

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

In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
Implementation of Sections 255 and 251(a)(2) of)	WT Docket No. 96-198
The Communications Act of 1934, as Enacted by)	
The Telecommunications Act of 1996: Access to)	
Telecommunications Service, Telecommuni-)	
cations Equipment and Customer Premises)	
Equipment by Persons with Disabilities)	
)	
Telecommunications Relay Services and Speech-)	CG Docket No. 03-123
to-Speech Services for Individuals with Hearing)	
and Speech Disabilities)	
)	
The Use of N11 Codes and Other Abbreviated)	CC Docket No. 92-105
Dialing Arrangements)	

ORDER

Adopted: June 26, 2009

Released: June 26, 2009

By the Acting Deputy Chief, Consumer & Governmental Affairs Bureau:

I. INTRODUCTION

1. In this Order, the Consumer & Governmental Affairs Bureau (Bureau) finds good cause to extend for one year (until June 29, 2010), the current limited waiver of section 64.604(a)(4) of the Commission’s rules,¹ to the extent that the rule requires traditional telecommunications relay service (TRS) providers to “automatically and immediately” call an appropriate Public Safety Answering Point (PSAP) when receiving an emergency, 711-dialed call placed over an interconnected Voice over Internet Protocol (VoIP) service.²

2. The rule at issue has been waived previously, and on April 1, 2009, the Bureau extended that limited waiver until June 29, 2009.³ In doing so, the Bureau recognized that “technical and

¹ 47 C.F.R. § 64.604(a)(4).

² See 47 C.F.R. § 9.3 (defining “interconnected VoIP service”).

³ *Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, WC Docket No. 04-36, WT Docket No. 96- (continued....)

operational challenges” continue to prevent traditional TRS providers from developing a system to consistently identify an appropriate PSAP to which to route an emergency, 711-dialed interconnected VoIP call in the manner prescribed by section 64.604(a)(4).⁴ At the same time, the Bureau issued a Public Notice (*Notice*) seeking comment on the specific challenges preventing traditional TRS providers from complying with this rule and on the continuing need, from the consumer’s perspective, to be able to dial 711 via TRS in an emergency, rather than dialing 911 directly.⁵

3. The record reflects that traditional TRS providers continue to encounter significant challenges in reliably identifying the physical location of (and therefore an appropriate PSAP for) an interconnected VoIP caller who dials 711, rather than 911, to reach emergency personnel.⁶ Based on this information, and for the reasons set forth below, we find good cause to waive section 64.604(a)(4) for one year, to the extent that the rule requires traditional TRS providers to “*automatically and immediately*” route the outbound leg of an interconnected VoIP-originated emergency 711 call to an appropriate PSAP.⁷ We emphasize that grant of this waiver will not prevent traditional TRS users from reaching emergency services. During the pendency of the waiver, traditional TRS providers will be required to maintain a manual system for routing 711-dialed emergency calls as quickly and efficiently as possible, and to renew their efforts to educate consumers of traditional TRS to dial 911 directly, rather than placing a 711-dialed TRS call, in an emergency.

II. BACKGROUND

4. TRS, mandated by Title IV of the Americans with Disabilities Act of 1990 (ADA), enables individuals with hearing or speech disabilities to access the public telephone system to communicate with voice telephone users through a communications assistant (CA) at a TRS relay center.⁸ The CA relays conversations between persons using various types of assistive communication devices and persons who do not require such assistive devices. A *traditional* TRS call is accomplished via text-to-voice or voice-to-text, with the text provided by a TTY. Although such calls typically are placed over the public switched telephone network (PSTN) (*i.e.*, by using a TTY with a traditional wireline telephone service), a traditional TRS call may also be made using a TTY via an interconnected VoIP service (*i.e.*, by plugging a TTY into an interconnected VoIP handset or device).

(Continued from previous page) _____
198, CG Docket No. 03-123 & CC Docket No. 92-105, Order, 24 FCC Rcd 5707 (CGB April 1, 2009) (*April 2009 TRS 711 Waiver Order*).

⁴ *Id.*, 24 FCC Rcd at 3936, para. 11.

⁵ *Id.*, 24 FCC Rcd at 3937, paras. 13-14.

