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September 22, 2003

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th H Street, SW, Portals
Washington, DC 20554

Re: CC Docket No. 98-67 Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities and CG Docket No. 03-123 Americans With Disabilities Act of 1990

Dear Ms. Dortch:

On September 17, 2003 Richard Ellis, Ann Rakestraw and Michael O'Connor of Verizon met with the following members of the FCC's Disabilities Rights Office: Tom Chandler, Cheryl King, Sean O'More and Pam Gregory.

In the meeting, Verizon discussed the technical aspects of implementing the Commission's June 17, 2003 clarification of the Second Report and Order regarding delivery of 911 calls placed through a Telecommunications relay Service.

A copy of the handout used in the discussion is attached. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Richard T. Ellis".

cc: Thomas Chandler
Cheryl King
Sean O'More
Pam Gregory



Verizon E911

**E911
Networks
&
TRS**

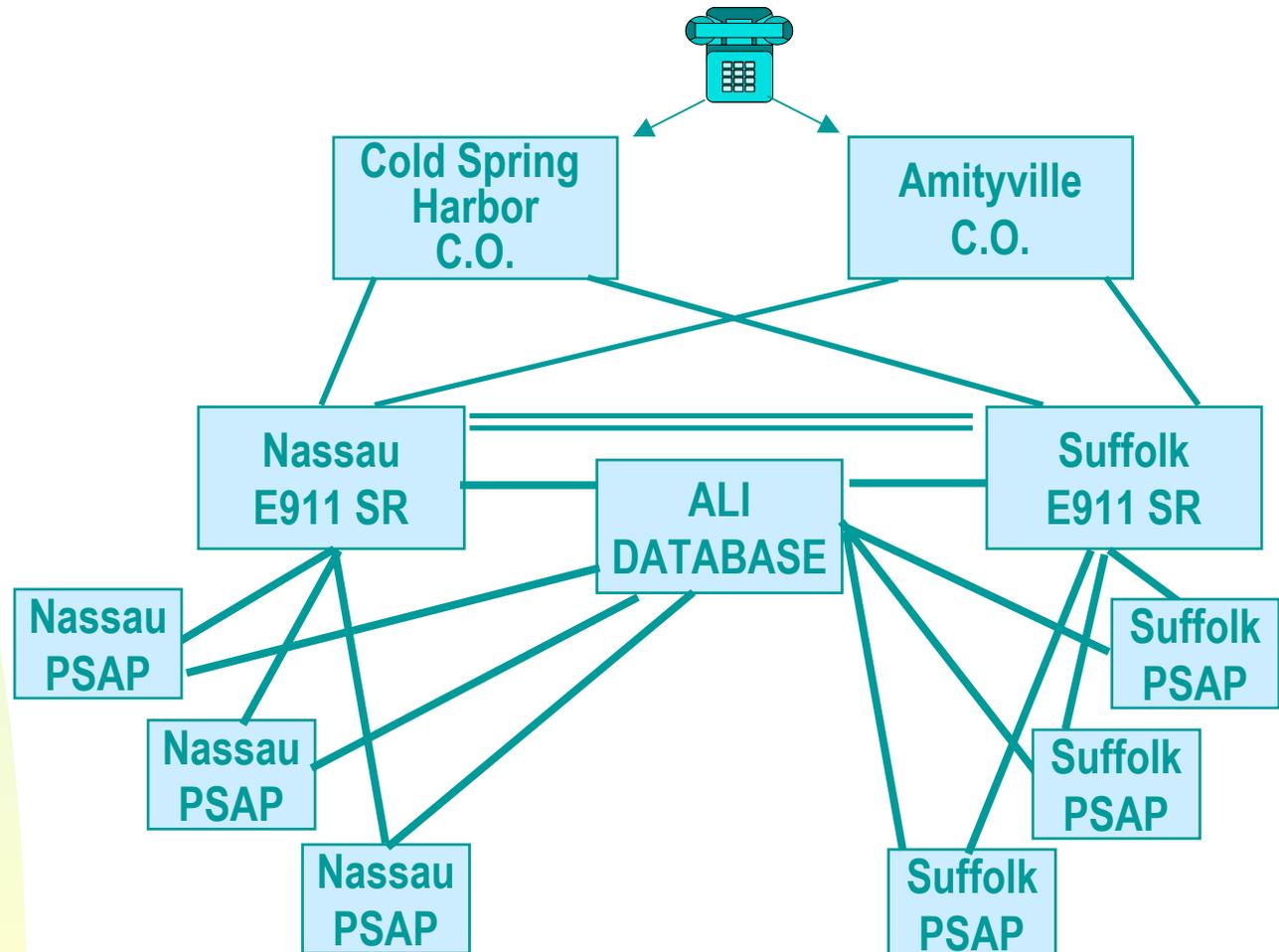


Agenda

- How E911 Works
 - ◆ ADA Functional Equivalence
- The Verizon NY E911 Network
- How TRS Works
- NY TRS & E911
- TRS / E911 Integration Obstacles



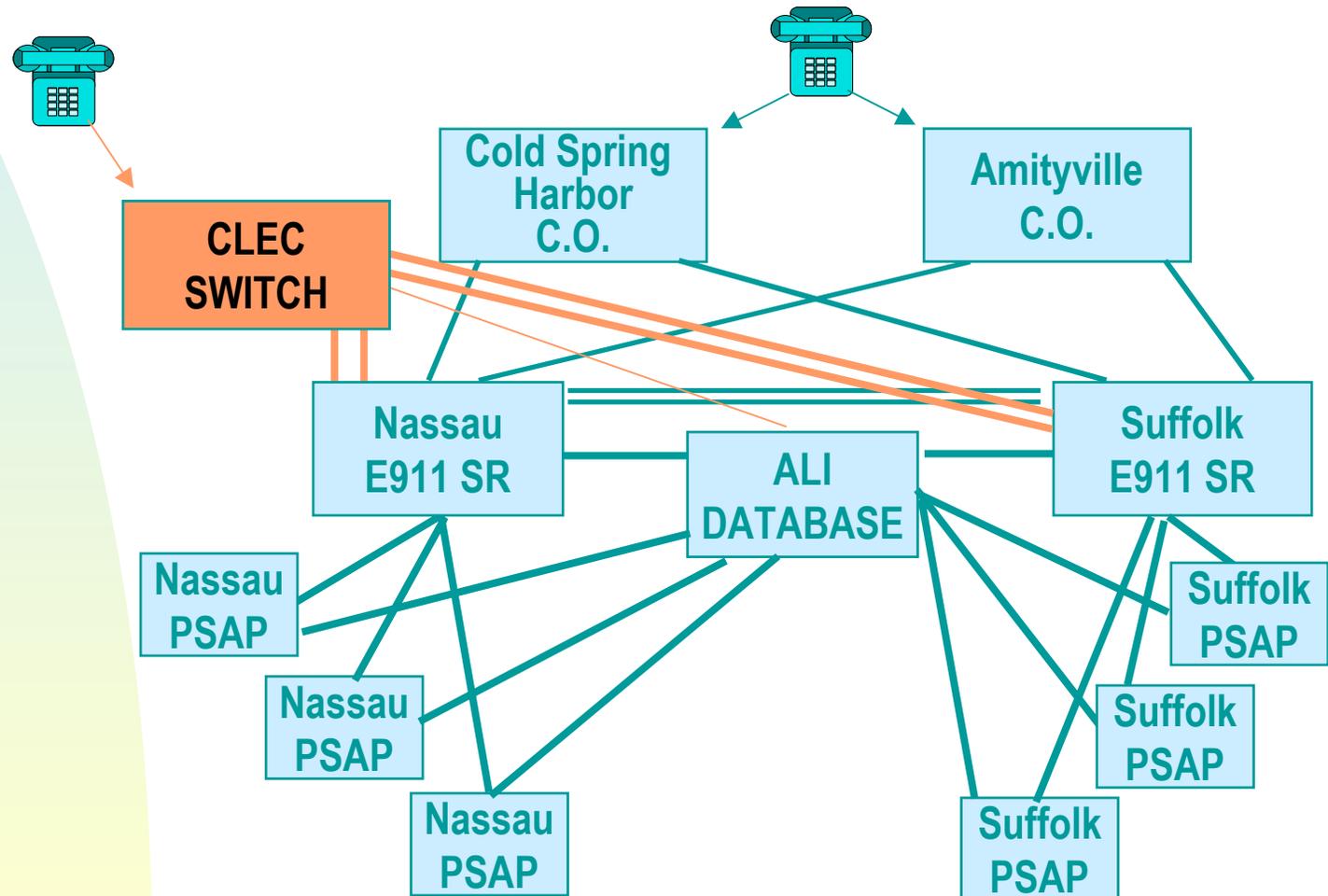
Wireline E911



- **How E911 Works**
- The Verizon NY E911 Network
- How TRS Works
- NY TRS & E911
- TRS / E911 Integration
- Obstacles



