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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CC Docket No. 98-67

Comments
Of
Telecommunications for the Deaf, Inc.

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I. INTRODUCTION

1. The Federal Communications Commission (FCC) proposed on May 14, 1998 some rule amendments in its *Notice of Proposed Rulemaking (Notice)* that it believes will enhance the quality of Telecommunications Relay Services (TRS), and broaden the potential universe of TRS users. The FCC proposes to require that, within two years of the publication in the Federal Register of a *Report and Order* in this proceeding, common carriers providing voice transmission service must ensure that nationwide speech-to-speech (STS) relay services are available to users with speech disabilities throughout their service areas. NPRM ¶ 2. Second, the FCC proposes a number of amendments to its current TRS minimum standards that it believes will improve the overall effectiveness of the TRS program. NPRM ¶ 3. Third, it proposes amendments to its TRS enforcement rules to improve its oversight of certified state TRS programs and its ability to compel compliance with the federal mandatory minimum standards for TRS. NPRM ¶ 4.

2. Telecommunications for the Deaf, Inc. (TDI) hereby submits comments to the Federal Communications Commission in response to CC Docket No. 98-67. TDI takes this opportunity seriously to comment on most of the rulemaking proposals by the FCC that would impact on quality of telecommunications relay services. TDI views this FCC process as vital to maintaining and further developing this telecommunication resource to a level of functional equivalence for the nation's 3 1 million deaf, hard of hearing, and speech impaired Americans,

and their contacts such as their families, employers and employees, service professionals and friends.

II. BACKGROUND

3. TDI is a national consumer organization that seeks to represent the interests of 28 million Americans who are deaf, hard of hearing, late deafened, and deaf-blind. Celebrating its 30th year anniversary of its founding this year, its mission is to promote full visual access to entertainment, information, and telecommunications through consumer education and involvement, technical assistance and consulting, application of existing and emerging technologies, networking and collaboration, uniformity of standards, and national policy development and advocacy. In our comments herein we support fully the Commission's proposals on speech-to-speech relay services, revision of speed-to-answer calculation, in-call replacement of CAs, disclosure of customer information, and monitoring of state TRS programs. We differ with the FCC on issues such as reimbursement for same language transliteration only, non-adoption of CA requirements, outreach and information activities, advisory mechanisms, and certain TRS features and capabilities.

III. DISCUSSION

A. Coverage of Improved TRS Under Title IV of the ADA

1. Scope of TRS Generally

3. The FCC has asked for comments regarding evolution of TRS that go beyond traditional TTY relay service. TDI supports the FCC's tentative conclusion that Title IV of the Americans with Disabilities Act (ADA) is applicable to any wire or radio communication service that enables persons with hearing or speech disabilities to engage in communication with persons without such disabilities and is not limited to services using TTYs. NPRM ¶ 14. This serves as an assurance to all public agencies monitoring relay service contracts, and companies/associations that provide relay services that the FCC's regulations do not limit or discourage deployment of new technologies with TRS. It is also significant to TRS consumers who have expressed various ideas and needs for further enhancement of the TRS.

5. The FCC is proposing that the cost of Speech-to-Speech (STS) and Video Relay Interpreting (VRI) services be recoverable by the Interstate TRS Fund. The FCC said that TRS providers should be reimbursed for providing intrastate or interstate improved relay services whether they provide the service voluntarily or as required by the Commission's or a certified state's TRS rules. We concur with the preference of the Commission that it issues a determination first, through a rulemaking or a declaratory ruling, that such service is an "improved" TRS service. NPRM ¶ 15. TDI asks that a time limitation be made for such FCC rulings on "improved" TRS services such as within three months from the time of request.

