3)(iv), states: "Relay services shall be capable of handling pay-per-call services." Since pay-per-call vendors have migrated to 8XX numbers, 9XX call paths are no longer necessary. Callers used to pay for these calls via local telephone bills, however now pay-per-call vendors require a debit/credit card.

Using pay-per-call services is easy for Sprint Relay users. Sprint Relay offers users pay-per-call services by dialing 711 or the State's toll free number. The user will access pay-per-call services in the same way they access other types of calls.

The 9XX decommission was effective on December 31, 2017.

To reflect the above detailed changes, Minnesota Relay has updated our website (www.mnrelay.com) and the materials that we provide to telephone carriers regarding Minnesota Relay information to be placed in their annual notices to customers and their telephone directories. We are in the process of updating our brochures to reflect the changes.

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We have also notified the FCC's website Point of Contact (TRS_POC@fcc.gov) to update Minnesota's information in the TRS by State section of the FCC's website.

The Department of Commerce certifies that Minnesota's TRS program will continue to meet federal minimum standards.

If I can be of further assistance, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Rochelle Renee Garrow".

Rochelle Garrow, TAM Administrator

Phone: 651-539-1878 | E-mail: rochelle.garrow@state.mn.us

cc: Daniel P. Wolf, MN Public Utilities Commission Executive Secretary
Michael McCarthy, MN Public Utilities Commission
Greg Doyle, MN Department of Commerce