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	)	CG Docket No. 03-123
	)	
	)	WC Docket No. 05-196
E911 Requirements for IP-Enabled Service Providers	)	

COMMENTS OF ACUTA

ACUTA: The Association for Information Communications Technology Professionals in Higher Education ("ACUTA")[1] respectfully submits these comments in response to the Federal Communications Commission's ("FCC") Report and Order and Further Notice of Proposed Rule Making ("FNPRM") regarding the assignment of 10 digit telephone numbers to users of Internet-based Telecommunications Relay Services ("TRS").[2] Specifically, ACUTA wishes to respond to the FNPRM's question regarding the involvement of multiline telephone systems ("MLTS") owners in the assignment of 10 digit phone numbers and to comment on the issue of registering

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[1] ACUTA is a non-profit association whose members include over 800 institutions of higher education within the United States. ACUTA members include both large and small non-profit institutions of higher education, ranging from institutions with several hundred students to major research and teaching institutions with greater than 25,000 students. ACUTA member representatives are responsible for managing voice, data and video communications technology services for students, faculty and staff on college and university campuses.

[2] *See* In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers, *Report and Order and Further Notice of Proposed Rulemaking,* CG Docket No. 03-123, WC Docket No. 05-196, FCC 08-151 (2008) ("*TRS 10-Digit Number Order and NPRM*").

IP addresses and/or domain and member names.

As an initial matter, ACUTA strongly supports the Commission's finding that "the best process for Internet-based TRS users to obtain telephone numbers is directly from their Internet-based TRS providers."[3] This process offers Internet-based TRS users an efficient mechanism for obtaining numbers and is most consistent with the manner by which subscribers to interconnected VoIP, CMRS, and local exchange service obtain numbers from their providers.

In light of this, ACUTA sees no need to modify the recently-adopted Commission rules to inject MLTS owners into the number provisioning process and would strongly oppose such a modification.[4] First, there will be no interaction between the MLTS system and Internet-based TRS, so involving MLTS owners in the process will add an unnecessary step to the process. Second, MLTS owners do not have independent access to telephone numbers, but must depend on others to provide them. Third, requiring MLTS owners to assign numbers raises questions about whether the users of those numbers would be able to retain them after they leave the MLTS environment, which is a particular concern in college and university environments where users come and go frequently.[5]

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[3] *Id*. at ¶ 28 ("We find that the best process for Internet-based TRS users to obtain telephone numbers is directly from their Internet-based TRS providers. The record generally supports this approach. Such a process is functionally equivalent to the process by which subscribers to interconnected VoIP, CMRS, and local exchange service obtain numbers. Indeed, even proponents of the neutral third-party process note that some consumers view their Internet-based TRS provider as if it were a telephone company and therefore expect that they should obtain numbering resources directly from the Internet-based TRS provider.").

[4] In the *NPRM*, the Commission asks "should . . . MLTS operators provide telephone numbers to Internet-based TRS users." *Id*. at ¶ 114.

[5] ACUTA does not, however, oppose permitting MLTS owners to request that their numbers be assigned for VRS use when they determine that doing so is appropriate, subject to the ability of the MLTS owner to ask for the number to be reassigned back to standard use at a later date.

ACUTA also wishes to express its concern regarding the requirement that Internet-based TRS providers register the IP address and/or the domain and user name for each Internet-based TRS user.[6] As the FCC noted, IP addresses are often dynamically assigned.[7] In addition, many of the workstations used by Internet-based TRS users at colleges and universities will be on network connections that are behind firewalls which may translate IP addresses. Accordingly, it will be very difficult for Internet-based TRS providers to collect and provision the IP addresses of their users into the central database – particularly users from colleges and universities. We also find problems with using domain and user names if those names are used to identify an Internet-based TRS user at a college and university. The use of <username>@<university>.edu would in most cases not be sufficient to contact the institution's TRS user. However, the examples used by the FCC in the Report and Order are those of services (*i.e.*, sirelay.com and aol.com).[8] This approach does not raise the same concerns, as addresses specifically related to services typically are sufficient to reach a specific user.

Mapping TRS numbers to URIs that are linked to specific services also offers the most flexibility for the college or university IP-based TRS user to utilize the service, whether at his or her machine, at a student computer lab, in the library, at some other on-campus workstation with broadband access or at a non-campus location such as the home of a friend. Linking TRS

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6 *Id*. at ¶ 50 ("The primary purpose of the central database will be to map each Internet-based TRS user's NANP telephone number to his or her end device. This can be accomplished by: (1) provisioning the database with each Internet-based TRS user's IP address (either alone or as part of a URI); or (2) provisioning the database with URIs that contain domain names and user names – such as an instant-message service and screen-name – that can be subsequently resolved to reach the user's end device.").

7 *Id*. at n. 133 (IP addresses "can be dynamic, changing frequently.").

8 *Id*. at n. 132 (describing how URIs specify addresses).

numbers to non-service provider URIs, on the other hand, could limit user access more significantly because calls will be routed to the non-service provider URIs at all times.

Finally, ACUTA would like to offer its resources and the expertise of our nearly 2,000 institutional and corporate members to work with the VRS community to explore ways to make the campus telecommunications environment more user-friendly to hearing-impaired individuals. Although campuses currently meet the requirements of the Americans with Disabilities Act to provide access to telecommunications services, there may be ways that colleges and universities can adapt new and emerging technologies to enhance the communications experience for the hearing-impaired. ACUTA also can help develop guidelines or "best practices" in this area that could guide both VRS users and campus telecommunications professionals in improving the availability and usability of VRS. We encourage the FCC to form an advisory group or to solicit the formation of such a group in the industry, and ACUTA would be willing to coordinate or participate in these discussions.

For all these reasons, ACUTA respectfully requests that the Commission adopt rules in this proceeding that are consistent with these comments.

Respectfully Submitted,

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