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6 January 2003

Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Subject: Comment with regard to:

Reply comments of Verizon regarding State of Hawaii's
TRS Certification, 12/31/02

Hawaii State Certification Renewal Application
Telecommunications Relay Services (TRS)
47 C.F.R. § 64.604 & 47 C.F.R. § 64.605
May 1, 2002 FCC Public Notice (DA 02-1006)

Response is needed to Verizon's reply comment filed on 12/31/02.

Verizon's recent reply in 98-67 to the Hawaii's Speech-to-Speech (STS) consumer community adds no data supportive of Hawaii's application for certification renewal, and attempts to devalue the genuine testimony regarding service problems in Hawaii by characterizing the comments as mere "suggestions." Verizon's reply appears to me, and I hope will be understood by the FCC, to be a series of spurious excuses for not offering a functionally equivalent STS service in the State of Hawaii.

1) Verizon would never assign operators with deep southern dialects to take calls from able-bodied Hawaii citizens simply because they would not understand each other and hence, Verizon would lose money. Yet they inflict this problem on Hawaii's STS users. Such action does not provide functional equivalence, nor does it appear to meet minimum standards.

2) Verizon contends that its information in Hawaii directories and in their TRS User & Listings Guide is "available". Without an entry in the table of contents, it is only as available as is a needle in a haystack. Plus, as other filed comments have emphasized, the target population, since they have not been able to use the telephone, would not likely peruse a phone book in the first place.

3) Verizon asserts it is unaware of any significant number of complaints from callers in other jurisdictions (northern states, Virgin Islands) about failure to understand

the dialect of AT&T's Virginia-based communications assistants. That is not an issue here. The issue is the difficulty that Hawaii users encounter understanding this dialect, and the problem the CAs have understanding common terms, expressions and place names as used by Hawaii telephone subscribers. Verizon must be aware that northern states do not have place names such as Kalanianaole Highway, and has not responded meaningfully to this issue.

Nor has the Commission required that each state have a separate set of operators, an issue raised by Verizon, not by the Commission. What is required is only that the states operate their services in conformance to the regulations.

4) There was no analysis of connect time provided in the Hawaii PUC application for recertification, nor has Hawaii PUC provided any reply to the comments. Accordingly, the users' assertions that there are significant connect time delays is perfectly credible. On checking again, I learned that some users have experienced up to 4 minutes connection time to reach an STS CA through Hawaii's 711 number. No able-bodied person has a comparable wait.

5) Verizon stated that callers can avoid the delay by calling the toll-free STS number, but this is a spurious claim. Verizon does not advertise this AT&T number to its STS. That number would be even *harder* to find than a needle in a haystack.

6) Finally, the slide attached at the end of the Verizon reply comment is not part of the preceding newsletter; it appears to be a Verizon effort. I suspect it has not been disseminated much outside of Verizon. Hawaii voters overwhelmingly passed a constitutional amendment opposing same-sex marriage by a margin of 69% to 28 %, so a promotion which features two men linked by a heart-shaped telephone line would no doubt meet with strong adverse reaction if it got out.

While Verizon spends millions and millions of dollars to advertise its services to customers all over the country, it is unwilling to spend a comparable per capita sum to advertise its services to potential STS users in Hawaii. It also continues to collect relatively high surcharge fees from Hawaii residences and businesses while providing an essentially unpromoted and technically inadequate service that discourages rather than facilitates utilization.

In reviewing whether to grant approval of Hawaii's application, the FCC, which has left it to Verizon and the Hawaii PUC to do effective STS outreach and provide an acceptable and functionally equivalent service, should conclude that so far this has not been achieved, and again I urge that the application be denied.