6. TDI supports the proposal by the FCC that the Interstate TRS Fund Advisory Council develops guidelines for interstate cost-recovery for improved TRS, within six months of the FCC's adoption of a *Report and Order.* NPRM ¶16. We welcome the intent of the FCC to obtain public comment on these guidelines, prior to final enactment. We expect the guidelines to give incentives for TRS providers to be reimbursed in proportion to the volume of service and range of features they offer with the STS, VRI, and future "improved" TRS services. We propose that consideration be given to developing guidelines to reward service improvements by relay providers from the Fund. Such examples are better than average typing speed, faster call setup, higher levels of accuracy in spelling and grammar, faster text transmission capabilities, and aggressive outreach and information activities to the general public, etc. Since the Interstate TRS Advisory Council doesn't have any authority for enforcement procedures, the FCC has sole authority and responsibility to adopt, implement, and enforce its regulations based on these guidelines.

7. The FCC has established rules that set forth the minimum operational, technical and functional standards for TRS.[1] TDI takes no objection that only services that are mandated by Commission regulations must comply with the Commission's mandatory minimum standards. These services would include standard TRS, voice carryover (VCO), hearing carryover (HCO), and, as the FCC is proposing in this *Notice,* STS service. NPRM ¶ 17. TDI also believes that these minimum standards should also apply to "improved" services, however in the case of VRI, such standards may not be met in many places across the nation. The availability of personnel

[1] 47 C.F.R. § 64.604.

for qualified or certified interpreters for VRI will more likely be limited in many parts of America. This would definitely affect the VRI speed of answer which as a result might not meet the TRS minimum standard. TDI recommends that when improved services require hiring of personnel with specialized skills that take years to learn and develop, that each state be able to determine the performance standards for VRI.

8. TDI is in full support of the FCC's proposal to modify the "Communications Assistant" definition by removing the words "from text to voice and from voice to text," and keeping the remainder of the definition. NPRM ¶ 18.

2. Speech-to-Speech (STS) Relay Service

9. TDI agrees with the FCC's proposal that STS be classified as a mandatory TRS service and operated under current TRS minimum standards. We are confident that given the two years' time from the FCC's *Report and Order,* the TRS providers will be in position to have adequate staffing and resources to offer this vital service. We concur that mandatory provision of this service will result in additional access and opportunities in various life activities for the nation's 2.5 million speech impaired Americans.

3. Video Relay Interpreting (VRI) Services

10. TDI supports provision of Video Relay Interpreting (VRI) service across the

nation at the earliest time possible. At least five million deaf and hard of hearing Americans that rely primarily on visual communications would appreciate the offering of this service. This service will be an empowering communication tool for children who haven't learned to type, citizens who converse in extensive American Sign Language, citizens who lipread, and elderly adults who find typing difficult to do. North Carolina is the only state in America that provides VRI full-time at nine remote sites. It is currently handling an average of 400 VRI calls per month -- between 2,000 and 5,000 minutes. The North Carolina VRI experience tells us that nuances of facial and sign language communication, instant interruptions, and easier access to voice driven menu systems are among the most important benefits for the deaf and hard of hearing citizens that have tried this service. Eventually, the benefits of this service will by far outweigh the costs of providing this service.

11. The FCC has tentatively concluded that VRI should not be a required TRS service under its rules. NPRM ¶ 32. The FCC went on to say that it recognizes that TRS providers may voluntarily offer VRI services to TRS users as the technology develops and as the costs of providing VRI decreases. NPRM ¶ 33. In light of these circumstances, TDI proposes that the Commission mandates a phase-in period, and revisits this issue on an annual basis, to determine whether it is ready to be a mandatory TRS service. The technology for video conference products and the telecommunications network are changing rapidly. This should eventually help bring down costs, making VRI more affordable and universal. This may also help to gain acceptance by state equipment distribution programs across the nation to include VRI products as part of their offerings. We are not satisfied with the average 15 frames per second

