



# Minnesota Relay Service

Operated by USA Relay

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

October 27, 1998

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

## COMMENTS OF

Trich Shipley, Minnesota Relay Service Sr. Consumer Relations Manager

For the past several months, I have been working with Minnesota relay consumers who are not able to place relay calls through the IXC/CLECs they currently use. Please consider my below comments and suggestions.

I request clarification and enforcement of equal access to Telecommunications Relay Services (TRS) as provided for in Title IV of the Americans with Disabilities Act (ADA) and regulated by Federal Communications Commission 47 CFR (Federal Register/Vol. 56, No 148) as cited below:

B7 64.601(4) Common Carrier or Carrier: Any common Carrier engaged in interstate communication by wire or radio as defined in section 4(h) of the Communications Act of 1934, as amended (the act), and any common carrier engaged in intrastate communication by wire or radio, notwithstanding sections 2(b) and 221(b) of the act.

B7 64.604 (b)(3) Equal Access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

At the present time many Inter Exchange Carriers (IXCs) or Competitive Local Exchange Carriers (CLECs) provide service and/or special pricing plans to a home or office only if calls are made directly, either by calling tty to tty or voice to voice. People with hearing or speech disabilities may use any IXC or CLEC that provides service in their area if they call TTY to TTY directly, but are often blocked from using that

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same carrier for TRS calls to a (voice) standard phone user. Access can be accomplished through an agreement with the current provider of TRS in each state, but often is not done. Mandating and ensuring agreements is of extreme importance. I feel the current situation is in direct conflict with equal access and choice of carrier capability as provided for by the ADA and regulated by the FCC as cited above.

I feel that this issue is of the utmost importance due to the changes brought about by the Telecommunication Act of 1996 as it relates to opening the market for IXCs and CLECs. As these markets expand, voice customers will have a far greater choice of carriers as time goes on. This new and growing arena of competition and choice will be blocked to the disabled consumer if it is not fully accessible via TRS.

I respectfully request that the FCC review and clarify the previous ruling and enforce the equality of access to all carriers pursuant to the ADA and FCC regulations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Trich Shipley", with a large, stylized flourish at the end.

Trich Shipley  
MRS Sr. Consumer Relations Manager