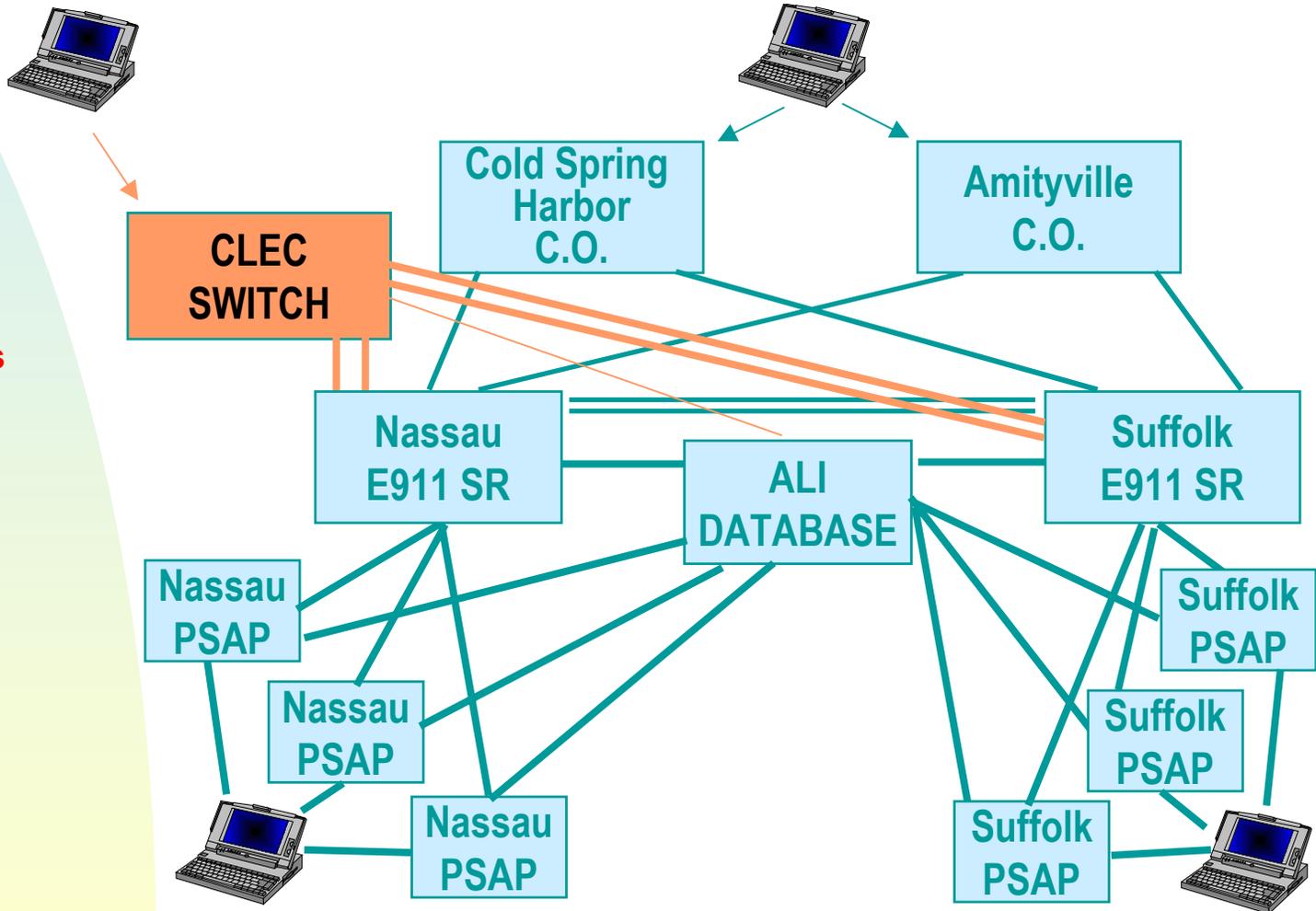
Wireline E911 CLEC Interconnection



- **How E911 Works**
- The Verizon NY E911 Network
- How TRS Works
- NY TRS & E911
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Wireline E911



