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December 5, 2011

Marlene H. Dortch
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Re: CG Docket No. 10-51
AT&T IP Relay Certification Application

Dear Ms. Dortch:

Please accept for electronic filing in the above-referenced docket the attached redacted version for public viewing of AT&T Corp.'s Certification Application for Internet Protocol Relay Service. Pursuant to Section 0.459 of the Federal Communication Commission rules, AT&T has requested confidential treatment of the redacted information and documents submitted with AT&T's Certification Application because the identified information and documents are exempt from disclosure under FOIA exemption 4. A full, unredacted version of AT&T's Certification Application (marked as "Confidential – Not for Public Inspection") was hand delivered to the Commission today, in accordance with Commission paper filing requirements.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert Vitanza", with a long, sweeping horizontal line extending to the right.

Robert Vitanza

Attachment

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)	
)	
Structure and Practices of Video Relay Services)	
Program)	CG Docket No. 10-51
_____)	
)	
Internet Protocol Relay Service Certification)	

**INTERNET-BASED TRS CERTIFICATION APPLICATION
OF AT&T CORP. FOR CERTIFICATION OF
INTERNET PROTOCOL RELAY SERVICE**

REDACTED VERSION

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December 5, 2011

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In the Matter of)	
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Structure and Practices of Video Relay Services)	
Program)	CG Docket No. 10-51
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Internet Protocol (“IP”) Relay Service)	
Certification)	

**INTERNET-BASED TRS CERTIFICATION APPLICATION
OF AT&T CORP. FOR
CERTIFICATION OF IP RELAY SERVICE**

AT&T Corp. (“AT&T”) submits this application for certification of its Internet Protocol (“IP”) Relay Service.

I. Introduction and Background

In its Second Report and Order dated July 28, 2011, the Commission amended its rules to require that all providers of Internet-based Telecommunications Relay Service (“iTRS”), including IP Relay providers, apply for and obtain certification from the Commission to provide iTRS and to be eligible to recover from the Interstate Telecommunications Relay Service (“TRS”) Fund.¹ AT&T is currently an IP Relay provider and, in this application, seeks certification from the Commission to continue providing IP Relay to deaf and hard-of-hearing Americans and to recover from the Interstate TRS Fund for that service.

¹ See Structure and Practices of the Video Relay Service Program, Second Report and Order and Order, CG Docket No. 10-51, FCC 11-118 (rel. July 28, 2011) (“Order”).

AT&T has a long history of providing TRS services to deaf and hard-of-hearing Americans, longer than any other company. We were the first company to offer state funded 24 hours a day, 7 days a week traditional TRS, beginning in January 1987. Thereafter, we have been instrumental in introducing many features to traditional TRS that are now standard in the industry, such as text pacing and single line answering message retrieval. AT&T offered the first demonstration of web-based IP Relay in October 2000 during the National Association of State Relay Administration annual conference. AT&T then began offering IP Relay to the general public in June 2002. Since that time, AT&T has continued to improve its IP Relay offering, introducing features that are not currently available from any other IP Relay provider. AT&T has also offered Video Relay Service (“VRS”) since January 2003² and most recently in September 2011, expanded its offering to include IP CTS.

AT&T also manages the call centers that support its traditional TRS operations.³ AT&T hires, trains, supports and employs its own Communication Assistants (“CA”), supervisors and managers at these call centers. AT&T also owns, maintains, and supports the CA workstations, call routing, switches, network platform, and the billing and recording systems. These same call centers and employees are used to provide the IP Relay service for which AT&T applies for certification.

² AT&T has provided VRS through CSDVRS, LLC since August 25, 2010. Prior to that date, AT&T provided VRS through Purple Communications, Inc. (“Purple”) and its predecessor Hands On Video Relay Service Inc. (“HOVRS”). AT&T has provided notice to the Commission of its intention to discontinue offering VRS.

³ AT&T currently provides traditional TRS in California, Michigan, Virginia, Pennsylvania, and the District of Columbia.

AT&T has provided IP Relay in compliance with the Commission’s non-waived mandatory minimum standards, other Commission rules, and state contractual requirements.⁴ In this application, AT&T demonstrates that it will continue to meet these standards and that it is otherwise qualified under Commission rules to continue providing IP Relay to deaf and hard-of-hearing Americans and to recover from the Interstate TRS Fund. Therefore, this application is in the public interest and should be granted.

II. Qualifications for Certification.

AT&T provides the following information to the Commission pursuant to Commission rule §64.606(a)(2), 47 C.F.R. §64.606(a)(2):

A. Description of Service (47 C.F.R. §64.606(a)(2)(i)).

AT&T’s IP Relay, also called “AT&T Instant Message (“IM”) Relay” allows a person with a hearing or speech disability to access the service through an Internet-enabled device instead of over the Public Switch Telephone Network (“PSTN”). One leg of the call (between the relay user and the CA) occurs via the Internet and the other leg of the call (between the CA and the hearing person) occurs via the PSTN. To use the service, a deaf or hard-of-hearing person communicates with a hearing person by typing a message via the Internet to a specially trained CA, who voices the typed message to the hearing person. A registered AT&T IM Relay user can also easily receive an IM Relay call when the hearing user dials the relay user’s assigned ten-digit telephone number. In that situation, the call is routed to AT&T’s IM Relay call center, and a CA staffing that center, and the CA calls the deaf or hard-of-hearing person. There is no cost to a user to place or receive an IM Relay call.

⁴ [REDACTED]

AT&T currently provides access to AT&T IM Relay 24 hours a day/7 days a week in both Spanish and English. AT&T uses the public Internet, its own redundant network, an automatic call distribution platform, and high quality hardware and proprietary software to route and process its IP Relay calls. AT&T's technical relay platform is supported by its own team of engineers and developers. AT&T has developed an extensive database system that allows its

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] accurately report and

submit monthly data to the Interstate TRS Fund Administrator. Additionally, this platform allows AT&T to accurately and effectively track the length of calls, as well as the number of calls at any time of the day, the number of calls waiting in queue, abandoned calls, and the number of dropped or unanswered calls.

AT&T provides its IP Relay service through a publically available instant messaging based application developed by America On Line ® (“AOL”) known as AOL® Instant Messenger Service (“AIM®”). To access AT&T IP Relay, a user must first register with AOL® and secure a screen name. Thereafter, the AIM® user can initiate an IP Relay call with AT&T by communicating with the interactive relay agent screen name, ATTRELAY. A first time user who communicates with ATTRELAY to place a non-emergency call must:

- (1) register by providing a first name, last name, e-mail address, and valid physical address within the United States;
- (2) agree to the terms and conditions for the use of the service;
- (3) self-certify that s/he has a medically recognized disability; and

(4) request a ten-digit telephone number.

[REDACTED]

[REDACTED]

[REDACTED] (See Attachments 1 through 1-H for screen shots of the registration process).

