

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

In the Matter of)	
)	
Provision of Improved Telecommunications)	CC Docket No. 98-67
Relay Services and Speech-to-Speech)	
Services for Individuals with Hearing and)	
Speech Disabilities)	
)	
Clarification of Procedures for)	
Emergency Calls at Telecommunications)	
Relay Centers (TRS))	

REPLY COMMENTS OF VERIZON

Introduction

As Verizon stated in its initial comments, the Commission should revise Section 64.604(a)(4) of its rules to clarify that emergency Telecommunications Relay Service (TRS) calls should be sent to “*an* appropriate” Public Safety Answering Point (PSAP), rather than “the nearest” PSAP, as is stated in the current Commission rule language. *See* Public Notice, DA 02-1826, at 1 & n.1 (rel. July 29, 2002). However, it should resist commenters’ suggestions to change the language to the “*most* appropriate” PSAP, as requiring TRS providers to determine which of any of a number of “appropriate” PSAPs would be the “most” appropriate one likely would only serve to delay a response to an emergency call. The Commission also should not require that TRS providers responding to emergency calls obtain access to the same databases used to route 911 calls. Such a change is not necessary, because hearing impaired customers already can receive the “functional equivalent” of a voice 911 caller by dialing 911 directly. And because of differences between the operation of TRS Relay Centers and the routing systems used for emergency 911 calls, it would be prohibitively burdensome and

expensive to implement and maintain a new system that attempted to coordinate the separate services.

Argument

The Commission Should Not Require Transfer to the “Most” Appropriate PSAP, or Require TRS Providers to Use the Same Databases as Those Used for Routing 911 Calls

As Verizon pointed out in its initial comments, there often is more than one PSAP that is equipped and able to handle an emergency call. Because that might not always be the one geographically “nearest” the caller, the Commission should clarify that a TRS provider satisfies its obligation under Section 64.604(a)(4) by transferring the call to “*an* appropriate” PSAP. However, it should not require transfer to the “*most* appropriate” one (however defined), because such a rule would actually be counterproductive. If a “*most* appropriate” rule were adopted and read narrowly so that the TRS provider believed that it had to ascertain which of a number of “appropriate” PSAP providers was the *most* “appropriate” one, that would needlessly delay the speedy provision of emergency services to the caller. And a rule that required the PSAP to be “*an* appropriate” one would, by definition, require transfer to a PSAP that would be able to quickly and effectively respond to the emergency call.¹ For example, Sprint, a supplier of TRS to Verizon and other carriers, relies on the NPA-NXX of the end user to route the calls to *an* appropriate PSAP. *See* Sprint Comments, at 3.

Some commenters have argued that the “functional equivalence” mandate of the Americans with Disabilities Act (ADA) requires TRS providers to use the same systems for emergency calls as are used to respond to voice 911 calls. *See, e.g.*, Telecommunications for the Deaf, Inc. Comments, at 6-7 (“TDI Comments”); Comments of Maryland Department of Budget

¹ If the PSAP were not equipped or jurisdictionally able to respond to the caller, it would not be “an appropriate” one to transfer the call to.

and Management, at 2. However, revamping the TRS system simply is not necessary in order to achieve complete “functional equivalence,” and, because of differences between the 911 and TRS systems, such a suggestion would be prohibitively difficult and costly to install and maintain.

As an initial matter, hearing-impaired users *already* can obtain the functionally equivalent service of non-disabled 911 callers by dialing 911 directly for emergency services.² Because dialing 911 directly will automatically route calls to an appropriate PSAP, it will always be more efficient than any emergency call to a TRS Relay Center, because an emergency call to TRS must be processed by at least two entities (the TRS Relay Center and the PSAP). Thus, Verizon’s directories inform TRS customers to dial 911 directly in the case of an emergency. *See Verizon Comments*, at 3.

TRS relay centers are not primary emergency centers, and indeed, handle very few emergency calls. *See Sprint Comments*, at 2 n.1 (estimating that less than one-twentieth of one percent of the calls it handled in 2001 were “emergency-type calls”). A caller who dials the number for the TRS Relay Center (711) during an emergency is more analogous to a voice call to “0” in an emergency. While in either case the TRS Communications Assistant or voice call operator should be able to quickly transfer the caller to an appropriate PSAP, neither is an emergency service call center, and should not be the first one called in an emergency.

