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The National Center for Law and Deafness

800 Florida Ave. NE, Washington, DC 20002-3695 • (202) 651-5373 (Voice or TDD)

July 13, 1992

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

By Messenger

Re: CC Docket 92-105
Use of N11 Codes

Dear Secretary Searcy:

On behalf of NCLD, et. al., I have enclosed herewith one original plus nine copies of Reply Comments in the above-referenced proceeding.

Sincerely,

Karen Peltz Strauss

Karen Peltz Strauss
Supervising Attorney

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
The Use of N11 Codes and Other) CC Docket No. 92-105
Abbreviated Dialing Arrangements)

)

REPLY COMMENTS OF
NATIONAL CENTER FOR LAW & DEAFNESS et. al.

July 13, 1992

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SUMMARY

NCLD, et. al. supports the allocation of one or two N11 codes for access to relay services throughout the nation. In 1990, the Americans with Disabilities Act (ADA) directed the establishment of nationwide relay services for deaf, hard of hearing, and speech impaired individuals that are functionally equivalent to telephone services available to hearing individuals. However, because relay numbers vary from state to state, relay users have the extremely difficult task of ascertaining a new relay number whenever they travel to a new state. Allocation of N11 codes for access to relay services will help to fulfill the ADA's goal of functional equivalency by making access to these services convenient, fast, and uncomplicated for relay users. Moreover, by helping to bridge the telecommunications gap between individuals who use text telephones and those who use conventional voice telephones, N11 codes for relay would serve an important public purpose for all Americans. Once allocated for relay purposes, these codes should not be recalled at a later date.

N11 codes are a scarce public resource that should be reserved for important public functions that benefit the public at large. The Commission should not allow these codes to be allocated to the advantage of only a few private commercial interests. For this reason, even those codes that are not

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assigned to relay functions should be set aside for the future for access to other underlying network functions that serve a universal social purpose.

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) CC Docket 92-105
The Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)

COMMENTS OF
NATIONAL CENTER FOR LAW AND DEAFNESS, et. al.

I. Introduction

The Federal Communications Commission (FCC or Commission) has invited comments in the above referenced proceeding, released May 6, 1992. This proceeding follows a petition to the Commission, filed by BellSouth Corporation, requesting a declaratory ruling that assignment of N11 codes for local pay-per-call services would be consistent with the Communications Act and the Commission's policies. BellSouth had received a request to assign one of the remaining N11 codes to Cox Enterprises, Inc., an information service provider, for its information services. Original comments were due in this proceeding by June 5, 1992 and reply comments were due by June 22, 1992. By Order of the Commission released on June 15, 1992, the Commission extended the date for filing reply comments to July 13, 1992.

The National Center for Law and Deafness (NCLD et. al.) submits these joint reply comments in response to the above Notice of Proposed Rulemaking (NPRM), FCC 92-203, on behalf of

the following organizations:

National Organizations

American Speech-Language-Hearing Association
 Canadian Association of the Deaf
 Gallaudet University
 National Association of the Deaf
 National Center for Law and Deafness
 National Easter Seals Society
 National Fraternal Society of the Deaf
 Self Help for Hard of Hearing People, Inc.
 Telecommunications for the Deaf, Inc.
 United Cerebral Palsy Association
 United Church of Christ Office of Communication
 World Institute on Disability

