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June 26, 2009

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VIA ELECTRONIC FILING SYSTEM (ECFS)

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: CG Docket No. 03-123  
DA No. 09-1318  
HAMILTON RELAY, INC.  
Annual Consumer Complaint Log Summaries (June 1, 2008 - May 31, 2009)

Dear Ms. Dortch:

Hamilton Relay, Inc. ("Hamilton"), by its counsel and pursuant to Section 64.604(c)(1)(ii) of the Commission's rules, hereby respectfully submits its annual summary of consumer complaints for the period June 1, 2008 – May 31, 2009. The enclosed complaint logs cover Hamilton's provision of interstate traditional telecommunications relay service ("TRS"), Internet Protocol Relay service ("Internet Relay"), Internet Protocol Captioned Telephone ("Web CapTel") and Video Relay Services ("VRS"). Hamilton is located at 1001 12<sup>th</sup> Street, Aurora, NE 68818.

Hamilton tracks all complaints and all other customer service activity. For interstate traditional TRS, Hamilton's complaint summary is associated with the following database categories:

Traditional Interstate TRS Database Categories

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim

- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access
- External CapTel Complaints Received by Hamilton

Internet Relay Database Categories

For Internet Relay, Hamilton's complaint summary is associated with the following database categories:

- LEC External Busy

- Miscellaneous External Complaints
- 911 External Calls
- No Notice of How to Complain to FCC
- Replaced CA Improperly in Middle of Call
- CA Did Not Keep User Informed
- CA Accuracy/Spelling/Verbatim
- CA Typing Speed
- CA Typing
- CA Misdialed Number
- Ringing/No Answer
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Customer Data
- Spanish to Spanish Call Handling Problems
- Caller ID Not Working Properly
- CA Gave Wrong Information
- Fraudulent/Harassment Call
- Confidentiality Breach
- Miscellaneous Service Complaints
- Poor Vocal Clarity/Enunciation
- Didn't Follow Voice Mail/Recording Procedure
- Didn't Follow Policy/Procedure
- CA Hung Up on Caller
- Didn't Follow Emergency Call Handling Procedure
- Relay Not Available 24 Hours a Day
- Line Disconnected
- Connect Time (TTY/Voice)
- Busy Signal/Blockage
- Miscellaneous Technical Complaints

In the Miscellaneous External and Fraudulent/Harassment Call categories, you will find several complaints that we believe to be associated with fraudulent activity over Internet Relay. In some cases, it is not clear that the calls which generated these complaints came through the relay centers that process Hamilton Internet Relay calls. However, Hamilton believes that it is important for the Commission to have this information. Hamilton continues to implement protocols specifically designed to prevent calls originating from an international IP address from accessing the relay, and to take other measures to counter Internet Relay fraud in a manner consistent with the guidance provided by the Commission in the Public Notice dated June 18, 2004. *See FCC Reminds Public of Requirements Regarding Internet Relay Service and Issues Alert*, Public Notice, DA 04-1738 (rel. June 18, 2004).

VRS Database Categories

Hamilton discontinued its provision of Video Relay Service effective December 1, 2008. The enclosed complaint log reflects the discontinuance as of that date. For VRS, Hamilton's complaint summary is associated with the following database categories:

- Miscellaneous External Complaints
- 911 External Complaints
- No Notice of How to Complain to FCC
- Interpreter Accuracy/Verbatim
- Replaced Interpreter Improperly in Middle of Call
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Ringing/No Answer
- Miscellaneous Service Complaints
- Didn't Follow Emergency Call Handling Procedure
- Interpreter Gave Wrong Information
- Didn't Follow Voice Mail/Recording Procedure
- Interpreter Rude
- Interpreter Misdialed Number
- Interpreter Did Not Keep User Informed
- Caller ID Not Working Properly
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Customer Data
- Interpreter Hung Up on Caller
- Miscellaneous Technical Complaints
- VCO Break-Down
- Busy Signal/Blockage
- Connect Time (TTY/Voice)
- Line Disconnected

#### Web CapTel Database Categories

For Web CapTel, Hamilton has included all complaints regarding its provision of this service regardless of category.

#### Other Forms of TRS

Hamilton did not receive any complaints with respect to its provision of interstate STS relay services. With respect to captioned telephone relay ("CapTel"), Hamilton reports all CapTel complaints to the participating CapTel states (Wisconsin, Maine, Nebraska, Kentucky, Montana, Wyoming, Idaho, Rhode Island, Iowa, Arizona, West Virginia, Maryland, Pennsylvania, Georgia, Kansas and the District of Columbia). The participating states include all interstate and intrastate CapTel complaints on their reports submitted to the Commission.

Hamilton processes any complaint which originates via e-mail, fax, telephone, regular mail, outreach events or at the workstation. Hamilton's policy is to provide a resolution to all complaints within 72 hours of receipt.

Finally, Hamilton is separately filing, on a confidential basis, a summary including the total number of interstate calls by type of TRS.

Should you have any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

A handwritten signature in black ink, appearing to read "D. A. O'Connor", with a stylized flourish extending to the right.

David A. O'Connor  
Counsel for Hamilton Relay, Inc.

Enclosure