

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 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
)	CG Docket No. 03-123
AT&T Petition for Reconsideration and Limited Waiver)	
)	
Verizon Petition for Reconsideration)	

**REPLY COMMENTS OF
THE FRONTIER AND CITIZENS TELEPHONE COMPANIES**

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October 30, 2003

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The Frontier and Citizens Telephone Companies (“Frontier”)¹ fully support the Reply Comments of the New York State Telecommunications Association (“NYSTA”), filed in the current round of reply comments in this proceeding. Like NYSTA, Frontier supports Verizon’s Petition for Reconsideration. In summary:

(1) A Telephone Relay Service (TRS) emergency call is like an operator-handled emergency call when a non-hearing impaired customer dials only 0 (also referred to as “0-“). The calling party has already reached a live person and is in actual communication. In the event of any problems with routing the call to the proper emergency assistance agency, there is a live person who can resolve any problem. It is

¹ The Frontier and Citizens Telephone Companies are Incumbent Local Exchange Carriers (ILECs) under the common ownership of Citizens Communications Company. They provide telecommunications services to approximately 2.5 million access lines in 24 states.

therefore neither necessary nor appropriate to require every TRS to duplicate the routing information within every 911 network within the geographic area served by the TRS, which could be an entire state or more. Each TRS already routes emergency calls to “an” appropriate emergency-handling agency, which is the functional equivalent of 0-service.

(2) There is no technologically feasible way to provide the routing information contained within a myriad of 911 routing systems to the TRS or to keep that information up to date in real time. There is no need or reason for the 911 routing system in one area to be compatible with the 911 routing system in a different area. Each system is designed to route emergency calls only from numbers within the ILEC, CLEC or CMRS switches that are connected to it. These systems are not compatible with each other and are not designed in such a way that their routing tables can be duplicated or exported to another system. It is therefore not economically reasonable to require the TRS to route an emergency call to “the” appropriate PSAP.

(3) Hearing-impaired customers should not be using the TRS for emergency calls in the first place. Any call transfer involves loss of time and potential technical difficulties, no matter how well designed the systems may be. Establishing exceedingly complex and expensive routing functions at the TRS would only provide a false sense of security and would encourage hearing-impaired users not to dial 911. For example, only the 911 PSAP, not the TRS, receives Automatic Location Information. If the call is terminated prematurely, the TRS will certainly not have location information and may not have a callback number. These issues are solved if the caller dials 911 where there is an E-911 system.

Frontier therefore urges the Commission to grant Verizon's petition.

Respectfully submitted,

**FRONTIER AND CITIZENS
TELEPHONE COMPANIES**

A handwritten signature in black ink, appearing to read "Gregg C. Sayre". The signature is written in a cursive style with a large initial "G".

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