Local Organizations

Arizona Association of the Deaf
 Arizona Council for the Hearing Impaired
 Chicago Hearing Society
 City of Chicago, Mayor's Office for People with
 Disabilities
 HANDS Advocacy Organization, Chicago
 Illinois Association of the Deaf
 Illinois Department of Rehabilitation Services
 Illinois School for the Deaf and its Alumni Association
 Illinois Telecommunications Access Program Advisory
 Council
 Illinois/Iowa Independent Living Center
 Kentucky Commission for the Deaf and Hard of Hearing
 Jacksonville Community Center for the Deaf
 Jewish Family and Community Services, Skokie
 Ladies Aid Society, Jacksonville
 Lincoln & Central Illinois Chapters, Self Help for Hard of
 Hearing, Inc.
 Maryland Office of the People's Counsel
 Metro Washington Telecommunication for the Deaf
 Minnesota Deaf Education and Advocacy Foundation, Inc.
 NORCAL Center on Deafness, California
 New Jersey Association of the Deaf
 Northern Virginia Resource Center for the Hearing Impaired
 Nova West Chapter, Self Help for the Hard of Hearing, Inc.
 Virginia
 Oregon Chapter of Self Help for Hard of Hearing, Inc.
 Otero County Association of the Deaf, New Mexico
 Telecommunicators of Central Illinois
 Wisconsin Telecommunications Relay System

II. The Commission Should Direct the Administrators of the NANP to Reserve Two of the Remaining N11 Codes for Access to Telecommunications Relay Services.

A. The Commission has Sufficient Jurisdiction to Direct the Assignment of N11 Codes

The Commission has correctly noted its plenary jurisdiction over issues concerning the North American Numbering Plan (NANP). Because it has ultimate authority on this issue, and because it is charged with issuing rules and regulations that are necessary in the public interest, 47 U.S.C. §201(b), the Commission can direct Bellcore, as the Administrator of the NANP, to assign N11 numbers as it sees fit. We urge the Commission to direct the assignment of two of the remaining N11 codes - 511 for access to voice relay services and 711 for access to text telephone relay services¹ - because, as shown below, allocation of N11 codes in this fashion will serve the public interest to a far greater extent than would allocation of these codes to enhanced service providers.²

¹ Some relay systems to date have found it advantageous to have two separate relay lines - one for access by text telephone users and the other for access by voice telephone users. This may allow for more immediate responses to callers by the relay centers. Other relay systems have found no difficulties using only one number. It is unclear at the present time, whether one or two numbers need be reserved for access to relay services. We believe that the Commission should seek additional public comment from both relay providers and consumers on this issue.

² The FCC suggests that other dialing arrangements - such as those which entail use of "*" or "#" signs - may be feasible for abbreviated dialing. But the various comments filed suggested that switching difficulties make these codes unavailable at this time. See e.g. Comments of Bell Atlantic at 6 (estimating that use of these codes would require software changes that would take at least two years); Comments of Pacific Telesis at 14 (estimating it might take several years to implement use of these codes); Comments of Cox Enterprises, Inc. at 21. In addition, numbers which use "*" or "#" would remain

B. Assignment of N11 Codes for Access to Relay Services Will Fulfill the ADA's Goal of Functional Equivalency

On July 26, 1993, Congress passed the Americans with Disabilities Act (ADA). P. L. 101-331, 47 U.S.C. 12101-12213; 47 U.S.C. 225. The stated purpose of this landmark legislation was to "provide a clear and comprehensive national mandate to end discrimination against individuals with disabilities and to bring persons with disabilities into the economic and social mainstream of American life." S. Rep. at 2. Among other things, the ADA recognized that for more than half a century, individuals with disabilities have encountered the discriminatory effects of communication barriers within our telecommunications network. Title IV of the ADA begins to address the past failure of the public switched telecommunications network to be accessible to individuals with hearing and speech disabilities by requiring all common carriers to provide both intra- and interstate telecommunication relay services nationwide. 47 U.S.C. §225 et. seq. Telecommunications relay services enable individuals who use text telephones, also known as telecommunication devices for the deaf (TDDs), to carry on near simultaneous conversations with individuals who use conventional voice telephones over the telephone network.

virtually inaccessible to millions of relay users who still use rotary telephones. Indeed, the FCC itself has noted that "using these arrangements . . . may require substantially more time for the local exchange carriers to provide the service and substantial effort and costs in reprogramming equipment" NPRM at para. 19. Because other forms of abbreviated dialing do not appear to be feasible at the present time, we urge the Commission to allocate the N11 codes for relay purposes.

