



# COMMONWEALTH OF MASSACHUSETTS

## Department of Telecommunications and Cable

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*Via ECFS*

June 27, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Room TW-A325  
445 12th Street, SW  
Washington, DC 20554

**RE: CG Docket No. 03-123**  
**Telecommunications Relay Service Consumer Complaint Log Summary**

Dear Ms. Dortch,

The Massachusetts Department of Telecommunications and Cable (“MDTC”) and the Massachusetts State 911 Department submit this filing in compliance with the requirement that states and telecommunications relay service (“TRS”) providers annually submit consumer complaint log summaries to the Federal Communications Commission (“FCC”).<sup>1</sup> This submission constitutes the Massachusetts TRS complaint log summary filing for the 12-month period ending on May 31, 2019.

Hamilton Relay, Inc. (“Hamilton”) contracts with the State 911 Department to provide TRS in Massachusetts. Hamilton tracks all TRS complaints and all other TRS customer service activity for Massachusetts. The complaint summaries herein and attached are associated with complaints related to the FCC’s TRS rules. Hamilton processes any complaint that originates via a toll-free telephone number, e-mail, website, in person, in writing, or via Live Chat. Hamilton strives to respond to all customer inquiries within 24 hours and to resolve complaints within 72 hours.

Hamilton received a total of 100 TRS complaints regarding the FCC’s mandatory minimum standards for the time period June 1, 2018 through May 31, 2019. In addition, Hamilton received a total of 2 captioned telephone service complaints regarding the FCC’s minimum standards for the same time period. Of the 100 TRS complaints in Massachusetts, 79 of them were expressed from two Speech-to-Speech (“STS”) relay users who have had difficulty

<sup>1</sup> See 47 C.F.R. § 64.604(c)(1); *In re Telecomms. Relay Servs. & Speech-to-Speech Servs. for Individuals with Hearing & Speech Disabilities*, 15 FCC Rcd. 5140, 5144-46, *Report & Order & Further Notice of Proposed Rulemaking* (Mar. 6, 2000).

with STS procedures and processes. Hamilton Customer Care personnel and Hamilton management have spoken with these users on several occasions to assist, and Hamilton will continue to work with these users. Hamilton's complaint logs are included with this letter as an electronic attachment.

In addition to complaints made directly to Hamilton, the State 911 Department has received complaints directly from one individual STS user weekly during the time period of June 1, 2018 through May 31, 2019. These complaints vary and often do not pertain to TRS. Many of those complaints that do pertain to TRS are duplicative of those filed with Hamilton. The State 911 Department shares this STS user's complaint information relevant to STS with Hamilton management.

Finally, listed below are five complaints made directly to the MDTC by the same individual STS user referenced above.<sup>2</sup>

- |            |   |
|------------|---|
| 9/25/2018  | The STS user stated that STS operators were not properly documenting phone numbers provided by directory assistance operators. The user also stated that operators were not properly reviewing her customer profile for purposes of speed dials. The MDTC contacted Hamilton, a representative of which indicated that they were able to work directly the user to resolve her issues. On November 14, 2018, the MDTC closed the complaint. |
| 11/30/2018 | The STS user recommended that she be able to mute "on hold" music when placed on hold by a business. The MDTC informed the user that it does not have jurisdiction to implement her recommendation.   |
| 12/31/2018 | The STS user had a question about compliance with federal STS regulations. The MDTC directed the user to contact the FCC.   |
| 1/24/2019  | The STS user had a complaint about directory assistance. The MDTC worked with the user to place a directory assistance exemption on her Verizon account.  |
| 4/5/2019   | The STS user stated that she believed an STS operator was violating STS rules. The user filed her complaint with the State 911 Department.  |

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<sup>2</sup>

As these complaints were made by the same individual, they may be duplicative in many, if not all cases.

If you have any questions, please feel free to contact me at 617-305-3580, or Dixie Ziegler with Hamilton at 800-618-4781 V/TTY.

Sincerely,

/s/ Sean M. Carroll

Sean M. Carroll  
General Counsel

Attachments (2)

cc (via email): Dennis Kirwan, General Counsel, Massachusetts State 911 Department  
Monna Wallace, Programs Director, Massachusetts State 911 Department