

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

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

**Ex Parte Comment on 711 Access to TRS on behalf of the
Pennsylvania Public Utility Commission**

Pursuant to the Federal Communications Commission's Revised Public Notice on FCC Convenes a Public Forum on 711 Access to Telecommunications Relay Services, released on June 16, 1999, the Pennsylvania Public Utility Commission (the PaPUC) submits this ex parte comment.

Since the Fall of 1998, Staff of the PaPUC has been meeting with members of the telecommunications industry and discussing a plan for implementing 711 access to the TRS system in the Commonwealth. Staff has been in discussions with AT&T Communications of PA, Inc. (AT&T), the state TRS relay provider, Bell Atlantic-Pennsylvania, Inc. (Bell Atlantic). and other Incumbent Local Exchange Companies (ILECs), as well as various facilities-based Competitive Local Exchange Companies (CLECs) operating in the state, to seek their input into the feasibility of 711 access.

Both Bell Atlantic and AT&T made presentations to the PaPUC and the PA Relay Advisory Board on their individual plans for implementation. Bell Atlantic indicated that it would like to implement 711 in Pennsylvania (and throughout its region) in a manner similar to the system implemented in Maryland. AT&T had an alternative approach that was discussed and reviewed. After further meetings with both companies, as well as the Pennsylvania Telephone Association (representing the ILECs of PA), and some larger facilities-based CLECs, we have developed a plan that has received support from the industry, and the hearing and speech impaired community. The plan, as currently proposed, is a blending of ideas from both Bell Atlantic and AT&T, and is similar to the one being implemented in Maryland.

The PaPUC intends to issue a Tentative Order in the near future that would seek comments on the proposed implementation plan from interested parties in the state. There would follow a comment period providing parties an opportunity for input into the process. An advisory committee for assisting in developing the implementation process may be designated. It is also the PaPUC's intent that a Final Order describing and

directing how the system should be implemented will then be issued. The proposed plan as presented herein may change in the PaPUC's Final Order based on the comments received. The proposed implementation plan is described below.

IMPLEMENTATION PLAN FOR 711 ACCESS IN PENNSYLVANIA

Implementing 711 service in Pennsylvania will enable customers to dial only three digits to send text or voice messages using the Telecommunications Relay Service (TRS). The TRS provider in Pennsylvania currently is AT&T Communications of Pennsylvania, Inc.

The plan for implementing 711 access in Pennsylvania involves using 711 for both voice and TTY calls. Both voice and TTY users will dial 711 to access the TRS Relay Center. ILECs and facilities-based CLECs will translate the 711 call to the current TRS 800 number that is used for voice calls, (800) 654-5988. The translation normally occurs within 1 second. (The voice number and the current TTY/TDD number will still be available for calls for those customers not using the abbreviated 711 dialing.)

When the call reaches the TRS Relay Center, operated by AT&T, the Pennsylvania customer will enter an Enhanced Voice Upfront Automation (EVUFA) Call Flow where voice customers will be greeted with an initial "Pennsylvania Relay" prompt. The system will immediately be listening for touch-tone prompts to expedite the call setup.

The first step will be to determine the correct call-type option for the customer. The system will begin with a voice prompt. The customer will be prompted to press "1" if a voice call, "2" if ASCII or "3" if Baudot. If the user presses "1" for voice, they will go to another menu and be asked to press "0" for a Communications Assistant, "1" to enter the number being called, or "2" for an explanation of how the TRS Service works. This initial voice prompt menu takes about 5-7 seconds.

Although unable to hear the prompt, the voice message provides the necessary pause for TTY users to enter their call-type option selection, either preprogrammed or manually. ASCII and Baudot customers will be encouraged to program their computer or TTY to automatically dial 711, followed by a pause, and then a "2" or "3" depending on their specific needs. If the text customer (ASCII or Baudot) programs their computer or

TTY, or manually enters their selection, then the call is immediately routed to the correct modem (ASCII or Baudot).

The voice message gives the requisite information to Hearing Carry-Over (HCO) callers to properly choose their correct call-type option. Voice Carry-Over (VCO) calls are typically processed as TTY calls (Baudot). Most VCO callers use a regular TTY machine and can easily choose their correct call-type option (#3). For VCO callers using the newer non-TTY VCO-telephones, the Relay system would time-out and transfer the caller to a Communications Assistant for handling either after choosing an option ("3") or by timing-out due to the caller taking no action at all.

If the user does not press any number on this initial menu a 5-second time-out occurs, after which the caller's ANI (Auto-Number Identification) is checked for an entry in the Relay Choice Profile Database. The Relay Choice Profile Database will check the customer's telephone number to determine if there is a prearranged option in the database on the choice of call type - voice, ASCII or Baudot. For the customer who takes no action, checking the Relay Choice Profile Database would take about 1-2 seconds.

If the customer has a Relay Choice Profile, the call will be sent to the appropriate option, either ASCII or Baudot. If the user does not have a Relay Choice Profile established, the call goes to the ASCII seek tone. If the user does not respond to ASCII (in about 5 - 7 seconds), the call goes to the Baudot seek tone. If the user does not respond to Baudot (again in about 5 - 7 seconds), the call is sent to a Communications Assistant for help.

At worst, a TRS call using 711 would take no more than 28 seconds to be processed. This worst case scenario assumes that the call is using the Baudot text format, the customer has no Relay Choice Profile set up, and/or does not choose an option at the initial prompt, necessitating going through all of the steps. At best, ASCII and Baudot customers could get to the correct modem in 3 seconds, which is faster than currently.

Both ILECs and facilities-based CLECs will need to implement 711 access, in order for there to be complete statewide coverage. There will be press releases detailing the implementation of 711 in the state; a bill insert will be developed to be included in all customers' bills; and the Customer Guide pages of the telephone books will be updated to include the use of 711. COCOT providers will be notified of 711 so that their "smart

payphones” can be programmed to translate the 711 call directly from the payphone itself.

Through our discussions with individual ILECs and CLECs, as well as the TRS provider, we have been informed that the costs for implementing the plan are minimal. All of the companies with whom we have met, have indicated that their networks could be modified to have the capability of translating 711 calls to the TRS relay center’s 800 number in a short time period and at a nominal cost. In addition, none of the LECs have indicated that they would need to seek reimbursement for the cost of modifying their networks.

The TRS provider, AT&T, has indicated that it intends to implement the PA 711 plan into their national relay network. As such, it will be available for operation in the various states where AT&T is the relay service provider as approval to implement 711 is granted in each state.

Therefore, the PaPUC encourages the FCC to develop its final rules on 711 access as quickly as possible. The PaPUC is of the belief that 711 implementation has been delayed long enough, especially since it is a service that would benefit our speech and hearing impaired community. The PaPUC also strongly encourages the FCC to issue final rules that allow for individual state variations in their 711 plans. If you have any further questions on the implementation of Pennsylvania's proposed TRS plan, please contact Ms. Gail Wickwire at (717) 787-2101.

Respectfully submitted,

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Certificate of Service

I, David E. Screven, hereby certify that I have this 30th day of July, 1999, served an original copy of the Ex Parte Comment on the 711 Access to TRS on behalf of the Pennsylvania Public Utility Commission upon the Secretary of the Federal Communications Commission and the other persons listed below by Federal Express:

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