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

In the Matter of	)	
	)	
Use of N11 Codes and Other	)	**CC Docket No. 92-105**
Abbreviated Dialing Arrangements	)	
	)	

Ex Parte Comments
MCI WorldCom, Inc.

Introduction

MCI WorldCom, Inc. (MCI WorldCom) submits these comments in response to the Federal Communications Commission=s (Commission) Public Notice requesting information regarding the implementation of nationwide 711 access to telecommunications relay services (TRS); obstacles to the implementation of nationwide access; and how those obstacles can be overcome.[1]

MCI WorldCom supports implementing nationwide access to TRS through the use of abbreviated dialing. Use of abbreviated dialing measures, such as 711, will increase the ease of

[1]FCC Convenes a Public Forum on 711 Access to Telecommunications Relay Services, Public Notice, released June 8, 1999, revised June 16, 1999.

access to telecommunications services, eliminate barriers to nationally uniform telecommunications services, and aid in bringing competitive telecommunications choices to those with hearing and speech communication difficulties.

Implementing an abbreviated dialing system capable of flexibly and economically responding to varying user requirements, however, especially the 711 dialing mechanism, will be a difficult task. A nationwide 711 code would work best if TRS centers provided only one TRS service; if TRS customers only used one technology to access the TRS center; and if customers could only access one TRS provider within each state. However, these conditions do not currently prevail. MCI WorldCom takes this opportunity to identify the strains which existing diverse conditions will place on a simple 711 dialing mechanism and offers a recommendation towards the development of a more flexible abbreviated dialing mechanism.

TRS Customers Rely on a Variety of TRS Services

In a recent Notice of Proposed Rulemaking the Commission proposed improving the quality and variety of TRS services. It proposed: 1) requiring TRS centers to make speech-to-speech (STS) relay service available within 2 years of the date of the Final Order; 2) permitting TRS centers that offer multilingual relay services (MRS) to receive federal reimbursement; and 3) requiring TRS centers to answer 85% of all calls within 10 seconds by a Calling Assistant (CA) prepared to place a TRS call at that time. MCI WorldCom was a strong supporter of these proposals. MCI WorldCom was also expressed strong support for including additional relay

services such as Video Relay Interface (VRI) service.[2]

[2]In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Notice of Proposed Rulemaking, (*Speech to Speech NPRM*), CC Docket No. 98-67, FCC 98-90, Released May 20, 1998.

TRS Customers Use a Variety of Technologies to Access TRS Centers

TRS customers currently use a variety of technologies to access TRS centers. A customer will make a voice call if they wish to communicate with a hard-of-hearing customer. A customer with a speech disability may also access the TRS center via a voice or text call. Customers who are hard-of-hearing will access the TRS center with a variety of text-based communication protocols, including: ASCII; Baudot; Turbocode; and Q90. Other protocols will, no doubt, be developed and supported in the future.

TRS Customers Will Increasingly Rely on a Variety of TRS Vendors

Nearly all states currently rely on a single vendor to provide TRS services.[3] However, the Commission has recognized that its rules allow multiple carriers to provide TRS services within a state, and has supported multi-vendoring in the belief that it will reduce the costs and improve the quality of TRS services.[4]

A Simple, Abbreviated, 711 TRS Code Does Not Accommodate the Variety of TRS Services, Access Methods, or Vendors

In order to comply with the Commission=s speed-of-answer rules, TRS centers currently rely on unique call-in numbers to each TRS service. Thus, there may be separate numbers for voice TRS, text TRS, multilingual service, speech-to-speech service, and in the future, video relay

[3]California is the only state currently providing TRS services with more than one vendor.

[4]*Speech to Speech NPRM* at & 65.

service.[5] Text service can be accessed using a variety of protocols. Each of these protocols may have its own access number in order to comply with the speed-of-answer rules.

