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	)	
	)	

GoAmerica's Annual Report on Waived Requirements
for IP Relay and Video Relay Services

GoAmerica, Inc., submits this report in compliance with the Commission's requirement that providers of Internet Protocol Relay ("IP relay") and Video Relay Service ("VRS") file annual reports informing the Commission of any developments and progress relating to the providers' ability or inability to meet certain mandatory minimum standards for telecommunications relay services ("TRS") that are currently waived by the Commission.

GoAmerica provides both IP relay and VRS under the i711.com brand and provides these relay services through a web site at www.i711.com, as well as through specialized applications on T-Mobile's Sidekick devices, certain BlackBerry devices, and AOL Instant Messenger ("AIM"). Except where noted, the information that follows in this report applies to both IP relay and VRS.

GoAmerica submits the following information relating to developments and progress for each of the currently waived mandatory minimum standards for TRS.

Voice Services, including STS, VCO, HCO, VCO-to-VCO, HCO-to-HCO, VCO-to-TTY, and HCO-to-TTY – Each of these voice-based services require a *voice* telephone call from the called party. As our IP relay and VRS platforms are designed and implemented only to accept originating *text* and *video* calls from the Internet, and only to place outbound *voice* calls from the relay centers to the called party using the public switched telephone network, it is technically impossible for us to provide voice-based services where a *voice* call to a relay center is originated by the called party.

We have been monitoring advances in Voice over Internet Protocol ("VoIP"), and we can envision VoIP calls originated by the called party connecting to our relay centers. However, this would require significant research and development, as well as a substantial architectural and engineering expansion of our IP relay and VRS platforms, for which there is no available funding. Furthermore, we would have no control over the installation and configuration of customer premises equipment that is required to route audible speech between personal computers and/or mobile devices and our relay centers

at a high level of quality to make this even usable on a consistent basis. For this reason, the waiver for voice-based services should be extended indefinitely.

These technical challenges notwithstanding, we have been able to support certain types of VCO and HCO relay services without requiring that the calling party originate a voice call into a given relay center. For example, we currently offer one-line VCO/HCO in our VRS. In this situation, the calling party provides a "callback" telephone number to the video interpreter ("VI"), and the VI sets up the relay call by first calling back the called party at the provided callback number. The VI then places the outbound voice call to the called party using a conference calling feature. Once such a call is established, the calling party can speak by voice to the called party, and the calling party can hear the voice of the called party. We currently are working to provide similar VCO/HCO capability in our text relay platform, but the pace of implementation has been hampered by a lack of funding and resource allocation to higher priority projects.

Also, two-line VCO and two-line HCO services are supported by our relay platforms. In this situation, the calling party has conference calling capability on his or her telephone, as provided by a local exchange carrier ("LEC") or by a private branch exchange ("PBX"). The calling party first requests that the relay operator calls back the calling party by voice. Then, the calling party places a voice call directly to the called party and "bridges" the two calls together into a conference call. Our relay platforms do not interfere with such conference calling services provided by a LEC or a PBX.

Emergency Call Handling – In order for emergency calls to be efficiently routed to the most appropriate PSAP, an automatic means of identifying the location of the caller is required. In today's native E9-1-1 network, this location is derived from the Automatic Number Identification (ANI) data associated with the calling party. However, in IP relay and VRS calls, the calling party's associated IP address often bears little relationship to the calling party's geographic location. This is more so when using mobile devices to place IP relay calls since such calls are handled from a small, fixed set of IP addresses. Likewise, VRS calls originating from PCs can come from any geographic location or may have their true IP address masked by firewalls or Internet Service Providers (ISP).

In the last year, we have learned more about potential industry solutions for determining a caller's location by manually entering street address information provided in real time by the calling party, in text form or in sign language. The monthly service fees for these potential industry solutions, as well as the integration and deployment costs, are expected to be significant. Since the Interstate TRS Fund does not reimburse such research and development activities, we have not been able to devote significant funds towards resolving the emergency call handling issue. This fact notwithstanding, we have attended several relay industry conference calls and regulatory summits on this matter over the last year; the issues and technical challenges are well-documented on the TRS docket. We now look to the Commission for guidance on this matter.

