

July 3, 2006

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VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Pam Gregory
Federal Communications Commission
Consumer & Governmental Affairs Bureau
445 12th Street, SW
Room 3-C417
Washington, DC 20554
Pam.Gregory@fcc.gov

RE: **HAMILTON RELAY, INC.**
Annual Consumer Complaint Log Summaries (June 1, 2005 - May 31, 2006)
CG DOCKET NO. 03-123
DA 06-1175

Dear Ms. Dortch and Ms. Gregory:

Hamilton Relay, Inc. ("Hamilton"), by its counsel and pursuant to Section 64.604(c)(1)(ii) of the Commission's rules, hereby respectfully submits its annual summary of consumer complaints for the period June 1, 2005 – May 31, 2006. The enclosed complaint logs cover Hamilton's provision of interstate traditional relay service, IP Relay and Video Relay Services ("VRS"). Hamilton is located at 1001 12th Street, Aurora, NE 68818.

Hamilton tracks all complaints and all other customer service activity. For traditional interstate TRS, Hamilton's complaint summary is associated with the following database categories:

Traditional Interstate TRS Database Categories

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Misdialed Number
- CA Typing Speed
- CA Typing
- Fraudulent/Harassment Call
- Confidentiality Breach
- CA Didn't Follow Policy/Procedure
- Caller ID Not Working Properly
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Speech to Speech Call Handling Problems
- Improper Use of Speed Dialing
- Improper Handling of Three Way Calling
- Replaced CA Improperly in Middle of Call
- Improper Use of Customer Data
- Spanish to Spanish Call Handling Problems
- Ringing/No Answer
- Connect Time (TTY-Voice)
- CA Hung Up on Caller
- Miscellaneous Service Complaints
- Poor Vocal Clarity/Enunciation
- Didn't Follow Voice Mail/Recording Procedure
- Didn't Follow Emergency Call Handling Procedure
- VCO Break-Down
- Carrier of Choice not Available/Other Equal Access
- Relay Not Available 24 Hours a Day
- Line Disconnected
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- HCO Break-Down
- Miscellaneous Technical Complaints
- 711 Problems
- STS Break-Down

For IP Relay, Hamilton's complaint summary is associated with the following database categories:

IP Relay Database Categories

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Did Not Keep User Informed
- CA Typing
- Poor Vocal Clarity/Enunciation
- CA Accuracy/Spelling/Verbatim
- CA Typing Speed
- CA Misdialed Number
- Miscellaneous Service Complaints
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Ringing/No Answer
- Caller ID Not Working Properly
- CA Gave Wrong Information
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Improperly Handled ASL or Related Culture Issues
- Didn't Follow Voice Mail/Recording Procedure
- Didn't Follow Policy/Procedure
- CA Hung Up on Caller
- Didn't Follow Emergency Call Handling Procedure
- Improper Use of Customer Data
- Miscellaneous Technical Complaints
- Busy Signal/Blockage
- Relay Not Available 24 Hours a Day
- Line Disconnected
- Connect Time (TTY/Voice)

In the Miscellaneous External and Fraudulent/Harassment Call categories, you will find several complaints that we believe to be associated with fraudulent activity over Internet Relay. In some cases, it is not clear that the calls which generated these complaints came through the relay centers that process Hamilton Internet Relay calls. However, Hamilton believes that it is important for the Commission to have this information. Hamilton continues to implement protocols specifically designed to prevent calls originating from an international IP address from accessing the relay, and to take other measures to counter Internet Relay fraud in a manner

consistent with the guidance provided by the Commission in the Public Notice dated June 18, 2004. See *FCC Reminds Public of Requirements Regarding Internet Relay Service and Issues Alert*, Public Notice, DA 04-1738 (rel. June 18, 2004). Hamilton also intends to file comments in connection with the Commission's recent *Further Notice of Proposed Rulemaking* concerning misuse of Internet Relay and VRS.

For VRS, Hamilton's complaint summary is associated with the following database categories:

VRS Database Categories

- Miscellaneous External Complaints
- 911 External Complaints
- LEC External Busy
- No Notice of How to Complain to FCC
- Interpreter Accuracy/Verbatim
- Replaced Interpreter Improperly in Middle of Call
- Confidentiality Breach
- Ringing/No Answer
- Miscellaneous Service Complaints
- Didn't Follow Emergency Call Handling Procedure
- Interpreter Gave Wrong Information
- Didn't Follow Voice Mail/Recording Procedure
- Interpreter Rude
- Interpreter Misdialed Number
- Interpreter Did Not Keep User Informed
- Caller ID Not Working Properly
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Customer Data
- Interpreter Hung Up on Caller
- Miscellaneous Technical Complaints
- VCO Break-Down
- Busy Signal/Blockage
- Connect Time (TTY/Voice)
- Line Disconnected
- Spanish to Spanish Call Handling Problems

Finally, Hamilton did not receive any complaints with respect to its provision of interstate STS or interstate Spanish relay services. With respect to captioned telephone relay ("CapTel"), Hamilton reports all CapTel complaints to the participating CapTel states (Wisconsin, Maine,

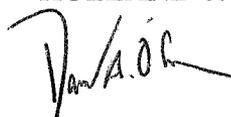
Nebraska, Kentucky, Montana, and Wyoming). The participating states include all interstate and intrastate CapTel complaints on their reports submitted to the Commission.

Hamilton processes any complaint which originates via e-mail, fax, telephone, regular mail, outreach events or at the workstation. Hamilton's policy is to provide a resolution to all complaints within 72 hours of receipt. All of the complaints discussed in the enclosed documents have been resolved.

Should you have any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "David A. O'Connor", written over the printed name.

David A. O'Connor
Counsel for Hamilton Relay, Inc.

Enclosure

cc (via e-mail): Pam.Gregory@fcc.gov