- **How E911 Works**
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Functional equivalence

- **How E911 Works**
- The Verizon NY E911 Network
- How TRS Works
- NY TRS & E911
- TRS / E911 Integration
- Obstacles

- TRS users have available the functional equivalent of E911 service, whether they dial 911 or 711:
 - ◆ Dialing 911: 911 providers are required to have procedures in place to handle TTY calls. 28 CFR §35.162. When a PSAP receives a call that is silent or issues TTY tones, it goes into TTY mode. If it gets no response from the caller, it dispatches assistance.
 - ◆ Dialing 711: In the overwhelming majority of cases, current 711 routing procedures transfer the caller to a PSAP that is able to handle the call. PSAPs have the ability to transfer calls to nearby PSAPs.
- The FCC has recognized that functional equivalence can be met through alternatives that do not require technically infeasible or burdensome requirements. See 17 FCC Rcd 21233 (2002).

E911 Network

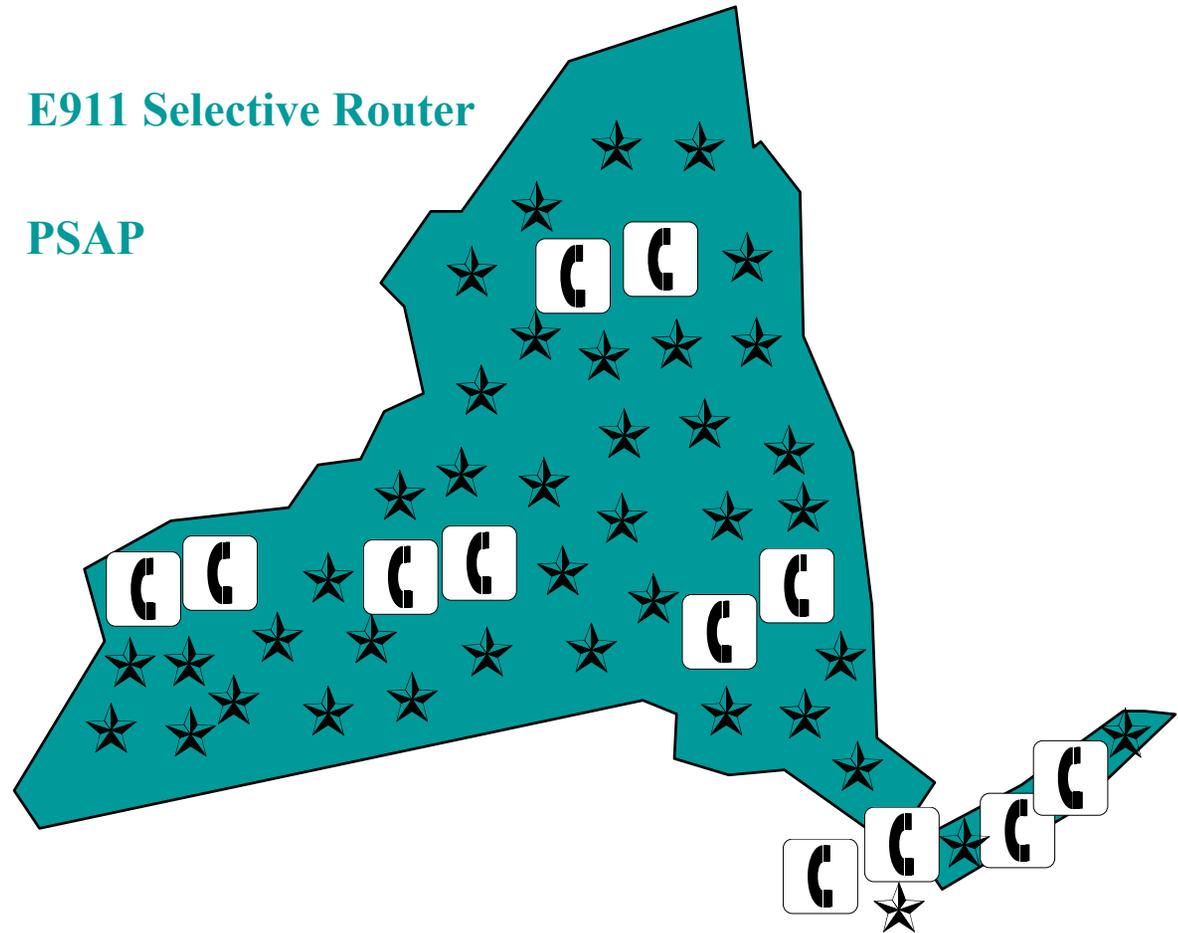
Verizon New York



E911 Selective Router



PSAP

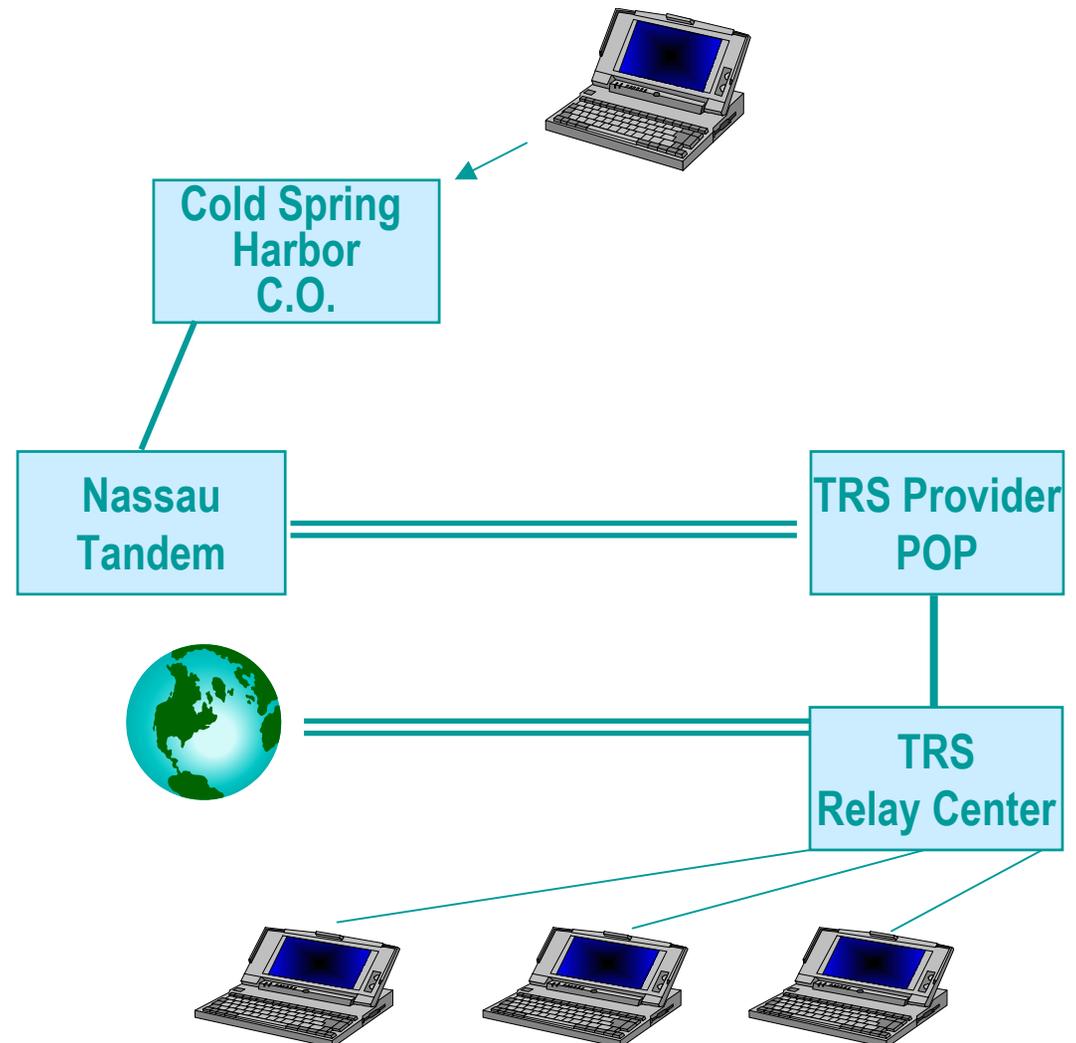


- How E911 Works
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Wireline TRS