⁶ Comments of Sprint Nextel Corporation (filed May 28, 2009); Comments of AT&T, Inc. (filed May 28, 2009). See also *Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123 & CC Docket No. 92-105, Petition for Extension of Waiver (filed June 11, 2009) (*Petition for Extension of Waiver*).

⁷ 47 C.F.R. § 64.604(a)(4) (emphasis added).

⁸ See 47 U.S.C. § 225; 47 C.F.R. § 64.601 *et seq.* (implementing regulations).

5. The Commission's TRS rules require common carriers providing telephone voice transmission services to offer 711 abbreviated dialing access to traditional TRS as a toll-free call.⁹ 711 abbreviated dialing allows TRS users (both persons with hearing or speech disabilities and voice telephone users) to initiate a TRS call from anywhere in the country by dialing 711, so that TRS users do not have to dial or commit to memory (especially when traveling to another state) the ten-digit or toll free number of a particular state's TRS provider. The Commission's TRS rules also set forth operational, technical, and functional mandatory minimum standards applicable to the provision of TRS.¹⁰ As relevant here, these rules require traditional TRS providers to handle emergency calls by using a system that "automatically and immediately transfers the caller to an appropriate [PSAP]."¹¹ The Commission has defined an "appropriate PSAP" as "either a PSAP that the caller would have reached if he had dialed 911 directly," or "a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner."¹²

6. In the 2007 *VoIP TRS Order*, the Commission extended its pre-existing TRS rules to interconnected VoIP providers, including the duty to offer 711 abbreviated dialing access to TRS.¹³ The *VoIP TRS Order* required interconnected VoIP providers to offer 711 abbreviated dialing "to ensure that TRS calls can be made from any telephone, anywhere in the United States, and that such calls will be properly routed to the appropriate relay center."¹⁴ Following release of the *VoIP TRS Order*, several parties filed petitions for waiver raising two distinct issues: (1) the ability of *interconnected VoIP providers* to route the inbound leg of 711-dialed calls to an appropriate TRS provider, particularly when the caller's telephone number does not correspond to the caller's geographic location, and (2) the ability of *TRS providers* that receive, via an interconnected VoIP service, 711-dialed calls concerning an emergency to automatically and immediately route the outbound leg of the call to an appropriate PSAP.¹⁵

⁹ See 47 C.F.R. § 64.603; *Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, Second Report and Order, 15 FCC Rcd 15188, 15191, para. 3 (Aug. 9, 2000) (*711 Order*).

¹⁰ 47 C.F.R. § 64.604 (the TRS mandatory minimum standards).

¹¹ 47 C.F.R. § 64.604(a)(4).

¹² *Id.*

¹³ See *Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123 & CC Docket No. 92-105, Report and Order, 22 FCC Rcd 11275, 11291-97, paras. 32-43 (June 15, 2007) (*VoIP TRS Order*).

¹⁴ *Id.*, 22 FCC Rcd at 11296, para. 42.

¹⁵ See Motion for Stay or Waiver of the Voice on the Net (VON) Coalition (Sept. 14, 2007) (seeking to stay or waive 711 abbreviated dialing requirement, as applied to interconnected VoIP providers); United States Telecom Association Petition for Waiver of Certain Regulations Concerning Provision of 711 Dialing (Sept. 21, 2007) (seeking to waive 711 abbreviated dialing requirement insofar as it requires interconnected VoIP providers to route emergency 711 calls, including those involving non-geographic telephone numbers, to a relay center capable of identifying the appropriate PSAP); Hamilton Telephone Company d/b/a/ Hamilton Telecommunications, Petition for Waiver (Sept. 21, 2007) (seeking to waive the requirement that TRS providers "automatically and immediately" route VoIP-originated emergency 711 calls to an appropriate PSAP because TRS providers cannot reliably determine the geographic location of 711 TRS callers using interconnected VoIP service).