No special equipment is required for users to access AIM® other than any Internet-enabled device with access to AIM®, such as a desktop computer, laptop, net book, or wireless phone. Likewise, there is no program or software application download required in order to use AT&T IM Relay, though a user may have to download software from AOL to utilize AIM®.

A standard telephone user can place a call to any AT&T registered IM Relay user by simply dialing the ten-digit telephone number of the AIM® user. The call is then routed to the first available CA for normal call handling. If the AIM® user is on line, the CA will be able to connect the relay call.

AT&T provisions the user's screen name and ten-digit telephone number, not an IP address, in the central database. The ten-digit number is not mapped to a device, but is instead mapped to a screen name regardless of the device being used. Registered users can access and update their registered location from any device with Internet access anywhere and at any time through the AOL AIM® chat window or by sending an e-mail to AT&T Customer Care at [rm-attcustomercare@att.com](mailto:attcustomercare@att.com).

AT&T provides on its IP Relay website information educating users about the importance of keeping their registered location current, information on placing calls to emergency 911 services, and information about the user's ability to port their ten-digit telephone number assigned by AT&T to any provider of their choice. Additionally, the AT&T IP Relay website

provides additional information and links that direct the website visitor to information posted on the Commission’s Disability Rights Office regarding Internet-based relay services and the requirements for registering for a ten digit number, porting a number and placing emergency calls to 911.

B. Non-Waived Mandatory Minimum Standards (47 C.F.R. §64.606(a)(2)(ii)).

AT&T currently meets or exceeds all non-waived mandatory minimum standards for IP Relay as codified in 47 C.F.R. §64.604 and intends to continue to comply after certification.

1. Communication Assistants (“CAs”).

[REDACTED] All AT&T IP Relay CAs are required to competently type at a minimum rate of 60 words per minute, and must be able to demonstrate adequate grammar and spelling skills. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] which insures that CAs can interpret effectively, accurately, and impartially, both receptively and expressively, using necessary vocabulary.

The training stresses Commission requirements for IP Relay [REDACTED]

During pre-employment, initial training if needed, and annually thereafter, CAs are tested using an audio-typing test to ensure they maintain a minimum typing speed above the required 60 words per minute. Additionally, CAs have an annual review of the requirements for confidentiality of all relay calls. All CAs are trained to handle emergency calls without delays or problems. [REDACTED]

[REDACTED] CAs comply with Commission rules regarding call duration in that there is no limit on the number of calls or length of calls that can be placed through the relay service. Specifically, AT&T trains its CAs to stay with a relay call for a minimum of ten minutes. AT&T's CAs are also trained to use their best efforts to transfer a call to a person of another gender if requested by the IP Relay user during a call.

2. Confidentiality and Conversation Content.

AT&T CAs are trained to convey the full content, context, and intent of all communications and receive extensive training on the need to relay all relay conversations verbatim without changing the intent of the communication. AT&T CAs are required to sign a "Code of Ethics" statement, wherein the CA certifies that he/she "will convey the content and the spirit of the speaker." Attachment 2 provides a copy of the AT&T Code of Ethics. CAs are trained and required to relay verbatim unless requested otherwise by the caller and/or recognized by the relay CA as an ASL call requiring translation. AT&T CAs are trained to be neutral and non-participative in all relay conversations. AT&T CAs are also explicitly trained not to disclose the contents of any relay conversation or keep records beyond the duration of the call.

[REDACTED]

[REDACTED]

[REDACTED] CAs are also trained to not disclose any information obtained during an emergency call and to use that information only to facilitate emergency services, to communicate with emergency call handlers and emergency response or law enforcement personnel, to ascertain a user's location in an emergency situation, or for other emergency or law enforcement purposes. AT&T uses customer information it acquires for the limited purpose of connecting TRS users with called parties, and does not sell, distribute, or reveal the information in any way contrary to Commission rules, unless ordered to do so by a lawful authority.

3. Types of Calls & Equal Access.

The Commission has waived until July 1, 2012, the requirement that IP Relay providers provide One Line VCO, VCO-to-TTY, VCO-to-VCO, One Line HCO, HCO-to-TTY, HCO-to-HCO, Call Release, Pay-Per Call (900) calls, Operator Assisted and Long Distance calls, and Speech to Speech (STS) calls.⁵ The Commission has also waived indefinitely the Equal Access requirement.⁶ AT&T meets all conditions to qualify for these waivers and intends to continue meeting these conditions if the waivers are extended. Specifically, AT&T has filed its annual report with the Commission on the status of incorporating these features into IP Relay and AT&T offers free long distance. AT&T handles all types of calls that have not been waived by

⁵ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123, WC Docket No. 05-196, Order, 26 FCC Rcd 9449 (2011).

⁶ See *Provision of Improved Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Declaratory Ruling and Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 7779 (April 22, 2002)

the Commission. AT&T does not limit the type, length, or number of calls it handles for a deaf or hard-of-hearing user. Further, AT&T does not refuse any single or sequential calls.

4. Voice Mail and Interactive Menus

The Commission rules require CAs handling IP Relay calls to use a hot key that sends a text to a user alerting the user when they have dialed a number answered by a recorded message or interactive menu. AT&T's IP Relay platform allows for this functionality. [REDACTED]

[REDACTED]

[REDACTED]

5. Speed Dialing/Call Release/Three-way Calling

Users of AT&T IP Relay have the ability to create, edit and store a list of their most frequently called telephone numbers. Users are able to type the command, "SPEED" to see a list of the pre-programmed speed dial numbers. Typing the word "ADD" allows users to add numbers to the speed dial list. Typing "DELETE" will allow users to remove a number from the list. All of these options are available with the assistance of the CA. As referenced above, the Commission has waived the call release requirement until July 1, 2012. AT&T can also accommodate three-way calling if a called party has this feature enabled by their local carrier.

6. Emergency Call Handling⁷

AT&T complies with the Commission's mandates for emergency call handling procedures. Specifically, AT&T transfers calls to the most appropriate public safety answering point ("PSAP"). AT&T IP Relay uses a proprietary method for automatically identifying when a user types "911", "9-1-1", or "Emergency" in the chat window. Emergency calls get "priority

⁷ See also 47 C.F.R. §64.605.

treatment” and are sent directly to the top of the queue for handling by the first available CA.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] AT&T attempts to transmit the user’s call back number, the caller's registered location, the name of the provider, and will voice the CA's identification number for each call to the appropriate PSAP or local emergency authority that serves the caller's location.

The CA will remain available to the emergency agency for any information or assistance to support emergency service and will attempt to reestablish contact with the TRS user and/or PSAP if one or both legs of the call are disconnected. A supervisor is typically summoned to provide support for the CA until the call ends and the PSAP disconnects.

AT&T provides detailed information and an advisory on its website about the limitations of processing emergency 911 calls through IP Relay. This information is prominently provided in several places on the website. Users who register with AT&T acknowledge these limitations before completing the registration process. Additionally, AT&T includes information about completing 911 emergency calls through IP Relay in its promotional and marketing information (see Attachment 3).

