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July 16, 1998

Office of the Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington DC 20554

Subject: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities CC Docket No. 98-67

Comments to the **Notice of Proposed Rulemaking** with comment due date of July 20, 1998

Dear Sirs:

My comments are as follows:

Part II Background

1 My first comments apply to the section of Part IT Background, paragraph 6, "Title IV of the ADA requires the Commission to ensure that TRS is available, to the extent possible and in the **most efficient manner**, to persons with hearing or speech disabilities in the United States. TRS is a telephone transmission service designed to give persons with hearing or speech disabilities '**functionally equivalent**' access to the telephone network.. "

There is one group of people with disabilities that have not been adequately covered in any of the FCC regulations, They apparently are not covered under title IV because that portion of the ADA is basically to provide TRS between deaf or hard of hearing people that must use a **tty**, or equivalent, to communicate with a hearing person. The availability of communication access of people who must use the **tty** to call a person that also uses a **tty** is covered indirectly by title II and III of the ADA, and is somewhat covered by section 255 of the Telecommunications Act of 1996. I am directly speaking of the ability of these people to communicate **tty-to-tty** from a **tty** payphone. A good example would be making an emergency call from an Interstate **Hwy** rest stop at night, The only reason that they can't make this call using coins is that **they** can't hear how much money to deposit. and also when to add more coins if more time is needed. These messages should also be visual For convenience there should also be the visual status messages of 'dial tone', 'ringing', and 'busy'. The light on the **tty** drawer cannot be easily used to determine the status signal (I've tried it). The visual messages must be on the **payphone** itself spelled out.

Many of these people do not have a credit card, debit card, nor have made arrangements to call collect. Since it requires only the visual messages to enable them to use the **payphone** and deposit the coins required, and since **from** the ADA regulations. they are to receive '**functionally equivalent**' access, **the** FCC should make some ruling regarding this situation. **If it is not to be done under these rules, then these rules should acknowledge the existence of these people and state where the FCC has directly addressed this issue.** Almost all payphones do not have the provision of visual messages needed to permit these people to have access and **the** FCC rules should correct the situation. TRS coin calls **cannot** be made because of technical difficulties, but there is absolutely no reason why **tty-to-tty** coin **payphone** cannot be made by people who wish to make the direct call, having only coins available to make the call.

James H. Stoltz July 16, 1998

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III Discussion

A. Coverage of Improved TRS Under Title IV of the ADA

1. Scope of TRS Generally

2. Par. 14 "We believe that Title IV's language and structure establish that Congress intended TRS to be an evolving service that would expand beyond traditional TTY relay service as new technologies developed." I agree with this conclusion.
3. Par. 15 This paragraph addresses the matter of reimbursement from the TRS **fund** for cost of improved interstate relay services and also intrastate relay services. I agree with this generally as long as there are safeguards to protect against funding voluntary projects that may not be in the best interests of improved TRS service. The states involved should certainly have a say as to their interests in having this improved service when it is voluntary
4. Par. 18 Definition of Communications Assistant is too restrictive. I agree with the FCC conclusion.

2. Speech-to-speech (STS) Relay Service

5. Par.23 I agree that STS service should be a mandated service of TRS. The STS service should be mandated from a speech impaired person to a non-speech impaired person (including those who use a tty) and also to another speech impaired person, **Item (7)** of section 64.60 I should be revised to include calls to another speech impaired person.

Par.23 Also in section 64.603 (Provision of services), item (c), it should be understood that the provider of these services may not be the same as the provider of relay service to hearing impaired people.

6. Par.24 I agree that national rules mandating STS are needed. However the use of mandated STS service will require flexibility in the TRS rules. It must be recognized that this service, while necessary in my opinion, will have a very small quantity of users. To handle this in an economical **manner** might be best done by having a national relay center for this purpose. One of the service providers could bid to set up one relay center nationally for this type of call in all the areas in which they (AT&T, MCI, Sprint, or any others) provide TRS services, or they could bid on one center for the entire country. The use of specially trained **CAs** and the difference in communication problems, may make it easier to separate **from** the regular relay centers (functionally -- perhaps not physically). However I believe the relay providers can suggest the most economical method that will still provide proper service.
7. Par.25 Implementation time of STS services. I agree with the FCC conclusions and believe it should be done on a national basis as indicated in 6.
8. Par.26 I agree that the TRS minimum standards may have to be relaxed for STS service, and believe that because of the lack of experience, the initial minimum standards should be tried for one or two years. and then reviewed and revised as necessary, based on experience.

