

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

REPLY COMMENTS OF VERIZON

Michael E. Glover
Of Counsel

Karen Zacharia
Sherry A. Ingram
VERIZON
1515 North Courthouse Road
Suite 500
Arlington, VA 22201-2909
(703) 351-3065

Scott Delacourt
Sean Day
WILEY REIN & FIELDING LLP
1776 K Street, N.W.
Washington, D.C. 20006
(202) 719-7459

Attorneys for Verizon

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The general consensus among commenters in this proceeding is that the Commission should establish a database to facilitate the assignment of ten-digit telephone numbers to VRS users.² This database should be managed, and telephone numbers should be assigned, by a neutral third-party database manager directly reimbursed from the TRS Fund. As Verizon noted in its opening Comments, several technical and administrative issues must be resolved before such a database can be established.³ These issues should be resolved by existing industry groups with support from the VRS community. Further, the Commission should, on this record, limit the database solution to VRS. The assignment of ten-digit telephone numbers to other Internet-based TRS users should await a separate rulemaking.

¹ The Verizon companies participating in this filing (“Verizon”) are the regulated wholly owned subsidiaries of Verizon Communications Inc.

² See e.g., Comments of Verizon at 1; Comments of Telecommunications For the Deaf and Hard of Hearing, Inc., *et al.*, at 7 (hereinafter “Comments of TDI”); Comments of Sprint Nextel Corporation at 2; Comments of AT&T Inc. at 2.

³ Comments of Verizon at 3-4.

I. THE COMMENTS MAKE CLEAR THAT A NUMBER OF ISSUES MUST BE RESOLVED PRIOR TO THE ESTABLISHMENT OF A VRS TELEPHONE NUMBER DATABASE.

The assignment to VRS users of ten-digit telephone numbers and the establishment of a database associating those numbers with dynamic IP addresses would enhance VRS functionality and advance the Commission's goals of interoperability and functional equivalency. The Commission must, however, address several technical, administrative, and funding issues prior to the assignment of such numbers and the development of a database. These issues include identifying the industry group responsible for resolving particular implementation issues, including the applicable timeline; tasking the database manager with telephone number assignment; and providing for direct reimbursement to the database manager for cost arising from development, implementation and maintenance of the database.

A. Existing Industry Groups Should Be Tasked With Resolving Database Implementation Issues Within Their Area of Expertise.

Because existing industry groups have the relevant expertise and already are considering many of the implementation issues raised by efforts to associate telephone numbers with dynamic IP addresses, the Commission should draw on these resources to inform its policymaking. The creation of a ten-digit VRS telephone number database will require the careful resolution of several numbering issues, database implementation concerns, and protocol/equipment matters. The responsibility for addressing these issues should be assigned by the Commission to existing industry groups with the relevant expertise. As an example, numbering administration and allocation as well as database feature and functionality requirements for mapping E.164 NANP numbers to IP addresses would be assigned to the North American Numbering Council ("NANC").

Careful Commission oversight of this process is necessary to insure a comprehensive and timely resolution of outstanding issues. The Commission should, therefore, clearly delineate the areas of responsibility for the industry groups. In addition, the Commission should provide each group tasked with resolving an issue a schedule for reporting back with proposals as well as any concerns.

B. The Neutral Third-Party Database Manager Should Be Responsible For Telephone Number Assignment.

In order to insure full cost recovery under existing TRS reimbursement rules, the Commission should task the database manager with telephone number assignment. TDI *et al.* urge the Commission to “mandate that VRS providers provide 10-digit geographic TNs to VRS users.”⁴ VRS providers are reimbursed from the TRS Fund according to a formula centered on the number of actual conversation minutes processed by the provider. This reimbursement formula would not permit direct reimbursement of VRS providers for the cost of purchasing telephone numbers to be associated with dynamic IP addresses. Indeed, if a VRS provider were to purchase telephone numbers for customers who do not ultimately use the service or only do so sporadically, there is no way to guarantee repayment. To avoid stranding the cost of telephone number purchases with providers, telephone numbers should be assigned directly by the database manager. The database manager should be reimbursed for costs attributable to this task from the TRS fund.

C. Expenses Incurred In Establishing A VRS Telephone Number Database Should Be Reimbursed From The TRS Fund.

Because access to a VRS telephone number database should be available to the entire VRS community – VRS users and service providers alike – the mechanism for recovering

⁴ Comments of TDI at 5.

database costs should not be a provider access fee. Universal access to the database would facilitate VRS to hearing calls and vice versa, as well as “peer to peer” calls without the need for VRS internetworking by permitting a caller to “look up” a VRS user. Sprint-Nextel’s proposal to establish a “dip fee” for access to the database presupposes, however, that only VRS providers will access to the database, and should, therefore, be rejected.⁵ Because the database will benefit the entire VRS community, the costs associated with its development, implementation and maintenance should be payable to the database manager through direct reimbursement out of the TRS Fund.

II. WHILE THE RECORD JUSTIFIES THE ASSIGNMENT OF VRS TELEPHONE NUMBERS, IT IS PREMATURE TO EXTEND THIS PRACTICE TO IP-RELAY.

Without further development of the record, it is premature for the Commission to consider the use of ten-digit phone numbers associated with dynamic IP addresses outside the VRS context. The Commission’s Further Notice seeks comments on the assignment of VRS telephone numbers through a database mechanism.⁶ The record in this proceeding supports the feasibility of this endeavor. However, the record contains very little information on the feasibility of assigning ten-digit telephone numbers to IP-relay users. Accordingly, it would be premature to extend this proceeding to include IP-relay users. The appropriate vehicle for considering assignment of telephone numbers associated with dynamic IP addresses to IP-relay users would be a separate rulemaking. The Commission could revisit the assignment of telephone numbers to IP-relay users in the future with the benefit of the lessons learned in the VRS context.

⁵ Comments of Sprint-Nextel at 3-4.

⁶ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling and Further Notice of Proposed Rulemaking, FCC 06-57, ¶¶ 45-50 (May 3, 2006).

CONCLUSION

For the foregoing reasons, the Commission should move forward with establishment of a database associating dynamic IP addresses with ten-digit telephone numbers assigned to VRS users. The technical issues associated with the assignment of such numbers and the creation of a database should be resolved by existing industry groups. Moreover, the Commission should permit direct reimbursement of the neutral third-party database manager for costs associated with the development, implementation and maintenance of the database, as well as the assignment of telephone numbers. For the present, the assignment of telephone numbers associated with dynamic IP addresses and the creation of a database should be limited to VRS.

Respectfully submitted,

VERIZON

By: /s/ Sherry A. Ingram

Michael E. Glover
Of Counsel

Karen Zacharia
Sherry A. Ingram
VERIZON
1515 North Courthouse Road
Suite 500
Arlington, VA 22201-2909
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