

**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 Services for Individuals with)	
Hearing and Speech Disabilities)	
)	
E911 Requirements for IP-Enabled Service)	WC Docket No. 05-196
Providers)	

To: Secretary, FCC
For: The Commission

**REQUEST FOR EXTENSION AND CLARIFICATION
OF VARIOUS iTRS WAIVERS**

Hamilton Relay, Inc., AT&T Inc., CSDVRS, LLC, Sorenson Communications, Inc., Sprint Nextel Corporation, and Purple Communications, Inc. (collectively, the “Providers”), hereby request extension and/or clarification of the various waivers that have been issued to Internet-based telecommunications relay services (“iTRS”) providers in the above-captioned dockets.¹ A number of those waivers will expire on January 1, 2010, and therefore the Providers request expedited consideration of this petition.

I. Background

It has been repeatedly recognized by both the Commission and commenters that a number of the requirements set forth in Sections 64.603 and 64.604 of the FCC’s Rules are inapplicable to iTRS providers, given the operational nature of the Internet platform. In recognition of this fact, the Commission has waived many of those requirements for

¹ For purposes of this petition, iTRS providers include Internet Relay providers, Video Relay Service (“VRS”) providers and Internet Protocol Captioned Telephone Service (“IP CapTel”) providers.

iTRS providers. Some waivers have been issued indefinitely, while others have been periodically extended since being first issued many years ago, and are currently scheduled to expire on January 1, 2010 unless further extended by the Commission.

As described in further detail below, the Providers submit that the Commission should take this opportunity to: 1) extend various waivers indefinitely for Internet Relay and VRS providers, consistent with the Commission decision to grant indefinite waivers to IP CTS providers; and 2) clarify several discrepancies in the waivers that have been issued to date.

II. The Current Waiver Situation

A summary of the current status of various iTRS waivers follows. Please also refer to the chart attached hereto as Exhibit 1, which summarizes the current status of waivers.

A. Waivers That Expire on January 1, 2010

The following waivers will expire on January 1, 2010 for Internet Relay providers:

- Speech-to-Speech (STS)
- Types of calls
- Pay-per-call (900) service
- Voice Carry Over (VCO) (one-line)
- Hearing Carry Over (HCO) (one-line)
- VCO-to-TTY
- HCO-to-TTY
- VCO-to-VCO
- HCO-to-HCO
- Call release

The following waivers will expire on January 1, 2010 for VRS providers:

- Types of calls
- Equal access to interexchange carriers
- Pay-per-call (900) service

- VCO (one-line)
- HCO (one-line)
- VCO-to-TTY
- HCO-to-TTY
- VCO-to-VCO
- HCO-to-HCO
- Call release

B. Indefinite Waivers

The following requirements have been waived indefinitely for Internet Relay providers:

- Equal access to interexchange carriers
- Providing service 24/7

The following requirements have been waived indefinitely for VRS providers:

- STS
- Spanish-to-Spanish

The following requirements have been waived indefinitely for IP CTS providers:

- STS
- Equal access to interexchange carriers
- Pay-per-call (900) service
- VCO (one-line)
- HCO (one-line)
- VCO-to-TTY
- HCO-to-TTY
- VCO-to-VCO
- HCO-to-HCO
- Call release
- Three way calling
- Speed dialing
- Providing service 24/7
- Gender preference
- Handling calls in ASCII and Baudot formats
- Outbound 711 calling

Thus, STS has been waived indefinitely for VRS providers, but the STS waiver for Internet Relay providers expires on January 10, 2010. Similarly, the “equal access”

requirement has been waived indefinitely for Internet Relay providers, but the equal access waiver for VRS providers expires on January 10, 2010.

With the exception of the “types of calls” requirement, all of the waivers that will expire on January 1, 2010 for Internet Relay and/or VRS providers have been waived indefinitely for IP CTS providers.² Indeed, IP CTS providers have received additional indefinite waivers of three-way calling, speed dialing, gender preference, ASCII/Baudot formatted calls, and outbound 711 calling.

III. The Commission Should Extend Various Waivers Indefinitely and Clarify the Status of Certain Waivers

Because all three forms of iTRS share the same Internet architecture, the Providers submit that all of the waivers that will expire on January 1, 2010 for Internet Relay and VRS providers should be waived indefinitely, consistent with the decision to waive the requirements indefinitely for IP CTS providers. In addition, IP CTS providers should receive an indefinite waiver of the “types of calls” requirement.