Moreover, differences between the 911 and TRS systems would make it prohibitively difficult and costly to install and maintain a database that attempted to combine them. As an

² As Verizon stated in its initial comments, the ADA requires all 911 PSAPs to be able to receive and process calls from hearing-impaired callers. *See Verizon Comments*, at 3. *See also* 28 C.F.R. § 35.162 (“Telephone emergency services, including 911 services, shall provide direct access to individuals who use TDD’s and computer modems”).

initial matter, the 911 databases are not maintained in a format that is currently usable by TRS centers. Currently in the Verizon network, when a caller dials 911, the end office sends the call to a trunk group with a selective router that automatically routes the call to a particular PSAP. The routing information is not in a “database” that can be read or used by a TRS provider; instead, it is in a format designed to interact with the switching routers. Thus, in order to convert the 911 system to a format that could be used by TRS Relay Centers, Verizon would have to initially develop and maintain readable output files for each 911 database, and presumably update the files on a daily basis. And in addition to formatting, there are other adjustments that would have to be made to make the information usable in a larger system.³ Because Verizon does not currently have such output systems in place, creating and maintaining a TRS-ready emergency database would require the addition of new resources, including numerous additional hours of employee work.

Moreover, in Verizon’s networks, 911 routing is set up at each selective router; therefore, there is not one nationwide “standard” or central 911 database, but potentially hundreds. There are easily more than 100 selective routers – and thus 100 separate 911 selective routing databases – in Verizon’s territory alone. Thus, Verizon would have to set up and maintain more than 100 of these databases, or somehow synthesize them all into one or more larger databases, for TRS

³ One problem is that in the 911 system, the appropriate PSAP is identified based on the Emergency Service Number (“ESN”) assigned to the caller’s address, within a particular Emergency Service Zone (“ESZ”). However, there are only a limited number of ESNs available, and the same ESN may be used in different geographic areas to denote different PSAPs. Thus, for example, a router may only identify a PSAP by the designation “ESN 150,” but the same ESN number may be used for one PSAP in Pennsylvania and a different PSAP in Virginia. While this is not a problem for a 911 selective router that only operates in one area, it becomes a problem if several different databases are combined.

use.⁴ Likewise, a regional Relay Center that centralizes 711 service over several states presumably would have to pay for several different databases, likely in different formats from different ILECs, and synthesize them into one coherent emergency database, which again would have to be implemented and presumably updated on a daily basis.

It is difficult to estimate the total price tag that would be required to synthesize the various 911 systems across the country with the systems used by TRS providers, but Sprint probably was correct in noting that “the cost of developing such systems is likely to run into the millions.” Sprint Comments, at 3-4. These increased costs would likely be borne by the TRS fund, which would put a significant drain on its resources.⁵ Because hearing impaired customers already can (and do) receive the functional equivalent of voice 911 callers by dialing 911 directly, and there is no evidence that the current system for handling TRS emergency calls is in any way inadequate, the Commission should not require TRS providers and local exchange carriers to implement and maintain costly new systems that would be redundant to the 911 network.

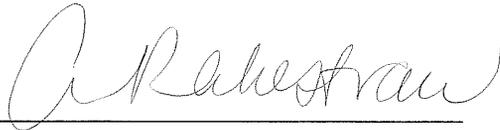
⁴ Presumably, because different TRS providers serve different portions of Verizon’s territory, they would not want to have to purchase a database that covers all of Verizon’s 911 selective routers, but only the portions corresponding to the territory in which that provider offers service.

⁵ *See generally* 47 U.S.C. § 225(d)(3)(B)(Commission “regulations shall generally provide that costs caused by interstate telecommunications relay services shall be recovered from all subscribers for every interstate service and costs caused by intrastate telecommunications shall be recovered from the intrastate jurisdiction”).

Conclusion

The Commission should change rule 64.604(a)(4)'s reference from "the nearest" to "*an* appropriate" PSAP, but not the "*most* appropriate" one. It should reject suggestions to require TRS providers to use the same databases as used for routing 911 calls, as such a requirement would be unnecessary and extraordinarily burdensome to implement and maintain.

Respectfully submitted,



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September 13, 2002

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