transmission, and we encourage that industry develop improved technology to produce 30 frames per second or better on regular transmission lines. We remain optimistic as we see emergence of new transmission lines, such as ISDN/BRI, ISDN/PRI, and ADSL, but we are concerned the cost of accessing these lines needs to be kept reasonable. We accept the idea of getting VRI only on a temporary basis at remote sites in each state, as a way of introducing this service to the constituency groups that will benefit substantially from it. We fully expect newer technology and other resources to take place, shifting access and use of VRI from remote sites to the vicinity of one's house. TDI asks that VRI be capable of being combined with Voice Carry-Over TRS feature, as we have many deaf and hard of hearing citizens who can speak for themselves and only need the interpreter for receptive communication. We recognize that as products and network capabilities are made available, it will not solve the supply and demand concern for availability of qualified or certified sign language interpreters. The phase-in decision by the FCC will enable colleges and universities across the nation to establish and maintain additional interpreter training and sign language/deaf culture programs. TDI is receptive to the idea of a separate certification process for VRI interpreters. TDI is confident that this phase-in mandate will blend in well with the future possibilities of teleconferencing and the Internet services in education, medicine, rehabilitation, civics, and community life.

12. TDI commends the plans of the FCC to incorporate the definition of "qualified interpreter," as used by the Department of Justice in its Titles II and III regulation, to its TRS rules.[2] We agree with the FCC that TRS confidentiality, conversation content and "type of call"

[2] *See* n.73, *supra*.

rules must apply to the provision of VRI services.[3] We are glad that the FCC sees it appropriate to allow costs of interstate VRI to be recovered from the interstate TRS Fund, subject to guidelines by the interstate TRS Fund Advisory Council. We are also relieved to see the FCC's intent to have the costs of intrastate VRI be recoverable from the intrastate jurisdictions. NPRM ¶ 34.

4. Multilingual Relay Services (MRS) and Translation Services

13. TDI agrees that the decision as to whether to implement MRS is best left to the state TRS programs. NPRM ¶ 37. Although the FCC doesn't propose to mandate the provision of MRS, MRS is considered a "relay" service within the meaning of Title IV. Accordingly, to the extent voluntarily provided, the costs of intrastate or interstate MRS are recoverable from the intrastate jurisdiction or the interstate TRS Fund, as appropriate. By allowing providers to recover their costs for providing this service, the FCC seeks to spur the development of MRS and to encourage the offering of MRS on a voluntary basis. NPRM ¶ 38.

14. We oppose the FCC's plan for the TRS Interstate Fund to reimburse for same-language transliteration only. NPRM ¶ 39. We believe that the FCC needs to include translation MRS for limited situations. As evident in Texas, some deaf children of foreign parents do not learn their parents' language. Such translation services will provide these deaf children the means to communicate with their hearing parents via the relay service. Otherwise, phone access

[3] *See* 47 C.F.R. § 64.604(a)(2), (a)(3).

is available for this application. However, we agree that the FCC should leave the decision to the states to provide these services.

15. The FCC asked for feedback on a third type of MRS, which is ASL translation services, and asks whether these services are reimbursable. NPRM ¶ 39. Since ASL is a visual language and has a different syntax and grammar system from English, it is a foreign language. Thus services related to translation from ASL to English or English to ASL should be covered. We recommend that relay users ask for such translation services from the Communication Assistant (CA) first before the call takes place. Otherwise, the CA will conduct the call verbatim.

5. Access to Emergency Services

16. TDI shares the FCC's concern that there is a lack of consistency among TRS providers regarding the handling of emergency calls, thus which may jeopardize public safety. NPRM ¶ 41. We agree that TRS centers should be required under the Commission's rules to pass a caller's AN1 to an emergency services operator. We ask that consumers decide when there is an emergency, and to have full control of the call during the emergency, not the Communication Assistants unless the consumer is in danger and loses control of the call. In light of the new 3 11 services, we sincerely believe that training and outreach programs are necessary to inform and educate consumers and TRS professionals on how to respond to a variety of situations as emergencies or non-emergencies.

