

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

In the Matter of)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CC Docket No. 98-67
Interstate Telecommunications Relay Service (TRS) Fund Advisory Council Files Proposed Guidelines for the Recover of Costs Associated with Internet Protocol Relay Services)	

**COMMENTS
WORLDCOM, INC.**

On October 9, 2002, the Interstate Telecommunications Relay Service (“TRS”) Advisory Council submitted to the Commission recommended guidelines to govern the recovery of costs associated with Internet protocol relay (“IP Relay”) service.¹ WorldCom hereby responds to the Commission’s request for comments on the cost recovery guidelines developed by the Interstate TRS Advisory Council (“Advisory Council”).²

¹ Interstate TRS Advisory Council, Recommended Internet Protocol (IP) Cost Recovery Guidelines (“Recommended Guidelines”), CC Docket No. 98-67, October 9, 2002.

² Public Notice, Interstate Telecommunications Relay Service (TRS) Fund Advisory Council Files Proposed Guidelines for the Recovery of Costs Associated with Internet Protocol Relay Services, CC Docket No. 98-67, rel. December 13, 2002.

In their October 9, 2002 Report to the Commission, the Advisory Council made, *inter alia*, the following findings with regard to cost reimbursement for IP Relay Service:³

- IP Relay calls currently have the essentially same cost components as traditional TRS calls;
- There is no automatic method of determining the geographic location of the origin of an IP Relay call, either now, or in the foreseeable future;
- IP Relay providers may need to develop methods to block international-to-international IP Relay calls;
- Allocating IP Relay costs to intrastate jurisdictions by requiring IP Relay users to identify their originating location through a profile would deter the use of the service;
- Allocating IP Relay costs to intrastate jurisdictions through the use of a fixed allocator would be inaccurate and administratively burdensome.

On the basis of these findings, the Advisory Council recommended the Commission reimburse all IP-Relay calls from the Interstate TRS Fund at the same rate as traditional interstate relay minutes.⁴ WorldCom endorses this conclusion. WorldCom therefore requests the Commission continue to reimburse IP Relay calls from the Interstate TRS Fund, and at the same rate as traditional relay calls are reimbursed.

Respectfully Submitted

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³ Recommended Guidelines at 13.

⁴ *Id.*, at 14.

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 February 7, 2003

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