

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

In the Matter of)	
)	
)	
Telecommunications Relay Services)	CG Docket No. 03-123
and Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	
)	
E911 Requirements for IP-Enabled)	WC Docket No. 05-196
Service Providers)	

REPLY COMMENTS OF AT&T INC.

AT&T Inc. (“AT&T”), on behalf of its telephone companies, files this reply to the issues raised in the Petition for Reconsideration and Clarification (the “Petition”) of Sorenson Communications, Inc. (“Sorenson”) and the comments filed in response to the Petition in the foregoing dockets.

INTRODUCTION

Sorenson’s Petition asks the Commission to, among other things, (1) amend the Commission’s rules to allow Internet-based TRS providers to continue routing emergency calls over administrative lines in limited circumstances, which would alter the requirement in the 10-Digit Number Assignment Order¹ that all emergency calls route via the Wireline E9-1-1 Network, and (2) clarify that Internet-based TRS E9-1-1 rules

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123, WC Docket 05-196, Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 03-123, WC Docket 05-196, FCC 08-151, para. 82-84 (rel. June 24, 2008) (“10-Digit Number Assignment Order”).

adopted in the 10-Digit Number Assignment Order apply only to calls of Internet-based TRS users who have registered with a default provider.²

Consumer groups oppose Sorenson's request to continue to route limited Internet-based TRS emergency calls over administrative lines,³ whereas Internet-based TRS providers support Sorenson's request to continue to use administrative lines where appropriate.⁴ Internet-based TRS providers agree with Sorenson that the E9-1-1 rules adopted in the 10-Digit Number Assignment Order should apply only to calls of Internet-based TRS users who have registered with a default provider. Consumer groups also appear to accept Sorenson's argument as to the application of the E9-1-1 rules to registered users only, though their comments are limited to the automatic routing of emergency calls over the Wireline E9-1-1 Network.

DISCUSSION

The Commission Should Recognize the Need to Continue to Route Calls Over Administrative Lines in Appropriate Circumstances

AT&T concurs that the Commission should amend its rules to allow Internet-based TRS providers to complete emergency calls over administrative lines in limited situations in which the inability to use administrative lines would potentially render call completion or the transmission of accurate location information impossible. AT&T disagrees with the Consumer groups' comment that Sorenson has not provided "sufficient and particular reasons" for the need to continue using administrative lines. To the contrary, Sorenson provides a number of valid examples of situations where the use of an

² AT&T's reply will not comment on Sorenson's request for reconsideration that the Commission allow the continued use of proxy numbers.

³ Opposition 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, California Coalition of Agencies Serving the Deaf and Hard of Hearing, and Hearing Loss Association of America, pages 6-7.

⁴ Partial Opposition of Communications Access Center, CSDVRS, LLC, GoAmerica, Inc., Hamilton Relay, Inc., and Snap Telecommunications Inc.

administrative line rather than the Wireline E9-1-1 Network to route an emergency call would more likely result in proper completion of the call and transmission of the most accurate location information.⁵ The Internet-based TRS providers' comments include additional examples.⁶

Yet, it is questionable whether the examples provided by Sorenson and the Internet-based TRS providers exhaust the situations where the use of the Wireline E9-1-1 Network is not the optimal route for emergency calls or the possible solutions to those situations. Absent detailed information about the numbering database to be created by NeuStar, the interaction between NeuStar and Internet-based TRS providers, and related issues, it is unlikely that a narrowly crafted exception to the Internet-based TRS E9-1-1 rules would encompass all situations where use of the Wireline E9-1-1 network is not the best transmission path. Additionally, without direct input from PSAPs and VoIP Position Centers, possible "work-arounds" that would allow stricter adherence to the Commission's administrative line ban cannot be foreclosed. These unique and complex issues are best considered by technical groups, which will have the benefit of information that is yet to be decided. AT&T concurs that the Commission should allow the continued use of administrative lines in limited situations in the short term, but encourages the Commission to consider the recommendations of future technical groups to identify all situations where routing an emergency call via the Wireline E9-1-1 Network might compromise the transmission of the call or location information of the user and to consider other solutions in those situations if identified by the technical groups.

⁵ Petition, at pages 3-5.

⁶ Partial Opposition, at pages 8-9.

E9-1-1 Rules Should Apply to Only Registered Callers

AT&T agrees with Sorenson that the Commission’s E9-1-1 rules for Internet-based TRS providers adopted in the 10-Digit Number Assignment Order should apply to only those Internet-based TRS users who have registered with a default provider after December 31, 2008. All commenters acknowledge that until an Internet-based TRS user registers with a default provider, that provider cannot automatically complete emergency calls via the Wireline E911 Network and transmit automatic number information (“ANI”), the user’s registered location, the name of the Internet-based TRS provider, and the communications assistant’s identification number. Yet, the rules adopted in the 10-Digit Number Assignment Order impose the obligation to route all emergency calls in this manner. The Commission should recognize this discrepancy in the rules and clarify that Internet-based TRS providers must comply with these E9-1-1 requirements only for calls of registered users.

For the foregoing reasons, AT&T urges the Commission to consider this submission.

Respectfully submitted,



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