AT&T also has implemented a system to provide priority routing for emergency callbacks, which are generally originated by a voice caller at the 911 dispatch center or emergency agency. These callbacks are given priority queuing when the 911 personnel respond affirmatively to an audio message asking if they have an emergency call.

7. International Calls.

As required by Commission Orders,⁸ AT&T does not submit international IP Relay calls to the Interstate TRS Fund Administrator for reimbursement.

8. Speed of Answer.

AT&T ensures adequate staffing of its call centers using projected call volumes to substantially comply with the requirement that 85% of all IP Relay calls are answered within 10 seconds, calculated on a daily basis. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. Operations and Uninterruptible Power.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁸ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, ¶129 & n.371 (rel. June 30, 2004); *In re: Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Report & Order, note 106 (rel. April 6, 2011).

[REDACTED]

10. Caller ID.

The AT&T IP Relay platform allows for the transmission of a user’s ten digit number if the user has registered with AT&T. Standard telephone users who subscribe to Caller ID services from their telephone service provider will receive the ten digit telephone number of the AT&T registered user. For “dial around” users not registered with AT&T, the AT&T IP Relay platform will transmit the generic number, 800-855-0000.

11. Public Access to Information.

AT&T complies with the Commission rules to ensure that everyone in its service area, including individuals who are deaf, hard of hearing, speech disabled, senior citizens and the general public, are aware of the availability and use of relay services. AT&T provides annual notice to all residential users regarding the availability and use of traditional TRS via bill inserts,

for your information pages and/or newsletters. AT&T also conducts outreach and education to ensure that the hearing, hearing loss and speech loss communities are informed about relay services. AT&T employs a team of marketing individuals and channel managers who actively conduct targeted outreach about all of AT&T's relay services, including IP Relay, and also participate at a wide variety of deaf meetings, conferences and gatherings regularly scheduled in communities across the United States. Additionally, AT&T also distributes a brochure with information about all types of relay services, including IP Relay, at outreach events, meetings, and conferences.

AT&T has also used popular websites and publications directed toward the deaf, hard of hearing, and speech loss community to announce the availability of its IP Relay Service. Some of these include banner ads and announcements on Deaf Digest, TDI World, Deaf Weekly, Hearing Health Magazine, DeafTimes, and others.

12. Rates.

AT&T does not charge users to access AT&T IP Relay, including long distance services that are needed for a call; however, users who access the service from mobile devices may incur data and usage charges from their mobile provider.

13. Jurisdictional Separation of Costs.

Commission rule §64.604(c)(5), 47 C.F.R. §64.604(c)(5), requires, where appropriate, the costs of providing TRS to be separated by intrastate and interstate jurisdiction, pursuant to Section 410 of the Communications Act, 47 U.S.C. §410. AT&T complies with this standard and has procedures in place for tracking and reporting true and accurate call data needed for its cost and data submissions to the Interstate TRS Fund Administrator.

14. Notification of Substantive Changes.

AT&T has complied, and in the future will continue to comply, with Commission rules requiring notice to the Commission of substantive changes in AT&T's TRS programs, services and features within 60 days of the time such changes occur and certification that AT&T will continue to meet federal minimum standards after the changes are implemented.

15. Data Collection/Audit.

AT&T will continue to provide the Interstate TRS Fund Administrator with accurate and complete information and data, including historical and projected minute and cost information as required to support determination of TRS Fund revenue requirements and payments; documentation attesting to the accuracy of the information; speed of answer compliance data; and call data for each IP Relay call for which compensation is sought, namely (a) the call record ID sequence; (b) CA ID number; (c) session start and end times noted at a minimum to the nearest second; (d) conversation start and end times noted at a minimum to the nearest second; (e) incoming telephone number and IP address (if call originates with an IP-based device) at the time of the call; (f) outbound telephone number (if call terminates to a telephone) and IP address (if call terminates to an IP-based device) at the time of call; (g) total conversation minutes; (h) total session minutes; (i) the call center (by assigned center ID number) that handled the call; and (j) the URL address through which the call is handled.

AT&T uses an automated system to capture speed of answer and call data and submits that data to the Interstate TRS Fund Administrator electronically, in a standardized format. AT&T will also submit to audits of all of the data AT&T submits to the Interstate TRS Fund Administrator. Further, AT&T will retain in an electronic, easily retrievable format, all data that it submits to the Interstate TRS Fund Administrator, all back-up data supporting AT&T's request

for compensation from the Fund, including call detail records, and all records used to substantiate AT&T's annual cost and expense submissions, for a minimum of five years.

16. Whistle Blower Protection.

AT&T does not take any reprisal against any current or former employee who discloses any information to an AT&T manager, the Commission, the Interstate TRS Fund administrator or any federal or state law enforcement entity that the person reasonably believes evidences known or suspected violations of The Communications Act or TRS regulations, or any other activity that the person reasonably believes constitutes waste, fraud, or abuse, or that otherwise could result in the improper billing of minutes of use to the TRS Fund. AT&T requires all employees that support IP Relay to review on an annual basis AT&T's TRS whistleblower protection rules, which includes notice of employee's whistleblower rights and the right to notify the Commission's Office of Inspector General or Enforcement Bureau of any suspected wrongdoing. Attachment 4 is a copy of AT&T's TRS whistleblower protection rules. The document is provided in writing. [REDACTED]

17. Ownership and Organization.

[REDACTED]

18. Employees Involved in IP Relay.

[REDACTED]

[REDACTED]

19. Sponsorship Agreements.

[REDACTED]

C. Complaint Procedures. (47 C.F.R. §64.604(c)((1),(2),(6))

AT&T has an established process for receiving and responding to customer complaints, inquiries and comments to ensure the highest quality of care for its IP Relay users. AT&T's procedures for resolving customer complaints comply with the Commission's complaint reporting and resolution process as described in Commission rule §64.604(c) (1), (2), (6), 47 C.F.R. §64.604(c) (1), (2), (6). [REDACTED]

[REDACTED]

[REDACTED] The AT&T Customer Care line is staffed 24 hours a day, 7

days a week and is accessible directly in the mode of communication preferred by the user as follows:

- By requesting a Supervisor while on a TRS Relay Call;
- By dialing our designated TTY Customer Service Line at 1-800-682-8786;
- By dialing our designated Voice Customer Service Line at 1-800-682-8706;
- By Fax: 1-800-288-2184;
- By Email: rm-attcustomercare@att.com; or
- By accessing Website: www.att.com/relay and filling out an E-feedback form.

Within 24 hours, a representative of AT&T IP Relay will acknowledge in writing any complaints received either by mail or telephone, unless the user prefers to be contacted by phone. If the user prefers phone contact, AT&T will document the conversation. If research is required to resolve a caller's inquiry, AT&T will make follow-up contacts to the user on a timely basis until a resolution is reached. The Customer Care team also provides a wide range of information regarding agencies, organizations and other resources for deaf, hard-of-hearing, blind-deaf, or speech disabled callers.