6. Access to Enhanced Services

17. The FCC has quoted Congress as stating that "Title IV was not intended to mandate access to enhanced services." NPRM ¶ 45. However, based on the finding in the May 17, 1990 Congressional Record produced from Ms. Karen Peltz-Strauss of the National Association of the Deaf (NAD), TDI wishes to endorse the NAD's assertion that there was some agreement made at that time during an ADA-related legislative proceeding on such access. In the Record, the dialogue reads that the two Congressmen, Mr. Steny Hoyer and Mr. Thomas Luken agreed on the House floor that when future technology allows for access to audiotext services, that it would be Congress' intent to ensure such access. We defer from this situation that the FCC has the authority to require relay providers to facilitate audiotext calls, where technically feasible. TDI has learned that Wisconsin and New York have already required relay providers to "capture" the full text of the voice menu systems.

18. TDI agrees with the FCC that the Communication Assistant should be permitted to inquire as to whether the TRS user wishes the CA to summarize the message or to listen for specific information. We agree with the FCC's tentative narrow exception to the requirement that all calls be relayed "verbatim"[4] if it would increase TRS efficiency, by allowing CAs to alert the TRS user to a recorded message through a "hot key" on their terminal, and to receive instructions from the TRS user on how he or she wishes to proceed, without having to engage in

[4] *See* 47 C.F.R. 64.604(a)(2).

frequent call-backs. Moreover, TRS users could still request a verbatim message, even if to do so would require frequent call-backs by the CA. NPRM ¶ 46.

B. Mandatory Minimum Standards

1. Speed-of-Answer Requirements

19. The ability of a TRS user to reach a CA prepared to place his or her call, without experiencing delays that a voice telephone user would not experience in placing a telephone call, is essential to the concept of "functional equivalence." NPRM ¶ 49. TDI commends the FCC for its tentative decision to revise its speed-of-answer rules to require TRS providers to answer 85% of all calls within 10 seconds *by a CA prepared to place the TRS call at that time. NPRM* ¶ 50. TDI concurs that the calculation of whether a provider is in compliance with the 85% - 10 second rule must be performed on at least a daily basis. TDI is eager to see whether this new calculation formula will result in a decrease of blocked calls and a more positive experience for relay users.

20. We note that the FCC has chosen not to adopt a regulation that assumes that all abandoned and redialed TRS calls result from high blockage. NPRM ¶ 53. TDI, at present accepts the idea of excluding them from the calculations. However, we recommend that the relay provider be required to keep a record of such calls and present them for review, should questions arise on the speed of answer during a certain period of time.

2. CA Quality and Training

21. TDI agrees with the FCC that there are a number of allegations by TRS users that CA quality appears to vary widely, and in many cases may be substandard. NPRM ¶ 58. TDI was rather disappointed to learn that the FCC chose not to impose a minimum typing speed for CAs at this time. The FCC was concerned that initiating such a rule would constrain the labor pool for CAs and affect the relay providers' offering of TRS on a consistent basis. NPRM ¶ 58. The lack of the FCC's minimum standard for typing speed definitely determines the quality of communication assistants across the nation, as well as the overall ability to accomplish functionally equivalent access. A SHHH member in New Jersey was correct in a recent listserve communication in which he said, "the labor pool for CAs is not constrained, although perhaps it is constrained at a wage rate which does not attract higher speed CAs. Offering a wage rate which reflects the ability to type at an appropriate rate for Relay would attract people to the CA position and relieve any artificial constraints imposed by the lower wage scale."[5] When we have a minimum standard from the FCC for typing speed, we can expect new developments with enhanced TTY protocols and enhanced computer software to be effective. This will also help state TRS programs initiate upgrades or revisions of the contractual requirements for relay services with state government procurement officials. This would greatly increase TRS transmission times, and thus CA typing speeds. TDI urges the FCC to impose such a minimum standard for typing speed during this proceeding. The ten to fifteen year experiences in relay services on national, state, and local levels can serve as a guide for the FCC to arrive at a

[5] source: Stephen A. Gregory, tan-list-owner@aol.com, June 3, 1998

reasonable level of typing speed. We understand in New Jersey, the agents have 60 wpm as their average typing speed, whereas in some other states, they have a range of 35 to 45 wpm. We recommend that typing tests for CAs be oral rather than text-to-type, as to measure accurately their performance and spelling skills. And that they must have professional qualifications before they are permitted to handle calls, not just "entry level" skills. This is vital for business professionals who rely on the service for telecommunication access.