The relay requirement of the ADA rests on Congress's commitment to fulfill the universal service obligation imposed on the Federal Communications Commission in 1934. 47 U.S.C. §151. Prior to the ADA, little had been done to ensure that telephone services over the public switched network were available "so far as possible" to Americans who were deaf, hard of hearing, or speech impaired. Consequently, for more than 55 years, these individuals were denied even basic access to the plain old telephone service that has been taken for granted by the rest of our society.

Although the ADA's relay requirements do not take effect until July of 1993, statewide relay services have begun operations in nearly all of the fifty states. Within the coming year, the handful of states that remain without these services will also be required to begin operations. With the exception of a few regional relay centers (e.g. Maine and New York, Texas and Colorado), for the most part, each of the individual states and territories have acted independently in establishing their own relay programs.³ The consequence has been a confusing myriad of seven to ten digit relay telephone numbers across the nation. See Attachment A, FCC Informational Handbook on Telecommunications Relay Services at 4-5. Thus, relay users have

³ See National Center for Law and Deafness, Summary of State Dual Part Relay Services (1991). The ADA itself contains a process whereby these individual states can apply to the FCC for certification to operate and enforce their own relay systems. 47 U.S.C. §225(f); 47 C.F.R. §64.605. The certification process is to begin in October of 1992.

been confronted with the monstrous task of ascertaining different relay numbers whenever they travel across state borders.

Directory assistance services, accessible via a voice 411 number, are not directly accessible to deaf individuals and other text telephone users who need to ascertain a state's relay number. Indeed, these individuals are caught in a Catch-22: they need to call 411 to ascertain the local relay number, but they need the relay number to access 411. The alternative for these individuals is to undertake the burdensome task of locating an up-to-date telephone book in the state to which they have travelled - a difficult, if not impossible task given the frequency with which telephone books are either old, missing, or tattered at public telephones.⁴

Even hearing individuals who do have access to 411 directory assistance services have found ascertaining relay numbers from these services a difficult task. To begin with, because so many relay systems are new (and because many will continue to come on line in 1993), as of yet directory assistance services often cannot supply information about access to these systems.⁵ In

⁴ A second alternative for text telephone users is to call AT&T's Special Needs Center, which provides nationwide operator services for individuals who use text telephones. But AT&T's Center is accessed through a ten digit number, which text telephone users may not have on hand in their travels.

⁵ For example, recent attempts to ascertain Maryland's relay numbers by the author of these comments were futile through that state's directory assistance 411 service; operators at that number had no knowledge of the existence of that state's relay system. When a representative of Sprint Services, relay provider for that state, was questioned as to why 411 operators did not have this information, it was revealed that typically there is a

addition, because relay systems are operated by different service providers in different states, they often have different names. For example, in Arizona, the relay service operates under the auspices of "TES, Inc.", in South Dakota, the relay is operated by "Communication Service for the Deaf", and in Minnesota, it is provided by an organization known as "D.E.A.F., Inc.". Knowing the catch words for a particular state's relay system is sometimes necessary to ascertain that state's relay number from its directory assistance service. Unfortunately, these barriers to relay access, confronted by hearing persons who are already unfamiliar with and uncertain about using relay service, may be just enough to discourage these individuals from using that service. Indeed, the ease with which these individuals are able to access relay systems will influence, in part, their willingness to venture into this new service.

On July 26, 1991, the FCC issued rules implementing Title IV of the ADA. In re: Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990, Report and Order and Request for Comments, CC Dkt. No. 90-571 (Report and Order). Those rules set forth minimum guidelines to ensure that telephone relay services provided to individuals with hearing and speech disabilities are functionally equivalent to telephone services

lag time of several months between the time that a relay system starts and the time that 411 operators learn about the availability of this service.

available to individuals without those disabilities.⁶

Accordingly, those rules require the completion of all requested relay calls regardless of content, length, or frequency, and seek to ensure that relay systems, to the greatest extent possible, serve as "transparent conduits" for the transfer of information between text telephone and conventional telephone users. See Report and Order at para. 13.