AT&T maintains a log of all the customer contacts including complaints, inquiries, and commendations and these are tracked in a database. The customer contact logs show the date, the time, the nature of the contact, the resolution of the issue, and the date that the resolution was reached. On an annual basis, AT&T submits a summary of its complaint logs to the Commission covering the preceding 12 months and will continue to do so after receiving certification from the Commission. Additionally, AT&T complies and will continue to comply with all rules, requests, procedures and time frames set by the Commission to resolve formal and informal complaints pertaining to AT&T that are forwarded by the Commission.

AT&T has submitted to the Commission the following contact person for consumer information and complaints, grievances, inquiries, or suggestions about the provision of AT&T IP relay services.

Toni Acton
Director of Federal Regulatory
1120 20th St. NW – Room 1000
Washington, DC 20036
Tel: 202-457-3039
Fax: 202-457-3070
E-mail: toni.acton@att.com

D. Annual Compliance Reports Statement. (47 C.F.R. §64.606(a)(2)(iv)).

AT&T commits to filing annual compliance reports with the Commission that demonstrate AT&T's continued compliance with Commission rules.

E. Registration Process (47 C.F.R. §64.611).

AT&T IP Relay requires non-registered users to register with AT&T as their default provider in order to use the service. As part of the registration process, users must provide a first name, last name, e-mail address, and physical address within the United States to create an IP Relay account. After the user confirms the accuracy of the registration information they have entered, AT&T, through its vendor Bandwidth, confirms the accuracy of the physical address provided by the user. If the address submitted by the user is invalid, AT&T advises the user that it cannot verify the address. If the address submitted by the user is valid, the user must self-certify that they have a medically recognized disability. Then, the user can proceed through the remainder of the account set-up process and is assigned a 10-digit number.

AT&T obtains routing information, including IP addresses or domain names and user names, from the user automatically, provisions and maintains such data in the TRS numbering directory, and maintains such information within AT&T's internal database as well. AT&T also

ceases routing information from all users that port a ten-digit number to another default provider, communicates with other providers to ensure that only a default provider provisions information to the central database, and is aware that it must query the TRS database for accurate routing information. AT&T has not distributed any equipment as part of its IP Relay operation.

As AT&T explains above, AT&T includes an advisory on its website and in promotional materials addressing E911. AT&T also includes information in the same advisory on its website about the numbering and registration process, such as how a user can obtain a ten-digit telephone number, the ability to move their number to another provider, the process to submit, update, and confirm receipt by the provider of their registered location, and a statement of the importance of maintaining accurate up-to-date registered location information. AT&T obtains and retains each registered users' affirmative acknowledgement that they have received and understood this information.

F. Compliance with Applicable TRS Rules and Minimum Standards

AT&T is committed to insuring continued compliance with Commission rules and regulations pertaining to IP Relay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

III. Conclusion.

Since 1987, AT&T has been a vital player in the relay business and has introduced innovations that facilitate accessibility for the Nation's deaf and hard-of-hearing. AT&T has expanded its TRS offerings from those early days from traditional TRS to iTRS. Specifically, AT&T has been a key IP Relay provider since 2002. Thus, AT&T has the requisite expertise to be an IP Relay provider. Further, AT&T has demonstrated a continued commitment to meet the Commission's non-waived mandatory minimum standards for IP Relay and to comply with Commission rules and regulations pertaining to IP Relay. AT&T respectfully requests that the Commission grant this application.

December 5, 2011

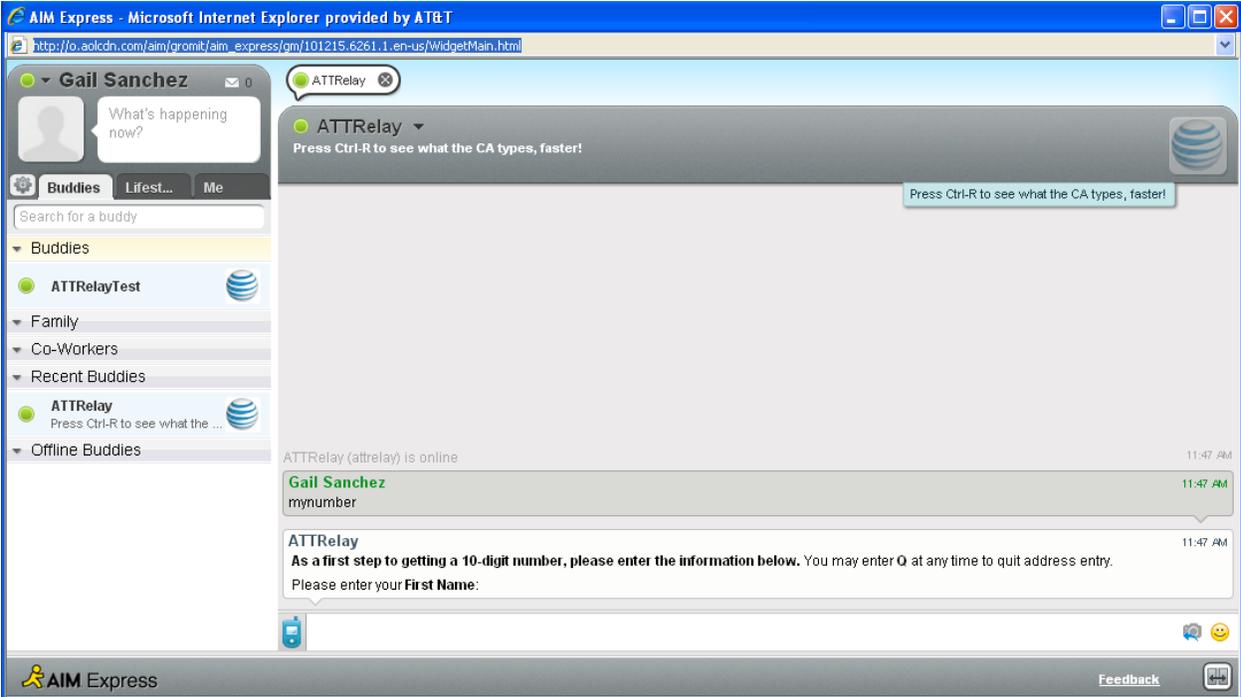
Respectfully submitted,

AT&T Corp.

