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VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **WRITTEN EX PARTE PRESENTATION**

*Telecommunications Relay Services and Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities*
CG Docket No. 03-123

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

Dear Ms. Dortch:

On behalf of Hamilton Relay, Inc. ("Hamilton") and at the request of Commission staff, we are submitting this letter to provide information concerning Hamilton's validation and verification procedures prior to issuing a ten-digit number to an IP-based Telecommunications Relay Service ("iTRS") user. Hamilton believes this information may be useful to the Commission in terms of establishing a set of minimum standards to apply to iTRS verification/validation procedures.

Under current rules, the Commission does not mandate the use of any particular verification procedures. Instead, the Commission requires only that iTRS providers implement a reasonable means of verifying registration and eligibility information that is not unduly burdensome.¹ Among other things, the Commission has suggested that sending a postcard to the

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, CC Docket No. 98-67, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, FCC 08-275, ¶ 38 (rel. Dec. 19, 2008).

user's mailing address would be acceptable.² Hamilton believes that the postcard approach does not afford the user or the provider with a sufficiently rapid response timeframe. Given the Internet-based nature of iTRS, Hamilton believes that a more immediate verification procedure is warranted, and that its procedures described below accomplish this goal in an efficient and cost-effective manner. Hamilton also believes these procedures strike an appropriate balance between the Commission's desire to deter iTRS fraud and abuse, and the relay user's desire to obtain a ten-digit number in a straightforward manner.

The following describes certain of the procedures that take place when a new user registers for a 10-digit number with Hamilton. For security and other reasons, not all of Hamilton's internal procedures are described below.

1. The relay user registers for an account with Hamilton by visiting www.hamiltonrelay.com.

2. Registration requires the user to enter his/her full name, date of birth, e-mail address, and a password to be associated with the Hamilton account. The user is also asked to enter a physical address for validation purposes.

3. Initial Screening. Upon submitting this information, the user's name and address are processed immediately through a subcontractor. The information is cross-checked against public records and an accuracy percentile is assigned. If the information cannot be verified to Hamilton's standard, then the registration process stops until a user can provide verification of identity and location as explained below. This initial screening process occurs within a matter of seconds.

4. Secondary Screening. To add a secondary layer of verification, the physical address information provided by the user is validated through Hamilton's 911 and numbering subcontractor. This process also ensures that 911 provisioning is available at the user's address. Secondary screening also occurs within a matter of seconds.

a. If a user's information passes the initial screen but is deemed invalid through the secondary screening, Hamilton's Customer Service will contact the user and request additional information. If the user cannot provide any additional information for the address provided, but the user and address appear to be otherwise legitimate, then Customer Service will explain that Hamilton's 911 subcontractor does not currently recognize the user's address as a valid 911 address, and if the user is still willing to obtain a number then Hamilton will give them a 10-digit number.³

² *Id.*

³ As explained below, a user may nonetheless make an emergency 911 call routed to an appropriate PSAP at any time on Hamilton's system.

5. Following initial and secondary screening, an automated e-mail is immediately sent to the user. One of two possible e-mails is sent:

a. Unsuccessful Verification: If the user's submitted information fails the initial screening and/or the secondary screening, the user receives an e-mail requesting proof of identification. Acceptable forms of identification include a driver's license or a recent utility bill, which may be mailed, e-mailed or faxed to Hamilton's Customer Service within three (3) days from initial registration.

i. Should the user fail to provide such identification, the user's account is removed from Hamilton's database immediately after the third day.⁴

ii. If the user provides valid proof of identification, Hamilton's Customer Service manually overrides the initial unsuccessful verification and an e-mail confirmation is sent to the user. The process continues as described in section b, below.

b. Successful Verification: The user then proceeds to select a locally-based 10-digit number.

6. When the user's number is made available by Hamilton's numbering vendor, the number is sent to the user by e-mail, and calls can be placed and received.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1).

In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor

David A. O'Connor

Counsel for Hamilton Relay, Inc.

cc: Karen Peltz Strauss
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⁴ Users may make emergency 911 calls at any time, despite registration status. Newly registered users may place calls immediately after they have submitted all of the necessary registration information. *See Consumer & Governmental Affairs Bureau Reminds Video Relay Service (VRS) and Internet Protocol (IP) Relay Service Providers of Their Outreach Obligations and Clarifies Their Call Handling Obligations for Unregistered Users After the November 12, 2009, Ten-Digit Numbering Registration Deadline*, CG Docket No. 03-123, WC Docket No. 05-196, DA 09-2261, 24 FCC Rcd 12877, 12878 (rel. Oct. 21, 2009).