

**Before the
Federal Communications Commission
Washington, DC 20054**

In the Matter of)	
)	
Telecommunications Relay Services)	
and Speech-to-Speech Services for)	CG Docket No. 03-123
Individuals with Hearing and Speech)	
Disabilities)	
)	
E911 Requirements for IP-Enabled Service)	WC Docket No. 05-196
Providers)	

AT&T 2011 ANNUAL REPORT ON TRS WAIVERS

Pursuant to the Commission’s June 30, 2010 *Order* in the above-captioned proceeding,¹ AT&T Services, Inc. (“AT&T”), on behalf of its affiliates providing Internet Protocol Relay Service (“IP Relay”) and Video Relay Service (“VRS”) (jointly called “IP TRS”), submits this Status Report on its progress in providing certain mandatory minimum features and functions for IP TRS that are currently subject to Commission waivers.

DISCUSSION

Pay-Per-Call Services

It remains technically infeasible for AT&T to offer Pay-Per-Call service for IP TRS users. The ability to process and complete calls to Pay-Per-Call services via IP Relay and VRS is dependent on a billing relationship between the provider offering these services and the IP TRS user. AT&T and other IP TRS providers have no billing relationship with IP TRS users and no reasonable prospect of such a relationship in the near future. Although IP TRS providers

¹ See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers, Order, WC Docket No. 05-196 (2010) (“Order”).

obtain registered location information from IP TRS users in conjunction with the assignment of 10-digit numbers, knowing a user's address is merely a small part of the equation.

Establishing a billing relationship with IP TRS users would require providers to make huge investments in billing and support systems, back-office personnel, training, and distribution systems for generating and sending bills to users who complete calls to Pay-Per-Call services.² Imposing these costs on TRS providers or the Interstate TRS Fund cannot be justified as reasonable. For these reasons, AT&T urges the Commission to issue a permanent waiver of the requirement that TRS providers offer Pay-Per-Call Services with IP TRS, or in the alternative, to extend the current waiver for an additional period of time.

VCO, HCO & STS

AT&T cannot simultaneously process voice and data information on the same Internet connection in order to reliably enable voice or hearing carry over and does not foresee the ability to provide this feature in the near future. For this reason, AT&T urges the Commission to continue waiving the requirement for handling one line VCO, HCO, STS and other voice-enhanced relay services.

Carrier of Choice (Equal Access to Interexchange Carriers) Operator Assisted Calls/Long Distance Calls

AT&T cannot offer these features to IP TRS users. Like all IP TRS providers, AT&T would have to bill IP TRS users for their use of the features if offered. Yet, AT&T and other IP TRS providers have no billing relationship with IP TRS users and would incur significant costs in establishing such a relationship, even if the provider knows the registered location of the user. These substantial costs are not justified when compared to the minimal benefit of these features to IP TRS users, who incur no cost to make IP TRS calls, including calls that might be

² TRS providers would potentially incur further significant costs if required to mail paper bills to users of Pay-Per-Call services.

considered long distance. For this reason, AT&T also submits that there is no compelling reason to mandate that IP TRS providers allow users to make operator assisted and long distance calls by their carrier of choice or preferred interexchange carrier. AT&T urges the Commission to permanently waive the requirement that providers offer these features with IP TRS, or alternatively, continue to extend the waiver of the requirement.

Call Release

AT&T has been unable to implement a solution that would allow a communications assistant (“CA”) to be released from an IP TRS call without the call also terminating due to incompatible protocols. AT&T’s version of call release that allows a CA to disengage from a call between TTY users while allowing the call to proceed independently on AT&T’s switch does not operate for IP TRS calls. AT&T has no current solution that would allow for call release to occur for IP TRS calls. AT&T would argue that there is no longer the need for a call release capability for IP TRS calls, as communications and accessibility technology has leaped-frogged the need for call release for IP TRS for the vast majority of deaf and hard of hearing Americans. Deaf and hard of hearing persons who want to communicate with each other engage in text and instant messaging, point-to-point video calling, and video calling without relying on IP TRS. Thus, the time and resources that providers need to develop a call release capability for IP TRS calls would likely outweigh the use of and benefits to be derived from the development of such a capability. For those reasons, AT&T urges the Commission to extend indefinitely the waiver of the requirement that IP TRS providers offer call release.

CONCLUSION

The lack of a billing relationship between TRS providers and IP TRS users, and the significant costs to TRS providers or the Interstate TRS Fund of mandating such a billing

relationship, establishes good cause for the Commission to permanently waive the requirement that TRS providers offer those IP TRS features that require billing to users. Further, existing technological barriers demonstrate good cause for the Commission to continue to enforce the current waivers for the call types/features discussed above and further extend those waivers for the foreseeable future.

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Respectfully submitted,



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