



STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL  
ALAN G. LANCE

25 1008  
July 17, 1998

**VIA FED EX**

Office of the Secretary  
Federal Communications Commission  
19 19 M Street, NW, RM 222  
Washington, D.C. 20554

**RE: CC Docket No. 98-67**

Dear Secretary:

Enclosed for filing is an original and six copies of the Idaho Public Utilities Commission's comments in the above referenced case. Please acknowledge receipt of this document by date stamping the duplicate copy of this letter and returning it in the enclosed self-addressed, stamped envelope.

Sincerely,

Cheri C. Copsey  
Deputy Attorney General

Enclosure

bls/L.fcc.rs

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

**IN THE MATTER OF** )  
 )  
**TELECOMMUNICATIONS RELAY SERVICES** )  
**AND SPEECH-TO-SPEECH SERVICES FOR** )  
**INDIVIDUALS WITH HEARING AND SPEECH** )  
**DISABILITIES** )  
\_\_\_\_\_ )

**CC DOCKET NO. 98-67**

*10/21/98*  
*10/21/98*

**COMMENTS OF THE IDAHO PUBLIC UTILITIES COMMISSION**

The Idaho Public Utilities Commission submits these comments in response to the Federal Communication Commission's (FCC) May 20, 1998 Notice of Proposed Rulemaking in the matter of Telecommunications Relay Services and Speech-to-Speech Services (STS) for Individuals with Hearing and Speech Disabilities.

The Idaho Public Utilities Commission (IPUC) supports the principle behind the proposed rulemaking to enhance the quality of Telecommunications Relay Service (TRS) and broaden the potential universe of TRS users. Promoting access to telecommunications for millions of persons who might otherwise not be able to take advantage of the ever expanding telecommunications world is a worthy goal. Indeed, the IPUC considers the TRS system of TTY-to-speech and speech-to-TTY a giant step toward that goal. However, the IPUC cannot support the FCC's proposal to impose mandatory minimum standards on speech-to-speech relay services and joins Idaho's TRS Administrator, Mr. Robert Dunbar, Donnelly, Idaho, in opposing them.

The IPUC considers this proposed rulemaking premature and ill-advised for states with small populations. The FCC has provided too little data in this NPRM regarding the costs to

implement and maintain STS services, the efficiency and effectiveness of the services, or the number of those who can be expected to actually use the services, as compared to those who need STS.

Before mandatory standards are imposed, the FCC should have valid estimates of STS customers and locations in order for states to determine the most efficient and cost effective relay providers. (Mr. Dunbar estimates fewer than six users of STS services in Idaho.)

It is critical that the costs associated with implementing and maintaining these services, such as the acquisition of facilities, specialized equipment, knowledgeable administration, and the recruitment and training of personnel, be understood and documented before this program is arbitrarily imposed on the states. Training and salaries will be costly. Such services require a highly skilled workforce that will expect compensation commiserate with those skills. There is no indication that the FCC considered the funds that would have to be expended as a result of this proposed rulemaking, but costs are a major issue for those who must implement it. Therefore, the total expense of speech-to-speech relay services nationally and regionally must be determined and funding sources identified in advance of implementation.

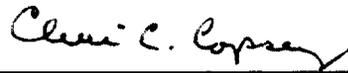
The personnel to provide these services is another issue to be resolved before mandatory minimum standards are imposed. The FCC provides no data on the recruitment and training of personnel, leaving unanswered such questions as: Are there difficulties associated with recruiting capable Communications Assistants (CA) and if so, what are they? How much training will be required of the CAs? Will the training be more extensive than that for the present TRS system and, if so, by how much? What will be the drop-out rate of 1) the trainees, and 2) the CAs? What impact with the STS relay service have on the present TRS system?

The significant issues of cost, usage, effectiveness, and efficiency must be thoroughly addressed in advance of any rulemaking. This information should be available in those states now

offering STS services voluntarily and referred to in the NPRM. Therefore, the IPUC strongly recommends that, before the FCC imposes mandatory standards on STS relay services, it establish a three-year monitoring program with the voluntary programs and that it systematically collect operating and cost data that becomes a part of that rulemaking.

In the long run, however, the IPUC believes STS relay services will continue to be too costly for Idaho and opposes implementation. If STS should become mandatory for certification, the IPUC urges the FCC to permit relay service providers to take advantage of regional centers or to subcontract with other providers to gain efficiency in providing STS relay services.

Respectfully submitted this 17<sup>th</sup> day of July 1998.



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Cheri C. Copsey  
Deputy Attorney General

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