

**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 2012 ANNUAL REPORT ON IP TRS WAIVERS**

Pursuant to the Federal Communication Commission’s Orders in the above-captioned dockets,<sup>1</sup> AT&T Services, Inc. (“AT&T”), on behalf of its affiliates providing Internet Protocol Relay Services (“IP Relay”) and Internet Protocol Captioned Telephone Service (“IP CTS”) (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 TRS 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

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<sup>1</sup> 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”); Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Internet-based Captioned Telephone Service, *Declaratory Ruling*, CG Docket No. 03-123, at 15 (2007).

reasonable prospect of such a relationship in the near future. Although IP TRS providers 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.<sup>2</sup> Imposing these costs on TRS providers or the Interstate TRS Fund cannot be justified as reasonable, especially given the decline in calls to pay-per-call services across the telecommunications industry. For these reasons, AT&T urges the Commission to further extend the current waiver for Pay-Per-Call Services for an additional period of time.

### **VCO, HCO & STS**

While AT&T is able to process requests from IP TRS users for a two-line Voice Carry Over (VCO) or Hearing Carry Over (HCO), AT&T is still unable to 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.

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

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 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.

AT&T also notes that the Commission did not consider or grant a waiver of the need to handle operator assistance or long distance calls for IP CTS. AT&T hereby requests that the Commission extend to IP CTS the waiver granted to IP Relay for the reasons explained above.

### **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.

### **Three-Way Calling**

The current IP CTS platform does not support the capability to perform three-way calling initiated from an IP CTS operator. It is possible for the IP CTS user to initiate a three-way call on their device without an IP CTS operator if the device has conference calling capability.

### **Speed Dialing**

Speed dialing, as defined by the Commission, allows a TRS user to give the CA a “short-hand” name or number (*e.g.*, “call Mom”) for the user’s most frequently called telephone numbers to allow the user to place a call without having to remember or locate a telephone number.<sup>3</sup> This definition of speed dialing is not applicable to IP CTS, as an IP CTS user never speaks to a CA, which is anonymous to all parties to the call. Thus, to the extent that this definition of speed dialing is applied to IP CTS, the Commission should retain the indefinite waiver. Nevertheless, AT&T’s IP CTS does offer users the ability to set up contact lists/phone books from which telephone numbers can be speed dialed without having to enter each digit of the telephone number. Further, IP CTS provided via the Captel 800 and 800i devices also contain a speed dial function.

## **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

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<sup>3</sup> See Telecommunications Relay Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, *Order* at 7-8 (2007)

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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