- How E911 Works
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- **How TRS Works**
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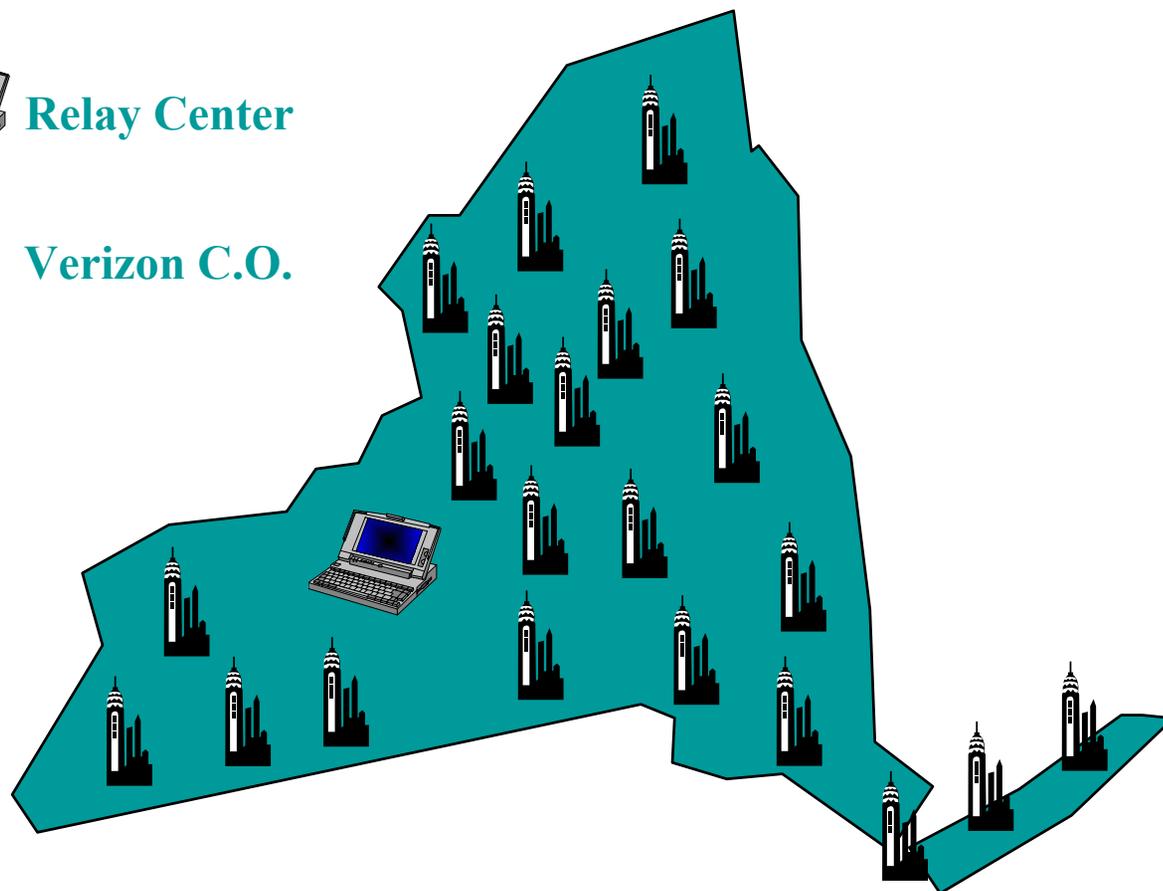
NY TRS E911



Relay Center



Verizon C.O.



- How E911 Works
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- How TRS Works
- **NY TRS & E911**
- TRS / E911 Integration
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E911 / TRS

Integration Obstacles

- How E911 Works
- The Verizon NY E911 Network
- How TRS Works
- NY TRS
- **TRS / E911 Integration Obstacles**

- E911 System Design for E911
- TRS System Design for 711 (TDD)
- E911 / TRS Integration
 - ◆ Databases and trunking to route calls to appropriate E911 tandem
 - ◆ TRS database development to map each customer telephone number to a PSAP telephone number
 - ◆ Cost / development
 - ◆ Inferior product
- Customer education is the Key