



CTIA

Cellular Telecommunications Industry Association

EX PARTE OR LATE FILED

Andrea D. Williams

Assistant General Counsel

September 28, 2001

RECEIVED

SEP 28 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Mindy Littell
Attorney Advisor
Federal Communications Commission
Wireless Telecommunications Bureau
445 12th Street, S.W.
Washington, DC 20554

Re: 711 Abbreviated Dialing Code
Ex Parte Communication
CC Docket No. 92-105

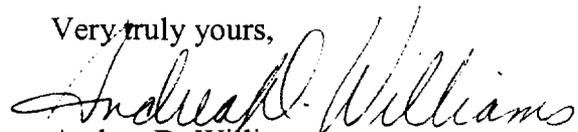
Dear Ms. Littell:

Per our discussion, attached is a summary of CTIA's effort to assist its members in their endeavors to provide access to telecommunications relay services via the 711 abbreviated dialing code by the October 1, 2001 compliance date.

If you should have any further questions concerning the information provided in the summary, please contact me or Kathryn Condello, CTIA's Vice President for Industry Operations. I can be reached at (202) 736-3215 or via e-mail at awilliams@ctia.org. Kathryn Condello can be reached at (202) 736-3235 or via e-mail at kcondello@ctia.org.

Thank you for meeting with us, and I look forward to hearing from you.

Very truly yours,


Andrea D. Williams

Attachment (1)

No. of Copies rec'd 01
List ABCDE



Implementation of 711 Abbreviated Dialing Code for Telecommunications Relay Services

Summary Report

The FCC's rules require all telecommunications carriers, including wireless carriers, to provide access via the 711 dialing code to telecommunications relay services (TRS) by **October 1, 2001**. This FCC mandate requires all wireless carriers to be able to translate and deliver 711-dialed calls to a Telecommunications Relay Service provider (TRS provider) by the October 1st compliance date. The FCC's rules also require carriers and TRS providers, in cooperation with the states, to engage in on-going, comprehensive education and outreach efforts to publicize the availability of 711 access.

To assist its members in their efforts to implement the 711 dialing code, CTIA established a 711 Implementation Working Group to identify the technical issues and possible approaches with respect to implementation. To meet its obligation to translate and deliver 711 calls to a TRS provider, the 711 Implementation Working Group recommends that a wireless carrier can take one of two approaches:

1. The carrier can contract directly with an underlying TRS provider to provide relay services to their customers, or
2. The carrier can route 711-dialed calls through the State TRS infrastructure.

If contracting with an underlying TRS provider, the carrier compensates the TRS provider directly for any translation and routing services. A direct contract allows a carrier to develop and implement carrier-specific treatment for its' TRS customers. CTIA recently reminded its member carriers that if a carrier is interested in this approach, the carrier should contact the major TRS vendors as soon as possible. CTIA has provided its members with a list of the major vendors with the appropriate contact information.

Alternatively, a wireless carrier can route 711-dialed calls through the current State TRS infrastructure, and rely on existing funding mechanisms to compensate the TRS Provider. While there are significant challenges associated with using the current State TRS infrastructure,¹ the 711 Implementation Working Group and the five (5) largest TRS

¹ Unfortunately, the current TRS operational processes are aligned with state geographic and LEC calling-area boundaries. Unless the mobile ANI is an in-state ANI, the state's TRS provider may not recognize the call as originating within the state and will sometimes deny service. Even if the mobile ANI is in-state, the TRS provider does not have a LEC-equivalent mechanism to bill (if appropriate) any toll-related charges, nor can it determine when a toll IS appropriate. While simple translation and delivery of wireless TRS calls permit these calls to be completed to the TRS center, such translation and delivery do not meet the FCC's objective and requirement to provide "functionally equivalent" service to this customer class. (See Section 225 of the Communications Act of 1934, as amended, 47 U.S.C. 225 (1997)).

providers² have worked together and developed priorities and recommendations that will assist wireless carriers in implementing the 711 dialing code using the current State TRS infrastructure by the October 1st compliance date.

Priorities:

1. The wireless industry will translate and route 711-dialed calls to the appropriate TRS provider by October 1, 2001.
2. The TRS Providers will put sufficient mechanisms in place, and conduct the appropriate outreach/education to the State-level administrative bodies to accommodate the processing of wireless “non-state ANI” calls.

Recommendations:

1. Wireless 711-dialed calls should be routed to the State TRS provider of the serving cell site. Thus, calls originating in a Kansas cell site would be routed to the Kansas TRS center, while calls originating from a Missouri cell site would be routed to the Missouri TRS Center.
2. Wireless carriers will translate 711 calls to an unpublished 800 number designated by the State’s TRS provider. The call may arrive with any ANI (mobile ANI preferred), but should include a wireless ANI identifier (or “ii” digit) of 61, 62 or 63. Some TRS providers indicate that they may provide a wireless-only 800 number. The provision of a wireless-only 800 number is at the discretion of the TRS provider.
3. The TRS provider will provide relay service for the call regardless of the ANI. Since the 800-number is an unpublished number, it will be presumed that any non-state ANIs are wireless in nature, and have been routed to the appropriate State center by the wireless carrier. Thus, the TRS provider will now assume that any incoming calls are in-state in nature. With this assumption as the operating principle, the TRS provider can seek compensation based on the terminating state of the call. If the call terminates within the originating state, the TRS provider will receive compensation from that State’s TRS fund. If it terminates outside the originating state, they will receive compensation from NECA.
4. The TRS centers will not attempt to collect billing information from the wireless customer before terminating a “long distance” call. Instead, they will aggregate call records for wireless calls, and submit on a semi-annual basis, an invoice for their uncollected toll to a central processing administrator (CPA) at a nominal, flat, per-minute rate. The preferred invoicing information will

² The five major TRS vendors are Sprint, AT&T, Hamilton, MCI-WorldCom, and Southwestern Bell, and account for TRS contracts in 48 of the 51 state jurisdictions.

include details outlining the originating ANI, terminating ANI, and the duration of the call being invoiced.

At the request of the 711 Implementation Working Group, CTIA has established a suitable central processing administrator (CPA) to handle the semi-annual billings from the 51 TRS operations and determine an equitable way of assessing and collecting these monies from the participating carriers. National Telemanagement Corporation (NTC), a subsidiary of Illuminet, Inc., has volunteered to perform this administrative service. The settlement method will apportion the aggregated bill among the participating wireless carriers and settlement will be made between the Administrator, the wireless carriers and the TRS Service providers.

On September 27, 2001, CTIA reminded its members regarding the October 1st deadline and provided its member companies with a summary of the two approaches that have been developed to assist wireless carriers with 711 implementation.