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January 16, 2013

VIA ECFS

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554
Attn: Chief, Consumer & Governmental Affairs Bureau

REDACTED FOR PUBLIC INSPECTION

Re: Hamilton Relay, Inc.
CG Docket Nos. 10-51, 03-123
Second Amendment to Internet-based TRS Certification Application

Dear Ms. Dortch:

Enclosed, on behalf of Hamilton Relay, Inc. ("Hamilton"), is a redacted version of a second amendment to Hamilton's December 5, 2011 application for certification as a provider of Internet Relay services and Internet Protocol Captioned Telephone services. A confidential version of the second amendment is being concurrently filed with the Commission via hand delivery.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

David A. O'Connor
Counsel for Hamilton Relay, Inc.

Enclosure

REDACTED FOR PUBLIC INSPECTION

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

SECOND 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 and pursuant to Section 1.65 of the Commission's rules, hereby submits this second amendment to its December 5, 2011 application (the "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 various aspects of the Application, as follows.

I. Introduction

Due to changes in TRS service contracts over time, the second sentence of this section is changed to state: "Hamilton currently provides intrastate TRS and/or Captioned Telephone Services in 18 states and U.S. territories."

II. Certification Information Required by the Second R & O

A. Forms of Internet-based TRS to Be Provided

In addition to the list of *IP CapTel Access Points* provided on page 3 of the original application, Hamilton now has two additional access points to reach IP CTS:

- CapTel 840i Model Telephone
- Alternatively, Hamilton CapTel customers with a voice plan and Wi-Fi connection can access Hamilton CapTel mobile applications without access to a 3G network.

Hamilton original application, page 3

II. Certification Information Required by the Second R & O

C. Additional Information Required Under Section 606(a)(2)(ii)

3. Employee Information

The employee data graphic on page 4 of the original application is deleted in its entirety. The current number of employees involved in Hamilton's TRS operations is as follows:

[REDACTED]

Hamilton original application, page 4

II. Certification Information Required by the Second R & O

C. Additional Information Required Under Section 606(a)(2)(ii)

5. Sponsorship Arrangements

In addition to the sponsorship arrangements relating to Internet-based TRS that Hamilton listed in its original application, Hamilton notes the following additional sponsorship arrangements:

[REDACTED]

Hamilton original application, page 5

III. Compliance with Operational and Technical Standards

A. Internet Relay – Operational and Technical Standards

Hamilton notes that the waivers listed in this section have been extended to July 1, 2013.[1]

Hamilton original application, page 5

[1] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 27 FCC Rcd 7113, ¶ 1 (CGB/WCB 2012).

III. Compliance with Operational and Technical Standards
A. Internet Relay – Operational and Technical Standards
1. Communication Assistant (CA)
c. Typing Proficiency

Hamilton's relay centers have a combined average typing speed of **[REDACTED]** wpm with **[REDACTED]** accuracy.

Hamilton original application, page 7

III. Compliance with Operational and Technical Standards
A. Internet Relay – Operational and Technical Standards
6. Internet Relay Facilities
a. Description of Relay Centers

[REDACTED]

Hamilton original application, page 16

III. Compliance with Operational and Technical Standards
A. Internet Relay – Operational and Technical Standards
6. Internet Relay Facilities
b. Switches and Relay Platforms

[REDACTED]

Hamilton original application, page 17

III. Compliance with Operational and Technical Standards
B. IP CTS – Operational and Technical Standards

In addition to processing IP CTS calls from its **[REDACTED]** center, Hamilton now also processes these calls in its **[REDACTED]** centers.

Hamilton original application, page 19

CONCLUSION

For the reasons set forth above and in the Application, as amended, Hamilton submits that it has satisfactorily demonstrated compliance with all requirements for federal certification of its Internet Relay and IP CTS offerings, and that the public interest would be served by a grant of

the Application by allowing the public to continue accessing the Hamilton relay services upon which they rely.

Respectfully submitted,

HAMILTON RELAY, INC.

By: _____

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Its Counsel

January 16, 2013

LIST OF REDACTED ATTACHMENTS

Attachment B	Organizational Chart
Attachment G	Procedures Manual

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 second amendment to the applicant's pending December 5, 2011 application, 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 16th day of January, 2013.

John Nelson
President
Hamilton Relay, Inc.