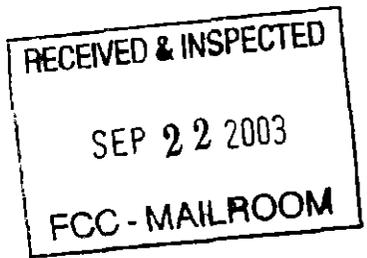


DOCKET FILE COPY ORIGINAL

LAW OFFICES
Messer, Caparello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet www.lawfla.com



September 19, 2003

BY OVERNIGHT DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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

Dear Ms. Dortch.

Enclosed for filing on behalf of Florida Telecommunications Relay, Inc. are an original and six copies of the Comments of Florida Telecommunications Relay, Inc. to the Second Report and Order, Order on Reconsideration and Notice of Proposed Rulemaking in the above referenced dockets. Also enclosed is one copy of Florida Telecommunications Relay, Inc.'s Outreach Materials

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me in the enclosed self address stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

A handwritten signature in black ink that reads "Norman H. Horton, Jr." in a cursive style.

Norman H. Horton, Jr

NHH/amb
Enclosures

Handwritten initials "NCS" in black ink.

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

RECEIVED & INSPECTED SEP 22 2003 FCC - MAILROOM
--

In the Matter of)
)
Telecommunication Relay Services and)
Speech-to-Speech Services for) CC Docket No 98-67
Individuals with Hearing and Speech)
Disabilities)
) CG Docket No. 03-123
)
Americans With Disabilities Act of 1990)

**COMMENTS OF FLORIDA TELECOMMUNICATIONS RELAY, INC.
TO THE SECOND REPORT AND ORDER, ORDER ON RECONSIDERATION AND
NOTICE OF PROPOSED RULEMAKING
Dated June 17, 2003.**

Florida Telecommunications Relay, Inc. (FTRI), is a corporation, not-for-profit, incorporated pursuant to the laws of the State of Florida and designated by the Florida Public Service Commission (FPSC) as the administrator of the telecommunications relay service and specialized telecommunications equipment distribution program in Florida. Chapter 427, Florida Statutes, the Telecommunications Access System Act (TASA), charges the FPSC with the duty among other things to “ establish, implement, promote and oversee . . .” a statewide access system and to designate an administrator and select a provider of the relay service. (§§ 427 704(1) (2) and (3)). Pursuant to this charge, the FPSC designated FTRI to be the administrator. The FPSC also contracts with a relay provider, currently Sprint, to provide relay services.

The duties and responsibilities of the administrator are described in § 427 705, F.S. Among the listed duties, FTRI is responsible to

[a]dminister advertising and outreach services as required by the Commission, either directly or through contract with third parties, or a combination thereof § 427 705 (1)(b).

Consistent with this charge, FTRI has conducted advertising and outreach efforts for both the equipment distribution and relay services.

During the first few years of TASA, although FTRI conducted outreach for the specialized telecommunications equipment distribution system and relay the emphasis of the outreach efforts by FTRI was on the equipment program because the first TRS provider, MCI, was required by their contract to outreach for relay. Over a period of time, representatives of organizations serving the deaf and hard of hearing community began to express their concern that there was a need for increased TRS-specific outreach. FTRI and the FPSC also recognized a need and as a result, in 2000, FTRI initiated an aggressive outreach program focused on the TRS with the objective being to increase consumer awareness of the relay service and broaden the base of those using the services. Shortly after the campaign was begun, the use of 711 to access TRS was required and the outreach program was modified to include consumer information about 711. The campaign was designed to be implemented over a three (3) year period with a sustainment program after the start-up period. The campaign utilized printed materials, presentations and other media products broadcast throughout the state. Additionally, efforts were directed at both businesses and individuals with programs tailored for each. Copies of the kit and samples of the brochures and media presentations developed and used by FTRI accompany these comments for review by the Commission.

In order to assess the effectiveness of the Florida outreach efforts, three (3) separate surveys were conducted by a professional organization. The results reflect increases in consumer awareness of various programs with significant increases in some areas. For example, the final survey revealed there was a 10% increase in the overall number of people who have heard of 711 but more significant is the 31% increase of those over 55 who have heard of 711. There was a 5% increase

of those who have heard of the relay service and the increases were across all subgroups of those polled 88% of the respondents felt the TRS program is a good idea

While the results reveal that there are still segments of consumers who are not familiar with the relay service, the increases in the responses reflect that outreach efforts do make a difference in consumer awareness and do serve a valuable purpose and for that reason, FTRI would offer the following specific comments with respect to the NPRM in support of outreach efforts.