The Providers also are seeking clarification concerning certain waivers that have been issued to date, as set forth below. In seeking these clarifications, the Providers submit that the Commission’s guiding principle should be that waivers should be issued to each form of iTRS on an equivalent basis, unless there is a sound rationale for not doing so with respect to a particular waived requirement. Specific waivers are addressed as follows:

² The “types of calls” requirement has not been waived for IP CTS providers, in contrast to Internet Relay and VRS providers for which the requirement has been waived until January 1, 2010.

A. Spanish-to-Spanish

In March 2000, the Commission adopted a requirement that all forms of interstate TRS must provide Spanish-to-Spanish relay services.³ The following year, the Commission determined that Spanish-to-Spanish was a non-mandatory service for VRS providers, noting in part that VRS is a voluntary service.⁴ However, it does not appear that the Commission has specifically addressed the applicability of Spanish-to-Spanish to Internet Relay and IP CTS.

Given that Internet Relay and IP CTS also are voluntary services, the Providers request that the Commission clarify whether Spanish-to-Spanish is a non-mandatory service for Internet Relay and IP CTS providers. A determination that Spanish-to-Spanish is not mandatory for Internet Relay and IP CTS providers would still allow any iTRS provider to offer and be reimbursed for Spanish-to-Spanish, and the competitively-based iTRS market may favor providers that offer this service.

B. ASL-to-Spanish

In 2005, the Commission authorized VRS providers to provide ASL-to-Spanish as a compensable form of TRS.⁵ ASL-to-Spanish remains a voluntary service for VRS providers.⁶ It is not clear from the record whether Internet Relay and IP CTS providers are subject to the ASL-to-Spanish requirement, but the Providers submit that any form of ASL is inapplicable to a text-based and speech-based service such as Internet Relay and

³ FCC 00-56, ¶ 29 (rel. March 6, 2000).

⁴ FCC 01-371 ¶ 27 (rel. Dec. 21, 2001), as clarified in FCC 04-137, ¶ 139 (rel. June 30, 2004).

⁵ FCC 05-139 ¶ 1 (rel. July 19, 2005).

⁶ *Id.*

IP CTS. Accordingly, the Providers request that the ASL-to-Spanish requirement be waived indefinitely for Internet Relay and IP CTS providers.

C. Types of Calls

Commission rules require TRS providers to handle any type of call normally handled by common carriers unless the Commission determines that it is not technologically feasible to do so.⁷ The “types of calls” requirement has been waived for Internet Relay and VRS providers until January 1, 2010, as long as the providers allow calls to be placed using calling cards and/or provide free long distance calls.⁸ The requirement has not been waived for IP CTS providers.

The Providers submit that the “types of calls” requirement be waived indefinitely for all forms of iTRS. Without access to interexchange carriers, the services offered by interexchange carriers such as calling cards, third party, and collect calls are not accessible through iTRS platforms. In any event, provided that iTRS providers offer their services free of charge, including free long distance service, the Providers submit that the rationale underlying the “types of calls” requirement is rendered moot.

D. Equal Access to Interexchange Carriers

Similarly, the “equal access” requirement should be waived indefinitely for VRS providers, as it has been for Internet Relay and IP CTS providers. Provided that VRS providers agree to abide by the condition placed on the equal access waiver issued to Internet Relay and IP CTS providers, i.e., that the VRS providers will pay for all long distance charges for VRS calls, the need for equal access is rendered moot.

⁷ 47 C.F.R. § 64.604(a)(3)(ii).

⁸ DA 08-2808 n.40 (Internet Relay); DA 08-2808 ¶¶ 1, 13 (VRS).

E. Pay-Per-Call (900) Services

Pay-per-call (900) services are calls that include a charge billed to the calling party.⁹ Significant technical hurdles prevent the Providers from automatically passing through 900 information and from following up with invoices for 900 service to the appropriate user. In addition, without the ability to confirm the correct Automatic Numbering Information (“ANI”) associated with a 900 call, the unacceptable danger is that pay-per-call charges may be billed to the wrong party or fraudulently evaded. Finally, there is no evidence in the record that the information or services available through pay-per-call services are unavailable to iTRS users through other methods that involve no payment per call.¹⁰ For these reasons, the Providers request that this requirement be waived indefinitely for Internet Relay and VRS providers, consistent with the decision to waive the requirement indefinitely for IP CTS providers.¹¹

F. Speech-to-Speech

As noted above, STS has been waived indefinitely for VRS and IP CTS providers. The Providers submit that STS should also be waived indefinitely for Internet Relay because, as with VRS and IP CTS calls, one leg of an Internet Relay call is entirely text-based without any speech capabilities, thus rendering the service incapable of providing STS.