22. TDI welcomes emergence of new technologies, such as enhanced TTY protocols and enhanced computer software with voice recognition applications, which can greatly improve the quality of TRS. NPRM ¶ 58. Initial results have been encouraging in New Jersey with Turbo Code, one of the available enhanced TTY protocols. Relay users in New Jersey have received transmissions at 100 words per minute or the speed of the TRS agent's typing skills, whichever is slower. We encourage that public service commissions, the relay service providers, and the manufacturers of enhanced TTY protocols or computer software arrive at a reasonable compromise on the costs and other related issues in provision of these transmission features. These key factions are encouraged to take into account their social responsibilities to the affected constituency groups that depend greatly on relay services for life, liberty, and full pursuit to happiness. We urge the FCC to revisit the minimum standard for typing speed, and see if these enhanced transmission features create ground for a new higher typing speed standard. As an alternative, voice recognition applications to Relay could greatly enhance the transmission speeds.

23. TDI concurs with the FCC that clear and articulate voice communication is an essential skill for any CA and is essential to the concept of "functional equivalency." NPRM ¶ 59. TDI is in favor of any nondiscriminatory and EEO-conforming evaluation processes to screen CAs for voice articulation. TDI ranks evenly the importance of high quality voice communication with high quality typing skills on the part of CAs to produce high quality relay service. Substandard voice communication can render the deaf or hard of hearing relay user useless or ineffective to the hearing party on the other end of the relay service call, and create a profound negative impact on the deaf or hard of hearing relay user's access and opportunities in employment, education, family relations, business, medicine, and other life activities.

24. TDI respectfully disagrees with the Commission that it should not adopt further CA requirements at this time. The Commission contends that . . .comprehensive Commission intervention in all areas of CA standards may overburden TRS providers and stifle competitive incentives for TRS providers to develop and improve their service to increase their attractiveness to consumers and state administrators, NPRM ¶ 60. We wish to point out that non-Commission intervention with any CA requirements since 1991 has resulted in awarding of numerous contracts to relay service providers primarily on the basis of the lowest cost bid. Usually, when some relay service providers implement their contracts, they keep operational costs, including compensation to CAs low to stay in compliance with contract cost terms, and to produce profit at same time. TDI urges that CAs be compensated appropriately in line with the skills and competence they possess, and those with higher typing speed and clear and articulate voice

communication, be retained at a higher pay and benefits as seen appropriate by the relay service providers. CAs are the front line workers and provide the most crucial part of the relay service.

3. In-Call Replacement of CAs

25. TDI is in full support of the FCC's intent to amend its rules to require that a CA answering and placing a TRS call must stay with that call for at least ten (10) minutes before an in-call CA transfer can take place. NPRM ¶ 62. It is a reasonable requirement in light of today's current duration average of seven minutes for a regular TRS call. TDI asks that the FCC establishes a rule permitting TRS users to request a specific CA gender during a CA transfer. If the relay service provider has another CA of the requested gender available, it should honor the request, and if there is none available at time of request, it can then be denied.

C. Competition Issues

1. Multivendoring

26. TDI is in favor of multivendoring with intrastate relay services for each of America's 50 states. However, we acknowledge the Commission's position that it only certifies each state's relay service program. We recognize that the FCC has no direct jurisdiction over the recovery of intrastate TRS costs nor involvement in the rate-setting or contracting processes by any state for its intrastate TRS program. NPRM ¶ 66. However, we ask the FCC to make a rule

that would require involvement of consumers, and key organizations of, by, and for the deaf and the hard of hearing citizens on each of the 50 states' review and selection processes for relay service contracts. If there is a relay service advisory council in place with any state, then we strongly urge the state to consult with the council and involve it extensively in the RFP and review processes.