Functional equivalency demands a telephone service for relay users which is uncomplicated, and as easy to access as dial tone network calling. It is undisputed that N11 codes are easy to remember, convenient, and typically universal. Indeed, many who have already commented in this proceeding have touted the benefits of keeping certain of these numbers reserved for important public purposes precisely because they are easily identifiable. Several parties, for example, supported the FCC's decision not to change the functions of 411 and 911 numbers for directory assistance and emergency services. See e.g. Comments of BellSouth at 2-3. Similarly, Ameritech has urged continuing

⁶ During that proceeding, over 70 consumer organizations submitted comments to the FCC setting forth what they determined to be essential to a functionally equivalent relay service. Included within the reply comments of these organizations was a request that access to relay services be made available through a single 800 nationwide telephone number set aside through the North American Numbering Plan. The Commission responded that because 800 numbers are assigned to particular carriers, it did not find it feasible to establish a single, nationwide relay number at that time. Nevertheless, even then, the Commission recognized the benefits of a universal number: "We encourage state systems and all other relay providers to use numbers that are easy for consumers to remember and would further the goal of nationwide access to [telecommunication relay services]." Report and Order at para 42.

use of 611 for repair, because of the frequent need to call a repair office from outside of the home, where one may not have a telephone directory to find an unfamiliar number. Comments of Ameritech at 4. See also Comments of Pacific Telesis at 5. We have already detailed at length the difficulties encountered by relay users seeking unfamiliar relay numbers when outside their homes.

True functional equivalency also demands that the speed of entry into the public switched network be somewhat comparable to the speed of entry for conventional telephone users. To make a telephone call, a hearing individual typically picks up a handset and dials the number of his or her destination party. A deaf or hard of hearing relay user, however, must first dial the seven to ten digit number of the relay system; the relay system then proceeds to dial the number of the destination party. This doubles the length of time needed to dial for relay users, and sometimes as many as twenty digits may be need to be dialed (ten by the relay user and ten by the relay operator) before a connection is made with the called party. Use of the three digit N11 code would lessen the dialing time for relay users, resulting in a dialing scheme for relay users that is more functionally equivalent to the direct dialing available for conventional telephone users.

C. Assignment of 511 and 711 for Relay Services Would Serve the Overall Public Interest

It is undisputed that N11 codes are both a scarce and valuable public resource. According to the NPRM, only four of

these codes, 211, 311, 511, and 711 have not been assigned by the NANP Administrator for specific applications on a nationwide basis. Only two additional codes, 611 and 811, may be also available for abbreviated dialing. Initial comments submitted to the FCC in this proceeding reflected almost unanimous opinion that because of their scarcity, these numbers should be set aside for the important public purposes for which they were originally reserved. Indeed, U.S. West's comments appeared representative of comments submitted by most of the other regional bell companies in concluding that "the extremely limited nature of N11 numbers combined with their ease of use requires that they be reserved for public service applications" Comments of U.S. West at 6. Similarly, MCI urged the FCC to require that "nationally ubiquitous uses [for these numbers] be given priority over regional or purely local applications". Comments of MCI at 3. Others, such as AT&T and NYNEX, stressed the importance of reserving these numbers for network functions that benefit large, rather than small bodies of customers. Comments of AT&T at 3; Comments of NYNEX at 6.

N11 codes in use today, for the most part, benefit the entire population of telephone subscribers in some way. Assigning the remaining N11 codes to only a few business entities would conflict with the traditional use of these codes and allow only a few customers to benefit from very select services.

Relay services, in contrast, are intended to bridge the telecommunications gap between all individuals who use text

telephones and all individuals who are able to use conventional voice telephones. The ultimate objective of relay services - to fully integrate deaf, hard of hearing, and speech impaired Americans into the mainstream of the telephone network will only succeed if use of the relay system is made easy and convenient for both text telephone and voice telephone users. But access to these systems will remain impeded so long as ascertaining relay numbers continues to be burdensome. Assigning 511 and 711 to relay would alleviate this problem and ultimately benefit all Americans by facilitating access to relay services by both hearing and deaf individuals.⁷

III. Once Assigned for Relay Purposes, 511 and 711 Should Not be Recalled by the NANP Administrator.

The FCC has proposed allowing the assignment of N11 codes with the understanding that these codes may be recalled for use as area codes at some point in the future. NPRM at para 13. We strongly oppose recalling any N11 number which is assigned for relay purposes.

