BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services	)	CC Docket No. 98-67
And Speech-to-Speech Services for	)	
Individuals with Hearing and Speech)		CG Docket No. 03-123
Disabilities	)	

To: Secretary, FCC
For: Chief, Consumer & Governmental Affairs Bureau

REPLY COMMENTS OF HAMILTON RELAY, INC.

Hamilton Relay, Inc. ("Hamilton") hereby replies to the comments submitted in response to the Commission's November 30, 2004 *Public Notice* regarding the provision of three-way calling services to consumers of Telecommunications Relay Services ("TRS").[1]

On December 17, 2004, Hamilton joined Ultratec and Sprint in commenting that the Commission does not need to renew the three-way calling waiver in its entirety.[2] This is because CapTel and other TRS relay consumers have been able to and should continue to be able to participate in three-way and conference calls. Hamilton, Ultratec and Sprint also requested that the FCC clarify that the three-way calling obligation is met when parties to a relay call are able *to participate in*

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[1] *Federal Communications Commission Seeks Comment on Expiration of Waiver of Three-Way Calling Requirement for Providers of Telecommunications Relay Services (TRS)*, Public Notice, DA 04-3709 (rel. Nov. 30, 2004).
[2] Comments by Ultratec, Inc., Sprint Corporation and Hamilton Relay, Inc., at 2 (filed Dec. 17, 2004).

three way or conference calling, even if the TRS providers handling these calls are not able to set up these calls themselves.[3]

There is uniform support for this position in the comments filed by other parties in this proceeding. AT&T notes that the "most reasonable interpretation" of the three-way calling mandate is that the TRS center be capable of processing three-way TRS calls "established by the end user through [a] LEC-provided CCS feature or through bridging via the end user's own premises equipment."[4] SBC agrees that the TRS provider meets the minimum standard if it "facilitat[es] the relay of the voice and/or text messages (and the set-up in some instances) among the three participants in the call."[5] Hamilton concurs with this concept of TRS providers as facilitators, rather than providers, of three-way calls.

MCI states that its relay platforms are "capable of conferencing in other parties" and allow "parties to a TRS call between a TTY user and a voice caller to request establishment of a three-way call to another voice caller, or to another TTY."[6] Hamilton agrees that MCI's method is an acceptable method, but not the only acceptable method, of offering three-way calling. Hamilton urges the Commission to clarify that MCI's method, and the other methods noted by Hamilton and others in this proceeding, are all equally acceptable methods of meeting the requirement that TRS providers offer three-way calling capability.

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[3] *Id.*
[4] AT&T comments at 3.
[5] SBC Comments at 2 n.6.
[6] MCI Comments at 2.

Finally, Hamilton agrees with AT&T that an extension of the three-way calling waiver is necessary *only if* the Commission fails to make the clarification requested by Hamilton, Ultratec and Sprint.

Respectfully submitted,

HAMILTON RELAY, INC.

/s/ David A. O'Connor
David A. O'Connor
Holland & Knight LLP
2099 Pennsylvania Ave., NW
Suite 100
Washington, DC 20006
Tel: 202-828-1889
Fax: 202-419-2790
E-mail: doconnor@hklaw.com
Counsel for Hamilton Relay, Inc.

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