3. Video Relay Interpreting (VRI) Services

9. Par.32 I definitely agree that **VRI** services should not be mandated at this time. I see its main application as a convenient way for people who use sign language to communicate with people who do not use sign language. It **would** also apply to people who sign who **wish** to communicate to another person who also

signs. However one of the main proposed uses is for videoconferencing where a sizable group is in the audience. It should be remembered that for that application where there are also people present who do not sign, but need visual communications, captioning or very good typing by a highly skilled typist is necessary so that those people are not excluded. The FCC should encourage this type of development, so that it does not exclude part of the audience. Where **videoconferencing** is involved, the FCC should promote communication access for both those who require visual communication by signing as well as those who require captioning or similar visual type communications, and they should be both simultaneously presented when people with both types are present.

10. Par.34 I agree with the FCC conclusions regarding definition of "qualified interpreter", **confidentiality** rules, and that recoverable costs of intrastate VRI are provided as long as the state, or region involved, has approved the project.

4. Multilingual Relay Services (MRS) and Translation Services

11. Par.37 MRS is best left to the state TRS programs and that Commission intervention is not needed at this time. I agree with that conclusion.
12. Par.38 MRS costs of intrastate or interstate, to the extent **voluntarily** provided are recoverable **from** the appropriate **funding** source. as long as approved by the responsible group (interstate TRS fund or intrastate jurisdiction).
13. Par.39 MRS services are same language. and as such are not reimbursable **from** TRS **funding**. I believe an exception can be made for ASL users..

5. Access to Emergency Services

14. Par.41 How emergency calls are to be handled. I believe it would be desirable for the TRS centers to pass a caller's ANI to an emergency services operator, provided this is feasible. However there would have to be some indication from the caller that it is an **emergency**.

6. Access to Enhanced Services

15. Par.46 I agree with the FCC conclusions. The CAs should definitely be allowed to offer the caller a condensed version of the recorded message. Also in many cases the caller can tell the CA what they want to access so that the CA will not type summaries, but rather look for that subject item and access it. In most cases the best way is to get a live operator on the line. if that is possible.

B. Mandatory Minimum Standards

1. Speed-of-Answer Requirements

16. Par.5 1/52 In general I agree with the FCC conclusions. I would like to elaborate on the **manner** of calculating the time, using the procedure of relay service in Pa. in which AT&T provides the service. The dialing sequence is as follows:
- (a) caller dials the access number -- 1-800-654-5984
 - (b) an automatic response issued (from computer) PARC GA (call routed to the least busy relay center and placed in a queue..
 - (c) caller provides necessary info for call which usually would be the phone number but sometimes might have an extension #. a request for service dept, telling operator that if recorded msg, I will

- leave a voice msg., ask for reservations, and many other items that make the call shorter and more efficient. When I have finished with information and say GA, the timing starts.
- (d) The instant the CA begins to respond by saying: CA 9359 (F) VCO ON THANK YOU DIALING.. RINGING...1...2.. the timed period ends (typing the C in CA).

The new proposed FCC method of timing would start when the access number in step (a) is received at the computer. The actual calculation of time might be difficult since the timing would be started when the access number is completely received at the computer center. It would pause momentarily when the PARC GA is received by the **caller**. Then it would start again when the **caller** finishes his info to the CA and the relay center receives the caller GA. The second segment of time would end when the CA starts to respond with CA#. Let us call the **first** segment T1 and the second segment T2. The previous way of measuring was to determine T2. This could be measured at the relay center with accurate timing equipment. T1 **will normally** be a **small fraction** of a second. Let us assume that it averages 0.1 second, and normally does not exceed 0.2 seconds. The TRS provider could demonstrate to the proper authority the average and deviation of the T1 portion of the timing. It should be in the range indicated or less. When it is such a relatively small quantity, it can be given as a constant, so that it doesn't have to be actually measured to determine the speed of answer requirements. There may be other ways that the relay access sequence happens, and in such a **manner** that it becomes a larger **number**. However if the deviation is reasonably small, then a fixed T1 could still be used and selected to be equal or **greater than 97%** of the calls.

I don't know why all the **calls** could not be measured as long as they are completed sufficiently to determine T2. I was not aware that this was determined by a small sample. Also I believe the relay providers should clearly state how the measurement is made.