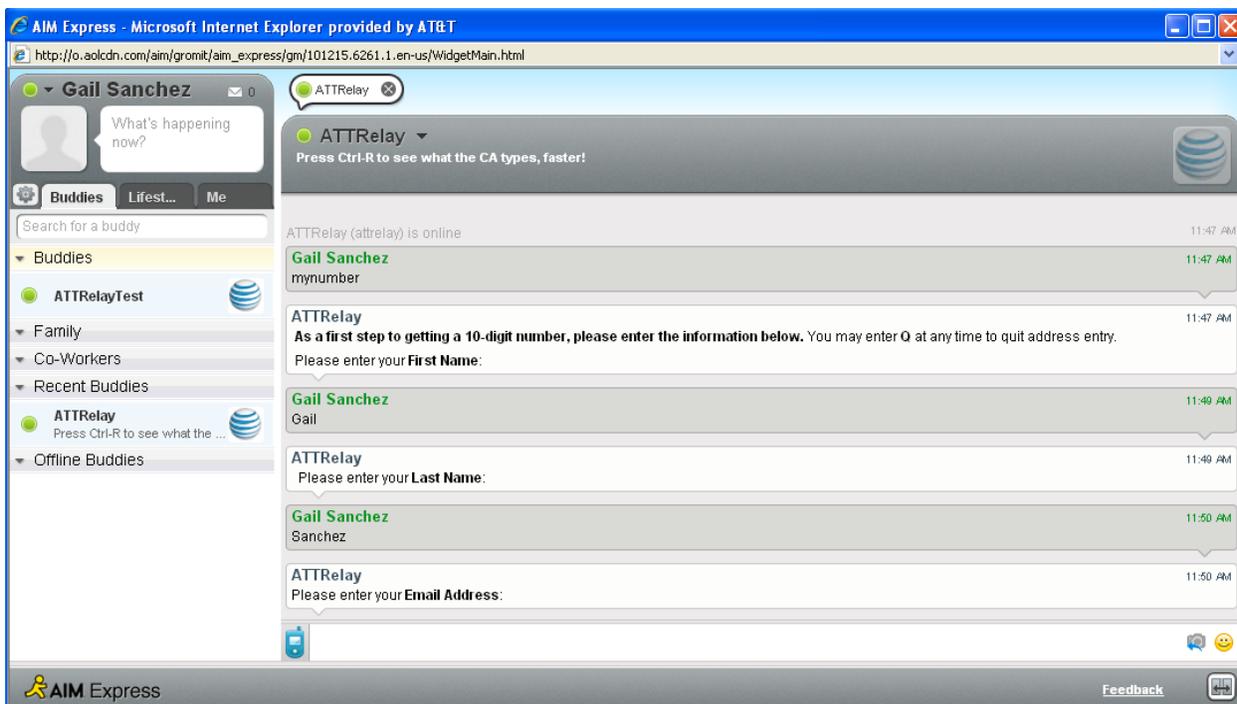
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ATTACHMENT 1
REGISTRATION SCREEN SHOTS

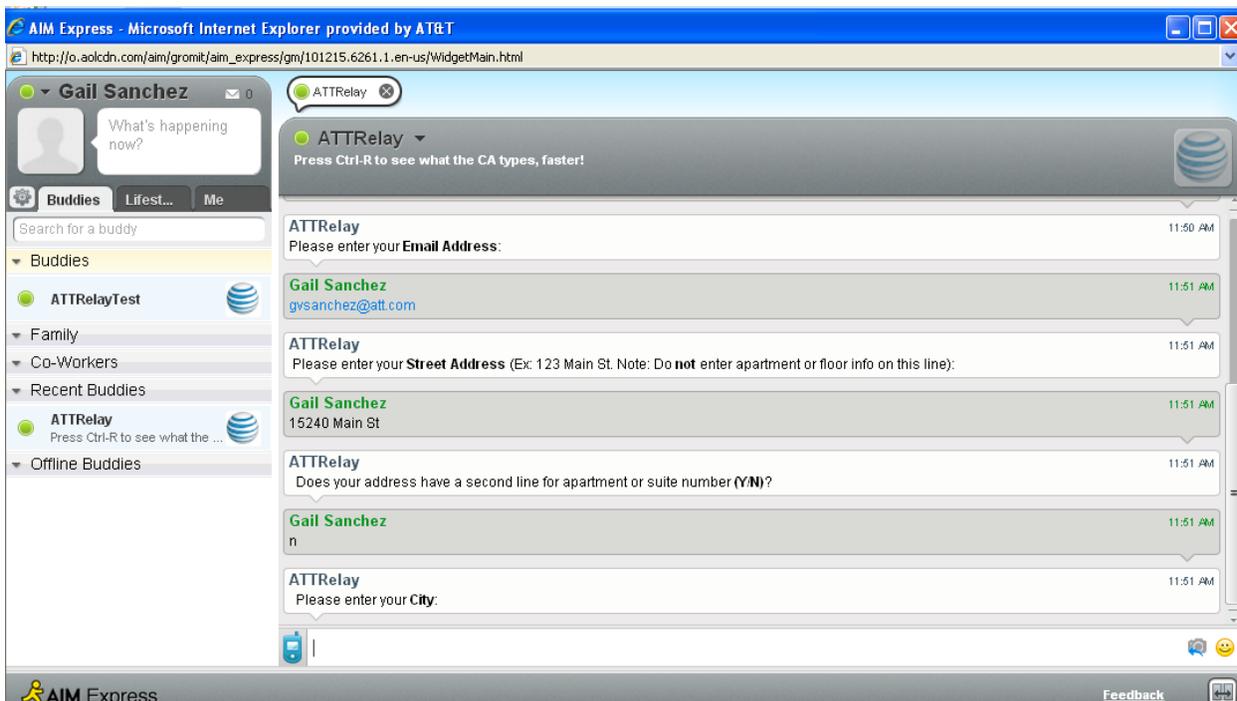
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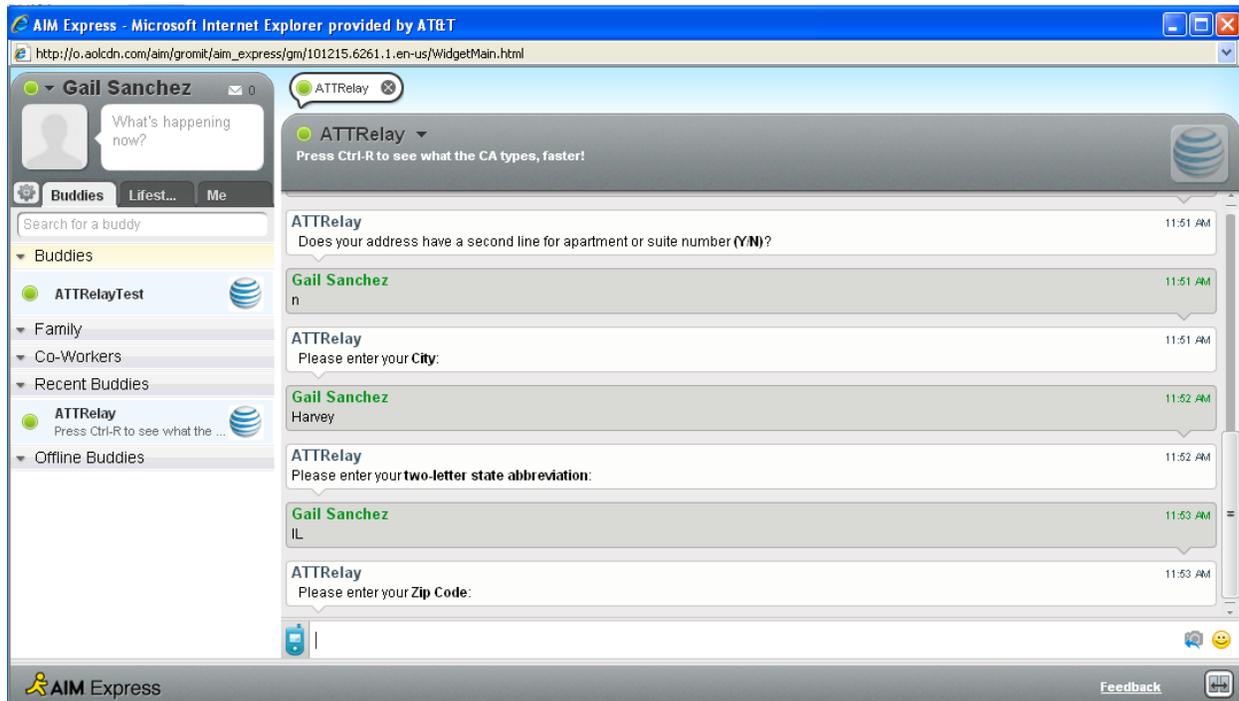
ATTACHMENT 1-A REGISTRATION SCREEN SHOTS