⁹ 47 C.F.R. § 64.604(a)(3)(iv).

¹⁰ In addition, the amount of pay-per-call traffic being utilized by the deaf community using iTRS (or even any form of relay) is *de minimis*.

¹¹ FCC 06-182, ¶ 30.

The Providers note that the Commission has tentatively concluded that Internet Protocol STS (“IP STS”) is a form of TRS eligible for compensation from the fund.¹² To the extent that the Commission adopts an order confirming that providers may offer IP STS on a voluntary basis and be compensated from the fund for that service, the Providers believe that any form of STS using the Internet Protocol should be treated as IP STS, and that Internet Relay, VRS and IP CTS providers should continue to have waivers of the STS requirement.

G. VCO, HCO, VCO-to-TTY, HCO-to-TTY, VCO-to-VCO and HCO-to-HCO

VCO permits a person with a hearing disability, but who is able to speak, to speak directly to the other party to the call (instead of typing text), but receive in return the called party’s spoken words as text on the TTY.¹³ HCO permits a person with a speech disability, but who is able to hear, to type text to the other party to the call (which is voiced by the CA), but listen in return to what the called party is saying.¹⁴ VCO, HCO, VCO-to-TTY, HCO-to-TTY, VCO-to-VCO, and HCO-to-HCO have been waived for IP CTS indefinitely; they have been waived until January 1, 2010 for Internet Relay and VRS providers.

The Providers request that these requirements be waived indefinitely for VRS and Internet Relay providers, as long as the provider is capable of a work-around solution, such as offering the ability to use two-line VCO as a means of utilizing VCO and HCO services over the Internet at no additional charge to users. This would allow the

¹² FCC 08-149, ¶ 2 (rel. June 24, 2008).

¹³ 47 C.F.R. § 64.601(18).

¹⁴ *Id.* § 64.601(8).

Commission to be relieved of the administrative burden of issuing periodic waiver extensions, while still offering TRS users the full capabilities of VCO and HCO services when using VRS and Internet Relay.

H. Call Release

Call release is a TRS feature that allows the Communications Assistant (CA) to drop from the call after the CA has set up telephone call between two TTY users.¹⁵ IP CTS providers have received an indefinite waiver of the requirement to provide call release.¹⁶ The call release waiver for Internet Relay and VRS providers will expire on January 1, 2010.

The Providers request that the Commission extend the call release waiver indefinitely for VRS and Internet Relay providers, consistent with the decision to grant IP CTS providers an indefinite waiver of this requirement. As acknowledged in 2008 when the Commission last assessed this waived requirement, “the Internet leg of the call (via video or text) cannot support call release functionality.”¹⁷ Because that situation has not changed and is unlikely to change in the foreseeable future, and in order to relieve the Commission of the administrative burden of issuing periodic waiver extensions, the Providers request that the call release requirement be waived indefinitely for all forms of iTRS.

¹⁵ 47 C.F.R. § 64.601(5).

¹⁶ FCC 06-182, ¶ 30 (rel. Jan. 11, 2007).

¹⁷ DA 08-2808, ¶ 9 (rel. Dec. 24, 2008).

I. Handling Calls in ASCII/Baudot Formats

Providers of traditional TRS must ensure that the TTY can communicate in either the ASCII or Baudot formats.¹⁸

IP CTS providers have received an indefinite waiver of the requirement to handle calls made in ASCII and Baudot formats.¹⁹ It does not appear from the record that the Commission has addressed the applicability of ASCII/Baudot calls in the context of VRS or Internet Relay providers.

Because ASCII and Baudot calls are not applicable to the Internet protocol with which VRS and Internet Relay calls are made, the Providers submit that the ASCII/Baudot call handling requirement should be waived indefinitely for VRS and Internet Relay providers, consistent with the decision to indefinitely waive this requirement for IP CTS providers.

