

# HealincVRS

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Via ECFS and Overnight Delivery

April 16, 2012

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities E911 Requirements for IP-Enabled Service Providers*, Docket Nos. CG Docket No. 03-123 and WC Docket No. 05-196, Mandatory Minimum Standards Waiver Annual Report

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission's 2011 VRS Waiver Extension Order<sup>1</sup> in the above-referenced proceedings, Healinc Telecom, LLC ("Healinc"), submits its annual report regarding Mandatory Minimum Standards ("MMS") currently waived for Video Relay Services ("VRS") and Internet Protocol ("IP") Relay services.<sup>2</sup>

A certified Statement of Compliance regarding the accuracy of this report is attached. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

HEALINC TELECOM, LLC



Lamar G. Stewart  
Chief Operations Officer

Attachment

<sup>1</sup> *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities E911 Requirements for IP-Enabled Service Providers*, Docket Nos. CG Docket No. 03-123 and WC Docket No. 05-196, Order, DA 11-1159, 26 FCC Rcd. 9449, (June 30, 2011) [2011 VRS Waiver Extension Order].

<sup>2</sup> Healinc does not provide IP Relay services

Healinc Telecom, LLC  
2012 Annual Mandatory Minimum Standards Waiver Compliance Report  
CH Docket No. 03-123

**I. Introduction**

The following constitutes Healinc Telecom, LLC's ("Healinc"), annual report regarding Mandatory Minimum Standards ("MMS") currently waived for Video Relay Services ("VRS") and Internet Protocol ("IP") Relay services,<sup>3</sup> submitted pursuant to the Commission's *2011 VRS Waiver Extension Order*. Healinc maintains that its Automatic Call Distribution platform currently has the technical capability to comply with the waived MMS. Healinc addresses the specific issues on which the Commission requests comment for each waived MMS.

**II. Compliance With Waived Mandatory Minimum Standards**

**1. *One-line VCO, VCO-to-TTY, and VCO-to-VCO.***

The Commission inquires whether it is necessary for this waiver to remain in effect, and whether a technical fix is imminent. Healinc currently maintains the ability through its Automatic Call Distribution platform to process these calls, though has received no such calls entailing these call types. Healinc does not require a waiver to comply.

**2. *One-line HCO, HCO-to-TTY, and HCO-to-HCO.***

The Commission inquires whether it is necessary for this waiver to remain in effect. Healinc currently maintains the ability through its platform to process these calls, though has received no such calls entailing these call types. Healinc does not require a waiver to comply.

**3. *Call Release.***

The Commission inquires whether it is necessary for this waiver to remain in effect. Healinc currently maintains the ability through its platform to process these calls, though has received no such calls entailing these call types. Healinc does not require a waiver to comply.

**4. *Pay-Per-Call (900) calls.***

The Commission inquires whether it is necessary for this waiver to remain in effect. Healinc currently maintains the ability to process pay-per-call calls and has developed procedures to do so, though has received no such calls entailing these call types. Healinc does not require a waiver to comply.

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<sup>3</sup> Healinc does not provide IP Relay services

**5. *Types of Calls (Operated Assisted Calls and Long Distance Calls).***

The Commission inquires whether it is necessary for this waiver to remain in effect. Healinc does not charge subscribers to place calls, consistent with the basis for Commission waiver. Healinc has implemented procedures to process such calls and does not require a waiver to comply.

**6. *Equal Access to Interexchange Carriers.***

The Commission inquires whether it is necessary for this waiver to remain in effect. Healinc does not charge subscribers to place calls, consistent with the basis for Commission waiver, as noted. Healinc does not require a waiver to comply. The Commission also requests that providers specifically address the effect of the numbering and registered location requirements on the continuing need for this waiver. Healinc maintains that the Commission's ten digit assignment requirements and underlying registered location requirements, effectively moot equal access to interexchange carrier requirements as each provider becomes its subscriber's default provider. Further, as no cost to the end user applies, it is unclear why a caller would require equal access to any carrier. Nevertheless, should a caller request a specific long distance provider, Healinc has the capability to route a call to a carrier using the carrier's network ("dial around") code on a non-presubscribed basis.

**7. *Speech-to-Speech.***

The Commission inquires whether it is necessary for this waiver to remain in effect. Healinc currently maintains the ability through its automatic call distribution platform to process these calls, though has received no such calls entailing these call types, and does not envision receiving such calls. Healinc does not require a waiver to comply.

**8. *Waiver for Default Providers Using Other Providers' CPE***

Healinc has supported the Commission's desire to institute technical standards and reiterates its support here.<sup>4</sup> Equipment interoperability is essential to the public's ability to select among service providers consistent with equal access in the wireline and wireless industries.

The Commission notes that this waiver is granted for default Internet-based TRS providers that are unable to meet such standards for newly-registered Internet-based TRS users who port their Customer Premises Equipment ("CPE") from a former default provider. Though the waiver remains warranted to account for such a situation, Healinc maintains that the waiver should be finite, thus compelling all manufacturers to have interoperable equipment, designed under Commission technical standards.

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<sup>4</sup> *In the Matter of Structure and Practices of the Video Relay Service Program Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, *Comments of Healinc Telecom, LLC* (March 9, 2012) at page 2 *et seq.*

