

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA. 17105-3265**

Public Meeting held January 27, 2000

Commissioners Present:

John M. Quain, Chairman  
Robert K. Bloom, Vice Chairman  
Nora Mead Brownell  
Aaron Wilson, Jr.  
Terrance J. Fitzpatrick

Implementation of 711 Access for the  
Telecommunications Relay Service

Docket Number:  
M-00900239

**FINAL ORDER**

**BY THE COMMISSION:**

Before the Commission for consideration is our September 24, 1999, Tentative Order concerning the Implementation of 711 Access for the Telecommunications Relay Service in Pennsylvania (hereinafter referred to as the Tentative Order). The Tentative Order presented a proposed implementation plan for 711 abbreviated dialing access to the Telecommunications Relay Service (TRS), established a 30-day comment period, and a 711 Implementation Committee. By this Final Order, we are adopting an implementation plan for 711 access which includes the tasks and activities, as well as the schedule for implementation.

**BACKGROUND**

On February 19, 1997, the Federal Communications Commission (FCC) issued its First Report and Order and Further Notice of Proposed

Rulemaking In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, at CC Docket No. 92-105; FCC 97-51. The First Report and Order, *inter alia*, ordered Bell Communications Research (Bellcore), as the North American Numbering Plan Administrator (NANPA), to assign 711 as a national code for TRS use. Also in that Order, the FCC tentatively concluded that nationwide implementation of 711 dialing for TRS access should occur within three years. (In addition, the FCC held a Public Forum on 711 implementation on September 8, 1999.)

In the fall of 1998, Bell Atlantic-Pennsylvania, Inc. (Bell) initiated a dialogue with the Commission for implementing 711 access in Pennsylvania. Bell's intent was to implement 711 access throughout its operating territory. Since that time, the Commission has met and discussed 711 implementation issues with Bell, AT&T Communications of Pennsylvania, Inc. (AT&T, the TRS provider in Pennsylvania), the Pennsylvania Telephone Association (PTA), representatives of the Competitive Local Exchange Company (CLEC) community, and representatives of the speech and hearing impaired community. Issues discussed included: should 711 be used for both text and voice users; the need to coordinate implementation with all Local Exchange Companies (LECs) operating in the state; the impact of an FCC final rulemaking; and the importance of public awareness on the use of 711.

In December 1998, Bell and AT&T made informational presentations at a meeting of the TRS Advisory Board in order to give the members an opportunity to hear the various 711 operational alternatives and provide feedback on their concerns. Further meetings were held during 1999 with Bell, AT&T, the PTA, and several of the large facilities-based CLECs to solicit the concerns of the broader Incumbent Local Exchange Companies (ILEC) and the

CLEC community. All companies indicated that it would not be a problem to reprogram their switches to accommodate 711 call routing, that the cost would be nominal, and that it could be accomplished within a few months.

Also during this time period, AT&T and the Commission reached a consensus on how the 711 operational system should function. It was agreed that 711 would handle both voice and text calls. It was also agreed that 711 calls would be routed by the LEC switch or the Pay Telephone provider to the assigned toll-free number to access the Pennsylvania Relay Center. AT&T has further refined the 711 operational system and will be utilizing an automated upfront system to handle the new TRS call flow at their Relay Centers. A description of this automation is provided as Attachment I to this Final Order.

## **DISCUSSION**

As stated above, our Tentative Order, entered September 24, 1999, presented a proposed implementation plan for 711 abbreviated dialing access to the TRS and established a 30-day comment period. Comments were received from AT&T, the Grove City Area Self Help for Hard of Hearing Group, The United Telephone Company of Pennsylvania and Sprint Communications Company, Self Help for Hard of Hearing People (SHHH), the Deaf-Hearing Communication Centre (DHCC), and 19 individuals in the affected hearing impaired community.

All of the commentaries strongly supported our efforts to implement 711 dialing access for TRS. The comments included: 711 would provide increased accessibility for the hearing-impaired community to the telephone system; it is easier to remember the 3-digit number rather than two toll-free

numbers<sup>1</sup>; 711 is less confusing to a hearing person when contacting a hearing-impaired individual; and 711 will eventually be used nationwide.

Sprint/United claimed, from their experience as the TRS provider in Maryland where 711 was introduced in February 1999, that 711 access has contributed to an increase in voice initiated traffic. Sprint/United stated that in Maryland voice initiated calls increased 7 percent in a three-month period after 711 implementation, significantly higher than historical growth rates. SHHH maintained that using 711 now in Pennsylvania would help develop its use nationwide. DHCC commented that the TRS in Pennsylvania is an essential service for those with a hearing loss, and that dialing 711 will make access much easier.

