

**Before the
Federal Communications Commission
Washington, DC 20054**

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

COMMENTS OF AT&T INC.

AT&T Inc. (“AT&T”), on behalf of its telephone companies, hereby updates its comments filed on the numbering issues identified in the May 2006 Further Notice of Proposed Rulemaking in the foregoing docket.

In its initial comments in this proceeding,¹ AT&T supported the adoption of a single, national database of proxy numbers to facilitate calls to Video Relay Service (“VRS”) users from hearing individuals. AT&T proposed that the database be implemented utilizing a dynamic domain name system (“DDNS”). AT&T urged the Commission to require VRS subscribers to use 10-digit North Atlantic Numbering Plan (“NANP”) numbers -- obtained directly from LECs -- as opposed to other numbering sequences as the proxy numbers for such calls. AT&T recognized that there could be multiple ways to design and implement a dynamic, national database of proxy numbers, but stressed that any such database should be capable of instantly mapping a VRS user’s telephone number (or other proxy) to an IP address. VRS users would, AT&T explained, initially populate the database by registering their telephone number (or other proxy) and IP address. VRS users with dynamic IP addresses would then update the registry as

¹ See Comments of AT&T Inc, filed July 17, 2006; Reply Comments of AT&T Inc., filed July 31, 2006.

their IP address changed, and would be able to do so automatically via existing DDNS software and hardware.

AT&T would like to update these comments in two respects. First, as explained above, AT&T proposed that the Commission assign NANP numbers as the proxy numbers for VRS calls, and that VRS users obtain such numbers directly from LECs. In terms of procuring the NANP numbers, AT&T recognized that some industry participants support VRS users obtaining them from VRS providers, rather than LECs. While AT&T did not oppose such an approach, AT&T expressed concern that existing numbering rules preclude VRS providers from obtaining such numbers from NANPA, and thus supported VRS users obtaining NANP numbers directly from LECs.

After further review of the record, and discussions with VoIP and VRS providers, AT&T supports VRS users obtaining NANP numbers directly from VRS providers. VRS providers can easily obtain NANP numbers through or in the same way that VoIP providers obtain numbers today and can then make those numbers available to VRS users at a much cheaper price. Because VRS users only need to use NANP numbers for inbound service (calls from hearing individuals), there is no need for the VRS user to purchase a local exchange access line to their premises, which is much more expensive. VRS providers can simply purchase NANP numbers routed to their call centers from VoIP providers, or the providers from whom VoIP providers obtain such numbers on a wholesale basis, and then assign them to requesting VRS users – a process fully consistent with the Commission’s existing numbering rules. The resulting cost for the VRS user is significantly less than the \$20 or more per number per month when purchased individually in conjunction with an access line from the LEC. The VRS user is also solely in

control of the number assigned to them, allowing the VRS user to port the number from one VRS provider to another.

Notably, VRS users with existing telephone numbers could use those numbers for VRS service. The customer need only port that number to the underlying wholesale provider of the VRS provider they choose, or make the forwarding feature associated with their local service send inbound calls to their VRS provider.

Second, AT&T initially proposed that VRS subscribers use existing DDNS capabilities to update their IP addresses in the national database. After further industry review, AT&T is concerned that some existing customer equipment does not have the capability to automatically update the national database. In that regard, VRS subscribers use VRS equipment manufactured or provided by the VRS provider of their choice. So when a VRS user's IP address changes, software within the VRS equipment automatically updates the user's *VRS provider* with the new IP address. In order for existing VRS equipment to automatically update a national database, the equipment would have to be reconfigured or replaced to do so, which could prove costly and delay implementation. AT&T therefore believes that the most feasible way to update the national database is to require VRS providers to do so upon receipt of updated IP addresses from their customers. This would allow VRS users to continue using the equipment they have today, with minimal burden to VRS providers.

For the foregoing reasons, AT&T urges the Commission to consider its updated proposals as outlined above.

Respectfully submitted,

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