

CONFIDENTIAL

RECEIVED

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

MAR 31 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of	)	
	)	
The use of N11 codes and other abbreviated dialing arrangements	)	CC Docket No. 92-105
	)	
First Report and Order and Further Notice of Proposed Rulemaking	)	FCC 97-51
	)	

**GTE's COMMENTS**

GTE Service Corporation and its affiliated  
domestic telephone operating and wireless  
companies

Richard McKenna, HQE03J36  
GTE Service Corporation  
P.O. Box 152092  
Irving, TX 75015-2092  
(972) 718-6362

Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036  
(202) 463-5214

March 31, 1997

Their Attorneys

No. of Copies rec'd 0712  
List A B C D E  
\_\_\_\_\_

## TABLE OF CONTENTS

	<u>PAGE</u>
SUMMARY .....	ii
BACKGROUND .....	1
DISCUSSION .....	2
1. The Commission should set aside 711 for text Telecommunications Relay Services and 511 for voice Telecommunications Relay Services.....	2
2. Until Advanced Intelligent Network (AIN) capabilities are in place, the selection of TRS providers should proceed as it does today: under a competitively selected vendor process implemented at the state level.....	4

## SUMMARY

1. As a general proposition, N11 codes should be employed for services that benefit the public at large or that serve the public interest. Generally N11 codes can be used in this way without the need for costly network changes, and the public has learned to associate certain codes with types of services that facilitate use of the network. More specifically, GTE supports the use of certain N11 codes for access to TRS.

2. Since 1993, GTE Hawaiian Telephone Company ("HTC") has been using two N11 codes (711 for text TRS and 511 for voice TRS) to provide TRS access in Hawaii. GTE recommends this approach inasmuch as its experience shows that it is: (A) technically feasible; (B) an important benefit to TRS users and well received by the community of those who are speech or hearing disabled; and (C) not cost prohibitive if implemented using the existing technical capabilities of the network. To facilitate this action, the Commission should take steps to free these two codes from any competing uses. In the longer term, once AIN is available, it will be possible to implement a better system and one that will allow for fully competitive TRS provision.

3. Employing (i) the current procedures of a primary provider for each state, (ii) the present network and (iii) current technology, nationwide implementation of N11 codes for TRS access based on the system of state-selected TRS providers can be carried out by August of 1999. However, in GTE's view, it is unlikely that the transition to a fully competitive TRS provider system can be effected by that time because of the technological limitations that will exist until AIN is fully implemented nationwide. An added difficulty is the complex transition from state contracts and state-administered

surcharges for cost recovery, a transition that will have to be analyzed, planned and executed to accommodate multiple providers. Since the timing and capabilities will vary from state to state and given the premise that it is the state's responsibility to provide competition for intrastate calls when reasonable, the transition to multiple TRS providers should be done on a state-by-state basis.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED

MAR 31 1997

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

In the Matter of )  
)  
The use of N11 codes and other ) CC Docket No. 92-105  
abbreviated dialing arrangements )  
)  
First Report and Order and Further ) FCC 97-51  
Notice of Proposed Rulemaking )

**GTE'S COMMENTS**

GTE Service Corporation and its affiliated domestic telephone and wireless companies ("GTE") hereby submit comments regarding the First Report and Order and Further Notice of Proposed Rulemaking, FCC 97-51 (released February 19, 1997), 1997 FCC LEXIS 1432 (the "*Further Notice*") in this CC Docket No. 92-105 ("D.92-105"), seeking comments (at paragraph 3) on the technical feasibility of implementing the 711 code to support nationwide access for Telecommunications Relay Service ("TRS") and a variety of other questions.

**BACKGROUND**

In 1992<sup>1</sup> and again in 1994<sup>2</sup>, the FCC sought industry comment on the use of N11 codes and other abbreviated dialing arrangements. GTE's position throughout

---

<sup>1</sup> D.92-105, Notice of Proposed Rulemaking, 7 FCC Rcd 3004 (1992) (the "1992 NPRM").

