

Rather than attempt to make regulatory policy without adequate information on a question of such importance to both TRS providers and customers, the Commission should defer establishing a specific timetable for 711 deployment until it has had the opportunity to collect and evaluate the data required for such a determination. An industry task force, such as Sprint proposes, composed of LECs, TRS providers and customer interests is an appropriate forum to assist the Commission in compiling and analyzing the necessary information.

The comments make clear that even the apparently "simple" matter of translating the 711 digits dialed by a TRS customer to the 1-800 access codes used by TRS relay centers may, in fact, be a complex undertaking. As both GTE (p. 3) and USTA (p. 3) point out, the 711 dialing prefix cannot be successfully used with electromechanical switching equipment, absent substantial hardware and/or software modifications to those systems.² The unmodified systems would require TRS customers to use a 1+711 dialing sequence, but transient customers could not easily determine whether such dialing is required from any particular originating telephone, thereby detracting seriously from the uniformity benefits of an N11 access code for TRS.

Moreover, in light of the increasing importance of wireless communications technologies for all telephone users, including TRS customers, it is especially significant that

² This is scarcely an isolated phenomenon; as USTA points out (p. 3), there are still over 800 step-by-step switches in operation among the 1300 incumbent local exchange carriers ("ILECs").

successful implementation of 711 access may encounter significant problems in wireless applications, as BellSouth (p. 3) points out. This is because wireless service territories in many cases cross one or more state boundaries, but wireless carriers' mobile switching offices could translate and route 711 calling only to one TRS center within that multi-state area, without regard to whether it is the preferred relay provider for a transient TRS customer moving within the wireless service territory.

BellSouth's comments also highlight another serious drawback with reliance on the 711 access code: namely, the adverse impact that such routing with current technology would have upon the opportunity of TRS customers to select from among multiple potential providers of relay service. As many commenters in addition to AT&T point out,³ converting local switching offices to translate (or "point") to a single TRS provider's toll-free 800 or other access number is inconsistent with the preservation of a "multi-vendor" TRS market environment. Market competition in voice services fostered by the Commission's pro-competitive policies has created a broad range of choices in services, functions, features and prices for those customers. The Commission therefore should take pains to assure that any 711

³ See Ameritech, p. 3 ("use of 711 to provide access to multiple TRS vendors is not the best method of fostering competition and consumer choice"); Bell Atlantic, p. 2 ("[t]here also does not appear to be any way to use 711 dialing and, at the same time, permit full competition among TRS providers"); GTE, p. 5 ("until AIN is in place, it is not practical to . . . offer a choice of providers"); MCI, p. 3 ("[t]he primary difficulty with a single access number is its inability to serve a multi-provider market"); Pacific, p. 3 ("[u]sing 711 as the sole access number may discourage [TRS] competition").

deployment program that may be ordered will not inadvertently operate to deprive TRS customers of these same benefits of a competitive relay services marketplace.

But even apart from the substantial difficulties described above in effectuating 711 access to relay centers from wireline and wireless local carriers, it is clear that reliance on the single N11 code would have profound consequences on TRS providers' abilities to provide quality relay service to their customers. For example, as AT&T showed in its Comments (p. 3), the single number would channel both text users (who employ multiple transmission protocols) and voice users to the same platform, resulting in serious potential service degradation.⁴ Several commenters therefore propose that any 711 access method be reserved solely to text users, with voice users required to employ a separate access number.⁵

Even if reserved to text users, a single 711 access method will impose serious technical and operational burdens on TRS providers because of the already wide and growing number of transmission protocols (e.g., Baudot, ASCII, and TurboCode) in use with text telephones. Current TRS centers have addressed this multiplicity of protocols by establishing separate toll-free

⁴ For this reason, MCI (p. 2) correctly recommends that the Commission adjust current answer performance requirements for TRS if a 711 access method is deployed.

⁵ See Bell Atlantic/NYNEX, p. 1 (endorsing toll-free 800/888 access for voice customers); GTE, p. 3 (urging Commission to set aside 511 access for voice users).

numbers to facilitate access for ASCII and Baudot devices.⁶

Implementing TRS platforms that can operate successfully with multiple protocols without adversely impacting answer performance will require significant technical development.⁷

Finally, many commenters observe that the FNPRM fails to address the cost recovery issues raised by mandating the deployment of 711 access.⁸ However, it would be premature for the Commission to address those issues without reliable data both as to the cost of local exchange and wireless network modifications and the revisions to TRS providers' systems that will be required to accommodate 711 dialing by TRS customers (whether voice, text, or both). The present record is unfortunately devoid of any information on these crucial subjects.

