



COMMONWEALTH OF MASSACHUSETTS

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By *ECFS*

September 25, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 03-123, Massachusetts TRS Certification Renewal

Dear Ms. Dortch:

In response to the Public Notice released by the Federal Communications Commission ("FCC") on July 19, 2017,¹ the Massachusetts Department of Telecommunications and Cable ("MDTC") respectfully submits this application for renewal of the certification of the Massachusetts Telecommunications Relay Service ("TRS") program. The MDTC has general oversight of the Massachusetts TRS program, including the enforcement of any federal minimum standards.² Pursuant to FCC requirements, a state desiring certification of its TRS program must establish that:

1. The state program meets or exceeds all operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604;
2. The state program makes available adequate procedures and remedies for enforcing the state program, including that it makes available to TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints;
3. Where the state program exceeds the FCC's mandatory minimum standards, the program in no way conflicts with federal law; and

¹ FCC, Public Notice, *Consumer and Governmental Affairs Bureau Reminds State Telecommunications Relay Service Programs to Seek Recertification*, CG Docket No. 03-123, DA 17-697 (rel. July 19, 2017).

² MASS. GEN. LAWS ch. 166, § 15E(f).

4. TRS funding mechanisms, if labeled, are labeled in a manner that promotes national understanding of TRS and does not offend the public.³

As evidenced in the attached documentation:

1. The Massachusetts TRS program meets or exceeds all federal operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604;
2. The Massachusetts TRS program makes available adequate procedures and remedies for enforcing the requirements of the state program, including making available to TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints;
3. Where the requirements of the Massachusetts TRS program exceed the mandatory minimum federal standards, the requirements in no way conflict with federal law; and
4. The funding mechanism for the Massachusetts TRS program is labeled in a manner that promotes national understanding of TRS and does not offend the public.

In conclusion, the MDTC attests that the Massachusetts TRS program meets the federal requirements and respectfully requests renewal of its certification. If you have any questions or require additional information, please feel free to contact me at sean.m.carroll@state.ma.us or (617) 305-3580.

Respectfully submitted,

/s/

Sean M. Carroll
Deputy General Counsel

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See 47 C.F.R. § 64.606(b)(1), (d).