<sup>2</sup> See Public Notice, IAD File No. 94-101, 9 FCC Rcd 3249 (1994).

these and related proceedings has been: These codes are a scarce resource that should be reserved for services that benefit the public at large.

As discussed *infra*, GTE implemented 511 TRS access for voice and 711 TRS access for text in GTE Hawaiian Telephone Company's service area in July, 1993.<sup>3</sup> This experience forms the basis for GTE's recommendations *infra*.

## DISCUSSION

### 1. **The Commission should set aside 711 for text Telecommunications Relay Services and 511 for voice Telecommunications Relay Services.**

Today, telecommunications relay services are provided to assure much-needed communication capabilities for those with speech and hearing disabilities. It is a program recognized as important and necessary, and it is in place in every state. To make this service accessible to all end users, the states typically fund the cost of providing these services through the use of a surcharge on customers' bills.

As demonstrated in Hawaii, it is technically feasible to provide access to a TRS provider using the 711 code today. On July 26, 1993, GTE Hawaiian Telephone Company became the first telephone company in the United States to offer convenient TRS access using standard N11 codes. Based on customer feedback since 1993, GTE's program in Hawaii using N11 codes for access to TRS services has been very successful. TRS users in Hawaii have found the N11 codes to be much easier to use and to remember than a seven-digit or ten-digit number and have applauded GTE's action implementing these codes.

---

<sup>3</sup> GTE Hawaiian Telephone Company ("HTC") is the only TRS provider within GTE.

GTE implemented two N11 codes for obtaining TRS services. The 711 code was established for access to TRS by text telephone users. The 511 code is used for access by voice telephone users. The implementation of GTE's N11 codes in Hawaii incurred minor costs and was completed in a relatively short time because GTE made use of technology already in place and used a dialing pattern that would work technically with all end office switches. The prefix 1 was used with Hawaii's N11 codes (*i.e.* 1+511, 1+711) to eliminate any difficulties with electromechanical or other end office switches that would have required additional hardware and/or software to directly route an N11 code.

Two codes, 511 and 711, were implemented because HTC's system could not differentiate between text and voice subscribers without significant time delay and confusion for voice users.<sup>4</sup> Until all TRS providers have the technical capability to make this differentiation, **GTE recommends** that 711 be set aside for text access and 511 for voice.

**GTE also recommends** that in states where there are still end office switches that lack the technical capability to route an N11 code, 1+ dialing should be allowed.<sup>5</sup> A transition such as this will significantly lower the high "up-front" costs of requiring the

---

<sup>4</sup> A voice customer calling TRS with just one number would have required the customer to listen to Baudot and ASCII tones until they timed out and transferred to a voice Communications Assistant. Some TRS providers may have the capability to perform this differentiation, thereby making only one code necessary -- in which case they could employ a single number.

<sup>5</sup> This dialing adaptation has worked in other similar situations, specifically for 411 where in some locations 1+411 must be dialed to obtain directory assistance.

implementation of N11 codes for TRS access beyond current switching and network capabilities. When the industry completes switch conversion to meet the dialing parity requirements of the Telecommunications Act of 1996 Act, prefacing the three-digit N11 code with 1+ will not be required.

**2. Until Advanced Intelligent Network (AIN) capabilities are in place, the selection of TRS providers should proceed as it does today: under a competitively selected vendor process implemented at the state level.**

HTC's experience demonstrates that TRS can provide important benefits to those with speech and hearing disabilities at very modest cost employing currently available technology. Abbreviated dialing permits convenient and faster access to the TRS provider. Moreover, an additional benefit of having uniform nationwide N11 codes for TRS is that the user would be able to access this service employing the same number when traveling to another state -- without the need to remember and keep track of different numbers in each state to access that state's TRS provider. This latter point is especially significant for those with speech and hearing disabilities who may not have the number ready at hand and would find it difficult to obtain.