With reference to **par. 53**, and in reference to abandoned **calls**, if such **calls** exceed the 10 second criteria, then they should be included in the timing measurement until abandonment, since the CA was not able to respond prior to abandonment

In paragraph 47 it is stated that and no more than 30 seconds shall elapse between receipt of dialing **information** and the dialing of the requested number. My question is this: What percentage of the time can the time exceed 30 seconds and the system still be in compliance. I feel rather certain that all systems exceed the 30 seconds at various times. We sometimes get the message **after** we give the GA: 'Your call will be handled ASAP, pls hold'. Most **frequently** this message comes out when the time reaches 20 seconds. It will be repeated in an additional 20 seconds if the CA has not yet responded, and is repeated until the CA responds. I believe that this probably happens on all the relay systems. These messages should not stop the timing. So my question is: How do we determine compliance for the 30+ second delay? Perhaps 99.8% of the calls that exceed the 10 second criteria should be equal or less than 30 seconds,

Sometimes I dial the relay access **number** 1-800-654-5984 and get a busy signal. Then I redial and **normally** do get access to the relay center by receiving the PARC GA. This does not occur very often. However it may be well to have the relay provider state how many calls they can get simultaneously and not have to give a BUSY signal. It would be well to know that the problem will not get worse if the number of calls per day increases within normal expectations.

2. CA Quality and Training

17. **Par.58/59** The question raised in these paragraphs regarding minimum skills I believe can be solved by

establishing a second level of CAs that would achieve that status by passing a test, administered by the relay provider, that would require minimum standards for this advanced level. It would in no way limit the market for CAs. In fact it would increase the market, because of improved pay for the more skilled operators and provide incentive for the less skill operators to improve their **performance**. This test would involve minimum typing speed of 80 to 85 words per minute with a defined accuracy, done from oral input closely duplicating the actual conditions. It would require some type of articulation minimum skills (I don't know how this would be established, but I'm sure others can suggest the standard). The TRS system in some indirect way would have to fund the increased CA compensation for the more skilled operators. The present requirements set by the relay providers could remain essentially the same for the first level CA, although a 45 to 50 word per minute accurate typing speed might be considered. It may be possible that the FCC could suggest the second level minimum standard to the relay providers, and let them meet and come up with a uniform second level minimum standard criteria which meets the approval of the Commission.

18. Par.60 I believe that the Commission should suggest to the relay providers that a minimum criteria be established for second level CAs to provide an incentive to increase the skill level of CAs as indicated above. The matter of financing should be addressed so that the relay providers are compensated for having the second level CA.

3. In-Call Replacement of CAs

19. Par.62 I agree with the Commission conclusions, I think the minimum time before a transfer can be made should be somewhere between 7 and 10 minutes.

C. Competition Issues

1. Multivendoring

20. Par.65 I don't believe the market is such that Multivendoring will improve service. Definitely the Commission should not require this type of competition. However the individual states should be permitted to use it if they see fit. The other states will watch how it works, and use it **if it** looks like an improvement. The way to improve service is when the states renew a contract with a vendor, and let the bidding begin. With this type of process, the single service company will tend to provide good service so that their contract will be renewed. This can be made more effective if the contract is for a 3 year period instead of 5 years.

I do not believe that 'the greatest benefits of TRS will be realized when vendors directly compete for TRS consumers' I cannot see any reason why the Commission has jurisdiction to require Multivendoring. I believe there is **no** correlation between the single-vendor model and problems with intrastate TRS. In fact I truly believe that the problems will increase with Multivendoring, because each vendor in Multivendoring will have unit costs increase since they are serving fewer customers. And when the costs of the lesser successful vendor become excessive, the service will get worse, and they will ultimately drop out of the competition. The market is limited, and the best way to increase competition is to use a 3 year contract period.

2. Treatment of TRS Customer Information

21. Par.72 I believe that the use of customer information is very desirable to ensure that customers receive TRS in the most efficient **manner** possible., If the data base is in fact paid for by the TRS vendor rather than from the TRS funds, then I believe a method should be agreed to by the TRS vendors and the TRS

administrators to make it the property of the TRS administrator of the state, assuming a single vendor situation.. The argument by Sprint that since the data base is compiled prior to the call reaching the CA doesn't seem to hold water, While the payment to a TRS vendor may be based on the number of calls, and the time of each call. the funding is spread over many tasks, many of which occur outside of the actual call time.

