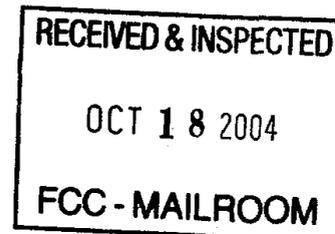


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October 15, 2004

BY OVERNIGHT DELIVERY

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

Re: CC Docket No. 90-571, CC Docket No. 98-67, and CG Docket No. 03-123 -
Telecommunications Relay Service and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities

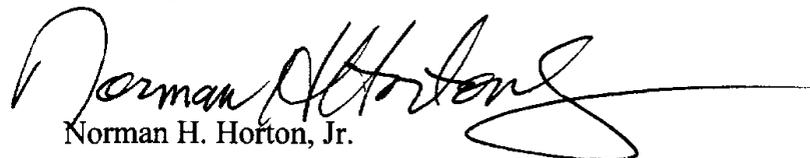
Dear Ms. Dortch:

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 Report and Order, Order on Reconsideration and Further Notice of Proposed Rulemaking in the above referenced dockets.

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,

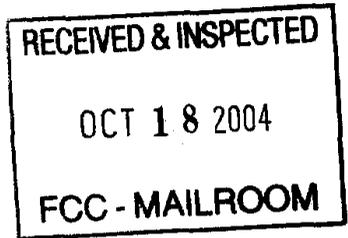

Norman H. Horton, Jr.

NHH/amb
Enclosures

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NHT/ABODE

atb

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



In the Matter of)	
)	CC Docket No. 90-571
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
)	

**COMMENTS OF FLORIDA TELECOMMUNICATIONS RELAY, INC.
TO THE REPORT AND ORDER, ORDER ON RECONSIDERATION AND
FURTHER NOTICE OF PROPOSED RULEMAKING**

Florida Telecommunications Relay, Inc. ("FTRI") as the designated Administrator for the relay system in Florida, submits these comments in response to the FCC's Report and Order, Order on Reconsideration and Further Notice of Proposed Rulemaking in CC Docket No. 03-123 released on June 30, 2004, and published in the Federal Register, Sept. 1, 2004.

1. FTRI has been designated by the Florida Public Service Commission ("FPSC") to be the Administrator of the Telecommunications Relay Service System in Florida. The applicable statutory requirements are contained in Part II, Chapter 427, Florida Statutes. Provisions relative to the Administrator are contained in Section 427.705, Florida Statutes.

2. The relay system is funded through a monthly surcharge on all local exchange company subscribers on an individual access line basis. (§427.704(4)(a)). The surcharge is determined by the FPSC upon recommendation by FTRI, but is capped at a maximum of 25 cents per line per month. (§427.704(4)(b)). FTRI is responsible for receiving moneys collected by the companies and for controlling and awarding money to all parties incurring costs

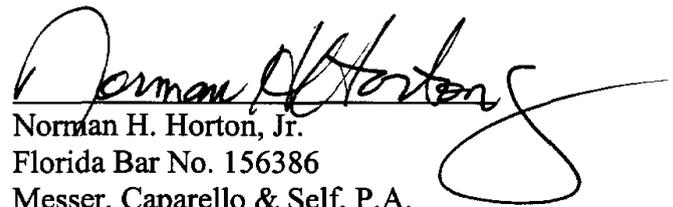
associated with the access system (§427.705(1)(d)(g)). Annually, FTRI prepares a budget for the access system and submits this budget, together with a recommendation as to the proper surcharge rate, to the FPSC. Changes to the surcharge generally occur at the same time the new budget is effective, July 1 of each year.

3. The current surcharge is \$0.15 per access line but the proposal of the FCC, if accepted, would cause that surcharge to increase dramatically. Based on VRS and IP minutes of use from the current provider and adjusted to reflect the percentage of total minutes represented by these numbers, the annual increase to be borne by Florida subscribers would be approximately \$5,200,000. This equates to an immediate monthly increase of \$.05 per assessed access line based on current subscribers. This increase would only pay for the minutes of use; it does not cover any additional expenses associated with the expanded offerings and there would be some.

4. Based on current actual numbers, Florida subscribers would see increased charges to support the relay program. With continued growth in usage, it is probable that the surcharge would reach the statutory cap within 2 years and at the time, absent a statutory change to increase the cap, there would need to be adjustments to the services offered, possibly delayed or eliminated services, in order to stay within available revenues.

Respectfully submitted,

Florida Telecommunications Relay, Inc.



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