

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

In the Matter of)
)
Sprint Petition for Declaratory Ruling) CC Docket No. 98-67
Regarding TRS Access to)
900 Pay-Per-Call Services via 711)

REPLY COMMENTS OF
TELECOMMUNICATIONS FOR THE DEAF, INC.

Telecommunications for the Deaf, Inc. (“TDI”), through undersigned counsel and in accordance with the Commission’s Public Notice¹, hereby submits its reply comments on the Petition for Declaratory Ruling submitted by Sprint Corporation (“Sprint”) requesting that the Commission declare that Sprint’s provision of 900 pay-per-call services to end users who access Sprint’s relay centers by dialing 711 is in compliance with the FCC’s requirement that such services be offered by relay providers.

In the initial round of comments, TDI and WorldCom, Inc., d/b/a MCI (“MCI”) filed comments in support of Sprint’s petition. AT&T Corp. (“AT&T”) opposed Sprint’s petition to the extent that the declaratory ruling petition may be read to imply that access by TRS customers to 900 pay-per-call services via the 711 dialing code is generally technically infeasible or unavailable. In addition, AT&T states that there are ways to harmonize the ability to access a TRS center via the 711 code with a customer’s right to block 900 calling originated from his/her telephone. In support, AT&T states that its TRS centers already offer 900 blocking capability through its TRS Relay Choice Profile (“RCP”) database, where if a TRS customer’s profile

¹ Public Notice DA 03-2629, released August 11, 2003.

shows that the automatic number identification for a user's incoming call has 900 blocking activated, AT&T will deny an outbound call to a 900 pay-per-call service.

In response to AT&T's comments, TDI offers the following. As Sprint already pointed out in its petition, the FCC has found that the provision of pay-per-call services through TRS is technically feasible.² TDI does not dispute this prior FCC holding, nor does it read Sprint's petition for a reversal of that finding. Instead, what Sprint rightfully seeks is a ruling that its method of offering pay-per-call services through TRS not only complies with Commission requirements, but also is in harmony with its obligation to give subscribers the ability to block access to pay-per-call services from their telephones.

While TDI appreciates AT&T's method of harmonizing these two requirements through an RCP database, many of TDI's members do not have profiles with their preferred TRS providers, nor are many of its members aware of such a procedure to set one up. In addition, as MCI pointed out, most relay users do not know in advance that their pay-per-call block could be frustrated because of 711 access. Further, many consumers are not familiar with the TRS system, and would not know that if they wanted to block pay-per-call service from their telephones, not only would they need to contact their Local Exchange Carrier, but they also would have to contact a relay center. Therefore, TDI believes that Sprint's proposed procedure is a more failsafe one than AT&T's, and therefore can be counted on.

Accordingly, TDI supports the FCC's issuance of a declaratory ruling that Sprint's provision of 900 pay-per-call services to end users who access Sprint's relay centers by dialing

² See *Improved TRS Order*, 15 FCC Rcd 5140, 5181 (¶98) (2000).

711 fully satisfies the requirement that such services be offered by relay providers.

Respectfully submitted,

Claude L. Stout
Executive Director
Telecommunications for the Deaf, Inc.
8630 Fenton Street, Suite 604
Silver Spring, MD 20910


Paul O. Gagnier
Troy F. Tanner
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W. Suite 300
Washington, D.C. 20007
Tel: (202) 424-7500
Fax: (202) 295-8478

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