

**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
	)	

**THIRD 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 six months 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, and August 4, 2010, Order DA 10-1445, 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*,<sup>1</sup> 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. On August 4, 2010, the Bureaus further extended the temporary waiver to expire on February 4, 2011.

In Orders DA 09-2543, DA 10-593, and DA 10-1445, 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. On September 17, 2010, the Commission released a notice of proposed rule making concerning iTRS toll free number usage.<sup>2</sup> Since the Commission is still considering these issues, and in order to avoid disruption of service to consumers, it would be in the public interest for the Bureaus to further extend the waiver until the Commission can adopt new rules, and provide for a reasonable implementation time. The Consumer Groups request a six month extension to provide the requisite amount of time, and believe that such a timeframe should be sufficient for the Commission to adopt new rules.

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<sup>1</sup> *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).

<sup>2</sup> *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers, Internet-Based Telecommunications Relay Service Numbering*, Notice of Proposed Rulemaking, Docket Nos. 03-123, 05-196 & 10-191 (rel. Sept. 17, 2010).

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  
Jeffrey R. Strenkowski  
BINGHAM MCCUTCHEN LLP  
2020 K Street, NW  
Washington, DC 20006  
(202) 373-6000

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

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

Cynthia Amerman  
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

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

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

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