7. In response to these and subsequently filed petitions for waiver, the Bureau issued a series of orders clarifying and/or waiving the respective obligations of interconnected VoIP providers and TRS providers with regard to 711-dialed calls under the applicable TRS rules.¹⁶ On April 1, 2009, in view of the continued technical and operational challenges presented by this requirement, the Bureau issued an order extending for 90 days (until June 29, 2009), the limited waiver previously granted to traditional TRS providers of section 64.604(a)(4),¹⁷ The Bureau allowed the waiver relief previously granted to interconnected VoIP providers to expire, however, noting that progress had been made toward resolving technical difficulties previously associated with the routing of 711-dialed calls by interconnected VoIP providers.¹⁸

8. In the *Notice* accompanying the *April 2009 TRS 711 Waiver Order*, the Bureau sought comment on any remaining compliance issues that currently prevent traditional TRS providers from reliably identifying the appropriate PSAP to call when receiving an emergency call via 711 and an interconnected VoIP service.¹⁹ In addition, the Bureau sought comment on: (1) the total number of interconnected VoIP-originated 711 TRS calls that are processed annually by interconnected VoIP and traditional TRS providers, and the proportion of those calls that are of an emergency nature; (2) the continuing need, from the consumer's perspective, to be able to dial 711 via TRS in an emergency, rather than dialing 911 directly; (3) any impediments consumers have encountered in attempting to dial 911 directly; (4) the effectiveness of providers' outreach efforts in educating consumers about the importance of dialing 911 directly in an emergency when using a TTY and an interconnected VoIP service; and (5) the continuing use of TTYs by individuals with hearing or speech disabilities and, in particular, the use of TTYs with an interconnected VoIP service.²⁰

9. In response to the *Notice*, interested parties filed three comments and one reply comment.²¹ In its comments, AT&T, a traditional TRS provider, explains that handling an interconnected VoIP-originated, 711-dialed, emergency call in compliance with section 64.604(a)(4) requires that traditional TRS providers: (1) identify a 711-dialed call as an interconnected VoIP call; (2) determine the

¹⁶ See *April 2009 TRS 711 Waiver Order*, 24 FCC Rcd at 3935-36, paras. 9-11; *Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123 & CC Docket No. 92-105, Order, 23 FCC Rcd 5707, 5712-15, paras. 9-14 (CGB April 4, 2008) (*2008 TRS 711 Waiver Order*); *Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123 & CC Docket No. 92-105, Order, 22 FCC Rcd 18319, 18322-24, paras. 8-14 (CGB Oct. 9, 2007) (*2007 TRS 711 Waiver Order*).

¹⁷ *April 2009 TRS 711 Waiver Order*, 24 FCC Rcd at 3936, para. 11.

¹⁸ *Id.*, 24 FCC Rcd at 3935, para. 9 n.27.

¹⁹ *Id.*, 24 FCC Rcd at 3937, para. 13.

²⁰ *Id.*, 24 FCC Rcd at 3937, para. 14.

²¹ See Comments of AT&T, Inc. (AT&T) (filed May 28, 2009); Comments of Sprint Nextel Corporation (Sprint) (filed May 28, 2009); Comments of TDI *et al.* (Consumer Groups) (filed May 28, 2009); and Reply Comments of Verizon (filed June 8, 2009).

location of the interconnected VoIP caller; and (3) identify an appropriate PSAP to call.²² Because it reportedly has implemented a system to accomplish step three (identifying the appropriate PSAP to call), AT&T's comments focus on the obstacles to accomplishing steps one and two – *i.e.*, identifying the call as an interconnected VoIP call and determining the geographic location of the caller.²³ AT&T explains that although it has taken steps to institute a process for determining when a 711-dialed call originates from an interconnected VoIP customer, the process requires that AT&T (and other traditional TRS providers instituting this process) assign a dedicated toll free number to every interconnected VoIP provider and, in turn, that every interconnected VoIP provider agree to route all 711-dialed calls through that dedicated toll free number.²⁴ According to AT&T, the sizable and ever changing number of interconnected VoIP providers, among other things, makes this approach problematic. In addition, even if a call is successfully identified as an interconnected VoIP call (because the interconnected VoIP provider routes it over an agreed upon, dedicated toll free number), AT&T states that traditional TRS providers “remain unable to reliably identify the geographic location of the caller via an automated process” when the caller is using a “non-geographically relevant” telephone number or a “nomadic” interconnected VoIP service.²⁵ AT&T estimates that it could incur \$600,000 over one to two years adopting a system that reliably determines the location of some (but not all) interconnected VoIP callers.²⁶ AT&T's comments indicate that few, if any, 711-dialed emergency calls are placed by interconnected VoIP users, and AT&T thus asserts that “the disproportionate impact of section 64.604(a)(4) as it applies to VoIP originated 711 calls” justifies granting traditional TRS providers an indefinite waiver of the rule.²⁷