IV. The Current IP CTS Waiver for Three-way Calling Is No Longer Necessary

Three-way calling allows more than two parties to be on the telephone line with the CA.²⁰ This requirement has been waived indefinitely by the Commission with respect to IP CTS.²¹ Previous waivers of this requirement for VRS and Internet Relay have been allowed to expire by the Commission. The Providers believe that the Commission may also allow the three-way calling waiver for IP CTS providers to expire, because most if not all of the IP CTS providers now offer this functionality. As such, the waiver is no longer necessary.

¹⁸ 47 C.F.R. §§ 64.601(3)-(4); 64.604(b)(1).

¹⁹ FCC 06-182, ¶ 30 (rel. Jan. 11, 2007).

²⁰ 47 C.F.R. § 64.601(16).

²¹ FCC 06-182, ¶ 30 (rel. Jan. 11, 2007).

V. Conclusion

For the foregoing reasons, the Providers respectfully request that the Commission extend or clarify the various iTRS waivers as described in this petition. In addition, the Providers submit that the current waiver of the three-way calling requirement for IP CTS providers may be allowed to expire. The attached Exhibit 2 contains a summary of these requests.

Respectfully submitted,

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Submitted via ECFS

CURRENT
Internet-Based TRS Waiver Status Chart

Exhibit 1

	<u>Internet Relay</u>	Exp. Date	Address in Annual Rpt.	<u>VRS</u>	Exp. Date	Address in Annual Rpt.	<u>IP CTS</u>	Exp. Date	Address in Annual Rpt.
FCC Requirement									
Spanish-to-Spanish	Required ¹			Voluntary ¹			Required ¹		
ASL-to-Spanish	N/A ²			Voluntary ³			N/A ⁴		
Types of Calls	Waived ⁵	1/1/2010	Yes, due 4/16	Waived ⁶	1/1/2010	Yes, due 4/16	Required ⁷		
Speed of Answer	Required ⁸			Required ⁹			Required ¹⁰		
Equal Access to Interexchange Carrier	Waived ¹¹	Indefinite	No	Waived ¹²	1/1/2010	Yes, due 4/16	Waived ¹³	Indefinite	No

¹ Declared non-mandatory service for VRS in FCC 05-139 at ¶ 1. Appears to be required for Internet Relay and IP CTS.

² Given the text-based nature of the services, ASL-to-Spanish is not possible with Internet Relay.

³ FCC 05-139 ¶ 1 (rel. July 19, 2005).

⁴ Given the text-based nature of the services, ASL-to-Spanish is not possible with IP CTS, but the Providers are seeking clarification of this issue.

⁵ DA 08-2808, n.40; *see also* DA 07-5098, n.44 (CGB rel. Dec. 26, 2007) (“2007 Waiver Order”). There may be an error in the 2008 Waiver Order, in which the Bureau, at Footnote 5, states that the types of calls requirement “has not been waived for IP-Relay.” This statement is not consistent with the waiver granted on the Bureau’s own motion in Footnote 40 of the same Order, as well as Footnote 44 of the 2007 Waiver Order.

⁶ DA 08-2808 at ¶¶ 1, 13.

⁷ “Types of calls” was not included in the waivers granted to IP CTS providers in FCC 06-182.

⁸ 47 C.F.R. § 64.604(b)(2)(ii) (85% of all calls must be answered within 10 seconds).

⁹ 47 C.F.R. § 64.604(b)(2)(iii) (VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis).

¹⁰ 47 C.F.R. § 64.604(b)(2)(ii) (85% of all calls must be answered within 10 seconds).

¹¹ DA 08-2808, n.6; *see also* FCC 02-121 at ¶ 31 (Rel. Apr. 22, 2002) (“IP Relay Declaratory Ruling and Second FNPRM”) (“provided that IP Relay Providers continue their policy of not charging customers for long distance calls.”)

¹² DA 08-2808 at ¶¶ 1, 15 (“as long as the providers provide free long distance calls.”)

¹³ FCC 06-182 at ¶ 30, n. 101 (“if an IP CTS provider does not offer interexchange carrier of choice, the provider must offer free long distance to their customers.”)