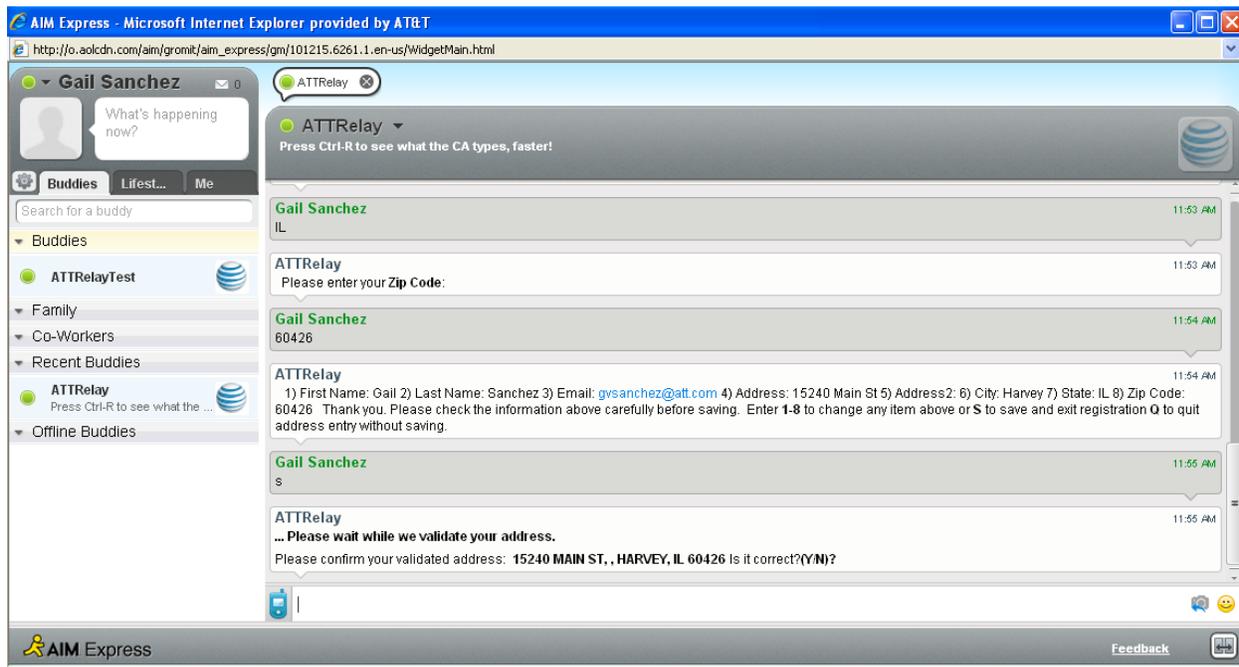
ATTACHMENT 1-B REGISTRATION SCREEN SHOTS



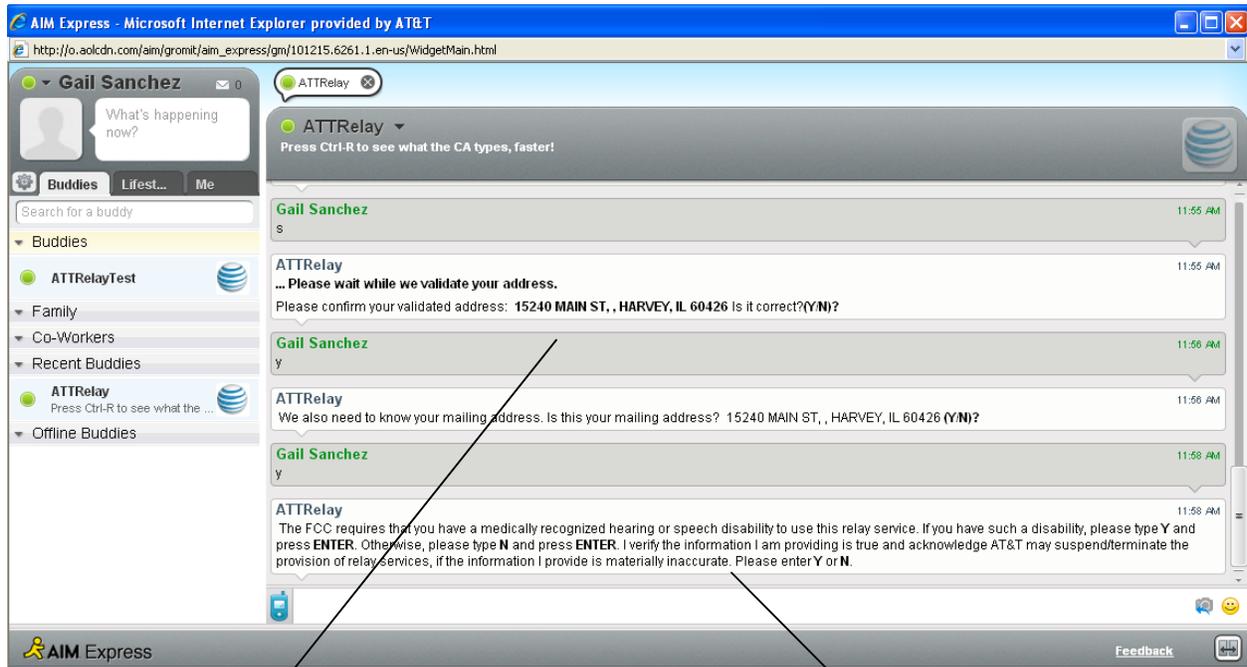
ATTACHMENT 1-C REGISTRATION SCREEN SHOTS



