

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
Structure and Practice of the Video Relay Service Program)	CG Docket No. 10-51
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
Internet-based TRS Certification Application of Hamilton Relay, Inc.)	

To: Secretary, FCC
For: Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program

MINOR AMENDMENT TO APPLICATION OF HAMILTON RELAY, INC. FOR CERTIFICATION AS A PROVIDER OF INTERNET RELAY SERVICES AND INTERNET PROTOCOL CAPTIONED TELEPHONE SERVICES

Hamilton Relay, Inc. (“Hamilton”), by its counsel, hereby submits this minor amendment to its pending December 5, 2011 application for federal certification as a provider of Internet Relay services (“Internet Relay”) and Internet Protocol Captioned Telephone Services (“IP CTS”). By this amendment, Hamilton is providing updated information concerning the handling of emergency calls in connection with Hamilton’s Mobile IP CTS offering.

In its December 5 application, Hamilton noted the following with respect to emergency calls using its Mobile IP CTS offering:

When calling 911 in emergency situations, the Mobile CTS users’ call is automatically routed to the appropriate PSAP by the mobile phone provider. 911 calls are not routed through Hamilton’s captioning service in this situation. This means that there are no delays in accessing emergency personnel, as calls are directly connected to an appropriate PSAP.¹

¹ Hamilton certification application, at 29.

Hamilton has now made it possible for Mobile CTS users to have the additional option of dialing 911 within the Hamilton Mobile CTS application. This process is very similar to making an emergency call using Hamilton’s Web CTS.² Specifically, when calling 911 in emergency situations using the Mobile CTS app, the user simply enters 911 in the “Number to Dial” field. The user then selects “Place Call”. The CTS captioning center then passes the ANI to Intrado’s Emergency Call Relay Center (ECRC). Intrado immediately transfers the call to the appropriate PSAP center. This allows the user to receive captions on the Internet connection and hear the conversation on the voice line. The PSAP operator converses directly with the IP CTS user to ascertain any other needed information, such as location information. This emergency call handling option for Mobile CTS users complies with the requirements of Section 64.605(a)(2).

Hamilton advises consumers to dial 911 directly without the use of Mobile CTS or Web CTS. Hamilton further advises consumers that if they choose to use Mobile CTS or Hamilton Web CTS to place an emergency 911 call, the user will need to provide important information to the PSAP immediately, including their location (street address, town, and state) as well as the nature of the emergency.

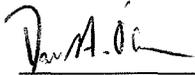
Hamilton takes seriously its obligation to handle all emergency calls as quickly as possible and to provide users with as many 911 options as possible. This additional service offering for Mobile CTS will assist those users who wish to have captions while they converse

² *See id.* at 30.

with emergency personnel in a mobile environment.

Respectfully submitted,

HAMILTON RELAY, INC.

By: 

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Its Counsel

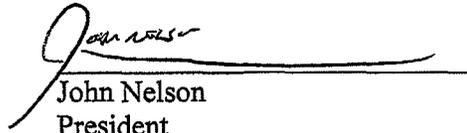
May 8, 2012

**DECLARATION OF JOHN NELSON, PRESIDENT
OF HAMILTON RELAY, INC.**

In compliance with 47 C.F.R. § 64.606(a)(2)(v), I declare under penalty of perjury that I am John Nelson, President, an officer of the above-named applicant, and that I have examined the foregoing submission, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

I hereby certify that neither Hamilton Relay, Inc. nor any affiliated party or person to the application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862; 47 C.F.R. § 1.2001.

Signed and dated this 8 day of MAY, 2012.


John Nelson
President
Hamilton Relay, Inc.