Meanwhile, we continue to advise our relay customers to use TTYs and traditional telephone lines for 911 calls, and we continue to display 911-related disclaimers on our relay web site.

Equal Access to Interexchange Carrier – Since all IP relay and VRS calls originate from arbitrary IP addresses often bearing little relationship to the identity of the calling party, we do not have the requisite Automatic Number Identification (ANI) data for the calling party. Therefore, we do not have access to accurate billing information, and in turn, an interexchange carrier chosen by the calling party would not be able to determine applicable rates for the telephone call to the called party nor a suitable destination to which a carrier bill could be sent. As long as we are unable to capture the requisite ANI data from an IP address, we would not be able to resolve this situation, and therefore the waiver of equal access to interexchange carriers for VRS calls should be extended indefinitely as is currently done for IP relay calls.

Pay-per-call (900) service – By its nature, pay-per-call (900) service requires that the ANI data for the calling party be collected so that the telephone calls can be billed to the calling party. In receiving IP relay and VRS calls at our relay centers, we are unable to determine the ANI data based on arbitrary IP addresses associated with these calls. If our relay centers were to absorb the costs of pay-per-call service by supplying our own ANI data for all pay-per-call requests, the overall cost of providing relay services would increase unnecessarily, and pay-per-call users would benefit from an unfair subsidy. As long as we are unable to capture the requisite ANI data from an IP address, we would not be able to resolve this situation. Also, we have not received requests from our relay users for pay-per-call service. Therefore, the waiver of pay-per-call service should be extended indefinitely.

Operator-assisted Calls – In order to accurately identify and bill relay users for long distance charges, a technical solution must be in place for geographic and billing identification of VRS users placing calls from the Internet. As indicated for equal access to interexchange carrier and pay-per-call service, no such solution is available at this time and would be costly to build and implement. In the meantime, we do not charge VRS users to complete any calls that may otherwise be billed as long distance calls, including operator-assisted calls.

Call Release – Call Release remains technologically infeasible in a IP relay and VRS environment. All telephone calls made in the IP relay and VRS environment are made only between the relay centers and the called party, using the public switched telephone network. As the calling party doesn't connect to a given relay center through the public switched telephone network, but rather through the Internet—using an entirely different protocol—there is no way for a relay operator to "sign off" or otherwise be "released" from a telephone call between the calling party and the called party. This is a fundamental incompatibility between an IP-based relay service and the need to place outbound voice calls, and therefore Call Release should continue to be waived.

Furthermore, deaf relay users desiring to contact other deaf relay users have multiple options for "point-to-point" conversation, such as instant messaging, email, webcams, and point-to-point videophones, and we have not received any requests from our relay users for this functionality.

Three-way Calling – As with voice services, if the calling party has conference calling capability on his or her telephone, as provided by a LEC or by a PBX, the calling party can make a conference call involving two (or more) called parties, assuming that all called parties are reachable through the public switched telephone network. Therefore, we are currently meeting this requirement for IP relay and VRS calls.

To expand the usefulness of this feature, we are exploring into the technical possibility of equipping our relay platform with the ability to originate such three-way calls from the relay centers, similar to the way VCO/HCO calls are handled, so that relay users who do not have conference calling capability on their telephones can nonetheless have a relay conversation with two or more called parties. If this technical exploration bears fruit, our assumption is that all long distance charges for each leg of the three-way call placed from the relay center itself would be compensable.

Speed Dialing – We currently offer speed dialing capability for both IP relay and VRS calls, in a number of different ways. Our IP relay and VRS users can store numbers on our relay web site and refer to them by shorthand names, numbers, or menu items when starting relay calls. In addition, our relay users can enter phone numbers on our relay web site, through AIM, or in our wireless relay applications, which are pre-populated in our relay operator's dialing environment for quicker call handling. If the waiver for speed dialing is not extended past its current expiration date of 1/1/2008, we do not anticipate any significant issues in offering speed dialing capability.

If you have any questions regarding this report, please do not hesitate to contact me.

Respectfully submitted,

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