CURRENT
Internet-Based TRS Waiver Status Chart

Exhibit 1

Pay-per-call (900) Service	Waived ¹⁴	1/1/2010	Yes, due 4/16	Waived ¹⁵	1/1/2010	Yes, due 4/16	Waived ¹⁶	Indefinite	Yes, due 4/16
Speech-to-Speech	Waived ¹⁷	1/1/2010	Yes, due 4/16	Waived ¹⁸	Indefinite	No	Waived ¹⁹	Indefinite	Yes, due 4/16
Voice Carry Over (VCO) (one-line)	Waived ²⁰	1/1/2010	Yes, due 4/16	Waived ²¹	1/1/2010	Yes, due 4/16	Waived ²²	Indefinite	Yes, due 4/16
Hearing Carry Over (HCO) (one-line)	Waived ²³	1/1/2010	Yes, due 4/16	Waived ²⁴	1/1/2010	Yes, due 4/16	Waived ²⁵	Indefinite	Yes, due 4/16
VCO-to-TTY	Waived ²⁶	1/1/2010	Yes, due 4/16	Waived ²⁷	1/1/2010	Yes, due 4/16	Waived ²⁸	Indefinite	Yes, due 4/16
HCO-to-TTY	Waived ²⁹	1/1/2010	Yes, due 4/16	Waived ³⁰	1/1/2010	Yes, due 4/16	Waived ³¹	Indefinite	Yes, due 4/16

¹⁴ DA 08-2808 at ¶¶ 1, 11.

¹⁵ DA 08-2808 at ¶¶ 1, 11.

¹⁶ FCC 06-182 at ¶ 30.

¹⁷ DA 08-2808 at ¶ 1, n.7 (CGB rel. Dec. 24, 2008) (“2008 Waiver Order”).

¹⁸ FCC 04-137 at ¶ 139 (rel. Jun. 30, 2004) (“2004 TRS Report and Order”).

¹⁹ FCC 06-182 at ¶ 30, n. 97 (rel. Jan. 11, 2007) (“2007 IP CTS Declaratory Ruling”).

²⁰ DA 08-2808 at ¶¶ 1, 5.

²¹ DA 08-2808 at ¶¶ 1, 5.

²² FCC 06-182 at ¶ 30.

²³ DA 08-2808 at ¶¶ 1, 7.

²⁴ DA 08-2808 at ¶¶ 1, 7.

²⁵ FCC 06-182 at ¶ 30.

²⁶ DA 08-2808 at ¶¶ 1, 5.

²⁷ DA 08-2808 at ¶¶ 1, 5.

²⁸ FCC 06-182 at ¶ 30.

²⁹ DA 08-2808 at ¶¶ 1, 7.

³⁰ DA 08-2808 at ¶¶ 1, 7.

³¹ FCC 06-182 at ¶ 30.

CURRENT
Internet-Based TRS Waiver Status Chart

Exhibit 1

VCO-to-VCO	Waived ³²	1/1/2010	Yes, due 4/16	Waived ³³	1/1/2010	Yes, due 4/16	Waived ³⁴	Indefinite	Yes, due 4/16
HCO-to-HCO	Waived ³⁵	1/1/2010	Yes, due 4/16	Waived ³⁶	1/1/2010	Yes, due 4/16	Waived ³⁷	Indefinite	Yes, due 4/16
Call Release	Waived ³⁸	1/1/2010	Yes, due 4/16	Waived ³⁹	1/1/2010	Yes, due 4/16	Waived ⁴⁰	Indefinite	Yes, due 4/16
Three Way Calling	Required ⁴¹			Required ⁴²			Waived ⁴³	Indefinite	Yes, due 4/16
Speed Dialing	Required ⁴⁴			Required ⁴⁵			Waived ⁴⁶	Indefinite	Yes, due 4/16
Providing Service 24/7	Waived ⁴⁷	Indefinite	No	Required ⁴⁸			Waived ⁴⁹	Indefinite	No
Gender Preference	Required ⁵⁰			Required ⁵¹			Waived ⁵²	Indefinite	No

³² DA 08-2808 at ¶¶ 1, 5.

³³ DA 08-2808 at ¶¶ 1, 5.

³⁴ FCC 06-182 at ¶ 30.

³⁵ DA 08-2808 at ¶¶ 1, 7.

³⁶ DA 08-2808 at ¶¶ 1, 7.

³⁷ FCC 06-182 at ¶ 30.

³⁸ DA 08-2808 at ¶¶ 1, 9.

³⁹ DA 08-2808 at ¶¶ 1, 9.

⁴⁰ FCC 06-182 at ¶ 30.