27. Title IV of the ADA permits carriers to comply with their statutory obligation to provide TRS "individually, through designees, *through a competitively selected vendor,* or in concert with other carriers." NPRM ¶ 66. Title IV does not indicate clearly regarding whom that makes the selection. TDI asserts that the consumers have the fundamental right to make the selection of a provider to handle either long distance and local calls. There should be alternative 800 numbers for TRS consumers to call for both interstate and intrastate calls.

28. While it is ideal in terms of quality assurance to have competition among some companies in each state to provide relay services for intrastate calls, costs could become very prohibitive as a whole for these companies on a regular basis. As a result, this may exhaust the reserves in each state's TRS funds more rapidly. Drawing from our experiences with long distance TRS calls, regional mechanisms with long distance and local telephone companies may be the solution to handle local TRS calls. State TRS programs can be billed from these companies for these calls originating from within their states. Some states have enabling legislation or regulations that require the relay center to be in-state. This would greatly reduce the prospects of multivendoring, and makes TRS more expensive without the critical mass

currently achieved with the regional centers. We realize this could also raise a myriad of legal and interstate issues, and may require legislative action from the U.S. Congress, and state legislatures across the nation, with technical support from the FCC and state public service commissions. However, the end result would merit this effort worthwhile. Procurement procedures within each state's government will need to be amended to allow for such outsourced intrastate services. The fact remains that the nation's deaf and hard of hearing population that uses relay services are a small percentage of the national telephone market, thus there will not be an adequate critical mass for a full, open competitive relay service market in each state. Therefore, we feel a regional approach may be the solution. We intend to explore this recommendation with other advocacy groups and the telephone industry, and see what their reaction is. Eventually, relay services will be provided by global enterprises, and we must ensure in collaboration with government and other advocacy groups that we have quality, steadily improving relay services in the rapidly transforming business world.

2. Treatment of TRS Customer Information

28. TDI supports that the disclosure by an outgoing TRS provider of customer information to a new TRS vendor that has won a TRS contract, is subject to section 222 of the Act and the FCC's implementing regulations.[6] TDI agrees that the outgoing TRS provider needs

[6] *See* In the Matter of Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, *Second Report and Order and Further Notice of Proposed Rulemaking,* CC Docket No. *96-115,* FCC *98-27* (rel. February *26,* 1998) *(CPNI Order).*

to be assured that the customer information will be used by the new TRS vendor for provision of relay services only, not for other telecommunications or business purposes.

D. Enforcement and Certification Issues

30. TDI fully supports the requirement that the states be required to notify the FCC of substantive changes in their state TRS program within 60 days of the effective date of the change and to file documentation demonstrating that the state TRS program remains in compliance with the Commission's mandatory minimum standards. We commend the FCC's plan to amend its rules to require that, as a condition of certification, a state TRS program must demonstrate that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints. NPRM ¶ 75.

31. TDI urges the FCC to mandate that the relay service providers and state TRS programs submit information on complaints that they get on a regular basis to the FCC. The FCC would be in position to monitor service quality with the relay service providers and monitoring effectiveness on the part of the state TRS programs. We commend the action of the FCC in its *NPRM* requesting the TRS providers and TRS state administrators to provide the FCC with data on the number of TRS complaints since 1993, the number of complaints resolved, and the time frame within which those complaints were resolved. NPRM ¶ 76. We are in complete support for guidelines that would generate review of, and decision on complaints at different

levels with either the relay service providers, the FCC, and the state TRS programs within time limitations.

