

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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In the Matter of )  
 )  
Common Carrier Bureau Seeks ) CC Docket No. 92-105  
Comment on 711 Access to ) NSD File No. DA 99-1170  
Telecommunications Relay Services )  
 )

COMMENTS OF GTE

GTE Service Corporation and its affiliated telecommunications companies (collectively, "GTE" or "Company")<sup>1</sup> respectfully submit comments in response to the Common Carrier Bureau's June 16, 1999, Revised Public Notice on FCC Convenes a Public Forum on 711 Access to Telecommunications Relay Services (TRS). GTE is a multi-faceted telecommunications company that includes incumbent local exchange carriers ("ILEC"), a competitive local exchange carrier ("CLEC") operating in other ILEC territories, a provider of wireless services, and a long distance telecommunications service provider.

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<sup>1</sup> GTE's affiliated telecommunications companies are: GTE's domestic telephone operating companies, GTE Wireless Incorporated and GTE Communications Corporation, Long Distance Division. GTE's domestic telephone operating companies are: GTE Alaska, Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., and Contel of the South, Inc.

As discussed below, GTE supports using an N11 code or codes for nationwide access to TRS.

## **I. DISCUSSION**

### **A. A nationwide system to access TRS using an N11 code or codes is in the public interest.**

GTE supports using an N11 code or codes for nationwide access to TRS.

Assigning an N11 code or codes for TRS access serves the public interest by facilitating the use of the Public Switched Network to benefit hearing and speech impaired individuals.

GTE has had a very positive experience using N11 codes for TRS access. In July of 1993, GTE Hawaiian Tel became the first local exchange carrier in the nation to offer three-digit TRS access codes, implementing 511 access for voice and 711 access for text services. In Hawaii, GTE currently serves an estimated 93,000 persons who are hearing impaired or have speech disabilities. TRS users in Hawaii have found the 511 and 711 access codes to be much easier to use and remember than seven or ten-digit numbers, and have applauded GTE's efforts in providing these codes for TRS access.

GTE's support for the use of N11 codes for TRS access is consistent with the recommendations offered by GTE to the FCC and state agencies in other numbering and abbreviated dialing arrangement proceedings. GTE has repeatedly advocated that N11 codes should be preserved and used to provide services that are adjuncts to basic service and serve the public interest. GTE has opposed using N11 codes in instances where such use promotes special interests and for-profit informational use.

Consistent with these positions, GTE believes that assigning N11 codes for TRS access represents a truly valid and socially beneficial use of scarce numbering resources. Using N11 codes for TRS would provide TRS users with functional equivalency in accessing the Public Switched Network by providing a simple, short access code that eliminates many of the difficulties TRS users encounter in placing calls.

**B. Technical issues should be addressed before timelines are established to implement access to TRS on wireline and CMRS networks.**

GTE recognizes the complex and interlocking technical and cost recovery issues associated with implementing N11 codes for TRS access. GTE believes these issues must be resolved before a timeline is established for implementing TRS access. GTE believes that hearing and speech impaired advocates, federal and state regulators, and telecommunications industry groups must work together to determine the best method to implement N11 codes for TRS access. The optimal result of this combined effort would be a blueprint for a consistent nationwide technical standard and implementation strategy. A number of parties have suggested practical methods in technical forums that could be achieved within reasonable timeframes pending resolution of some overarching technical issues.

**C. GTE's timeline for rolling out N11 TRS access in Hawaii could be used as an implementation guideline for nationwide access.**

As noted above, GTE has had a positive experience using N11 access for TRS services in Hawaii. Attachment A is the Public Affairs activity timeline that GTE Hawaiian Tel used in its successful rollout of N11 codes in Hawaii. GTE believes this

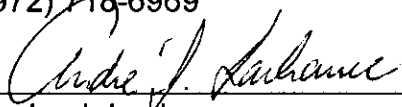
timeline is a reasonable implementation guideline that could be replicated, perhaps with some modifications, nationwide.

Dated: August 2, 1999

Respectfully submitted,

GTE Service Corporation and its affiliated telecommunications companies

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**ATTACHMENT A**

<b>Public Affairs Actions/Timeline</b>			
<b>Days to Implementation</b>	<b>Activity</b>	<b>Responsibility</b>	<b>Audience</b>
120 days prior to roll out	Schedule bill insert	State Public Affairs	Area Public Affairs
120 days prior to roll out	Develop ad*	HQ Public Affairs	
90 days prior to roll out	Develop copy and begin production of bill insert	HQ Public Affairs	All business and residential customers
30 days prior to roll out	Develop media releases	HQ Public Affairs	Local, trade and media aimed at the hearing and speech impaired
30 days prior to roll out	Bill inserts begin running	Area Public Affairs	All business and residential customers
30 days prior to roll out	Develop direct mail letters to targeted groups	State/HQ Public Affairs	<ul style="list-style-type: none"> <li>• Existing users of TRS services</li> <li>• Grass roots organizations</li> <li>• National organizations</li> <li>• Selected Politicians</li> </ul>
1-5 days prior to roll out	Media releases distributed	State and HQ Public Affairs	Local, trade and media aimed at the hearing and speech impaired
3-5 days prior to roll out	Send direct mail letter and copy of media release to local <u>grass roots</u> organizations.	HQ Constituency Relations	State organizations that work with and in support of three-digit access codes for hearing/speech impaired

<b>Public Affairs Actions /Timetable</b>			
<b>3-5 days prior to roll out</b>	<b>Send direct mail letter and copy of media release to <u>national organizations.</u></b>	<b>HQ Constituency Relations</b>	<b>National organizations that work with and in support of three-digit access codes for hearing/speech impaired</b>
<b>3-5 days prior to roll out</b>	<b>Send direct mail letter and copy of media release to <u>selected political leaders.</u></b>	<b>HQ Constituency Relations</b>	<b>State senators and representatives who have lobbied in support of N11 effort</b>
<b>3-5 days prior to roll out</b>	<b>Employee Bulletin</b>	<b>HQ Public Affairs</b>	<b>Telops Employees</b>
<b>5 days prior to roll out</b>	<b>Contact others in industry</b>	<b>Industry Relations</b>	<b>Other LECs (Outside of Hawaii only.)</b>
<b>According to publication schedule, not to appear prior to roll out</b>	<b>Place ads **</b>	<b>HQ Public Affairs</b>	<b>Education, Health Care and other specialized publications</b>
<b>30 days post roll out</b>	<b>Bill message</b>	<b>State Public Affairs</b>	<b>All business and residential customers</b>

**\* Development schedule to be approved by agency**

**\*\* Ad development/placement dependent upon budget availability**