Under a simple 711 system the TRS system cannot distinguish a request for text service from voice service. Consequently, CAs would probably be instructed to answer all calls as if they were text calls, since approximately 70% of relay calls are text users. In the event that the caller desired a voice call, the voice user will be required to listen to several TTY tones, then wait for the CA to recognize that the caller is waiting for a voice greeting. Not only would this add to CA answer time, it could also be confusing and frustrating for the customer and CA.

Similar problems occur with text calls. Since an ASCII call may disconnect unless the call is answered in ASCII, ASCII would be the first protocol used by the CA in a simple 711 environment. In the event the caller were connecting using another protocol, the user would again have to wait for the CA to recognize that the caller desires either a different text protocol or a voice call. Since ASCII calls constitute a small portion of the overall TRS call volume, the average speed of answer time would be negatively impacted by the longer connect times of calls in other protocols.

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[5]MCI WorldCom currently transfers customers requesting multi-lingual service and speech-to-speech service to special regional calling centers with CAs trained to handle these TRS calls.

Finally, a simple 711 system would not permit the TRS customer to choose which vendor will carry the call. One could assign calls to competing TRS providers, randomly, proportionately or according to some other algorithm. Many of the problems have already been identified.[6] For example, randomly assigning calls could overwhelm small carriers. Assigning calls according to carrier size would require changing the proportionality factor as relative carrier sizes changed over time. But most importantly, these proxy methods would not actually guarantee a customer its choice of vendor.

[6]See for example, MCI Comments, In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket 92-105, March 31, 1997.

A Flexible 5-digit TRS Code Could Accommodate the Variety of TRS Services, Access Methods, or Vendors

In response to these concerns surrounding a simple 3 digit abbreviated dialing code, MCI WorldCom proposes assigning a more flexible 5 digit or A711XX≅ code for nationwide access to TRS. Under this system, the first 3 digits would indicate a TRS call. The fourth digit would represent whether a caller is placing a voice or text call. For example, the number A1≅ could represent a text call and the number A2≅ could represent voice call. Once the user reached the CA, he or she could specify whether they were using Turbocode or ASCII, and whether they desired multilingual relay service.[7] The fifth digit could indicate which TRS vendor the customer would like to choose. The number A1≅ could represent MCI WorldCom, the number A2≅ could represent Sprint. The number A3≅ could represent AT&T, etc. Under this system, a caller wanting to use MCI WorldCom to place a text call would dial A71111≅ to reach the appropriate relay center using their choice of service provider.

Education Will Be a Key Component of Implementing a Five-digit System to Access TRS

[7]An even more flexible approach would be to permit the fourth digit to reflect more detailed service choices. For example, the number A1≅ could represent a standard voice call, A2≅ could represent an ASCII text call,A3≅ could represent a Turbocode text call, etc.

The numbers assigned to each service and each vendor for the fourth and fifth digits would be uniform throughout the country. Admittedly, a 5-digit code would be more complex than a 3 digit code. However, only marginally so. There would be a limited number of choices of carriers, and limited number of choices of services (text vs. voice). A national educational effort advertising the numbers for different carriers and different services should balance out the marginal complexity of a 5 digit system.[8] In order to ensure the success of a national education effort promoting an abbreviated TRS code, the Commission should require states that have used 711 for purposes other than TRS access to assign new codes for those purposes, in order to prevent customer confusion.[9]

Conclusion

In conclusion, MCI WorldCom firmly supports nationwide access to TRS systems through a five-digit dialing code. A five-digit code plan will ensure better customer service and give callers more options than a 3 digit dialing code without having to memorize many different telephone numbers.

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[8]This educational effort could include public service announcements on radio and television; prominent placements on government and carrier web sites; prominent placement in yellow pages, and periodic invoice messages placed on customer bills.

[9]For example, A711≅ is listed in the Miami Herald as AMiami's #1 Talkline≅ with per minute charges. A TTY user from Maryland (where 711 is in use) could be traveling in Florida and incur unexpected charges should they dial 711 for relay as they are accustomed to doing.

Statement of Verification

I have read the foregoing and, to the best of my knowledge, information and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on July 30, 1999.

Larry Fenster

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