

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

DEC 15 2000

In the Matter of)
)
Telecommunications Relay Services and)
Speech-to-Speech Services for Individuals)
with Hearing and Speech Disabilities)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 98-67

REQUEST OF VERIZON COMMUNICATIONS INC. FOR TEMPORARY WAIVER

Verizon Communications Inc. ("Verizon"), respectfully requests a six-month waiver of the December 18, 2000, deadline to comply with the requirements of section 64.604(a)(4) of the Commission's rules. That subsection requires telecommunications relay service ("TRS") providers to implement a system that automatically and immediately provides the *nearest* Public Safety Answering Point ("PSAP") with the caller's telephone number and that allows a communications assistant to pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

In all but one of the states within its footprint, Verizon does not directly provide TRS service.¹ Instead, it must rely on vendors that are generally selected by the state commissions. Verizon has been working with these designated vendors to ascertain how they can meet the requirement and whether it can be accomplished in a timely manner. Some have assured Verizon that they will meet the requirement, while others are unsure of when they will be able to comply. One of the larger vendors, Sprint, has a waiver pending before the Commission.

¹ The exception is Hawaii, where the state has awarded the contract to Verizon to operate the statewide TRS network. Verizon-Hawaii, Inc. is in compliance with the requirements of section 64.604(a)(4) and a waiver is not being requested for that state.

No. of Copies rec'd
List ABCDE 044

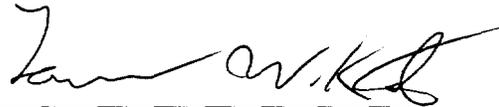
Verizon's waiver request is to ensure that it is in compliance both in states in which Sprint is the vendor until Sprint receives its waiver, and in jurisdictions in which the vendor has not requested a waiver and is unable to meet the requirements.

In the interim, in jurisdictions in which the vendor cannot meet the technical requirements of the Commission's rules, Verizon has taken steps to ensure that TTY users who call the TRS center have access to emergency services. For example, in New York, Verizon has instituted a mechanism in which the TRS center will immediately refer calls to a PSAP that will dispatch the appropriate emergency service, even though that PSAP may not be the closest one to the caller's location. This mechanism is technically out of compliance with the Commission's rule, even though the TTY user is fully protected and, like voice users, receives rapid access to emergency services.

In addition, Verizon is urging its TTY users in the event of an emergency to dial 911 directly rather than accessing the TRS center. The 911 call will go directly to the customer's serving PSAP, and all such PSAPs are TTY capable, rather than to the TRS center. The PSAP will then provide the same emergency dispatch service to TTY users as to voice callers and will capture the calling number in the event the caller disconnects.

Accordingly, Verizon respectfully requests a six-month waiver of section 64.604(a)(4), as specified above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lawrence W. Katz", written over a horizontal line.

Lawrence W. Katz
1320 North Court House Road
Eighth Floor
Arlington, Virginia 22201
(703) 974-4862

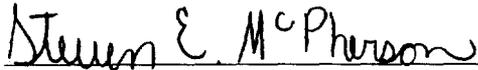
Attorney for Verizon Communications Inc.

Michael E. Glover
Edward Shakin
Of Counsel

December 15, 2000

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of December, 2000, copies of the foregoing
“Request of Verizon Communications Inc. for Temporary Waiver” were sent via courier
to the parties on the attached list.



Steven E. McPherson

* Via hand delivery.

Ms. Magalie Roman Salas, Secretary*
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Staci Pies*
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Karen Peltz Strauss*
Consumer Information Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

ITS, Inc.*
445 12th Street, SW
Washington, DC 20554

Charles L. Keller*
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554