Although some parties commenting on this proceeding have

⁷ The demand for relay services in states that have initiated programs has been truly astonishing. California alone handles in excess of 280,000 calls per month. Even more pronounced is the dramatic growth that states experience after first starting their relay operations. For example, New York experienced a 167 percent increase in the number of calls it relayed in the year and a half after it first began operations in January of 1989. Moreover, the hearing population has increasingly become reliant on relay systems to reach deaf friends and colleagues. While relay systems that first began operations in the late 1980's showed little use of these systems by hearing persons, the number of calls currently initiated by hearing callers ranges from 20 to 25 percent of all relayed calls.

suggested that one or two N11 codes may be needed for area codes before the numbering format for area codes is revised in 1995, none of the comments suggested that all of the remaining N11 codes would be needed for that purpose. Thus, if, in fact, N11 codes need to be allocated for area codes, the number(s) assigned for relay functions should be left undisturbed.

Just as consumers now rely on 411 and 911 for basic access to directory assistance and emergency services, so too, will relay users come to rely on the N11 numbers chosen to access relay. Indeed, as U.S. West points out, the Commission's disinclination to disturb the functions of 411 and 911 likely stems from the "widespread public acceptance of, and reliance on, the association between these N11 numbers and the public services to which they provide access". Comments of U.S. West at 5-6. For the same reason, the Commission should not disrupt the functions of the N11 numbers assigned for relay services once they have gained widespread use by the public. Recalling these codes would only cause overwhelming confusion for individuals who use relay services.

It should be remembered as well that relay access numbers provide a vital link between individuals who are deaf, hard of hearing or speech impaired, and the hearing world. Notwithstanding the ADA's new requirement that 911 be directly accessible to text telephone users in extreme emergencies, relay access numbers continue to connect these individuals to all other basic safety and welfare services. Changing the relay access

numbers once these numbers are assigned on a nationwide basis would seriously impair the ability of these individuals to reach their doctors, schools, public officials and other vital service providers.

IV. N11 Codes not Assigned for Relay Functions Should Be Reserved for Other Nationally Important Public Purposes.

NCLD, et. al. submits that even those N11 codes that are not assigned to relay functions should not be prematurely assigned to enhanced service providers. Because of the scarcity and uniqueness of these codes, their allocation should remain open to uses that can benefit the public at large, rather than uses that benefit a few private commercial interests.⁸ Given the rapid rate of progress in the field of telecommunications, it is impossible to predict, at this time, how these codes may be needed in the future to serve the public's needs.⁹ We, therefore, agree with those parties commenting on this proceeding

⁸ Again, other parties commenting in this proceeding agreed with the need to reserve these codes for purposes that are national in scope. See e.g. Comments of U.S West at 1; Comments of Pacific Telesis at 3 ("[t]he remaining codes should continue to be assigned based on public convenience and necessity"); Comments of Bellcore at 2 ("there may be as-yet-unidentified noncommercial public service uses of abbreviated dialing codes that may never be available in the future" if all codes are now assigned); Comments of GTE at 8 (reserve these codes for the public at large, rather than serve only a few competitive service providers).