10. Sprint, also a traditional TRS provider, seeks a “permanent waiver” of the requirement that traditional TRS providers must automatically and immediately call an appropriate PSAP when receiving an emergency 711-dialed call placed by an interconnected VoIP user.²⁸ Sprint contends that traditional TRS providers' compliance with section 64.604(a)(4) hinges on the ability of interconnected VoIP providers to provide sufficient information to enable traditional TRS providers to determine that a call is VoIP-originated and to accurately determine the caller's location.²⁹ According to Sprint, interconnected VoIP providers “have yet to expend the necessary resources to enable them to provide location information of their subscribers who seek to place emergency calls through relay” to the traditional TRS providers.³⁰ In reply comments, Verizon, an interconnected VoIP provider, explains that it does not object to extending indefinitely the limited waivers previously granted to traditional TRS providers.³¹ Verizon disagrees with Sprint's claim, however, that interconnected VoIP providers alone are responsible for resolving these issues and asserts that the Commission's rules specifically assign

²² Comments of AT&T at 4.

²³ *Id.* at 5.

²⁴ *Id.* at 6.

²⁵ *Id.* at 6-7.

²⁶ *Id.* at 9. AT&T explains that, using this system, it could reliably determine the location only of interconnected VoIP users who obtain service from VoIP providers that contract with third party registered location database administrators. *Id.*

²⁷ *Id.* at 11.

²⁸ Comments of Sprint at 1-2.

²⁹ *Id.* at 1-3.

³⁰ *Id.* at 2.

³¹ Reply Comments of Verizon at 1.

responsibility to the *TRS providers* for routing emergency interconnected VoIP 711 calls to the appropriate PSAP.³² Verizon further asserts that, in any event, the successful resolution of these issues will require the collaboration of many industry participants including, but not limited to, traditional TRS providers and interconnected VoIP providers.

11. The Consumer Groups emphasize the importance of ensuring that emergency 711 calls placed from a TTY via an interconnected VoIP service will be rapidly connected to an appropriate PSAP.³³ At the same time, the Consumer Groups assert that if the Commission determines not to require the automatic routing of such calls to an appropriate PSAP, the Commission should take steps to ensure that such calls will be manually connected as efficiently as possible.³⁴ While recognizing that “there appears to be a relatively small number of TTY users who also utilize interconnected VoIP service[.]” insofar as consumers with a broadband Internet connection are more likely to use Internet-based relay services, the Consumer Groups express the concern that there may still be TTY users who will attempt to connect to emergency services through 711 and relay for various reasons, including lack of awareness that direct 911 is the preferred method of accessing emergency services.³⁵ Accordingly, the Consumer Groups ask the Commission to ensure “continued efforts to educate TTY users of interconnected VoIP services about the availability of 9-1-1 direct dialing.”³⁶ In addition, they ask that the Commission take “significant and comprehensive steps” in a rulemaking proceeding to develop a “real-time text standard” for use in the IP environment for emergency communications.³⁷ They explain that such technology would be capable of transporting conversational text “natively as data” rather than as “tones” over IP networks, and would allow text communications to be sent directly to PSAPs “as part of the next generation 9-1-1 system.”³⁸

12. Most recently, on June 11, 2009, AT&T filed a petition seeking an indefinite extension of the current waiver of section 64.604(a)(4), asserting that traditional TRS providers “still cannot determine the appropriate PSAP to route a VoIP-originated 711 emergency call due to the inaccessibility of registered location information.”³⁹

III. DISCUSSION

13. The Commission may waive a provision of its rules for “good cause shown.”⁴⁰ For the reasons set forth below, we find good cause to extend until June 29, 2010, the current limited waiver of

³² *Id.* at 1, 3.

³³ Comments of Consumer Groups at 4, 6.

