

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 20, 2007

Commission Secretary
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
44 12th Street, SW, Room TW-A325
Washington, D.C 20554

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 64.605, the California Public Utilities Commission (CPUC) here submits its TRS State Recertification Application. As required by 47 C.F.R. § 64.605(a), the enclosed documentation in support of the application is in narrative form and clearly describes California's telecommunication relay service, namely the "California Relay Service" (CRS), and the procedures and remedies for enforcing any requirements imposed by the state program.

The FCC granted California's most recent application for recertification in May 2003. In that application, the CPUC explained that California Senate Bill 244 (Chapter 741, 1983) mandated the CPUC to establish the telecommunications relay service in California. California's relay service operations began on January 1, 1987, providing direct access to California's public switched telephone network by individuals who use text telephones. Users have 24-hour-a-day contact with individuals who use speech or text telephone equipment. More information about how CRS and the Deaf and Disabled Telecommunications Program have evolved since the 2003 recertification is contained in the attached application.

In compliance with the Americans with Disabilities Act of 1990 (ADA), S.393 Pub.L. 101-336-69 (July 26, 1990), and 47 C.F.R. § 64.605(b), the CPUC's TRS recertification application establishes that its telecommunications relay service program continues to meet or exceed all operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604; makes available adequate procedures and remedies for enforcing the state program; and establishes that its program in no way conflicts with federal law. The

Marlene H. Dortch
September 20, 2007
Page 2

CPUC requests TRS recertification to be issued under the name "California Relay Service".

All three of California's carriers continue to meet or exceed federal minimum standards contained in 47 C.F.R. § 64.604. MCI has exceeded the minimum requirements in such areas as communication assistants, emergency calls, STS called number, type of calls and speed of answer. Nordia has exceeded the minimal standards in the area of confidentiality and content. Further, Sprint has exceeded the minimum standards in the areas of carrier of choice, customized access numbers, two-line and reversed two-line VCO, E-Turbocode, and by offering captioning telephone services. These enhancements do not impair the carrier from meeting federal minimum standards. Rather, customers benefit from these enhancements.

We believe the enclosed documentation in our recertification application supports our assertion that the CRS continues to have qualified staff, reliable service, and a system capable of adapting to improvements in communications equipment technology and expanding services in response to increasing demand.

At this time Video relay Service (VRS) and Internet Relay (IP Relay) are part of the CRS RFP. These services, however, are not reimbursed by the state as they are federally funded through the interstate TRS fund.

If you have any questions regarding the enclosed documentation, please feel free to contact me at 415.703-1319.

Sincerely,

/s/ HELEN M. MICKIEWICZ

Helen M. Mickiewicz
Assistant General Counsel

HMM:jmc