The argument by Sprint that data should not have to be provided to competitors in a multivendor environment has some validity in my opinion. In that type of environment they should not be required to hand over the information to a competitor. Actually, when the competitor in that environment seeks a customer, they can get the information **from** the customer when they sign aboard. If the TRS vendor leaves a multivendoring state, then perhaps the CPNT should be obtained **from** that vendor.

With regards to the use of the CPNI information, I definitely believe that it should not be given to anyone else including a TRS vendor without the express permission of the individual relay user. In my case with AT&T, I have provided them a password to use for identification and telephone numbers that I **call** frequently. That information is proprietary with me, and unless I agree to the transfer to a new TRS vendor, it shall not be made available to anyone other than AT&T, and does not belong to the Pennsylvania Public Utility Commission. unless I specifically authorize it. Attached is a copy of the form, so that you can understand my position, The form also states that the information provided by me is strictly **confidential**. In view of this situation, the information is not transferable to anyone unless I specifically agree to the change. If the TRS administration wants to transfer it to another TRS vendor in a single vendor situation, then the form used by the TRS previous vendor must specifically ask the consumer for permission to do that and would have to be stated on the form that is filled out.

D. Enforcement and Certification Issues

22. Par.75 I agree with the tentative conclusions of the Commission, I doubt if many of the users are **familiar** with the proper procedure to file complaints. Since the relay providers are supposed to publicize the relay service with phone bill inserts, these inserts could provide, on occasion, information on complaint procedures.

E. Other Issues

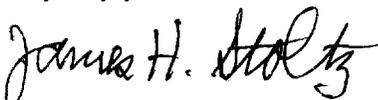
23. Par.78 Creating an advisory committee or expanding the role of the TRS **Fund** Advisory Council: I agree with proposed inaction of the Commission regarding these issues.
24. Par.80 Even though the Commission does not seek comments on the **Caller** ID issue, I think it is an important auxiliary aid to the effective use of the TRS, and wish to **call** this to the attention of the Commission. Caller ID is an important aid to a person that uses a phone that is **v/tty**. It helps me particularly at the start when I have a voice call in knowing who is calling so I can adequately respond. This is usually to tell them that I **cannot** understand what they are saying because I am hard of hearing. I request them to call me over the relay service and give them the proper relay access number.

On relay calls the identification on the Caller ID is usually **Unavailable**. At the present time AT&T is now providing the **information 800-855-0000**. This at least lets you know that a relay **call** was received. The reason that more identification is not used is that the relay call is really two calls, and the original caller is **connected** into the relay center, and the line at which my caller ID is sensing is what is coming from the relay center (800-855-0000). It would enhance my ability to communicate if I knew the identity and phone number of the original **caller**, so that I know who called while I was out. More than 60% of the calls that come to our home are relay calls,

I believe that the Commission should encourage TRS vendors to develop the technology to provide on my caller ID the information regarding the original caller plus a symbol to show that it was a relay call. The technology should not be difficult to develop. One way would be to place a caller ID at the incoming call at the relay center and **automatically** transferring that to the outgoing call **from** the relay center, and at the same time adding a symbol to show that it was a relay call. This proposed activity for the FCC does not have to be part of this project. but it should be part of some FCC project, and the time is now.

This concludes my comments in the matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with hearing and Speech Disabilities, CC Docket No. 98-67 with the comment due date of **July 20, 1998**. It is evident that the Commission did a lot of work in preparing the Notice of Proposed Rulemaking. Those people involved in preparing this document are to be congratulated for their dedicated work.

Very truly yours,



James H. Stoltz

attachment: AT&T form for their Relay Choice Profile

cc: Secretary, FCC original and 11 copies (each Commissioner to receive a copy)

Carmell Weathers, Common Carrier Bureau, 2000 M Street NW. Washington DC 20554

International Transcription Services, Inc., 123 1 20th Street NW. Washington DC 20036



Ready to revolutionize your relay setup? Design your Relay ChoiceSM Profile right now.

Please fill out the information below and return it **to** the AT&T relay representative. If at any time you would like to change your profile, create another profile for a different telephone number or add numbers to your personal memory dial list, call **1 888 288-2180 TTY** or **1 888 288-2181 Computer**. For help from a Customer Care Specialist call **1 888 288-2183 TTY/Computer**. Voice callers can call **1 888 288-2182** to create or change a profile, add telephone numbers to their personal memory dial list or ask questions. Be sure to have this form ready when creating or making changes to your profile. If you prefer, you can mail this form to: AT&T Relay Choice Profile, Customer Care Center, 15 LaSalle Square, 3rd Floor, Providence, RI 02903, or fax it to **1 888 288-2184**. All the information you provide will be kept strictly confidential.

