

**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-Enabled Service Providers	)	WC Docket No. 05-196
	)	

**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;**  
**American Association of the Deaf-Blind; and**  
**Hearing Loss Association of America**

**Reply Comments on Sorenson’s Petition for Declaratory Ruling or Limited Waiver of the  
Commission’s Rules**

**I. INTRODUCTION**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), through its undersigned counsel, 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”), American Association of the Deaf-Blind (“AADB”), and Hearing Loss Association of America (“HLAA”) (collectively, the “Consumer Groups”) hereby submit their Reply Comments in connection with the Petition for Declaratory Ruling or Limited Waiver of

the Commission's Rules filed by Sorenson Communications, Inc. ("Sorenson") on April 13, 2009.<sup>1</sup>

Sorenson asks the Commission to allow providers of Internet-based Telecommunications Relay Service ("iTRS") to assign numbers to their users from nearby rate centers in instances when geographically appropriate numbers are not available. CSDVRS, LLC ("CSDVRS"), Hamilton Relay, Inc. ("Hamilton"), Purple Communications, Inc. ("Purple") and Level 3 Communications, LLC ("Level 3") each filed comments in support of Sorenson's petition.

The Consumer Groups recognize the practical difficulties in obtaining numbers from every rate center in the United States and do not object to the assignment of numbers from nearby rate centers when numbers in geographically appropriate rate centers are not available. The Consumer Groups understand that this is a common practice for all types of Internet-based services. However, the Consumer Groups do have several concerns that they ask the iTRS providers and the Commission to take into consideration.

- Delivering an Enhanced 9-1-1 ("E911") call to the correct Public Safety Answering Point ("PSAP) is of paramount importance to the safety and well being of all iTRS users. The Consumer Groups therefore request that any relief granted by the Commission to be conditioned upon each default iTRS provider utilizing Automatic Location Information ("ALI") (use of the caller's Registered Location information to ensure E911 call delivery to the correct PSAP) and Automatic Number Identification ("ANI") (passing through to the PSAP the caller's 10-digit NANP number to ensure call-back capability by the PSAP to the caller), regardless of the geographic appropriateness of any NANP number assigned to the caller.
- In its comments, Purple asks the Commission to make it clear that neither toll free numbers nor proxy numbers are to be used in cases where a geographically appropriate number is not available. The Consumer Groups agree. A toll free

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<sup>1</sup> *Pleading Cycle Established for Comments on Petition of Sorenson Communications, Inc. for Declaratory Ruling or Limited Waiver of the Commission's Rules*, Public Notice, DA 09-1789, CG Docket No. 03-123, WC Docket No. 05-196, released August 11, 2009.

number is not an appropriate substitute for a geographic number. It cannot be used in isolation because it must be used in association with an assigned geographic number. Proxy numbers cause confusion to consumers because they look like geographic numbers, but no caller outside of the proxy number's network can call a proxy number. Moreover, they are outright dangerous in the event of an emergency call, because they cannot be used to find a Registered Location, and a PSAP cannot place a call back to a proxy number.

- In its comments, Hamilton states that a “geographically approximate number assigned in such cases [where a geographically appropriate number is unavailable] should not be viewed as a ‘guest’ or temporary number.”<sup>2</sup> The Consumer Groups concur. The term “guest” number should be limited to the assignment and use of NANP numbers on a temporary basis only during any period existing between the time of registration and the assignment of a permanent NANP number.<sup>3</sup>
- In its comments, CSDVRS mentioned that it cannot obtain numbers from any rate center in Hawaii and Alaska. Because Hawaii and Alaska are not contiguous to any other state, there are no nearby rate centers outside of Hawaii and Alaska. The Consumer Groups are having difficulty understanding why CSDVRS cannot obtain any numbers from any rate center in Hawaii and Alaska, because both states have urban centers within their borders--Honolulu, Hawaii and Anchorage, Alaska. As a result, the Consumer Groups request that any relief granted by the Commission be conditioned upon CSDVRS and the other iTRS providers working with their numbering partners and the Commission to locate at least one rate center within each of these two states that can be used for numbering assignments.
- In its comments, Level 3 discussed the legal difficulties it is experiencing in obtaining any numbers from rate centers within the state of New Hampshire. Level 3 mentioned that it filed a petition requesting relief from the Commission over a year ago. The Consumer Groups request that the Commission take action

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<sup>2</sup> Hamilton comments at 2.

<sup>3</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791 (2008) (FCC 08-275) (“December Order”). “The TDI Coalition recommends that once users register with a default provider, they should be able to place relay calls immediately, at least on a temporary basis, through, for example, the assignment of a temporary ‘guest’ or application number/identification system. . . . [W]e agree with the TDI Coalition and conclude that to the extent technically feasible, Internet-based TRS providers must allow newly registered users to place calls immediately.” *Id.* ¶ 25.

on Level 3's petition so that Level 3 can obtain numbering resources within the state of New Hampshire.

- In its comments, Hamilton asks the Commission to “define the scope of permissible ‘geographically approximate’ numbers.”<sup>4</sup> The Consumer Groups concur. The Commission should do what is necessary to ensure that iTRS users are able to obtain a NANP number with an area code assigned to the user's registered location. If this is not feasible, iTRS users must be able to obtain a NANP number with an area code that is adjacent to the area code of the user's registered location within the iTRS user's state. Notwithstanding this requirement, iTRS users, like VoIP users, should be permitted to request, and iTRS providers should be permitted to provide, NANP numbers that are not based on the geographic location of the iTRS user.<sup>5</sup>

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<sup>4</sup> Hamilton comments at 4.

<sup>5</sup> See Sorenson Petition at 15 & n.39 (and case cited therein).

In conclusion, the Consumer Groups do not object to the relief requested by Sorenson so long as the conditions requested herein are met.

Respectfully submitted,

Claude L. Stout  
Executive Director  
Telecommunications for the  
Deaf and Hard of Hearing, Inc.  
8630 Fenton Street, Suite 604  
Silver Spring, MD 20910

/s/Tamar E. Finn  
Tamar E. Finn  
Eliot J. Greenwald  
BINGHAM MCCUTCHEN LLP  
2020 K Street, NW  
Washington, DC 20006  
(202) 373-6000

*Counsel to Telecommunications for the Deaf  
and Hard of Hearing, Inc.*

Jamie Pope  
Executive Director  
American Association of Deaf-Blind  
8630 Fenton Street, Suite 121  
Silver Spring, MD 20910

Kathy Schlueter  
President  
Association of Late-Deafened Adults, Inc.  
8038 MacIntosh Lane  
Rockford, IL 61107

Nancy J. Bloch  
Chief Executive Officer  
National Association of the Deaf  
8630 Fenton Street, Suite 820  
Silver Spring, MD 20910

Brenda Battat  
Executive Director  
Hearing Loss Association of America  
7910 Woodmont Avenue, Suite 1200  
Bethesda, MD 20814

Sheri A. Farinha Vice Chair  
California Coalition of Agencies Serving  
the Deaf and Hard of Hearing, Inc.  
4708 Roseville Rd, Ste 111  
North Highlands, CA 95660

Cheryl Heppner  
Vice Chair  
Deaf and Hard of Hearing Consumer Advocacy  
Network  
3951 Pender Drive, Suite 130  
Fairfax, VA 22030

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