

Cecelia T. Roudiez
Senior Counsel



1515 North Courthouse Road
Arlington, Virginia 22201
Phone: (703) 351-3127
Fax: (703) 351-3664
cecelia.t.roudiez@verizon.com

April 20, 2006

CORRECTED VERSION

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: 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

Dear Ms. Dortch:

Verizon's 2006 Report on the Status of Waived IP Relay and Video Relay Services, filed on April 17, 2006, contained certain outdated information in Section II.F.

Enclosed is an updated and correct copy of the Report in its entirety.

If you have any questions, please contact me at the above-listed number.

Sincerely,

/s/ Cecelia Roudiez

Attachment

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Dear Ms. Dortch:

Please find attached Verizon's 2006 Report on the Status of Waived IP Relay and Video Relay Services. Verizon's IP Relay and VRS Services were formerly offered by MCI Global Relay Services.

If you have any questions, please contact me at the above-listed number.

Sincerely,

/s/ Cecelia Roudiez

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;
CG Docket No. 03-123

VERIZON'S ANNUAL REPORT
ON WAIVED REQUIREMENTS FOR
IP RELAY AND VIDEO RELAY SERVICES

Verizon submits this report pursuant to the Commission's requirement that providers of Internet Protocol Relay ("IP Relay") and Video Relay Service ("VRS") file annual reports every April 16 to inform the Commission of any developments and progress relating to the providers' ability or inability to meet mandatory minimum standards for telecommunications relay services ("TRS") that were previously waived by the Commission.¹

For IP Relay services, the Commission granted waivers of the requirements to provide : 1) automatic transfer of calls to emergency services providers, including location information; 2) voice services such as voice carry over service ("VCO"), speech-to-speech service ("STS"), and hearing carry over service ("HCO") and combinations of these waived services, such as VCO-TTY, HCO-TTY, VCO-VCO, and HCO-HCO; 3) access to pay-per-call providers, 4) call release, 5) three way calling, 6) speed dialing requirements and 7) carrier of choice.

For VRS services, the Commission similarly waived the requirements to provide: 1) automatic transfer of calls to emergency services providers, including location information; 2) voice services such as voice carry over service ("VCO"), and hearing carry over service ("HCO") and combinations of these waived services, such as VCO-TTY, HCO-TTY, VCO-VCO, and HCO-HCO; 3) access to pay-per-call providers, 4) call release, 5) equal access to interexchange carriers; 6) speed dialing, and 7) access to operator services and billing for long-distance service.

Verizon submits the following updated information relating to progress and developments affecting each of the aforementioned waived requirements.

I. IP Relay Services

- A. *Automatic Transfer of Emergency Calls to PSAPs* – This requirement relates to the capability to automatically transfer emergency callers to public safety answering points (PSAPs). The Commission initially waived this requirement because IP Relay providers do not have the originating telephone number (ANI) of the caller which is needed to identify the caller's geographic location for routing to the nearest appropriate PSAP. This situation remains unchanged and users of IP Relay service providers do not receive either

¹ Verizon's Relay Services were formerly known as MCI Relay Services, and past developments relating to these services were addressed in prior annual reports filed by MCI Global Relay Services. Verizon Relay Services are currently provided by MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon").

ANIs or Automatic Location Information (ALI) from callers and therefore, automatic routing to appropriate PSAPs cannot be accomplished. The Commission is currently addressing these specific concerns and Verizon has filed comments in the Commission's ongoing proceedings relating to TRS access to emergency services. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Access to Emergency Services*, Docket No. CG No. 03 -123); Comments of Verizon, filed February 22, 2006; Reply Comments of Verizon, filed March 8, 2006.

As reflected in those comments, Verizon is committed to exploring ways to assure effective priority handling of emergency calls received by its relay centers but does not consider user registration to be a workable, efficient or appropriate means to accomplish public safety goals. Today, Verizon continues to inform customers via its website that they should use their TTY and telephone to contact 911 which is best equipped to respond to emergencies. At the same time, if callers requests emergency service from our IP Relay operators, we will ask the callers for their city and state and route the call to a PSAP by using a national database of current PSAP numbers that Verizon maintains.

- B. *VCO, STS, and HCO and Other Voicebased Services* - The Commission waived the requirement to provide VCO, STS, HCO, and other voice-based services such as VCO-TTY, HCO-TTY, VCO-VCO, and HCO-HCO, finding that IP Relay can only be accessed as text service. While the technology for voice transmission over the internet via broadband connections continues to improve, most households still do not subscribe to broadband Internet access service. Moreover, while computer sound cards have improved, sound cards now installed in most computers are still insufficient to ensure a sufficiently clear communication. Similarly, while newer customer premise equipment with improved transmission capability and general quality is available in the market, the acquisition and deployment of such equipment remains outside the control of IP Relay providers. As a result, uneven and erratic voice quality still remains a barrier sufficient to warrant maintenance of the Commission's grant of waiver for these voice services.

As indicated in its last annual report, however, Verizon has been able to offer some of these above-mentioned services under certain conditions. If a user subscribes to conference calling and three-way calling service from the subscriber's local exchange carrier, Verizon can provide two-line VCO and two-line HCO. In the former case, the relay operator will type the voice user's communication and the caller may speak directly to the voice user. In the latter case, the relay operator will speak to the voice user so that the caller can thereby listen to the response.