If you enter your information into Relay Choice Profile using TTY or ASCII, make sure you complete the entire online questionnaire or *your profile will not be saved*.

1. Please provide your **telephone number**,
area code first: () _____

2. Please provide a **password** for identification
(PASSWORD MAY BE 4 TO 8 CHARACTERS LONG AND CAN BE
NUMBERS, LETTERS, OR A COMBINATION OF BOTH)

3. Please select your **communications preference**.
(PLEASE SELECT ONLY ONE)

- A. PC (ASCII) B. TTY c. TTY/VCO
D. TTY/HCO E. Voice

4. Circle the letter next to your preferred **long-distance**
telephone service provider. (PLEASE SELECT ONLY ONE)

By notmaking a selection, you are choosing AT&T as your long-distance provider for relay service. Some service providers may not be available in all areas.

- A. AT&T B. Allnet/Frontier C. LDDS D. MCI
E. Metromedia F. SPRINT G. Wiltel

5. Circle the letter next to your regional telephone
service provider. Remember, regional service is the
telephone service outside your local calling area,
but not long distance. (PLEASE SELECT ONLY ONE)

Some service providers may not be available in all areas.

- A. AT&T B. Allnet/Frontier C. LDDS D. MCI
E. Metromedia F. SPRINT G. Wiltel
H. Your local telephone service provider

6. Would you like **Spelling Correction** turned off or
left on? (PLEASE SELECT ONLY ONE)

- A. Off B. On

7. Would you like to have the CA identify **Background**
Noise? (PLEASE SELECT ONLY ONE)

- A. Yes B. No

8. Please list the names and telephone numbers that you
wish to store as your **memory dial** numbers. (you may
store up to 20 .10 digit domestic telephone numbers)

	Name (40 letters or less)	Telephone Number
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____
6.	_____	_____
7.	_____	_____
8.	_____	_____
9.	_____	_____
10.	_____	_____
11.	_____	_____
12.	_____	_____
13.	_____	_____
14.	_____	_____
15.	_____	_____
16.	_____	_____
17.	_____	_____
18.	_____	_____
19.	_____	_____
20.	_____	_____

RELAY CHOICESM PROFILE

From AT&T

AT&T has always been a leader in making telecommunications easy and accessible for **everyone**. Relay Choice Profile is just the start of **Relay 2000SM**, the new age of a more advanced, efficient and exciting relay service from AT&T.

Here's a list of the features you can get with Relay Choice Profile:

Memory Dial - With this convenient memory dial list, you can store up to 20 frequently dialed telephone numbers in the Relay Choice Profile database. When you place a call to anyone on that list, you need only to tell the CA whom to call. With memory dial, you can store frequently dialed numbers and can even request that the CA dial them by name.

Voice Carryover (VCO) - This profile feature is great for TTY and VCO phone users who want to speak for themselves. To make a call, VCO users should first type the number they want to call (VCO will already be turned on). When the CA comes online, the VCO user can speak. The CA then types the standard telephone user's response back. Best of all, when VCO users receive a call, they'll be able to answer the phone by speaking naturally because this feature will be automatically connected.

Hearing Carryover (HCO) - This allows TTY users who can hear to listen to the other person on the phone directly. The CA then voices the TTY user's typed response back to the voice caller.

Connect Preference - A time-saving benefit that enables you to be automatically connect in the mode in which you called. In other words, if you always use your TTY (baudot) you will be connected as TTY (baudot). Other connection preferences include: ASCII, voice, TTYNCO and TTY/HCO.

Carrier Preference - This feature lets you specify which long-distance and local toll carriers you are using, such as AT&T. By entering the carrier of choice in your profile, you can save time up front and avoid billing confusion later.

Spelling Correction - A great new feature for TTY and ASCII users. It automatically spell-checked and corrects certain words misspelled by the CA. On your screen, you would see only the corrected word, which results in a clearer conversation.

Background Noise - This feature instructs the CA to communicate any appropriate sounds-laughter, for example-that can be detected over the telephone in addition to the spoken words from a voice user. It provides you with additional information. Some people prefer not be informed about background noise. As a profile feature, you will be able to turn background noise off.