ATTACHMENT 1-D REGISTRATION SCREEN SHOTS



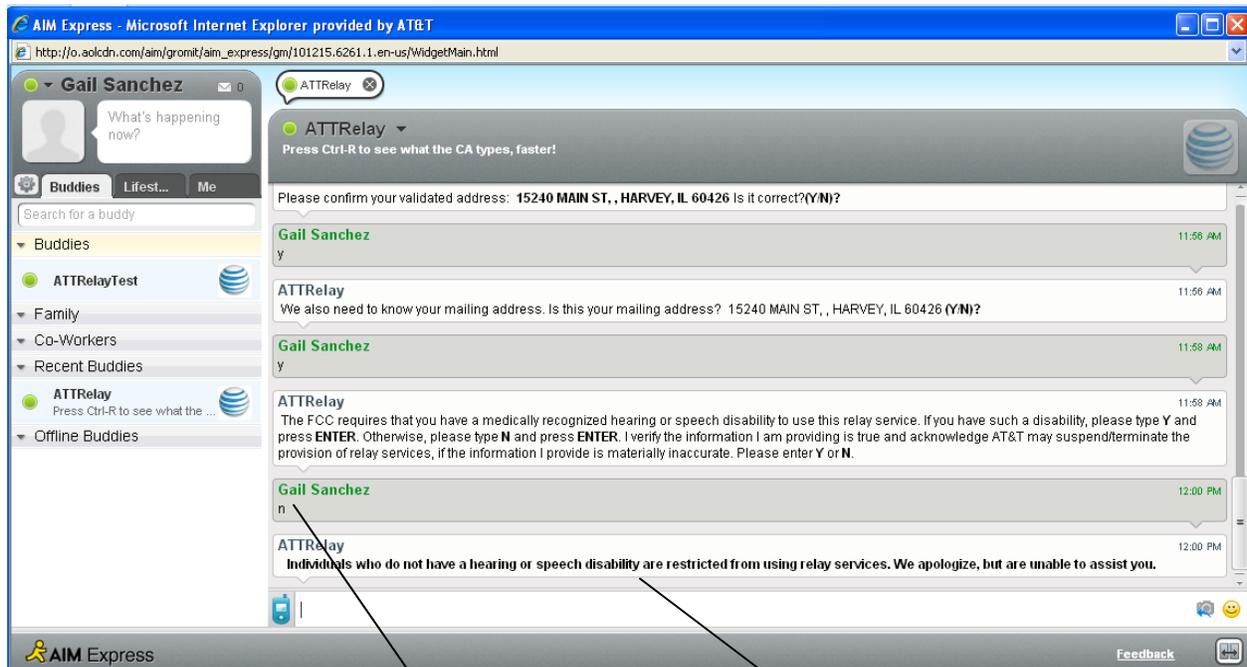
ATTACHMENT 1-E REGISTRATION SCREEN SHOTS



**Address
Verification/validation**

Self certification

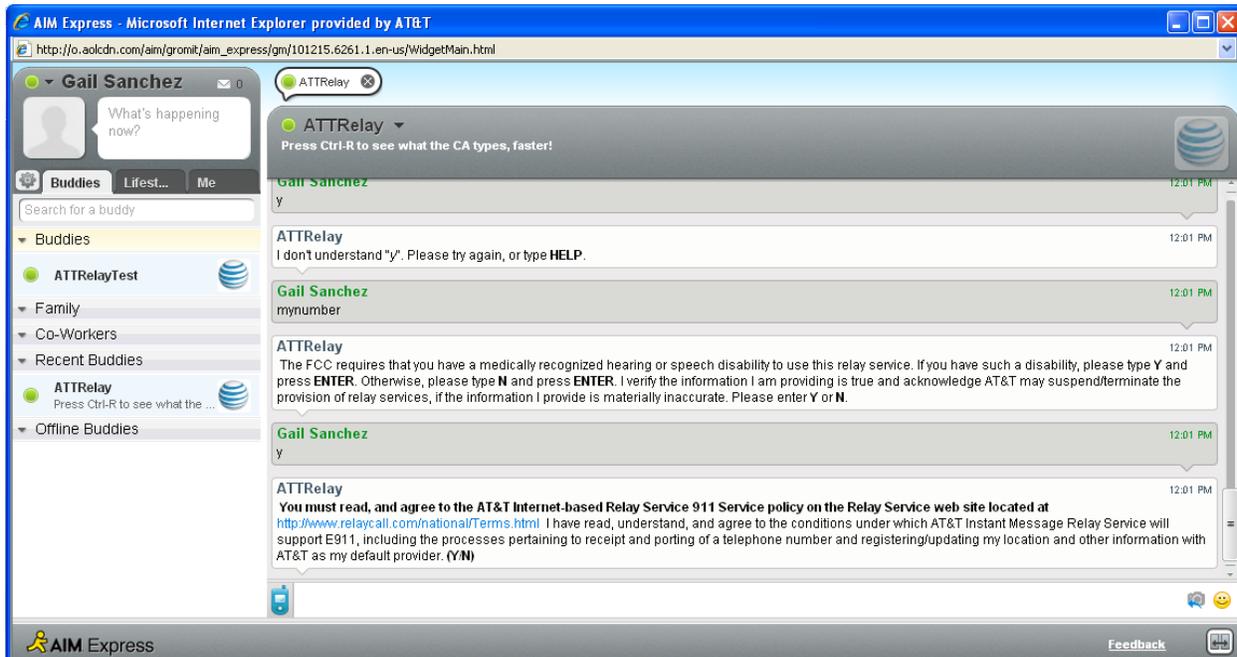
ATTACHMENT 1-F REGISTRATION SCREEN SHOTS



User indicates s/he does not have disability.

