

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

In the Matter of)	
Telecommunications Relay Services for)	
Individuals with Hearing and Speech)	CC Docket No. 98-67
Disabilities, and the Americans with)	
Disabilities Act of 1990)	

**REPLY COMMENTS
WORLDCOM, INC.**

WorldCom, Inc., d/b/a/ MCI hereby responds to comments filed by AT&T in response to a Petition for Interim Waiver and Rulemaking filed by the National Exchange Carrier Association, Inc. (“NECA”).¹ In its petition NECA explained that under certain circumstances it may happen that a wireless call will have an originating automatic number identification (ANI) linked to a state that is different from the state from which the call was made, and that this difference could result in the relay operator incorrectly identifying the jurisdiction of the call. This in turn could result in a situation where an attempted relay call would appear as an intrastate call from a state in which the relay operator handling the call is not the certified relay operator for that state.² Under these circumstances, the relay operator handling the call would not be able to be reimbursed for the call and would not carry the call. In order to ensure that wireless calls

¹ Provision of Improved Telecommunications Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, (*NECA Petition*) CC Docket No. 98-67, July 22, 2002.

² NECA Petition at 5.

handled by relay centers would be reimbursed under all conditions, NECA proposed reimbursing wireless calls from the Interstate Telecommunications Relay Service (TRS) Fund for an interim, two year period.

AT&T complains that NECA's proposal would result in a discrepancy between the Commission's universal service safe harbor allocation of interstate wireless calls, which is set at 28.5 percent, and the interstate allocation of relay reimbursements for interstate wireless calls, which would be set at 100 percent.³ AT&T's solution would be to require all wireless carriers to modify their cell sites to route wireless 711 calls to a special "wireless" toll-free number of the relay operator of the state serving the originating ANI of the call. The relay operator would then be reimbursed from its State TRS fund if the call terminated in-state, and from the Interstate TRS Fund if the call terminated out-of-state.⁴

While MCI is not opposed to AT&T's proposal, per se, the proposal does not have or propose a clear date by which it would be reasonably become effective. AT&T does not make clear that all wireless carriers have agreed to make the necessary cell site modifications. AT&T points to discussions it has had with CTIA, but not all wireless carriers belong to CTIA, nor do CTIA's positions bind wireless carriers. Since all these questions do not yet have answers, and there is no date certain by which all wireless calls handled through relay would be reimbursable under AT&T's proposal, it makes sense to adopt NECA's interim proposal. Finally, MCI notes that while AT&T's proposal does devise a method for allowing relay operators to be reimbursed when an out-of-state roaming wireless caller dials 711, it doesn't produce jurisdictionally accurate results. Under AT&T's proposal, a call which terminates in the relay provider's state

³ AT&T Comments at 5.

⁴ *Id.*, at 8.

would be treated as intrastate, while it would in fact be an interstate call. And a call, which terminated in the state from which the call was made would be treated as interstate, it would actually be an intrastate call. MCI notes that this jurisdictional inaccuracy is small compared to the need for the Commission ensure that relay providers are reimbursed for legitimate TRS calls, so they may carry these calls in turn. So too is the jurisdictional innacuracy of NECA's proposal small compared to the need to ensure that relay providers are reimbursed for all wireless TRS calls. For these sareasons, MCI supports NECA's interim funding proposal.

Respectfully submitted,

Larry Fenster

Larry Fenster
1133 19th St., NW
Washington, DC 20036
202-736-6513

July 30, 2003

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 July 30, 2003

Larry Fenster

Larry Fenster

1133 19th St., NW
Washington, DC 20036
202-736-6513

Certificate of Service

I, Larry Fenster, do hereby certify that copies of the foregoing Comments of WorldCom Inc. were sent on this 30th day of July, 2003, via email to the following:

Richard Askoff
National Exchange Carrier Association
80 South Jefferson Rd
Whippany, NJ 07981

Peter Jacoby
AT&T Corp.
Room 3A251
Bedminster, NJ 07921

Priscilla Whitehead
Counsel for TDI
Swidler Berlin Shereff Friedman, LLP
3000 K St., NW
Washington, D.C. 20007

Michael Fingerhut
Sprint Corporation
409 9th St., NW, Suite 400
Washington, DC 20004

Qualex
qualexint@comcast.net

Erica Myers
Disability Rights Office
Consumer Governmental Affairs Bureau
Federal Communications Commission
ericamyers@fcc.gov

Larry Fenster
Larry Fenster