

Before the
Federal Communications Commission
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Telecommunications Relay Services and |) | CG Docket No. 03-123 |
| Speech-to-Speech Services for Individuals |) | |
| With Hearing and Speech Disabilities |) | |
| |) | |
| Truth-in-Billing and Billing Format |) | CG Docket No. 98-170 |
| _____ |) | |

REPLY COMMENTS OF CONVO COMMUNICATIONS, LLC

Convo Communications, LLC (“Convo”) urges the Commission to deny the petition for declaratory ruling filed by ITTA— The Voice of America’s Broadband Providers (ITTA).¹ As a deaf owned and operated company which provides telecommunications relay services (TRS), Convo is of the view that ITTA’s request to identify TRS as a line item description in customer bills subverts the Americans with Disabilities Act’s (ADA) mandate of telecommunications as a universally available service and consequentially would segregate and stigmatize TRS as a “special” need which adds cost to ratepayers, but is done to provide a “social” service for the disabled. ITTA’s request to single out a class of telecommunications users as a cost burden is as egregious as a hotel or restaurant identifying in its bill a line item claiming a surcharge of the cost of providing accommodations generally, such as a ramp, brailled signage or captioned television sets; such line items do not exist in other ADA requirements for accessible programs and services because doing so would violate the public’s understanding that it is a civil right which extends to all in society, not a special service for certain people.

Convo agrees that it is discretionary, not required, for carriers to recover TRS Fund

¹ ITTA—*The Voice of America’s Broadband Providers, Petition for Declaratory Ruling*, CG Docket Nos. 03-123, 98-170 (filed May 8, 2018) (*Petition*); *Consumer and Governmental Affairs Bureau Seeks Comment on ITTA Petition for Declaratory Ruling*, CG Docket Nos. 03-123, 98-170, Public Notice, DA 18-516 (rel. May 18, 2018).

contributions from their customers, and that if they choose to do so, they can incorporate the costs into the rates they charge for their services.² The members of ITTA could themselves provide TRS in the areas that they provide service in as set forth by the ADA, but have elected to pass on to other companies the actual provision of TRS. It is conceivable that the members of ITTA are attempting to reduce their obligation to make accessible their telecommunications service that they decline to directly provide to TRS users by aggravating their ratepayers about a so-called additional charge so that these ratepayers will take action to reduce the cost of the obligation to make TRS available. ITTA should not be permitted to game the civil right of accessible telecommunications under the cloak of Truth-in-Billing rules.

Accordingly, the Commission should reject ITTA's petition.

Respectfully submitted,

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² See *Comments of the Enterprise Users Commenters*, CG Docket Nos. 03-123, 98-170, Part III (filed June 18, 2018).