⁴¹ 47 C.F.R. § 64.604(a)(3)(vi).

⁴² 47 C.F.R. § 64.604(a)(3)(vi).

⁴³ FCC 06-182 at ¶ 30.

⁴⁴ 47 C.F.R. § 64.604(a)(3)(vi).

⁴⁵ 47 C.F.R. § 64.604(a)(3)(vi).

⁴⁶ FCC 06-182 at ¶ 30.

⁴⁷ FCC 06-182, n. 20.

⁴⁸ 47 C.F.R. § 64.604(b)(4).

⁴⁹ FCC 06-182, n. 90.

⁵⁰ 47 C.F.R. § 64.604(a)(1)(vi).

⁵¹ 47 C.F.R. § 64.604(a)(1)(vi).

⁵² FCC 06-182 at ¶ 30.

CURRENT
Internet-Based TRS Waiver Status Chart

Exhibit 1

Handling Calls in ASCII and Baudot Formats	Required ⁵³	Indefinite	No	Required ⁵⁴	Indefinite	No	Waived ⁵⁵	Indefinite	No
Outbound 711 Calling	Required ⁵⁶			Required ⁵⁷			Waived ⁵⁸	Indefinite	No
Emergency Call Handling	Required ⁵⁹			Required ⁶⁰			Required Under Certain Circumstances ⁶¹		No

⁵³ Waived for IP CTS but not Internet Relay.

⁵⁴ Waived for IP CTS but not VRS.

⁵⁵ FCC 06-182 at ¶ 30.

⁵⁶ 47 C.F.R. § 64.603; *See also* FCC 00-257 (Rel. Aug. 9, 2000) (“*N11 Second Report and Order*”) (requiring access via the 711 dialing code).

⁵⁷ 47 C.F.R. § 64.603; *See also* FCC 00-257 (Rel. Aug. 9, 2000) (“*N11 Second Report and Order*”) (requiring access via the 711 dialing code).

⁵⁸ FCC 06-182 at ¶ 30.

⁵⁹ 47 C.F.R. § 64.605.

⁶⁰ 47 C.F.R. § 64.605.

⁶¹ FCC 08-98, n.7 and n.59 (Rel. Mar. 19, 2008) (“*Internet-based TRS E9-1-1 Order*”) (“we note that the requirements adopted herein shall apply to IP CTS providers only in circumstances where the call is initiated, or can be initiated, by the user contacting the provider via the Internet. By contrast, for example, if IP CTS were provided in such a way that the user first makes a voice telephone call to the called party, and then can elect to contact the provider via the Internet to receive captions, the requirements set forth herein would not be applicable.”)

PROPOSED
Internet-Based TRS Waiver Status Chart

Exhibit 2

	<u>Internet Relay</u>	Exp. Date	Address in Annual Rpt.	<u>VRS</u>	Exp. Date	Address in Annual Rpt.	<u>IP CTS</u>	Exp. Date	Address in Annual Rpt.
FCC Requirement									
Spanish-Spanish	Voluntary			Voluntary			Voluntary		
ASL-Spanish	Voluntary			Voluntary			Voluntary		
Types of Calls	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
Equal Access to Interexchange Carrier	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
Pay-per-call (900) Service	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
Speech-to-Speech	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	No	Waived	Indefinite	Yes, due 4/16
Voice Carry Over (VCO) (one-line)	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
Hearing Carry Over (HCO) (one-line)	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
VCO-to-TTY	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
HCO-to-TTY	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
VCO-to-VCO	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
HCO-to-HCO	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16
Call Release	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16	Waived	Indefinite	Yes, due 4/16

**PROPOSED
Internet-Based TRS Waiver Status Chart**

Exhibit 2

Three Way Calling	Required			Required			Required		
Speed Dialing	Required			Required			Waived	Indefinite	Yes, due 4/16
Providing Service 24/7	Required			Required			Waived	Indefinite	No
Gender Preference	Required			Required			Waived	Indefinite	No
Handling Calls in ASCII and Baudot Formats	Waived	Indefinite	No	Waived	Indefinite	No	Waived	Indefinite	No
Outbound 711 Calling	Required			Required			Waived	Indefinite	No

Note: Speed of Answer and Emergency Call Handling have been removed from the proposed waiver chart because they are now mandatory requirements (with the Emergency Call Handling requirements for IP CTS being slightly different than those applicable to Internet Relay and VRS).