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EX PARTE OR LATE FILED

**EX PARTE**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

August 2, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**RE: CC Docket No. 92-105/DA 99-1170, 711 Access to Telecommunications  
Relay Services**

Dear Ms. Salas:

Bell Atlantic is filing this ex parte in response to the questions posed by the Commission in its June 16, 1999 Public Notice.

Bell Atlantic commends the Commission for its continued effort to facilitate access to telecommunications services by persons with disabilities. Use of the same three-digit code nationwide to reach relay services is an important step in these continuing efforts. Accordingly, Bell Atlantic recommends that the Commission:

1. Continue the use of a single three digit code – 7-1-1 – to provide access to relay service;
2. Not mandate any particular technology for 7-1-1 access; and
3. Ensure that relay providers provide customers with access to the carrier of their choice.

Bell Atlantic has pledged to implement 7-1-1 dialing throughout its territory using the same network design developed and deployed used in Maryland. That will allow Bell Atlantic to implement 7-1-1 access within two to three months following completion of design and lab testing in a given state. Dialogue with other states, relay providers, and parties necessary for implementation is continuing in an effort to further the deployment of 7-1-1 dialing in the Bell Atlantic region.

**Use of AIN to Provide 7-1-1 Access to TRS**

Bell Atlantic chose Advanced Intelligent Network (AIN) technology to provide 7-1-1 access because of cost and functionality. The AIN Integrated Service Control Point (ISCP) contains service logic that responds to queries from the switches. The use of AIN enables the 800 number for each state to be programmed into an ISCP based on the Numbering Plan Area (NPA) of the calling party. Because of Bell Atlantic's success

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with the AIN deployment of 7-1-1 dialing in Maryland, AIN is being used to provide 7-1-1 service to Bell Atlantic's remaining states and jurisdictions.

### **Cost Recovery**

Bell Atlantic recommends that the Commission leave the issue of cost recovery associated with implementing 7-1-1 access to the states. States are in the best position to determine those costs, and allowing them to adopt recovery methods is consistent with the authority the Commission has traditionally given states over relay services.

### **Choice of Carriers**

The Commission should find that TRS providers are obligated to provide access to the customer's carrier of choice so that everyone -- including Relay users -- can benefit from being able to choose from all of the calling plans and services available to them in a competitive marketplace.

### **7-1-1 Education and Technical Assistance**

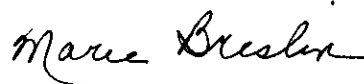
Since the states, carriers, and the relay providers are the most familiar with the relay customers, the Commission should allow those parties to develop any education and technical assistance necessary.

### **Time required to implement 7-1-1 dialing**

From Bell Atlantic's experience, once the initial design work and lab testing work is completed for the platform to be used in any jurisdiction (as it has been in Maryland), the administrative and translations work should take approximately two to three months before 7-1-1 service can be offered in any jurisdiction.

Attached is a detailed description of Bell Atlantic's efforts to date in providing 711 access to Relay users. Bell Atlantic appreciates the opportunity to present its views on the issues to be addressed in the upcoming forum.

Sincerely,



Attachment

cc: A. Gomez  
H. Schrier Nankin  
D. Ward

## ATTACHMENT 1

### **Comments on the Public Notice on FCC Convenes a Public Notice Forum on 7-1-1 Access to Telecommunications Relay Services**

**CC Docket No. 92-105**

#### **Summary**

On July 8, 1998 Bell Atlantic announced that it would be the first local telephone company to provide 7-1-1 service for deaf and hard of hearing customers throughout its service area. On February 8, 1999, the State of Maryland officially announced the availability of 7-1-1 service, thus becoming the first state in Bell Atlantic's territory to implement 7-1-1 dialing for Telecommunications Relay Service (TRS). Bell Atlantic's introduction of 7-1-1 service for its Maryland customers was accomplished at no cost to the state or its end users.

Dialogue continues with other states and Relay providers in an effort to further deploy 7-1-1 dialing in the Bell Atlantic region. Discussions with AT&T has led to the development of a method to handle calls delivered to their Relay centers that will allow both voice and text callers to use 7-1-1 as is being done in Maryland. VISTA, the Relay provider serving Massachusetts, has already indicated that it will be able to do the same in that state.