³⁴ *Id.*

³⁵ *Id.* at 3-4.

³⁶ *Id.* at 4, 6.

³⁷ *Id.* at 5, 6.

³⁸ *Id.* at 5.

³⁹ See *Petition for Extension of Waiver* at 2 (filed June 11, 2009) (*Petition*).

⁴⁰ 47 C.F.R. § 1.3; see generally *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, CC Docket Nos. 90-571 & 98-67, CG Docket No. 03-123, 19 FCC Rcd 12475, 12520, para. 110 (June 30, 2004) (*2004 TRS Report & Order*) (discussing standard for waiving Commission rules).

section 64.604(a)(4) of the Commission's rules,⁴¹ to the extent it applies to traditional TRS providers' obligation to automatically and immediately route the outbound leg of an interconnected VoIP-originated emergency 711 call to an appropriate PSAP.⁴²

14. As noted above, section 64.604(a)(4) requires that TRS providers use a system for incoming emergency calls that "automatically and immediately" routes the outbound leg of a TRS call to an appropriate PSAP.⁴³ The Bureau has previously noted that, although the *VoIP TRS Order* did not specifically address TRS providers' obligation to handle 711 emergency calls placed by interconnected VoIP customers via TTY, by extending the 711 abbreviated dialing requirement to interconnected VoIP providers, the order effectively placed traditional TRS providers under a duty to handle and route these calls as prescribed by the Commission's pre-existing emergency call handling rules.⁴⁴

15. The record reflects that the remaining technical and operational challenges of compliance with this requirement are formidable and that a comprehensive resolution of these issues will require significant, ongoing collaboration among a variety of industry stakeholders.⁴⁵ At the same time, the comments suggest that the increasing popularity and availability of Internet-based forms of TRS have significantly reduced the number of consumers with broadband Internet access who communicate via a TTY and an interconnected VoIP service, rather than via an Internet-based form of TRS.⁴⁶ Moreover, the introduction of more forward-looking solutions, such as the "real-time text" solution described by the Consumer Groups, is likely to diminish further the incidence of TTY use with an interconnected VoIP

⁴¹ 47 C.F.R. § 64.604(a)(4).

⁴² Notwithstanding this action, we note that if a caller using a TTY connected to an interconnected VoIP service calls a PSAP *directly* as a 911-dialed emergency call (as a text-to-text, or TTY-to-TTY call), the 911-dialed call will be routed automatically and immediately through the selective router over the wireline E911 network to the PSAP that serves the caller's Registered Location, just as it would be for a hearing caller via an interconnected VoIP service. *See 2008 TRS 711 Waiver Order*, 23 FCC Rcd 5706, at n.10.

⁴³ 47 C.F.R. § 64.604(a)(4).

⁴⁴ *October 2007 Order and Notice*, 22 FCC Rcd at 18324, para. 14.

⁴⁵ *See, e.g.*, Comments of AT&T at 7-9 (describing the estimated costs and the "substantial" level of cooperation among various stakeholders that would be needed to enable traditional TRS providers to automatically access interconnected VoIP customers' Registered Location information); Reply Comments of Verizon at 1 (any solution to these issues requires cooperative effort from "many industry participants").

⁴⁶ *See, e.g.*, Comments of Consumer Groups at 3 (noting that although the increasing affordability and availability of interconnected VoIP may make this service more attractive to TTY users, deaf or hard of hearing individuals with broadband Internet connections "may be more likely to use Internet-based relay services," particularly in an emergency situation); Comments of AT&T at 10 (asserting that VoIP users tend to be more "technologically savvy" than typical TTY users and, as such, are more likely to use Internet-based TRS rather than TTY); Comments of Sprint at 2-3 (stating that "deaf and hard of hearing users with broadband connections to their homes and offices are virtually certain to use [Internet-based TRS] to meet their communications needs"). Although the Consumer Groups state that "deaf, deaf-blind and hard of hearing consumers who wish to contact 9-1-1 directly currently have no direct 9-1-1 access through an Internet-based communications system other than through the use of a TTY operating through a VoIP system[,] see Comments of Consumer Groups at 3, this statement is no longer true in light of the Commission's recent adoption of a ten-digit numbering system and emergency call handling requirements for Internet-based TRS providers. *See generally Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591 (June 24, 2008) (adopting numbering and emergency call handling requirements for VRS and IP Relay providers).

