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April 15, 2013

**VIA ECF AND FEDERAL EXPRESS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: **CG Docket No. 03-123: *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities***

Dear Ms. Dortch:

Enclosed are the original and four copies of CAAG's Status Report on Currently Waived Requirements, which was electronically filed on April 15, 2013.

Sincerely,

Kathleen M. LaValle

KML/dc  
enclosure

cc: Gregory Hlibok (via e-mail)

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List: ABCDE

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	§	
	§	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	§	CG Docket No. 03-123
	§	
	§	
E911 Requirements for IP-Enabled Service Providers	§	WC Docket No. 05-196
	§	

**CAAG’S STATUS REPORT ON CURRENTLY WAIVED REQUIREMENTS**

Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Access Ability Group (“CAAG”) provides this Status Report regarding the progress made in complying with the requirement to provide telecommunications relay services meeting minimum standards for video relay service (VRS), as required by the Federal Communications Commission (FCC or Commission) Order, released June 22, 2012, in the above-referenced docket (*2012 TRS Waiver Order*).

**INTRODUCTION**

Pursuant to the *2012 TRS Waiver Order*, the Commission extends until July 1, 2013, its waivers of certain mandatory minimum standards for VRS, conditioned upon the filing of a status report on April 15, 2013, detailing the progress made toward meeting the requirements to provide the following services: (1) one-line Voice Carry Over (VCO), VCO-to-TTY, and VCO-to-VCO; (2) one-line Hearing Carry Over (HCO), HCO-to-TTY, and HCO-to-HCO; (3) call release; (4) pay-per-call (900) calls; (5) types of calls; (6) equal access to interexchange carriers; and (7) Speech-to-Speech (STS).

## **PROGRESS MADE IN COMPLYING WITH SPECIFIC REQUIREMENTS**

### **(1) One-line Voice Carry Over (VCO), VCO-to-TTY, and VCO-to-VCO**

Currently, CAAG provides VCO using two connections, an Internet connection and a voice phone line, rather than a single connection. While improvements have been made, CAAG remains concerned that the quality of voice transmissions through the Internet is not consistently equal to the quality available using a telephone line. Therefore, CAAG continues to use a two-line VCO call approach. VCO-to-TTY does not apply to CAAG as a VRS provider. CAAG has not in its experience received a request for VCO-to-VCO. For informational purposes only, CAAG believes that consumers seeking the VCO-to-VCO functionality may be using other means such as captioned telephone. CAAG can, however, establish two simultaneous video connections.

In terms of the direction moving forward, technological advances are being made. While a single connection approach to VCO may be available from select VRS providers, it is not today commercially available on an off-the-shelf basis. A consumer taking advantage of dial-around capability or a consumer migrating to a new default provider, would not necessarily have Consumer Premises Equipment (CPE) compatible with VCO service even if its default provider supplied a proprietary device to support single line VCO. Therefore, the waiver extension is justified as progress continues to be made toward the broad availability of a one-line VCO solution that does not raise device compatibility issues.

### **(2) One-line Hearing Carry Over (HCO), HCO-to-TTY, and HCO-to-HCO**

The waiver extension is justified on the same basis provided in connection with the waiver extension for VCO. The technology to support one-line HCO and HCO-to-HCO is not yet commercially available on an off-the-shelf, as opposed to a proprietary, basis. For

informational purposes only, CAAG reports having received one HCO call request in its years of operation and no HCO-to-HCO requests.

**(3) Call release**

Call release permits a CA to set up a TTY-to-TTY call and then sign off from the telephone line without effecting a disconnection. CAAG as a VRS provider does not support TTY and, therefore, has no update to provide on this service. CAAG notes, however, that the ability of a deaf user to dial a 10-digit number of another deaf user may render the call release function unnecessary.

**(4) Pay-per-call (900) calls**

The practical and economic difficulty continues to be that the cost to develop a billing mechanism to support accurate direct billing for 900 call charges, for customers CAAG does not currently bill, is prohibitive. Setting up a billing relationship with VRS users would require substantial investments in back-office billing and support systems, the costs of which are not justified by CAAG's experience with consumer interest. For informational purposes only, CAAG is not currently receiving requests from customers to place 900 calls.

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

Today, CAAG supports free long distance calling and would assist customers using calling cards to place international calls. Although CAAG's registered customers have a 10-digit number and are required to provide a physical address, an exact location cannot be ascertained, for example, if the customer is using a mobile device (e.g. a laptop) and is physically at an address other than the registered location. If the consumer has a different default provider and dials around to reach CAAG, we would not have a customer registered location. Also, even if the registered customer's location is known, limitations exist to an accurate identification of the

location of the called party. Should the VRS industry develop a universal billing platform for these types of calls, CAAG would support an industry solution that might, for example, use flat rate, minute-of-usage billing.

**(6) Equal access to interexchange carriers**

Equal access to interexchange carriers as it is available from telecommunications providers today is supported by a universal billing platform, with established relationships and compensation arrangements among carriers. Should VRS industry develop a universal platform to permit equal access to interexchange carriers, CAAG would support an industry solution to allow the exercise of choice, even though CAAG customers today are not charged for long distance calls for the reasons previously explained. CAAG, and we believe other VRS providers, do not have the mechanized capability today to allow VRS users to identify their preferred interexchange carriers, nor are agreements in place with the multitude of interexchange carriers a VRS user might select.

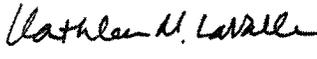
**(7) Speech-to-Speech (STS)**

Because VRS is visual, and STS is speech, CAAG has no relevant update to provide on the extension of the waiver for this service as it applies to IP Relay.

CAAG requests that the FCC continue the waiver of the minimum standards discussed above as they relate to VRS.

April 15, 2013

**RESPECTFULLY SUBMITTED,  
JACKSON WALKER L.L.P.**

By:   
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