Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Service	)	
and Speech-to-Speech Services	)	Docket 98-67
for Individuals with Hearing and	)	Docket 03-123
Speech Disabilities		

To: The Commission

ANNUAL REPORT ON PROGRESS OF MEETING WAIVED REQUIREMENTS

Communication Access Center for the Deaf and Hard of Hearing ("CAC") provides its annual report as mandated by Commissions Second Report and Order on its progress toward meeting certain telecommunications relay service ("TRS") requirements which have been waived for video relay service ("VRS").

Emergency Call Handling

CAC continues to investigate alternative methods for providing emergency call handling. However, the long term solution that would be required is an industry issue not one limited to just CAC. CAC continues to participate in an industry provider group looking at both short term and long term methods of providing this service to our deaf customers. CAC recently submitted detailed comments to an NPRM on this subject.

Resolution of this issue would require a substantial investment in research and development as well as staff resources. At this time, CAC does not have the resources available for this type of investment to try to solve this problem on our own.

Speed of Answer

This waived requirement was changed on January 1, 2006 when the FCC instituted new mandatory VRS Average Speed of Answer requirements. Since that time, CAC has met all required ASA standards.

Equal Access to Interexchange carriers

CAC believes that equal access to different interexchange carriers is not required with VRS because VRS users do not pay for long distance calls. In addition, consumer choice is maintained because VRS users can choose between several VRS providers and can in fact choose a different VRS provider for every individual call.

When it becomes a requirement to bill users for long distance calls it would then be appropriate to offer users a choice of carriers. By that time, sufficient development may have taken place to accommodate that choice and the billing process.

Pay-per-call service (900 numbers)

Because of the current waiver on this type of call and the very limited requests we have received, CAC has made no attempt to resolve this issue.

This type of call is a user paid for call and therefore, the provision of this service should be required only when there is sufficient user demand which does not seem to exist today.

VCO-to-TTY, HCO-to-TTY & VCO-to-VCO, HCO-to-HCO

CAC has and is investing in new technology that would allow us to provide these types of services as a stand alone service offering. However, we have not had a large consumer demand for those services and are reluctant to invest time, effort and financial resources to deploy those services for what we view as limited potential return.

Call Release

Call release is intended to allow a deaf TTY user access to another deaf TTY user

through a CA when the called deaf user must be reached through a voice only connection

such as a switchboard. This does not appear to be a problem for VRS users who can

normally be contacted directly. We have had no requests for this type of service.

CAC is investigating and testing new technology that would facilitate this service

however, we are reluctant to implement the technology, at substantial cost, when we

perceive no need and there is no customer demand.

3 Way Conversation

CAC does have the capability to offer three way video conversations. However, the current preferred video phones do not have the capability to participate in three way conversations as they only support one remote video user at a time. When this capability becomes available in video phones, we would then be able to support that service.

Additionally we have had no requests for this service.

Speed Dialing

In the past, CAC offered a Client Profile/preference data base in which clients could store frequently called numbers. They only need ask the CA to call someone by their name. This Client Profile was offered to our PC based clients.

However, we have had no requests from our clients for this service beyond our current capabilities and the majority of our clients use video phones and therefore do not have access to PC based services.

We are currently investigating new technologies that could offer this type of service to video phone clients.

Operator assisted calls; billing for long distance calls

At this time VRS providers are not required to handle operator assisted calls and not required to bill the end user for long distance costs. (64.604 (a) (3). CAC is handling all long distance calls at no charge to the VRS user. Incoming calls come to CAC through the internet at no charge to the consumer. At this time CAC could bill users for calls by billing that caller's credit card. However, the use of a credit card is not acceptable to the Commission.

It is technically possible to develop a mechanism to bill to a user's telephone number. This assumes that a VRS user has subscribed to local telephone service. Unlike TRS, VRS use does not require local telephone service. It would require development and testing to be able to bill in this manner and that would require a source of development funding that does not exist for CAC today.

Ending Comments

The waiver of certain TRS rules at this time is necessary to foster the establishment and growth of strong VRS providers. These waivers help us to offer functionally equivalent access to the telecommunication system that has

been available to hearing individuals for many years. As the industry and VRS itself has developed, some of those waived rules have now been implemented for VRS. We believe this is as it should be in that the Commission recognizes that as the industry grows and expands providers are able to meet requirements that they could not initially meet. In order to continue to nurture and strengthen the VRS modality and encourage improvements in technology and delivery of services, adequate funds should be made available for research and development that will facilitate bringing us closer to meeting those TRS standards that are applicable to VRS. This can be accomplished by designated research related funds or by increasing the VRS per minute reimbursement rate.

Respectfully Submitted,

COMMUNICATION ACCESS CENTER FOR THE DEAF AND HARD OF HEARING

Respectfully Submitted by:

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