Scope of public awareness (§ 129) Based on the Florida survey results, the public generally is not as aware of TRS as desired but the survey also supports a conclusion that outreach programs do improve awareness of TRS. Although FTRI has no data to reflect how often hang-ups occur but through meetings with user groups and individual consumers, this does appear to be happening, especially with calls to businesses. Some businesses are unfamiliar with relay calls and according to users, the method by which relay calls are announced to the recipient may add to the confusion. FTRI is trying to reduce this situation through a business partner program to recruit businesses to become relay friendly. When a business signs up as a partner, FTRI provides the business with a kit that contains printed and video materials that can be used to educate employees on the relay service. To date over 1,300 businesses representing over 248,000 employees have received the training material.

While the business partner program should help reduce the problem with business hang ups, to be effective, the relay provider should also provide information and training to their employees and users. Many hang-ups occur because the business believes the call is a marketing call and the initial contact with the relay provider communications assistant ("CA") or operator provides the foundation for the call. Time spent educating relay employees on the problem with hang-ups should significantly reduce this problem.

What kinds of additional outreach requirements should be required of TRS providers; what types of materials are most effective, and should the mandatory requirements be expanded? (§ 130.)

FTRI has experienced success with its outreach programs and current plans are to continue with these efforts. Florida has found media and face-to-face presentations to be the most effective. In fact responses to the professional survey conducted for FTRI identified TV placements and direct mail to be the best way to inform consumers of the program. In earlier, less scientific polls, with respect to the equipment distribution program, consumers identified ads and local exchange companies as the way they learned of the program. In its role as administrator, FTRI has found that the most effective program uses combinations of personal, printed, and broadcast contacts as well as local community based organizations. Relay providers and carriers are critical to outreach efforts as well and without any doubt, providers should offer – require – training for their employees as well as provide information to consumers. Employees of TRS providers have direct contact with consumers of relay services and directly affect the consumer's relay experience. FTRI would endorse and encourage training of TRS provider employees, but leave to the individual states how that requirement is implemented.

Who should reimburse TRS providers for additional outreach requirements? (§§ 131 and 132)

Florida funds the relay service through a surcharge on local telecommunications company subscribers collected by local companies (ILEC and CLEC) and remitted to FTRI and the outreach program administered by FTRI is funded with this surcharge. The relay provider in Florida is selected by the FPSC and contracts with the FPSC to provide the service and is reimbursed for the services it provides from this surcharge. To the extent the FPSC requires the provider to add or expand outreach efforts, other than internal training, any reimbursement should be an issue between

the FPSC and the provider. To the extent that the FCC imposes additional requirements on providers then the FCC should provide compensation for complying with these requirements. FTRI does agree that any carrier or provider seeking any type of reimbursement for providing relay service should be required to provide some outreach

How should a coordinated outreach campaign be funded? (§ 133)

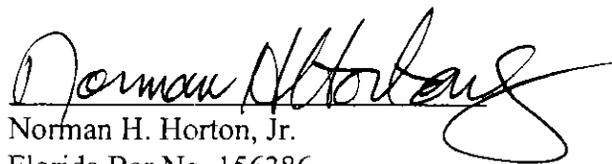
FTRI neither supports nor opposes a coordinated campaign at this time, but if one is required then funds should be provided for any such effort. In the case of FTRI, it is neither a carrier nor a provider, but does have the responsibility under Florida law to conduct outreach and should be eligible for funding if a coordinated effort is required.

Conclusion

Based on the Florida survey results, FTRI believes that outreach efforts do make a difference in consumer awareness of relay services. To be successful, outreach should encompass a variety of media but should also involve community groups and organizations. The relay providers are also an important element of successful outreach and should be involved not only with consumer oriented outreach but internal training and outreach as well. Providers should be expected to conduct outreach but the specific types and scope should be dependent upon the requirements of the state. Should the FCC impose outreach requirements on providers or carriers there should be a corresponding payment mechanism other than requiring states to pay for the additional activities.

Respectfully submitted,

James F Forstall
Executive Director
Florida Telecommunications Relay, Inc
1820 E. Park Avenue
Tallahassee, FL 32301


Norman H. Horton, Jr.
Florida Bar No. 156386
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876

DOCKET NO. 01-123

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o This document is confidential (**NOT FOR PUBLIC INSPECTION**)

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

- o Microfilm, microform, certain photographs or videotape.

- Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

1. One brochure of approximately 200 pages
2. Six pamphlets
3. Five Video Cassettes

DOCUMENT AVAILABLE
IN THE LEAD
DOCKET/RULEMAKING

SEE DOCKET NO. *98-67* FOR THE DOCUMENT.