

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

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

**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
TO PETITION FOR LIMITED WAIVER**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDF”), Association of Late-Deafened Adults, Inc. (“ALDA”), National Association of the Deaf (“NAD”), Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”), California Coalition of Agencies Serving the Deaf and Hard of Hearing (“CCASDHH”) and Hearing Loss Association of America (“HLAA”) (collectively, the “Consumer Groups”), hereby respectfully submit their opposition to Sorenson’s Petition for Limited Waiver (“Waiver Petition”) filed in the captioned proceeding.¹ The Commission should deny the Waiver Petition for the reasons set forth below and in the Consumer Groups’ opposition to the pending Sorenson Petition for Reconsideration and

¹ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities and E911 Requirements for IP-Enhanced Service Providers, Petition for Limited Waiver* (Sept. 30, 2008).

Clarification (“Reconsideration Petition”).² The Consumer Groups also point out that an appropriate transition period to complete user registration is already being considered by the Commission in its Further Notice of Proposed Rulemaking (“FNPRM”) and may impact Sorenson’s request.³

Background

On September 30, 2008, Sorenson filed its Waiver Petition asking the Commission to permit Sorenson to use proxy numbers for one year after a user receives a North American Numbering Plan (“NANP”) number to route calls to users and provide users time to inform callers that the user’s number has changed. Sorenson asserts that a limited waiver for one year is necessary to minimize the disruption to users of video relay services (“VRS”) and lists instances where a transition period and notice of change are utilized, such as new area codes, new telephone numbers, and new residential addresses.⁴ Sorenson also notes that the requested waiver will not be necessary if its pending Reconsideration Petition is granted before December 31, 2008.⁵

Limited Waiver to Use Proxy Numbers Should be Denied

The Waiver Petition must be denied because discontinuing the use of proxy numbers is necessary to avoid confusion between 10-digit NANP numbers and 10-digit proxy numbers.⁶

Many proxy numbers are duplicates of existing NANP numbers that may be assigned for

² *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities and E911 Requirements for IP-Enhanced Service Providers, Opposition to Petition for Reconsideration and Clarification* (Sept. 15, 2008) (“Opposition to Reconsideration Petition”).

³ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E9-1-1 Requirements for IP-Enabled Service Providers, CG Docket 03-123, WC Docket 05-196, Report and Order and Further Notice of Proposed Rulemaking, FCC 08-151, ¶¶45, 109* (released June 24, 2008).

⁴ Waiver Petition at pgs. 1, 4-5.

⁵ *Id.* at pg. 6, fn. 16.

⁶ *See* Opposition to Reconsideration Petition at pgs. 3-4.

wireline, wireless, or TTY service, and using proxy numbers after obtaining a NANP number would create confusion for users and interoperability issues for providers. For example, proxy numbers restrict a provider's ability to automatically route a 911 call to the appropriate public safety answering point ("PSAP") and transmit a caller's automatic number identification ("ANI") and automatic location information ("ALI") to the PSAP. Consumers may not be aware of such implications, given that an assigned proxy number and NANP number appear to function in the same way. Moreover, consumers should not be subjected to reduced 911 accessibility simply to provide additional time to update a user's contacts with new NANP telephone numbers.

As pointed out in previous comments by the Consumer Groups, the closed directory with proxy numbers only aids Sorenson's business because the Sorenson customer network cannot be penetrated without obtaining a Sorenson issued proxy number and inhibits the functional equivalency of the Internet-based VRS calling system.⁷ The request to use proxy numbers for one year after a 10-digit NANP number assignment must therefore be denied because it will not serve consumers' interest and will not move consumers towards functional equivalency.

Rather than continuing with the use of proxy numbers for yet another year, Sorenson can provide an outgoing message, either as a voice message when the call comes from a voice telephone number or a video message when the call comes from a video telephone number, informing the caller of the new number assigned to the called party. The outgoing message can be provided for a period of time such as three months, which would be consistent with the period of time that telephone companies provide incoming callers with a new telephone number message when a customer changes telephone numbers.

⁷ *Id.* at pg. 4.

The Consumer Groups therefore maintain that a one year waiver after the assignment of a NANP number is unnecessary for Sorenson or any other provider. Sorenson has been on notice since March 19, 2008, when the Commission adopted the *Interim Emergency Call Handling Order*,⁸ that a NANP-based numbering system would need to be fully implemented by December 31, 2008. Internet-based TRS users are expecting to receive NANP numbers and expecting to receive E911 service that automatically connects their emergency calls to the appropriate PSAP and automatically transmits the ALI and the ANI to the PSAP. Thus, there is no valid excuse to delay the December 31 date other than for a transition period that would be needed to provide Internet-based TRS users a reasonable opportunity to register their addresses and receive NANP telephone numbers, as contemplated by the Commission in the FNPRM. Therefore, the Consumer Groups urge the Commission to require providers to deny service (other than emergency calls) to unregistered users six months after the December 31, 2008 deadline for implementing NANP numbering.⁹ It is vital that users obtain the benefit of ten-digit numbering, including the benefits associated with 9-1-1 emergency calling.

⁸ *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 No. 05-196, Report and Order, 23 FCC Rcd 5255 (2008).

⁹ Opposition to Reconsideration Petition at pg. 3.

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Dated: October 15, 2008

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2008, I caused a copy of the foregoing
Opposition to Petition for Limited Waiver to be delivered to the following individuals.

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Dated: October 15, 2008