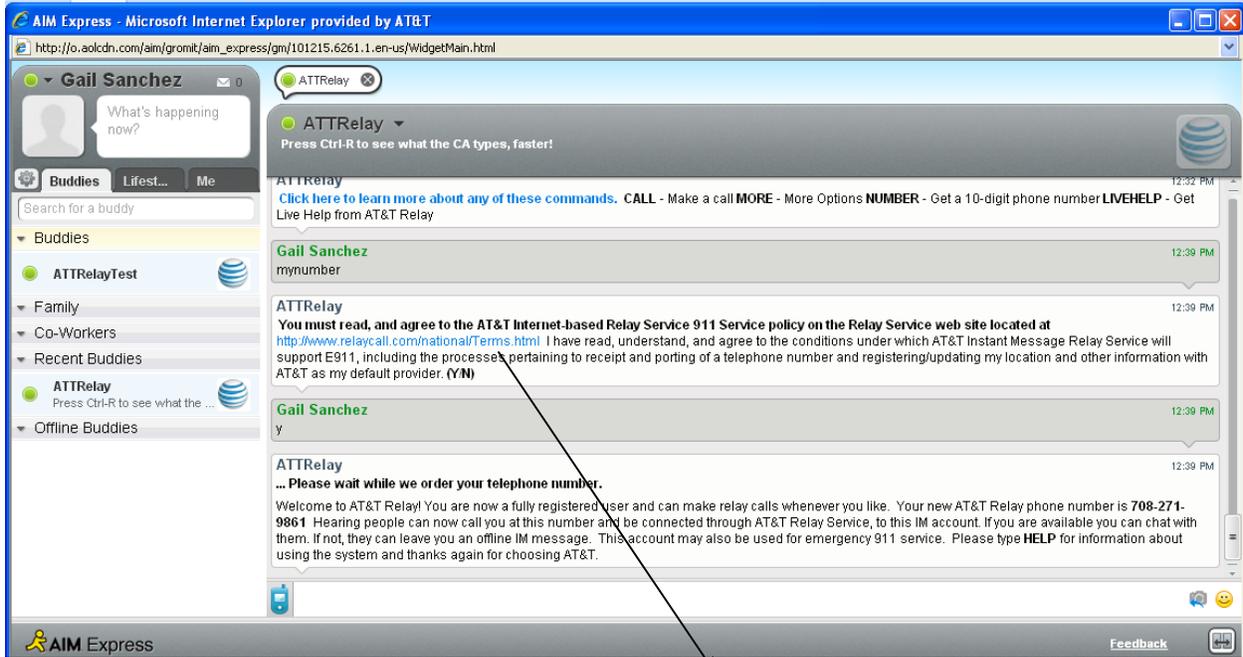
User told service is restricted for use by individuals with hearing or speech

ATTACHMENT 1-G REGISTRATION SCREEN SHOTS



ATTACHMENT 1-H

REGISTRATION SCREEN SHOTS



User must confirm they have read and agree to limitations of 911 service, porting of number and T&Cs

ATTACHMENT 2
AT&T CODE OF ETHICS

Redacted

ATTACHMENT 3 NATIONAL RELAY PROMOTIONAL BROCHURE

What's New with IM Relay



Real-Time Relay

Real Time IM allows you to receive the text of the voice caller on a word by word basis rather than waiting for the complete text message to be sent. AT&T is the only provider to offer this service, available only on PC desktop or laptop.

History

Allows you to see your most recent calls.

iCall

Allows you to provide instructions to communication assistant to expedite your calling.

Font Size

AT&T is currently the only provider to offer this service. This feature allows visually challenged consumers to increase or decrease font size while communicating.

Address

This feature allows consumers to update your e911 profile in the event of an emergency.

To use IM Relay just send an instant message to "ATRelay" on your AOL Instant Messenger™.

In an emergency, TTY users should dial 911 directly. Please space bar a few times to identify that you are a TTY user. Remember, dialing 911 directly can save valuable time and allow the emergency personnel to locate your address faster.

Caution: Please use your telephone or TTY to call 911 directly. AT&T is not liable for damages for emergency calls placed over the IP Relay or VRS. Internet ("IP") and Video Relay Service ("VRS") are NOT for emergency calls. If you use IP Relay or VRS to call 911, AT&T cannot automatically recognize your physical location, and thus AT&T cannot forward your location to the 911 center.

As of 1/1/2009, VRS and IP Relay users are required to register their address and to obtain a ten digit telephone number. Users can change providers at any time and retain the same number. Users should keep their address information updated for emergency 911 calls. For more details please visit att.com/relay.

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Rethink Possible 



TTY Relay

Text Telephone Relay Services, or TTY, allows users to type their conversation to a Communication Assistant who will convey the messages back and forth. In addition to TTY service, AT&T offers Voice Carry Over (VCO) for individuals who can speak but have a hearing loss, Hearing Carry Over (HCO) for individuals who can hear but cannot speak, and Speech to Speech (STS) service for individuals who have difficulty speaking.



IM Relay

Instant Message (IM) Relay allows users to make calls using AOL Instant Messenger™ (AIM). To use IM Relay just send an instant message with the phone number you want to dial to the screen name, "ATRelay" on AIM. Its that easy! If you have AIM on your wireless device you can also use AIM wirelessly too! We also offer real-time IM relay that no provider currently offers. AT&T will provide you with your own 10 digit phone number for easy and quick connection to your calls and '911' emergency calls.



VRS Relay

Video Relay Service (VRS) is for Deaf and Hard of Hearing individuals who prefer to use American Sign Language to communicate. You can access VRS relay with our free videophone software, AT&T Video Link.

Additional Resources

- Voice: 800-682-8706
- TTY: 800-682-8786
- Website: att.com/relay
- Email: rm-attcustomer@att.com



*AOL Instant Messenger Required for IM Relay

ATTACHMENT 4
AT&T TRS WHISTLEBLOWER PROTECTION RULES

Redacted

ATTACHMENT 5
AT&T CORP. BOARD OF DIRECTORS AND OFFICERS

Redacted

ATTACHMENT 6
NUMBER OF TRS EMPLOYEES

The number of full and part-time employees involved in the TRS operations that include the following positions: executives and officers, CAs and persons involved in marketing and sponsorship activities.*

<u>Employees</u>	<u>Full Time</u>	<u>Part Time</u>
Executives and Officers	████████████████████	
Senior Managers at Executive Director level or higher	████████████████████	
Operations		
Relay Call Center	████████████████████	
Communications Assistants	████████████████████	
Force and Business Analysis	████████████████████	
Operations Support		
Network Engineering	████████████████████	
Methods and Training	████████████████████	
Marketing Management		
Marketing Development and Outreach	████████████████████	
Business Development, Regulatory and Compliance Management	████████████████████	

*As of 11-16-2011

INTERNET-BASED TRS CERTIFICATION APPLICATION

DECLARATION
OF
SUSAN JOHNSON

SUSAN A. JOHNSON declares as follows:

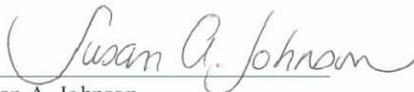
1. My name is Susan A. Johnson. My title is Senior Vice President, Customer Information Services, AT&T Services, Inc. ("AT&T Services"). My current office address is 208 S. Akard Street, Suite 910, Dallas, Texas 75202. My organization is responsible for AT&T's telecommunications relay services business, including internet protocol relay service ("IP Relay Service"), internet protocol captioned telephone service and video relay service. I am authorized, as an officer of AT&T Services, to provide this declaration on behalf of AT&T Corp. with regard to those telecommunications relay services operations.

2. AT&T Corp. is submitting its application for certification as a provider of IP Relay Service. The information provided in this application relies on subject matter experts in the Customer Information Services organization and other AT&T organizations.

3. In addition, I have reviewed information in this certification application and believe that all such information is reliable and accurate.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of December 2011.


Susan A. Johnson