- C. *Pay-Per-Call Services* - The Commission waived the requirement for IP Relay providers to offer access to pay-per-call services because it was not technically feasible to provide this service. A 900 number call typically terminates to a recorded announcement that is not answered by a live attendant, making the provision of alternate billing impossible. These prevailing circumstances have not changed and it remains technically infeasible to connect users to pay-per-call services in the absence of live pay-per-call billing operations. Additionally, this circumstance remains subject to the control of pay-per-call providers and outside the control of IP Relay providers.
- D. *Call Release* - Call release refers to the ability of a relay center to connect a calling and called party and then remove the center from any intermediating role in the transmission

path so that the parties can directly communicate using their customer premise equipment (“CPE”). Since its last report, Verizon has not discovered any technology or innovations that would make it possible for CPE utilizing incompatible protocols to directly communicate were the relay center to remove itself from performing an intermediating role.

- E. *Three-way Calling* - Three-way calling refers to the ability of a relay service customer to conduct a conference call involving three people. The Commission found that this requirement is met if a customer subscribes to a LEC provided three-way call service and the relay provider does not interfere with the ability of this service to function. Verizon’s IP Relay service does not interfere with the ability of a customer who subscribes to a LEC three-way calling service to use such service.
- F. *Speed Dialing* - Speed dialing offers the capability to store a list of telephone numbers manually with associated speed dialing codes as designated by the user in the TRS user’s consumer profile. The user may then request the relay operator to dial this code in order to speed dial the associated telephone number. Verizon continues to offer the IP Relay equivalent of speed dialing by enabling customers to establish a profile of speed dial numbers that the customer may access from Verizon’s Relay web site. With this access, the calling party may select the speed dial number of choice and the call is automatically dialed to the called party.
- G. *Carrier of Choice* - The Commission granted IP Relay providers an indefinite waiver of the equal access to interexchange carrier requirement so long as the IP relay service is provided without charge. Verizon does not charge customers who use of Verizon’s IP relay service and therefore continues to be in compliance with this requirement.

II. Video Relay Services

- A. *Speed of Answer (ASA)* - .This requirement relates to the period of time within which a provider must answer calls from VRS users. The Commission’s prior waivers affecting ASA standards expired on January 1, 2006 and Verizon is in compliance with currently applicable ASA requirements.
- B. *Automatic Transfer Of Emergency Calls To PSAPs* - The information pertaining to the transfer of emergency IP Relay calls set forth in Section I.A above is equally applicable to VRS emergency calls and is incorporated herein by reference.
- C. *Pay-Per-Call Services* - The Commission’s waiver of this requirement continues to be justified by the same circumstances that render access to pay-per-call services for IP Relay services technically infeasible as earlier described in Section I.C of this Report. Since VRS is an Internet-based service, as is IP Relay, it faces the same limitations for all services that require the automatic delivery of a caller’s originating ANI. A 900 number call terminates to a recorded announcement that is not answered by a live attendant, making the provision of alternate billing impossible and this circumstance is outside the control of VRS providers.
- D. *Call Release* - Call release involves the ability of a relay center to connect a calling and called party with the same type of customer premise equipment (“CPE”) and then remove

the center from playing any intermediating role while allowing the parties to directly communicate using their CPE. VRS users with compatible net-conferencing software are currently able to directly communicate. Otherwise, if a VRS user must first connect with a VRS center, as with IP Relay, Verizon is not aware of any technology or innovations that make it possible for VRS CPE utilizing incompatible protocols to directly communicate if the center were removed.

- E. *Three-way Calling* - Three-way calling enables a person to make a conference call involving three people. The Commission has recently found that this call service requirement is met if a customer subscribes to this LEC service and relay providers do not interfere with the ability of this service to function. Verizon's IP-VRS service does not interfere with the ability to use 3-way calling if users have subscribed to this LEC service.
- F. *Speed Dialing* - Speed dialing offers the capability to store a list of telephone numbers with associated speed dialing codes in the TRS user's consumer profile. The user may then request the relay operator to dial a code in order to speed dial the associated telephone number. While not offered presently, Verizon could with additional expense and investment, procure or develop the VRS equivalent of speed dialing using Verizon's Relay web site. By accessing this site, the calling party could select the previously stored speed dial number of choice and have the call automatically dialed to the called party.
- G. *Carrier of Choice* - The Commission granted VRS providers a waiver of the requirement for equal access to interexchange carriers because the deaf user to video interpreter portion of a VRS call is carried over the Internet and the VRS provider will therefore not be able to identify the consumer's chosen interexchange carrier. Additionally, as with IP Relay, the Commission does not require VRS providers to offer carrier of choice so long as the service is provided free of charge to the user. Verizon does not charge VRS users for VRS service.
- H. *Operator-assisted Calls* - VRS providers are currently not required to handle operator assisted calls so long as there is no charge for such operator assistance. Verizon does not charge VRS users to complete any calls that may otherwise be billed as toll calls, including operator assisted calls. Until technical solutions that allow for accurate identification of the geographic locations of IP users and addresses are developed, neither Verizon nor other IP-VRS providers will have the capability to identify and bill accurately for long distance toll calls.

If you have any questions, please contact me at the number listed below.

Respectfully Submitted

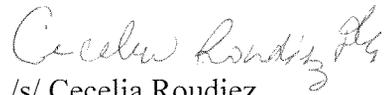
/s/ Cecelia Roudiez

cc: Thomas Chandler - Chief, Disability Rights Office

Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2006

A handwritten signature in cursive script, appearing to read "Cecelia Roudiez".

/s/ Cecelia Roudiez

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