#### **Background**

Subsequent to the FCC's action in 1997, the State of Maryland approached Bell Atlantic to determine the feasibility of implementing 7-1-1 dialing in that state. In response to a similar request in New Jersey in 1995, Bell Atlantic had already determined that such implementation was feasible and that Advanced Intelligent Network (AIN) was the appropriate mechanism. Since 7-1-1 had not yet been assigned for this purpose, Bell Atlantic was reluctant to move forward with any plan to deploy 7-1-1 dialing regionally. The FCC's action in 1997 eliminated any uncertainty regarding the reservation of 7-1-1 for Relay service, and Bell Atlantic began to formulate plans to deploy 7-1-1 dialing throughout its territory.

#### **Success in Maryland**

On February 8, 1999, the State of Maryland officially launched 7-1-1 access for Telecommunications Relay Service. The Maryland Department of Budget and Management/Telecommunications Access of Maryland is responsible for administering Maryland Relay, a public service created in accordance with Title IV of the Americans with Disabilities Act. Since 7-1-1 dialing was first introduced in Maryland, the Department has provided Bell Atlantic with feedback that indicates the 7-1-1 service has been an overwhelming success. Bell Atlantic is aware that a small segment of Voice Carry Over (VCO) users are experiencing problems using 7-1-1. The State of Maryland

and Sprint, the Relay provider, are addressing the problem. VCO users retain the ability to access Maryland Relay by using the pre-existing 800 number which remains in service. With that aside, the Department reports that the deaf and hard of hearing community has enthusiastically welcomed 7-1-1 dialing, and that it has also stimulated the use of Maryland Relay since it was first introduced on February 8, 1999.

During the implementation in Maryland, it was understood that it would be necessary to educate the public and promote awareness of the new code. To do so, Bell Atlantic included an insert, reviewed and approved by the Maryland State Relay, in its telephone bills informing customers of the change in dialing plans. Additionally, industry letters were sent to competitive local exchange carriers, wireless companies, interexchange carriers, the independent company, and Payphone Service Providers. The Maryland State Relay also put together TV and print ads, which were aired and published after February 8, 1999. All of these elements have contributed to the positive results obtained in the state thus far.

Successful implementation of 7-1-1 dialing in Maryland required a significant amount of cooperation between the State of Maryland, Sprint, Bell Atlantic, and the community. That cooperation demonstrated that all parties involved in the provision of telecommunications service could effectively work together and introduce 7-1-1 dialing in a way that provides the most benefit and maximizes customer satisfaction.

#### **7-1-1 for Text "and" Voice Users**

The deaf and hard of hearing community has embraced the use of 7-1-1 dialing in Maryland because voice users as well as text users can dial 7-1-1 and be connected to the Maryland Relay. Advocacy groups representing those who are deaf or hard of hearing have long held the belief that voice users (those who can hear) would be more inclined to call text users (those who are deaf or hard of hearing) if dialing was simplified for them. Indeed, statistics in Maryland thus far justify their claim. Initial indications are that Relay calls initiated by voice users are on the rise and people who are deaf or hard of hearing are receiving more calls through Maryland Relay.

In Maryland, where only one 800 number was being used by Sprint to provide access to its Relay center, implementation of 7-1-1 dialing for both text and voice users was an easy transition. The existing 800 number has remained in service and AIN, in Bell Atlantic's territory, or switch based translations, for the independent telephone company and others, are used to translate 7-1-1 to another 800 number that also routes to the center. Communications Assistants (CAs) determine, when the 7-1-1 call is answered, if the caller is a voice or text user. However, in most other states, Relay providers use separate 800 numbers to distinguish between the two types of users, making implementation of 7-1-1 for both text and voice users more difficult.

### **Action in Other States**

Bell Atlantic has been meeting over the past year with representatives from AT&T, the Relay Advisory Boards and, the New Jersey and Pennsylvania state commissions. At this time, both the New Jersey and Pennsylvania Relay Advisory Boards support the introduction of 7-1-1 dialing for text users as a "first step" but have asked AT&T to evaluate alternatives on how best to accommodate voice users. On April 15, 1999 AT&T presented a proposal to the New Jersey BPU, the New Jersey Relay Advisory Board, and other parties that would allow 7-1-1 to support both text and voice users. That proposal was subsequently accepted in New Jersey and Pennsylvania, and was being shared with other states served by AT&T. AT&T had begun work to make the necessary changes in all of their Relay Centers serving New Jersey, Pennsylvania, Delaware, Washington D.C., Virginia, West Virginia, Maine, Vermont, and Rhode Island. Work on this issue was halted when the FCC issued its Public Notice announcing the September Forum.