We received no comments from any LECs expressing any concerns or limitations on their ability to implement 711; therefore, we expect no implementation problem by the LECs. There were no negative comments received from any commentaries regarding the implementation of 711 or the approach outlined in our Tentative Order.

In addition to the 30-day comment period, our Tentative Order established a 711 Implementation Committee. The 711 Implementation Committee consisted of representatives of Bell, AT&T, the PTA, facilities-based CLECs, and the Commission. The 711 Implementation Committee met in December 1999 and identified the tasks and activities necessary for the implementation of 711 dialing; a timeline for accomplishing those tasks and activities was also developed.

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<sup>1</sup> The current Relay system uses one toll-free number for voice callers and another toll-free number for text telephone (data) callers.

The 711 Implementation Committee recommended that a new TRS toll-free number be obtained for routing the 711 calls. The new toll-free number would facilitate tracking the number of calls received at the Relay Centers from calls placed dialing 711 as opposed to calls received via the existing toll-free numbers. The 711 Implementation Committee recommended developing a template bill message or bill insert for carriers to use to notify their customers of this change. The Committee also recommended that carriers update their telephone directories to include information on the new 711 access number; and that the Commission update its website to include 711 information. The Committee also recommended that AT&T use the relay service to promote 711 awareness to Pennsylvania customers after each relay call for four (4) weeks prior to service availability.

The 711 Implementation Committee also made recommendations for a time-line for implementation. The following time-line was recommended:

- that the appropriate telecommunications equipment be modified to properly handle 711 calls by March 31, 2000
- that a 711 translation equipment cutover date of April 1, 2000 be established
- that a 30-day test period of April 1 – 30, 2000 be used by local exchange carriers for testing the new 711 system before it is available to the general public
- that a public access cutover date of May 1, 2000 be established for having the 711 dialing access available to the public
- that all LECs include a bill message or insert in all customers' telephone bills during the month of May 2000

## CONCLUSION

As we indicated in our Tentative Order, we find that 711 abbreviated dialing will facilitate the hearing and speech impaired community's access to the TRS system. Given the overwhelming positive comments we received from all commentaries in response to our Tentative Order, we continue to believe that 711 dialing will be beneficial to the affected community and to the hearing community as well.

In order for the hearing/speech impaired community to have the broadest possible access to this service, we believe that 711 should be implemented statewide. Accordingly we will direct all LECs, including ILECs and facilities-based CLECs, to implement 711 abbreviated dialing. Also, Pay Telephone providers must implement 711 access in their pay telephones.<sup>2</sup>

In addition, we encourage wireless providers to adhere to the directives in this Final Order to the extent feasible. In light of jurisdictional concerns we encourage, but do not mandate at this time. We note that a final order by the FCC on 711 is anticipated in the near future.

We accept the recommendations of the 711 Implementation Committee for the implementation of 711 access. Accordingly, we hereby direct that all LECs operating in the Commonwealth that have Public Switched Telephone Network capability modify their switches to provide for translating 711

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<sup>2</sup> In general, the Telecommunications for the Disabled Act of 1982, 47 U.S.C. §610, and subsequent FCC rules implementing the Act designate coin phone service as an essential service, and as such pay phones must be hearing aid compatible and meet other standards to facilitate use by the handicapped. Some pay telephones are "smart phones" that can be programmed to directly route the 711 call to the TRS Centers. Pay Telephone providers will need to program their smart phones to properly route calls placed by dialing 711.

calls to the new TRS toll free number, (888) 895-1197. In addition, all Pay Telephone providers must have 711 access available on their pay telephones. We direct that the 711 abbreviated dialing access to the TRS will be made available to the public in accordance with this Order and that all affected carriers must adhere to the time schedule adopted herein. The activities and tasks, along with the timeline, are delineated in the body of this Final Order. We also direct that carriers use the template bill insert or bill message to inform their customers of the availability of 711 dialing access. The template bill insert/message is contained in Attachment II to this Final Order; **THEREFORE,**

**IT IS ORDERED:**

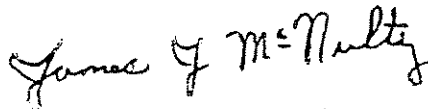
1. That this Final Order be published in the Pennsylvania Bulletin as soon as practicable.
  
2. That all Local Exchange Carriers with switching capability and all Pay Telephone providers modify their equipment to translate calls dialed as 711 to the assigned toll-free number, (888) 895-1197, in order to route 711 dialed calls to the Telecommunications Relay Service provider in accordance with the dates contained in Ordering Paragraph 4, below.
  