E. Other Issues

32 . One of the issues in the FCC's *NOI* is the effectiveness of carrier information and outreach activities.[7] NPRM ¶ 77. The FCC got some comments but chose not to propose any rules on this issue at this time. TDI proposes that the FCC makes a rule in that it gets a progress report annually from each of the 50 states' TRS programs on the outreach and information activities that have been conducted by these programs or their relay providers. Effective outreach and information activities will result in greater awareness and utilization of relay services. TDI wants the FCC to take note of the exceptional promotional activities taken by Telecommunications Access of Maryland (TAM), a governmental agency that oversees the Relay Maryland operations. In the last three months, TAM had local phone companies send out inserts on Relay Maryland in the monthly telephone bills to its customers, and conducted a survey on Relay Maryland with some deaf and hard of hearing citizens in Maryland.

33. The FCC didn't propose to establish an advisory committee to monitor TRS quality issues. NPRM ¶ 78. TDI wishes to go on record in unequivocal support for such an advisory mechanism at the national and state levels. The national mechanism can be patterned after the NECA's Interstate TRS Fund Advisory Council, such as meeting twice a year but

[7] *NOI*, 12 FCC Rcd at 1169.

focusing only on relay service quality issues. We strongly urge the FCC to mandate that each state's TRS program sets up and maintains a statewide advisory council. The state mechanism can support the state TRS program on a variety of issues or functions, such as contract selection process, service quality, outreach and information activities, employment opportunities, needs assessment, service enhancements, relations with business and industry, sensitivity and awareness efforts with the general public, etc. The national mechanism can review the statewide relay service efforts and come up with national perspectives on issues in relay services that warrant the FCC's attention and follow-up. Relay services were mandated as a result of the Americans with Disabilities Act in 1990. TDI feels the relay services need to educate the deaf and hard of hearing Americans with outreach activities to acquire full independence and self sufficiency. With both the national and state advisory mechanisms, the deaf and hard of hearing constituency groups would have representation and voice to dictate their needs, and evaluate the current provision of relay services on a regular basis.

34. In the recent *NOI*, groups representing TRS users recommended that the Commission require TRS providers to implement certain TRS features and capabilities. NPRM ¶ 80. TDI was disappointed that the FCC chose not to propose requiring "call release", Caller ID recognition, and "two-line VCO" as mandatory TRS features. The "call release" feature is very important in that the relay user can connect to the TTY recipient in an office, or a hotel, or a hospital, etc. after an initial contact with the switchboard and a voice operator with assistance of the relay service. Caller ID recognition is becoming a common household feature in today's society, and many TTY users gain critical information regarding voice versus TTY callers via

Caller ID. At present, if a person gets a relay service call and is not at home, his Caller ID screen shows "unavailable" on the screen. One TRS provider is passing an 800 number reflecting the call is from Relay. It is imperative that the FCC requires relay service providers to arrive at some agreement so that the information on the Caller ID display can show that it is from a relay service, along with the number the service is calling for. The "two-line VCO" feature is important for consumers who prefer to use one line for voicing and the other for receiving TTY message. It allows users more control of their call, provides a smoother and rapid completion of VCO calls, allows them to use their residual hearing, and is likely to cost no more than a direct VCO call. TDI strongly urges that the FCC rescinds its current position on these TRS features and capabilities, and instead makes them mandatory

IV. CONCLUSION

35. TDI appreciates the opportunity to comment on the FCC's proposals in this *NPRM*. As our feedback reflects, we applaud some proposals that require further enhancement of relay services across the nation, and we disagree with some proposals that don't meet our expectations for a functionally equivalent relay service mechanism. We strongly urge the Commission to take a closer review of some issues that should have been a part of the current *NPRM*, and to initiate a Further Notice of Proposed Rulemaking. Last, but not least, we commend the FCC on its sincere commitment to produce a fully accessible, modem telecommunications network for the nation's 3 1 million deaf, hard of hearing, late deafened, deaf-blind, and speech impaired Americans.

Respectfully submitted,

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July 20, 1998