

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

<b>In the Matter of</b>	)	
<b>Telecommunications Relay Services and</b>	)	
<b>Speech-to-Speech Services for</b>	)	<b>CC Docket No. 98-67</b>
<b>Individuals with Hearing and Speech</b>	)	<b>DA 02-1826</b>
<b>Disabilities</b>	)	

**REPLY COMMENTS  
WORLD.COM, INC.**

WorldCom Inc. (“WorldCom”) hereby responds to comments submitted in response to questions raised by the Commission in its July 29, 2002 Public Notice where it asked parties to comment on whether its rules require Telecommunications Relay Service (TRS) providers to transfer emergency calls to the nearest Public Safety Answering Point, or the nearest PSAP. WorldCom supports clarifying that Section 64.604(a)(4) of its rules requires relay providers to transfer emergency calls to *an* appropriate PSAP. An appropriate PSAP is any PSAP with the capability and authorization to dispatch emergency services to the caller. It is important for the Commission to recognize in its clarification that state and local agency decisions periodically change which PSAPs are authorized to dispatch emergency services to various NPA-NXXs, and that there will inevitably be time lags before relay providers can update their 911 data bases to reflect these changes.

WorldCom’s Global Relay Unit utilizes the same 911 data base to connect its non-TRS customers to PSAPs. WorldCom utilizes a database specifically maintained for emergency

services. All PSAPs are called periodically to verify whether they are capable of dispatching services to each associated NPA-NXX. If the PSAP does not have the capability or authorization to dispatch emergency services to an associated NPA-NXX, WorldCom identifies a PSAP in that NPA-NXX with this capability and updates its database accordingly. In addition, if an actual emergency call is requested through relay, and the communications assistant (CA) discovers that the PSAP does not have the capability or authorization to dispatch emergency services, the CA will consult with the PSAP to determine the appropriate PSAP, and forward this information to its 911 data base maintainers to ensure an appropriate PSAP is thereafter associated with that NPA-NXX.

Nearly all commenting parties recognize that existing 911 data bases are not instantaneously updated so as to provide a unique, always “correct” PSAP.<sup>1</sup> Of the six parties commenting on this issue, only INTRADO and TX-CSEC support identifying a single PSAP, as the appropriate PSAP, which they define as the PSAP that would be reached by an emergency call made by a non-TRS caller.<sup>2</sup> However, these LEC databases are not commercially available to relay providers. Moreover, LEC 911 routing data bases are dependent on the accuracy and completeness of the Master Street Address Guide (MSAG) information they receive from local and state 911 agencies. There may be inaccuracies in the MSAG or incompatibilities with MSAG updates and existing LEC 911 routing data bases.

The Commission should therefore reject INTRADO’s recommendation to integrate 911 TRS calls into the native 911 network.<sup>3</sup> INTRADO does not discuss how this may be accomplished, over what time period, or at what cost. WorldCom believes its method of

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<sup>1</sup> Comments of Verizon at 2; AT&T at 2; Sprint at 3; NENA and APCO at 2.

<sup>2</sup> Comments of INTRADO at 3; TX-CSEC at 1.

determining the appropriate PSAP provides it with a 911 data base which is among the most accurate in the industry. Given the relatively low volume of 911 calls placed through relay, and the lags that will inevitably occur between any modifications of the MSAG by local agencies and LEC and other 911 data bases, the Commission should simply clarify that its rules require TRS providers to route 911 calls to an appropriate PSAP.

Respectfully Submitted

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<sup>3</sup> Comments of INTRADO at 3.

## Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on September 13, 2002

# Larry Fenster

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## Service List

I hereby certify that on September 13, 2002, a copy of these Reply Comments was delivered by first-class mail to the following parties:

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