The current process of selecting TRS providers is done state by state. Each state issues a Request for Proposal ("RFP") and selects a qualified vendor on a competitive bid basis. Qualified vendors must meet mandatory minimum standards for operational, technical and functional procedures in accordance with Commission rules and regulations.<sup>6</sup> GTE believes this process is working reasonably well, and suggests

---

<sup>6</sup> See 47 C.F.R. section 64.604(a - c) - Mandatory minimum standards.

that, until Advanced Intelligent Network ("AIN") is in place, this competitive process to select the primary provider for each state should not be changed.

Currently, the use of an N11 code to access the TRS provider can be accomplished via a switch-based translation to an 800 number or a POTS number (seven or ten digits). Because of the shortcomings of the technology currently in place, this translation can only occur to one number, and consequently the preselection of an alternative TRS provider is not feasible. For the time being, given the limitations of this technology, the current practice of having a competitively selected vendor in each state act as the primary provider is what can be expected to work best.

Using current technology, the N11 code would translate and transfer the call to the primary TRS provider. A user desiring an alternative provider has the option of dialing that provider's 800 number. With the AIN network in place, the capability will exist for the end user to preselect a particular TRS provider so that, when the N11 code is dialed, a database query will be launched to the Service Control Point via the Signal Transfer Point to the AIN N11 gateway. At this gateway, upon receiving the N11 code and the calling party number, the system will return the chosen 800 number or seven- or ten-digit number to the originating end office for the appropriate forwarding. For these reasons, until AIN is in place, it is **not** practical to change the current procedures and offer a choice of providers.

A second consideration that supports continuing the current selection process is the need for contract revision in order to allow competing TRS providers to handle intrastate traffic. In most states, the current TRS contracts prohibit intrastate call handling by a provider located in another state. Coupled with this is the determination

of cost recovery for the TRS provider; this cost recovery is currently under a contract rate for each intrastate minute of use for which the TRS provider furnishes these services. The bids and resulting contracts in place today were based on that TRS provider's cost to furnish TRS in that state and an estimate of intrastate volume of calls and resulting minutes of use. This annual cost estimate for the furnishing of intrastate calls made to the TRS provider, along with various other costs, is the basis for determining the surcharge that all telephone subscribers pay in the state to fund the program. As a result, the per-minute rate that the TRS provider recovers and the surcharge that the subscribers in the state pay vary from state to state.

A transition on a state-by-state basis will have to be planned to first modify and later replace these contracts when access to preselected providers is available and provision of TRS on a fully competitive basis becomes practical. Also, in today's environment, the surcharge on end users to fund the cost of TRS is administered within the state. When access to providers outside state boundaries is allowed, the issue of the amount of and administrative approach for the surcharge to fund TRS will have to be addressed by the industry and both federal and state regulators.

For the foregoing reasons, **GTE's recommendations are the following:**

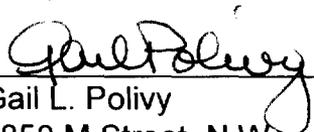
**First:** the current competitive process for selecting TRS providers at the state level should continue for the time being.

**Second:** Once AIN is available, the industry and federal and state regulators must determine the appropriate subsidy mechanism and then should proceed to open TRS to multiple competitive providers; and this should be handled on a state-by-state basis.

Respectfully submitted,

GTE Service Corporation and its affiliated  
domestic telephone operating and wireless  
companies

Richard McKenna, HQE03J36  
GTE Service Corporation  
P.O. Box 152092  
Irving, TX 75015-2092  
(972) 718-6362

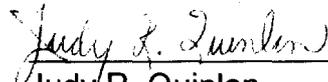
By   
Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036  
(202) 463-5214

March 31, 1997

Their Attorneys

## Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "GTE Comments" have been mailed by first class United States mail, postage prepaid, on March 31, 1997 to all parties of record.

  
\_\_\_\_\_  
Judy R. Quinlan