3. That all Local Exchange Carriers operating in Pennsylvania will include a bill message or bill insert in all customers' bills during the month of May 2000, in accordance with the template at Attachment II to this Final Order.

4. In accordance with the body of this Final Order, we direct that all LECs and Pay Telephone providers adhere to the following schedule:

By March 31, 2000	Implement equipment modifications to translate calls dialed as 711 to the assigned toll-free number, (888) 895-1197
April 1, 2000	711 translation equipment cutover date
April 1-30, 2000	711 access testing period
May 1, 2000	711 public access cutover date
May 1 - 31, 2000	Bill insert/message included in all customers' bills

5. That a copy of this Final Order be served on all Incumbent Local Exchange Carriers and Competitive Local Exchange Carriers operating in the Commonwealth, the Pennsylvania Telephone Association, the TRS Advisory Board, the Central Atlantic Payphone Association, the Association for Local Telecommunications Services, the Cellular Telecommunications Industry Association, the Office of Consumer Advocate, and the Office of Small Business Advocate.

**BY THE COMMISSION,**



James J. McNulty  
Secretary

(SEAL)

ORDER ADOPTED: January 27, 2000

ORDER ENTERED: **FEB -4 2000**



## ATTACHMENT I

### Automated Upfront System

Below are the steps that the TTY and voice callers will experience from the Telecommunications Relay Service (TRS) Center when placing a call using 711 abbreviated dialing. Since all users will now be entering the Relay from one number, the Relay must differentiate TTY users from voice users. As a result, the process produces a slightly different Call Flow than that which exists with the current Relay System.

#### **Step 1: TTY or Voice**

The Relay Center will first determine the call-type, either voice or TTY. The system will begin with a short voice prompt. *"For relay service press 1."* If the caller presses "1," they will be greeted with the "Pennsylvania Relay Service" voice prompt. This prompt will be followed by a menu of choices. The user will be prompted to press "1" to enter the telephone number being called, "2" for an explanation of how the Relay works, or "0" for a Communications Assistant (CA).

#### **Step #2: TTY Customer - ASCII or Baudot?**

Traditional TTY users, unable to hear prompts, will time-out 5 seconds after the initial voice prompt. The Relay system will check its database for a user profile, and if available, will connect the call to the appropriate ASCII or Baudot modem. If a user profile is not available, the system will attempt a connection in ASCII and then in Baudot. TTY customers with Touch Tone capability have the option to enter a "2" for ASCII or "3" for Baudot upon entering the Relay system for the quickest possible access. If data synchronization fails, a CA will join the call.

#### **Note 1: Customers with Special Needs**

Voice Carryover (VCO) calls are typically processed as TTY calls (Baudot), and Hearing Carryover (HCO) calls are typically processed as voice calls. Most VCO users use a traditional TTY machine and can easily choose their correct call-type option. For VCO callers using non-TTY VCO telephones, and who do not have a profile, the relay will time-out and transfer the call to a CA. It is strongly suggested that these users set up a user profile to expedite their relay calls.

**Note 2: All other Customers**

As stated in Step #1, if a "1" is not pressed after the initial voice prompt, the system will attempt to identify this user through a profile. If no user profile is available, the system will attempt to check if the caller is a TTY user, and the caller will hear modem (ASCII & Baudot) seek tones. If there is no response to the modem seek tones, the call will be transferred to a CA for action.

## ATTACHMENT II

### TEMPLATE BILL INSERT/MESSAGE

Now you can dial 7-1-1 to reach the Pennsylvania Telecommunications Relay Service (*PA TRS*) 24 hours a day, every day.

You may still use *PA TRS* by dialing the 800 numbers that you currently use. In addition, from now on, when you call *PA TRS* from inside Pennsylvania simply by dial 7-1-1. *There is no charge for dialing 7-1-1, and all options available to PA TRS users through the existing 800 numbers will be available to 7-1-1 users.*

How does the *PA TRS* work? *PA TRS* connects calls between a speech impaired or hearing impaired person using a TTY (text telephone) and a hearing person using a regular telephone. The person using the TTY types his or her conversation and the message is relayed to the other party by a Communications Assistant (CA). The CA then "relays" the hearing person's exact words by typing them back to the TTY user. All CAs have been specially trained to help conversations flow with ease and accuracy. All calls are handled with strictest confidentiality.

If you are having trouble dialing 7-1-1 in your area, please call your local telephone company.

To learn more about *PA TRS* and 711, you can go to the PA Public Utility Commission's website at <http://puc.paonline.com/trs>.

#### **A NOTE TO ALL PA RELAY USERS:**

**Please note that 7-1-1 is only to be used to reach the PA TRS.**  
**For EMERGENCIES you should continue to use 9-1-1.**