

**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
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	

To: Chief, Consumer and Government Affairs Bureau
Chief, Wireline Competition Bureau

SECOND REQUEST TO EXTEND WAIVER

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”), and American Association of the Deaf-Blind (“AADB”) (collectively, the “Consumer Groups”), hereby request that the Commission extend for one year the temporary waiver granted in this proceeding on December 4, 2009, Order DA 09-2543, and extended on April 2, 2010, Order DA 10-51, to permit toll free numbers and ten-digit geographic numbers to be directed to the same Uniform Resource Identifier (“URI”) in the iTRS Directory.

By way of background, on August 11, 2009, the Consumer and Government Affairs Bureau and the Wireline Competition Bureau (collectively the “Bureaus”) issued the *Toll Free*

Clarification Public Notice,¹ which prohibited populating toll free numbers in the iTRS database. In response to the October 27, 2009 Petition for Emergency Stay filed by the Consumer Groups, on December 4, 2009, the Bureaus temporarily waived for four months the aspect of the *Toll Free Clarification Public Notice* that prohibited placing toll free numbers in the iTRS database. On April 2, 2010, the Bureaus extended the temporary waiver to expire on August 4, 2010.

In Orders DA 09-2543 and DA 10-593, the Bureaus explained that the temporary waiver was granted to give the Commission time to consider the pending petition for reconsideration of the *Toll Free Clarification Public Notice* filed by CSDVRS, LLC on September 10, 2009, as well as iTRS toll free issues generally. Since the Commission is still considering these issues, in order to avoid disruption of service to consumers, it would be in the public interest for the Bureaus to extend the waiver until the Commission can issue a notice of proposed rulemaking on the issues, adopt new rules, and provide for a reasonable implementation time. Therefore, the Consumer Groups request a one-year extension to provide the requisite amount of time.

¹ *Clarification Regarding the Use of Toll Free Numbers for Internet-Based Telecommunications Relay Services*, CG Docket No. 03-123, CC Docket No. 98-67, WC Docket No. 05-196, Public Notice, 24 FCC Rcd. 10626 (2009).

Respectfully submitted,

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