In light of these many unresolved issues and the current absence of a record for reasoned decision-making, the Commission should not at this juncture prescribe a schedule for the deployment of 711 access for TRS. Instead, as Sprint suggests in its comments (p. 4), the Commission should direct the establishment of an industry task force to evaluate the

⁶ See AT&T, p. 3 (noting the recent adoption of uniform nationwide ASCII and Baudot toll-free numbers by the Industry Carriers Compatibility Forum ("ICCF")). TRS providers such as AT&T also provide service to telebraille customers using a separate toll-free access number.

⁷ See Bell Atlantic/NYNEX, p. 2 (noting that those carriers "have not identified any way to offer a [711] gateway that is compatible with Baudot signals").

⁸ See BellSouth, p. 4; Pacific, pp. 3-4; SWBT, pp. 5-6; USTA, p. 7.

technical, operational and cost implications of implementing the 711 access code for TRS on a nationwide basis. Such a task force should include representation from wireline and wireless local carriers, TRS providers, and users of relay services. Such a forum can compile and analyze the information on network architectures, service performance impacts, and related costs that the Commission must have before it can engage in any regulatory policymaking on this complex subject.

There is clear precedent in the TRS context for Commission reliance on such an industry task force. Specifically, in connection with TRS coin sent-paid calling, such a group evaluated the technical and cost implications of various network solutions for processing this traffic, and developed service alternatives that are in use today.⁹ This same approach should provide important assistance to the Commission in determining the schedule for deploying 711 TRS access, the operational impact of that deployment on TRS service, and the appropriate methods of providing for cost recovery in connection with deployment of 711 access.

Sale Of Abbreviated Dialing Arrangements. Those commenters that address the issue unanimously endorse the Commission's tentative conclusion (§ 71) that the sale of N11 codes would not be in the public interest.¹⁰ Further, the

⁹ See Telecommunications Relay Services, and the Americans with Disabilities Act of 1990, 10 FCC Rcd 10927 (1995).

¹⁰ See AT&T, pp. 5-8; BellSouth, pp. 7-8; Cox, pp. 2-6; Pacific, p. 4; PCIA, pp. 3-4; SWBT, p. 6; Sprint, pp. 4-5; USTA, p. 8; Vanguard, pp. 2-7.

parties that comment on the Commission's statutory authority to auction N11 codes or other numbering resources unanimously conclude that, at a minimum, such a policy would raise very serious legal questions.¹¹

Transfer of N11 Administration to NANPA. Every commenter to address the issue supports the FNPRM's tentative conclusion (§ 75) that administration of N11 codes for local use should be transferred from incumbent LECs to the NANP administrator ("NANPA") concurrently with the transfer of central office code administration functions to that entity.¹² The Commission should adopt this proposal or, in the alternative, should transfer N11 administration to the NANPA at an earlier date.

¹¹ See AT&T, pp. 5-8; BellSouth, p. 7; Cox, pp. 5-6; PCIA, pp. 3-4; Sprint, p. 5; Vanguard, pp. 2-5.

¹² Ameritech, p. 8; AT&T, p. 8; BellSouth, p. 8; Pacific, p. 4; PCIA, pp. 4-6; SWBT, p. 6; Sprint, pp. 5-6; USTA, p. 8.

CONCLUSION

For the reasons stated above and in AT&T's Comments, the Commission should defer its proposed timetable for implementation of the 711 code, and instead should establish an industry advisory committee to develop information on the technical, operational and cost recovery aspects of using the 711 code for TRS. In addition, the Commission should transfer administration of N11 codes to the NANPA no later than at the time of the transfer of central office code administration functions to that entity.

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CERTIFICATE OF SERVICE

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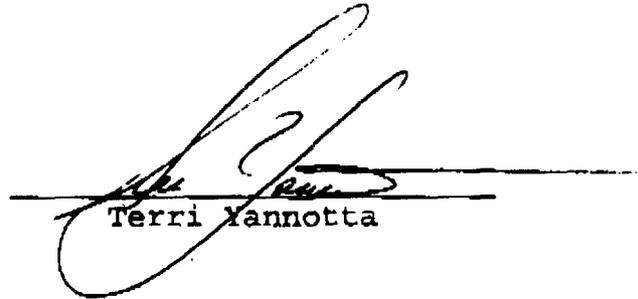
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