⁹ For example, the future may bring the need for abbreviated dialing for other individuals with severe disabilities or functional limitations. An abbreviated number for a braille channel or a special number for individuals who use synthetic voice generators or other alternative and augmentative communication devices might be needed in the future to facilitate the transfer of information over the telephone lines by these individuals.

who have urged the Commission to set aside these numbers for access to basic public network capabilities which can serve a universal social value. See e.g. Comments of NYNEX at 6; Comments of Ameritech at 5; Comments of Canadian Steering Committee on Numbering.¹⁰

Moreover, as consumers, we raise serious concerns about the confusion that is likely to result if the same N11 is assigned to access different businesses in different localities. See e.g. Comments of Pacific Telesis at 13; Comments of Sprint at 6. We agree with the Ad Hoc Telecommunications Users Committee that difficulties will arise if consumers are unable to associate a particular number with a particular service across localities; in particular, we worry that consumers may run the risk of incurring unexpected telephone charges if they call an N11 code in one area where access is free but then travel to an adjacent town where that same code accesses pay-per-call services. See Comments of Ad Hoc Telecommunications Users Committee at 3-4.¹¹

Were N11 numbers assigned to enhanced service providers at

¹⁰ In any event, a variety of other numbering arrangements appear to be available to connect enhanced service providers with the public switched telephone network. Ameritech (at 9), Pacific Telesis (at 2), and GTE (at 5-6) are just a few of the parties commenting to this proceeding who noted that these providers have potential access to many millions of numbers through 900 and 976 codes. In addition, Southwestern Bell and others have suggested that service providers may be able to utilize 555-XXXX codes for access to the network. Comments of Southwestern Bell at 12.

¹¹ This would be particularly problematic for consumers living in tri-state areas (NY-NJ-CT; MD-DC-VA), where dialing a particular N11 code may have very different consequences when crossing a state's line between one's home and one's job.

this time, they would be very difficult to recall and may be lost for future public interest purposes forever. See Comments of NYNEX at 10 (noting that after these numbers have been activated and publicized, their recall would be both confusing and problematic for consumers and providers); See also Comments of Ameritech at 8; Pacific Telesis at 12. Indeed, Bellcore points out that their recovery would be particularly difficult if they are assigned under different local procedures, contracts, and regulatory structures. Comments of Bellcore at 5.

Allowing the assignment of N11 numbers to enhanced service providers is particularly troublesome to text telephone users for a final reason. A few information providers who submitted comments in this proceeding suggested that N11 three digit dialing would enable their customers to more easily access information about arts and entertainment services. See e.g. Comments of Alternative Weekly Newspapers et. al.; Newspaper Association of America. Yet at the same time that these information providers seek this use of scarce N11 resources, the fact remains that the vast majority of their existing interactive information services remain virtually inaccessible to text telephone users. Many information services, accessible via 900 and 976 dialing arrangements, employ interactive functions which require a response to a prompt within a specified period of time - a period of time that is usually too short for a relay operator to respond to in a relay call. There is no guarantee that the services which these providers now propose via an N11

number will be any more accessible to text telephone users than their existing information services. It is highly inequitable, then, to allow enhanced providers to capture the use of the remaining N11 codes for commercial purposes to the exclusion of the deaf, hard of hearing, and speech impaired populations, when the alternative use for these codes proposed herein would facilitate access to basic network functions for these populations. See generally Comments of GTE at 2 ("The Commission's rules "should affirm the traditional use of N11 numbers, i.e. to facilitate public access to the underlying network").

V. Conclusion

A review of the initial comments filed in this proceeding reveal overwhelming opposition to assignment of the remaining N11 codes to information service providers.¹² Parties to this proceeding were nearly unanimous in concluding that applications of these codes to facilitate access to underlying network functions for the public as a whole are far preferable to limiting their benefits to a select number of private commercial interests.

¹² Even some information service providers who submitted comments voiced opposition to the Commission's proposal. See e.g. Comments of the Information Technology Association of America at 10 (Commission should investigate alternative dialing arrangements that can serve a greater number of service providers); Comments of Information Industry Association (N11 is a limited resource; alternative dialing plans should be considered); Comments of BT North America, Inc. at 4-6 (the N11 codes are too scarce to accommodate the number of requests for these numbers; 7 digit nationwide access is preferable).

