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

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

REPLY COMMENTS OF
TELECOMMUNICATIONS FOR THE DEAF AND HARD OF HEARING, INC.;
ASSOCIATION OF LATE-DEAFENED ADULTS, INC.;
NATIONAL ASSOCIATION OF THE DEAF;
DEAF AND HARD OF HEARING CONSUMER ADVOCACY NETWORK; AND
CALIFORNIA COALITION OF AGENCIES SERVING
THE DEAF AND HARD OF HEARING
TO REFRESH THE RECORD ON IP-BASED TRS NUMBERING

Telecommunications for the Deaf and Hard of Hearing, Inc. ("TDI"), Association of Late-Deafened Adults, Inc. ("ALDA"), National Association of the Deaf ("NAD"), Deaf and Hard of Hearing Consumer Advocacy Network ("DHHCAN"), and California Coalition of Agencies Serving the Deaf and Hard of Hearing ("CCASDHH") (collectively, the "Consumer Groups"), hereby respectfully submit their reply comments to refresh the record on assigning

Internet protocol ("IP")-based Telecommunications Relay Service ("TRS")[1] users ten-digit telephone numbers linked to the North American Number Plan ("NANP").[2]

In their opening comments, the Consumer Groups advocated a set of principles that should form the basis of any 10-digit NANP numbering system adopted by the Commission. These include:

- Third Party Number Administration
- Ease of Obtaining Numbers
- Privacy of Call Data
- Network Security
- Network Interoperability
- Equipment Interoperability
- Backward Compatibility
- Number Portability
- Location and Number Registration

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[1] IP-based forms of TRS include Video Relay Service ("VRS"), IP Relay and IP Captioned Telephone Service ("IP CTS") that enable an individual with a hearing or speech disability to communicate with hearing individual using sign language or text in a manner that is functionally equivalent to an individual who does not have a hearing or speech disability using voice communication services by wire or radio. 47 U.S.C. § 225; 47 C.F.R. § 64.601. In addition, the Commission has under consideration a request for clarification that IP-based Speech-to-Speech Relay Service ("IP STS") is a form of TRS eligible for compensation from the Interstate TRS Fund. *See Consumer and Governmental Affairs Bureau Seeks Comment on Request for Clarification that Internet Protocol Speech to Speech Service is a Form of Telecommunications Relay Service Compensable from the Interstate TRS Fund*, CG Docket No. 08-15, Public Notice, DA 08-292, released February 4, 2008.

[2] *Consumer & Government Affairs Bureau Seeks to Refresh Record on Assigning Internet Protocol (IP)-Based Telecommunications Relay Service (TRS) Users Ten-Digit Telephone Numbers Linked to North American Numbering Plan (NANP) and Related Issues*, CG Docket 03-123, Public Notice DA 08-607 (released March 19, 2008) ("Public Notice").

- Prioritization of 911 Calls
- Consumer Outreach and Education

The opening comments contained three competing numbering proposals respectively advocated by (1) CSDVRS, LLC and Communications Services for the Deaf ("CSD Proposal"), (2) GoAmerica, Inc., GoAmerica Relay Services Corp. and Hands On Video Relay Service (the "Joint Proposal"), and (3) NeuStar, Inc. (the "NeuStar Proposal"). In addition, comments were filed by AT&T, Inc., Dash Carrier Services, LLC, the Interstate Telecommunications Relay Services Advisory Council, the Nebraska Public Service Commission, Sprint Nextel Corporation, and Sorenson Communications, Inc.

After reviewing the proposals and other comments, the Consumer Groups recommend that the Commission seek clarification on certain aspects of the proposals as follows. Such clarification, if not already provided through refresh comments or reply comments, may be provided during the Commission's stakeholder workshop on April 29, 2008, or through appropriate written *ex parte* filings.

- For each proposal, if a hearing person who can communicate in American Sign Language ("ASL"), Conceptually Accurate Signed English ("CASE"), cued speech, speech reading, captioning or other forms of visual communication, has a video device, will that person be able to obtain a 10-digit NANP number without establishing a relationship with a TRS provider for TRS service?[3] A 10-digit NANP number would enable the hearing person to initiate and receive point-to-point video calls (which are not TRS calls reimbursable by the TRS Fund) with people who are deaf or hard of hearing and also communicate visually. There are many hearing people who can communicate visually and have

[3] A relay call between two hearing people is not reimbursable by the TRS Fund.

business relationships, provide services to, or have family members or friends who are deaf or hard of hearing. These hearing people should be able to communicate with people who are deaf or hard of hearing with a direct video connection. If a direct video connection cannot easily be established between deaf or hard of hearing people and hearing people using 10-digit NANP numbers, the hearing person and the person who is deaf or hard of hearing would be required to communicate with each other using a form of TRS such as VRS. This would result in additional and unnecessary costs to the TRS Fund and would be a less effective means of communication than point-to-point video.

