



Public Service Commission

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REC'D DIVISION OF RECORDS AND REPORTING

DATE: JANUARY 25, 2001

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYD)

FROM: DIVISION OF COMPETITIVE SERVICES (MOSES) *JFE*
 DIVISION OF LEGAL SERVICES (ELLIOTT) *msd*
 DIVISION OF APPEALS (BROWN) *ncb*

RE: DOCKET NO. 001809-TP - IMPLEMENTATION OF 711 ACCESS FOR TELECOMMUNICATIONS RELAY SERVICES.

AGENDA: 02/06/2001 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\001809.RCM

CASE BACKGROUND

711 is the dialing pattern some states currently use to access telecommunications relay service for the hearing and speech impaired. With 711 access implemented nationwide, a person traveling across the United States may dial 711 instead of being required to obtain the 800 number appropriate for each state's relay system.

On July 21, 2000, the Federal Communications Commission (FCC) adopted its Second Report and Order (FCC 00-257) in the matter of the use of N11 codes and other abbreviated dialing arrangements. The order mandates nationwide implementation of 711 dialing for access to telecommunications relay service on or before October 1, 2001. The order further authorizes states to develop and determine the most appropriate technological means of implementing 711.

On December 14, 2000, staff completed a workshop with the various telecommunications industries to identify any technical or

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FPSC-RECORDS/REPORTING

DOCKET NO. 001809-TP
DATE: January 25, 2001

logistical problems. No problems were identified that prohibit early implementation of 711 access.

The Commission is vested with the authority to implement 711 access by Section 427.702(3)(a)(b)(c), Florida Statutes. Further authority is expressed in Section 427.704(1)(d)(8), Florida Statutes.

Accordingly, staff believes the following recommendations are appropriate.

ISSUE 1: Should the Commission order all certificated telecommunications companies to provide 711 access to telecommunications relay service by August 1, 2001?

RECOMMENDATION: Yes. The Commission should order all certificated telecommunications companies to provide 711 access to telecommunications relay services by August 1, 2001. The local telephone companies should use the 800 number, 800/955-8771, to translate 711 calls. (MOSES)

STAFF ANALYSIS: On August 9, 2000 the FCC released Order No. FCC-00-257 in Docket No. 92-105. The order mandates nationwide implementation of 711 access to telecommunications relay service by all telecommunications companies on or before October 1, 2001. In paragraph 32 of the order, the FCC deferred to the states to develop and determine the most appropriate technological methods to implement 711.

711 is an abbreviated number that the local telephone companies can translate or convert to an 800 number for transmission to the relay provider. Attachment A gives a brief overview of how the call is processed.

Staff held a workshop on December 14, 2000, to determine if there were any technical or logistical problems associated with implementing 711. All certificated telecommunications companies and the Hotel/Motel Association were notified of the workshop. No alternative local exchange, shared tenant, or interexchange companies attended the workshop. Staff does not believe these companies will have problems with the implementation of 711 for relay since it has been implemented in other states.

The only implementation issue raised was in BellSouth's territory in South Florida. BellSouth currently has a customer using 711 in that area, and according to BellSouth's tariff, the customer must be given six months notice before being required to relinquish use of 711. BellSouth sent a letter to the customer on January 15, 2001, notifying the customer that 711 must be vacated by June 1, 2001. This will allow sufficient time for an intercept message to notify prior 711 users of the new method to access services.

Pay telephone providers were represented and stated that pay telephones can easily be reprogrammed to pass 711 to the local exchange company (LEC) much in the same manner as 911 is currently done.

Costs for implementing 711 access were not discussed at the workshop, because paragraph 43 of the FCC order states that "carriers bear and recover their own costs associated with providing access to TRS." The order further states that wireline carriers "recover those costs from the rates charged for intrastate and interstate services, separated pursuant to the Commission's jurisdictional separation rules."

Paragraph 45 of the FCC order allows relay providers and the states to adjust their contracts to allow relay providers to recover costs associated with implementing 711 access. Sprint, Florida's relay provider, stated in a meeting after the workshop that it would not increase the current per minute charge in its contract for 711 access.

Sprint did indicate that it may request temporary relief from the answer time requirements and liquidated damages provisions of its contract when 711 is first implemented. Sprint anticipates a surge in call attempts at first, which may prevent it from answering all relay calls within 10 seconds on a daily basis.

It appears that telecommunications providers will be able to implement 711 for access to relay services without hardship or delay. Accordingly, staff recommends that the Commission should order all certificated telecommunications companies to provide 711 access to telecommunications relay services by August 1, 2001. The local telephone companies should use the 800 number, 800/955-8771, to translate 711 calls.

ISSUE 2: Should the Commission order all telecommunications providers that bill end users for local service, to include a billing insert with the bill the customer receives immediately prior to the August 1, 2001 implementation date, notifying the customer that 711 access is available effective August 1, 2001?

RECOMMENDATION: Yes. All telecommunications companies that bill customers for local service should be ordered to include a bill insert that informs the customer that 711 access to relay services will be available effective August 1, 2001. (MOSES)

STAFF ANALYSIS: Paragraph 61 of the FCC order requires carriers to engage in outreach programs for 711 access, but does not mandate a method. A bill insert is an economical way for the billing companies to reach existing customers regarding 711 access. Additional outreach regarding 711 is being planned by Florida Telecommunications Relay, Inc.

Local exchange companies, a few alternative local exchange companies, and shared tenant providers bill customers for local service. Therefore, staff believes it is appropriate that all telecommunications companies that directly bill customers for local service be required to provide a bill insert notifying the customer that 711 access will be effective August 1, 2001.

ISSUE 3: Should this docket be closed?

RECOMMENDATION: No. This docket should remain open pending any protest filed within 21 days of the issuance of the Order by a person whose substantial interests are affected by the Proposed Agency Action Order. If no protest is received, the order will become final and effective upon the issuance of a consummating order. (Elliott, Brown)

STAFF ANALYSIS: Whether the Commission approves or denies, in whole, or in part, staff's recommendations, the result will be a proposed agency action order. This docket should remain open pending any protest filed within 21 days of the issuance of the Order by a person whose substantial interests are affected by the Commission's Proposed Agency Action. If the order is not protested, it will become final and effective upon the issuance of a consummating order.

How Does It Work?

1.

Customer dials 711.



TTY or Voice Relay User dials 711

2.

LEC identifies the 711 call and determines how the call should be routed.

LEC translates the 711 to a toll free number (800) and forwards the call to the state relay provider's network.*

Local Exchange Carrier (LEC) Central Office Switch

3.

The relay provider routes the toll free call across its network to the correct relay center based on the provider's traffic rules and requirements.

Sprint Network Switch

4.

The call arrives at the relay center in the form of a toll free call (800). The inbound call is processed to reach to the called party.

Relay Center Center ACD Switch

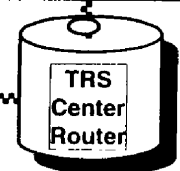
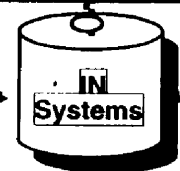
5.

The outbound relay call arrives at the customer.

Customer Answers the Phone



Intelligent Network (IN)



Note: 711 can be used for both voice and TTY callers, if properly configured.



*Note: Sprint recommends that 711 be pointed to a TTY relay number (1-800-955-8771)