NCLD et. al. is not seeking use of N11 numbers for access to merely enhanced telephone services. Rather we seek use of these codes as a means to achieve easier access to basic telephone service for relay users. The difficulties that text telephone users confront in their attempts to ascertain local relay numbers are extremely frustrating; the difficulties that voice telephone users confront when trying to find these numbers are discouraging as well, and may result in their abandoning efforts to contact deaf colleagues or friends.

A uniform number for relay services will enable relay users anywhere in the country to gain fast and easy access to the public switched telephone network. Regardless of where they are, these individuals will have the comfort and convenience that voice telephone users have when using dial tone service. Allocating N11 codes for relay will also enable relay access to more closely mirror direct dialing, by reducing the number of digits needed to gain passage to the relay service's outgoing line. For these reasons, assigning N11 codes for relay will not only benefit the entire calling public, it will serve as the next logical step in achieving a telephone service for deaf, hard of hearing, and speech impaired individuals which is functionally equivalent to telephone service available to hearing persons.

We commend the Commission for requesting public comment on this critical issue. We urge that the Commission intervene in this matter by assigning N11 codes for relay access and by

ensuring that the remaining N11 codes are allocated in a fair and equitable manner.

Respectfully submitted

Karen Peltz Strauss

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July 13, 1992

Attorney for NCLD et. al.

TRS TELEPHONE NUMBERS ACROSS THE USA

(For telecommunications relay service calls)

STATE		TEXT	VOICE	STATE		TEXT	VOICE
AK		n/a*	n/a	MT		800-253-4091	800-253-4093
AL		800-548-2546	800-548-2547	NC		800-735-2962	800-735-8262
AR		501-661-2736	501-661-2821	ND		n/a	n/a
AZ	Phoenix	602-231-0961	602-275-5779	NE		800-833-7352	800-833-0920
	other areas	800-367-8939	800-842-4681	NH		800-735-2964	800-735-2964
CA	until 3/10/92	800-342-5966	800-342-5833	NJ		800-852-7899	800-852-7897
	after 3/10/92	800-735-2929	800-735-2922	NM		800-659-8331	800-659-1779
CO		800-659-2656	800-659-3656	NV		800-326-4868	800-326-6888
CT	203 area	800-842-9710	800-833-8134	NY		800-662-1220	800-421-1220
	other areas	203-242-1011	203-243-8724	OH		n/a	n/a
DC		n/a	n/a	OK	918 area	800-722-0353	918-663-4071
DE		800-232-5460	800-232-5470		405 area	800-522-8506	405-942-8188
FL		n/a	n/a	OR	Salem	503-223-1353	503-223-1353
GA		800-255-0056	800-255-0135		(until 3/31/92) other areas	800-526-0661	800-526-0661
HI		808-643-8833	808-643-8255	PA		800-654-5984	800-654-5988
IA		n/a	n/a	PR		n/a	n/a
ID		n/a	n/a	RI		n/a	n/a
IL		800-526-0844	800-526-0857	SC		n/a	n/a
IN		n/a	n/a	SD	Sioux Falls	605-339-6464	605-339-6464
KS		800-766-3777	800-766-3777		other areas	800-622-1770	800-622-1770
KY		800-648-6056	800-648-6057	TN		800-848-0298	800-848-0299
LA	Baton Rouge	318-262-5377	318-262-5377	TX		800-735-2989	800-735-2988
	other areas	800-256-6004	800-256-6004	UT		801-298-8245	801-298-9484
MA		800-439-2370	800-439-2370	VA		800-828-1120	800-828-1140
MD		800-735-2258	800-735-2258	VI		n/a	n/a
ME	207 area	207-955-3313	207-955-3777	VT		800-253-0191	800-253-0195
	other areas	800-437-1220	800-457-1220	WA	Seattle	206-587-5500	206-587-5500
MI		800-649-3777	800-649-3777		other areas	800-833-6388	800-833-6388
MN	612 area	612-297-5353	612-297-5353	WI		n/a	n/a
	other areas	800-657-3529	800-657-3529	WV		n/a	n/a
MO		800-735-2966	800-735-2466	WY		n/a	n/a
MS		800-251-5325	800-544-5000				

*n/a = not available