- For each proposal, will a separate 10-digit number be required for each videophone or other device? People who are deaf or hard of hearing want to have videophones or other devices with the same telephone number on each floor or in multiple rooms in their homes, just as hearing people have multiple telephones with the same telephone number. These devices, just like telephones, may be identical or different (i.e., a stationary device, a portable wireless device, etc.).
- For each proposal, what actions will a consumer need to take to retain the same 10-digit telephone number and the same designated IP-based TRS provider when changing to a different videophone or other device used on the same IP system as the original device? Many people who are deaf or hard of hearing currently have multiple videophone or other devices and may obtain new devices in the future. Consumers should be able to change equipment with ease and without notifying their number or IP-based TRS provider, just as hearing people do with telephones on wireline systems and SIM cards on wireless devices.

- For each proposal, what actions will a consumer need to take when they change to a different IP system using the same device, in order to retain the same 10-digit number and the same designated IP-based TRS provider? For example, many people who are deaf or hard of hearing currently have one videophone device which they could transport for use on a variety of different IP systems (i.e., at home, while traveling, vacationing, or visiting family and friends).
- For each proposal, will a separate 10-digit number be required for each modality of communication (text vs. video) and/or TRS (VRS, IP Relay, IP CTS and IP STS) needed to facilitate communication between a person who is deaf or hard of hearing or has a speech disability and a person who is hearing? People who are deaf or hard of hearing or have a speech disability may want to have devices utilizing different forms of TRS all associated with the same telephone number, just as hearing people have multiple types of devices with the same telephone number. If a separate 10-digit number is not required for each modality of communication and/or TRS, explain how assigning a single 10-digit number for multiple modalities of communication (text vs. video) and/or TRS (VRS, IP Relay, IP CTS and IP STS) will function for incoming calls (direct or through a TRS) and for outbound calls. Further, explain what action a consumer will need to take in order to designate multiple modality TRS providers for a single 10-digit number.
- For each proposal, what action will a consumer need to take to forward calls received on one 10-digit number to be received on another 10-digit number, when using the same or different communication modalities? For example, what action would a consumer need to take to forward calls coming in to their "home" videophone 10-digit number (direct point-to-point video or through a VRS) to their "office" videophone 10-digit number?

What action would a consumer need to take to forward calls coming in to their "office" videophone 10-digit number (point-to-point video or through a VRS) to their 10-digit number for receipt of calls through an IP (text) TRS which they can receive on their mobile IP device?

- For each proposal, how is network security protected against hacking, unauthorized disclosure, fraud, slamming, warring and other abuses by outside parties illegally attempting to circumvent privacy? Allegations have been made that some of the proposals have insufficient network protection.
- For each proposal, how is the network protected against outages? Allegations have been made that some of the proposals could result in partial or complete system outage.
- For each proposal, are the consumer's equipment, software, and home or office network protected? Allegations have been made that some of the proposals require the opening of the consumer's firewall, thereby leaving the consumer's equipment, software, and home or office network open to attack.
- For each proposal, what, if any, impediments exist that might prevent complete implementation by the end of 2008? Allegations have been made that the need to add data fields, obtain the cooperation of third parties such as local exchange carriers, or to download software or distribute hardware to consumers may delay implementation or may add undue cost.
- Will each proposal provide for a seamless transition from the current method of call delivery to call delivery using 10-digit NANP numbers? A situation where thousands of consumers are unreasonably waiting for a NANP number must be avoided. Moreover, the transition must be designed to avoid confusion during the period when some

consumers have obtained NANP numbers, others continue to have non-NANP numbers, and they are trying to call each other.

- For each proposal, does the proposal permit the introduction of new equipment, technologies and standards? Allegations have been made that some proposals would inhibit or even prevent the introduction of new equipment, technologies and standards.
- For each proposal, does the proposal result in true 10-digit dialing, or are any additional numbers or characters required under certain circumstances? Allegations have been made that not all proposals will result in true 10-digit dialing.
- For each proposal, if the consumer's usual provider has a network outage or overload, can a 911 call be readily made or automatically redirected to an alternate provider, and will the call automatically include automatic number identification ("ANI") and automatic location information ("ALI")? Allegations have been made that with some proposals, a 911 call cannot easily be made with an alternate provider or that the ANI and ALI may not be accessible.

The Consumer Groups would like to see a full record developed in this proceeding so that the Commission can base its decision on a complete understanding of each of the proposals. Therefore, to the extent that the answers to these questions are not covered in the comments and reply comments, the Consumer Groups encourage each of the proponents of the respective numbering proposals to address these questions by filing written *ex parte* responses.

Conclusion

The Consumer Groups fully support the Commission's timeline of adoption of numbering rules by the end of the first quarter of 2008[4] and implementation of the IP-based TRS 10-digit numbering system by the end of 2008. Therefore, as soon the Commission holds the stakeholder workshop on April 28, 2008 and the record is complete, the Consumer Groups urge the Commission to move forward with the adoption of rules to implement NANP linked numbering and automatic 911 call routing for IP-based TRS users.

[4] In the Joint Proposal comments, it was suggested that the industry be afforded an additional 60 days to work out a consensus on the numbering plan. The industry has had plenty of time to work out a consensus and has been unable to do so. The deaf and hard of hearing communities can not afford to wait another 60 days for the industry to again not come to consensus. Therefore, the Consumer Groups urge the Commission to wait no longer and to move forward with a resolution of the issues.

Respectfully submitted,

/S/

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