service.⁴⁷ Taken together, these findings lead us to conclude that, while TTY use by interconnected VoIP consumers may be on the decline, there remain deaf and hard of hearing consumers who continue to rely on TTYs. Therefore, while we find good cause to extend for an additional year the limited waiver previously granted to traditional TRS providers, in light of the continuing technical and operational challenges described in the record, we decline to extend the waiver indefinitely, as requested by AT&T. As noted above, the Consumer Groups urge the Commission to initiate a proceeding to develop “real-time text” technology to “enhance communication during emergency situations by people who are deaf and hard of hearing or who have a speech disability.”⁴⁸ Although the action we take today is not intended to prejudge any future course of action by the Commission with respect to these issues, granting the waiver request before us will have the added benefit of affording the Commission sufficient opportunity to fully explore those issues.

16. Finally, we agree with the Consumer Groups that, during the period of this waiver, any traditional TRS provider that cannot automatically and immediately route to an appropriate PSAP the outbound leg of an interconnected VoIP-originated emergency 711 call, as required by section 64.604(a)(4), must maintain a manual system for doing so, to the extent feasible, that accomplishes the proper routing of emergency 711 calls as quickly and efficiently as possible.⁴⁹ This waiver is, therefore, conditioned on continued compliance with that requirement. Further, during this period, TRS providers and interconnected VoIP providers must continue to undertake consumer education and outreach designed to remind individuals with hearing or speech disabilities to dial 911 directly (as a text-to-text, TTY-to-TTY call) in an emergency, when using an interconnected VoIP service, rather than making a TRS call via 711 in an emergency.⁵⁰ We also expect TRS providers to continue their collaboration with interconnected VoIP providers and other industry stakeholders in order to resolve any remaining compliance issues associated with the processing and routing of interconnected VoIP-originated 711 emergency calls.⁵¹

IV. PROCEDURAL MATTERS

17. The full text of this document and copies of any subsequently filed documents in this matter will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, D.C. 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission’s duplicating contractor at Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC 20554. Customers may contact the Commission’s contractor at their web site www.bcpweb.com or by calling 1-800-378-3160. A copy of the underlying Petition for Extension of Waiver may also be found by searching ECFS at <http://www.fcc.gov/cbg.ecfs>.

18. To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This document can also be

⁴⁷ Comments of Consumer Groups at 5, 6.

⁴⁸ *Id.* at 5.

⁴⁹ *Id.* at 4. *See also* October 2007 Order and Notice, 22 FCC Rcd at 15324-25, para. 15.

⁵⁰ October 2007 Order and Notice, 22 FCC Rcd at 15324-25, para. 15.

⁵¹ In this regard, we agree with Verizon that it is not the responsibility of interconnected VoIP providers alone to resolve the technical issues associated with TRS providers’ obligation to route a 711-dialed, TTY call via an interconnected VoIP service to the an appropriate PSAP. *See* Reply Comments of Verizon at 3.

downloaded in Word or Portable Document Format (PDF) at: <http://www.fcc.gov/cgb/dro/trs.html#orders>. For further information, please contact Dana Wilson, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice), (202) 418-7898 (TTY), or e-mail at Dana.Wilson@fcc.gov.

V. ORDERING CLAUSES

19. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, and 225, and sections 0.141, 0.361, and 1.3 of the Commission's rules, 47 C.F.R. §§ 0.141, 0.316 & 1.3, this Order IS ADOPTED.

20. IT IS FURTHER ORDERED that section 64.604(a)(4) of the Commission's rules, 47 C.F.R. § 64.604(a)(4), to the extent that it requires traditional TRS Providers to implement a system to automatically and immediately call an appropriate PSAP when receiving an emergency 711-dialed call via an interconnected VoIP service, IS WAIVED until June 29, 2010.

21. IT IS FURTHER ORDERED that this Order SHALL BE effective upon release.

FEDERAL COMMUNICATIONS COMMISSION

Suzanne M. Tetreault
Acting Deputy Chief
Consumer & Governmental Affairs Bureau