

**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
)	
Americans With Disabilities Act of 1990)	CG Docket No. 03-123

COMMENTS OF VERIZON¹ ON PETITION FOR RECONSIDERATION OF AT&T

The Commission should reconsider the portion of the Second Report and Order that requires that emergency calls to a TRS provider be sent to the *same* PSAP that would have been reached if the caller had dialed 911, and requires that the TRS emergency PSAP database be updated on the same schedule as 911 “routing databases.” *See* Second Report and Order, 18 FCC Rcd 12379, ¶¶ 41, 42 (2003). In this regard, AT&T’s petition for reconsideration is consistent with Verizon’s reconsideration petition. *See* Verizon Petition for Reconsideration, at 1-2 (filed Sept. 24, 2003) (“Verizon Petition”). The Commission should not, however, adopt AT&T’s alternative proposal to require LECs, “as they update their own PSAP databases to concurrently make the same information available to TRS providers.” AT&T Petition, at 5. What AT&T seeks misconstrues the nature of the LECs’ PSAP routing systems, which do not rely on “databases” that can be made readily available for third party updates.

AT&T states that it already has access to “a national PSAP database maintained by a third party vendor” that it uses to handle TRS emergency calls. AT&T Petition, at 4. It describes this database as “a ‘snapshot’ of state PSAPs [that] is updated by the vendor at

¹ The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc., and are listed in Attachment A.

intervals on a state-by-state basis using information supplied by state agencies.” *Id.* AT&T correctly notes that there would be significant compliance burdens if TRS providers were required to ensure that the databases they relied upon for transmitting emergency TRS calls were updated on the same timetable as LEC’s 911 databases. *Id.*; *see also* Verizon Petition, at 5-8. Moreover, as Verizon explained in its petition for reconsideration, such a requirement is not necessary for functional equivalence, and there is no need for such a regulation because the system for handling TRS emergency calls is working well. Verizon Petition, at 2-5. Thus, the Commission should grant that portion of AT&T’s and Verizon’s petitions that asks it to reconsider its decision to require that emergency calls to a TRS provider be sent to the *same* PSAP that would have been reached if the caller had dialed 911, or updated at the same time as LECs’ 911 “routing databases.”

However, the Commission should *not* adopt AT&T’s alternative solution, which proposes that *if* the Commission does require that TRS PSAP routing databases be updated at the same time as LEC “911 databases,” it should, on reconsideration, “exercise its authority over the LECs that serve wireline 911 callers as they update their own PSAP databases to concurrently make the same information available to TRS providers.” AT&T Petition, at 5. AT&T’s request for access to “PSAP databases” misunderstands the complicated nature of the 911 routing system. For most 911 systems, when a caller dials 911, the switch serving the customer routes the call over a dedicated trunk group to a 911 selective router, which is a piece of network equipment that functions like a switch and routes calls to an appropriate PSAP. The information about which PSAP will receive that call is accessed via the 911 selective router. The 911 routing information is not in a “database” that can be read or used by a TRS provider; instead, it is in a format designed to interact with the 911 routers. In addition, in Verizon’s territory, the 911 selective

routers generally do not interact with other selective routers; thus, information about PSAPs served by one selective router generally is not available to any other selective routers. Verizon Petition, at 6. Because 911 routing is set up at each selective router, this routing information is not in one nationwide standard or central location, but potentially hundreds. *Id.*

As AT&T has recognized in prior comments, attempting to create an automated 911 database for TRS providers would be “cumbersome” and would require “substantial administration and maintenance” to make available on a centralized basis, and “even if all technical barriers to this approach were overcome, the connection of the originating party to the proper PSAP would still be slower than, and would not be functionally equivalent to, a traditional 911 call.” AT&T Comments, CC Docket No. 98-67, at 4 (filed Aug. 29, 2002). This observation is true whether the database would be one specifically created for the TRS system, or stitched together from a patchwork of different LEC 911 routing systems.

It would be very burdensome and extremely expensive to create a system to make the LEC 911 routing data available in a format that could be used by TRS providers. Verizon Petition, at 5-8. Indeed, it likely would take several years, and potentially cost hundreds of millions of dollars, to fund the creation, purchase, and coordination of databases containing information from every selective router for every local exchange carrier in their territory. *Id.* If LECs were required to provide such information to TRS providers, they would, of course, need to pass the considerable costs of implementing the necessary systems to the TRS providers.

The better course is to instruct callers to dial 911 directly in the event of an emergency. TTY users *already* can obtain the functionally equivalent service of 911 telephone callers because, as the Commission recognized, 911 centers must be equipped to handle calls from persons who use TTY. Second Report and Order, ¶ 37. Obviously, when TTY users dial 911

directly, their calls will automatically be routed to the same PSAP as a telephone user's call. Thus, when TTY callers dial 911, they will be assured that they would reach the same PSAP as telephone callers, and will reach an emergency 911 operator who is required to be able to handle TTY calls.

Respectfully submitted,



Ann H. Rakestraw

Michael E. Glover
Edward Shakin
Of Counsel

1515 North Courthouse Road
Suite 500
Arlington, VA 22201
(703) 351-3174

Attorney for the
Verizon telephone companies

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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.