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March 2, 2007

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte, CG Docket No. 03-123
Update to *Telecommunications Relay Service* guideline document
(ATIS-0300084)

Dear Ms. Dortch:

On behalf of the Alliance for Telecommunications Industry Solutions' (ATIS) Network Interconnection Interoperability Forum (NIIF), this is to inform you that the ATIS NIIF has updated its Telecommunications Relay Service (TRS) guidelines to reduce inappropriate blocking on SS7 networks of calls using Text Teletype (TTY) and similar technologies. The updated guidelines, which are available for free electronically, are designed to assist customers with hearing and speech disabilities.

ATIS is a technical planning and standards development organization that develops and promotes technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible, and open approach. Industry professionals representing more than 350 companies from all segments of the communications industry actively participate in ATIS' open industry committees, forums, and "Incubators." The ATIS NIIF discusses and resolves, on a voluntary basis, industry-wide issues associated with telecommunications network interconnection and interoperability involving network architecture, management, testing and operations.

Under the Commission's TRS rules, TRS vendors, which supply TTY and Speech-to-Speech Services for individuals with hearing and speech disabilities, are mandated to allow callers their choice of carriers. (47 CFR §604(b)(3)). Therefore, TRS providers must have direct connection to multiple carriers or, more likely, signal carrier selection information to a LEC. With the ongoing transition of many TRS providers to SS7 networks, new guidelines were required to ensure the successful completion of calls.

In response to this issue, the ATIS' Network Interconnection Interoperability Forum (NIIF) has recently updated its *Telecommunications Relay Service* guideline document (ATIS-0300084). The NIIF collaborated with TRS providers and vendors, the ATIS Ordering and Billing Forum, and the ATIS Packet Technologies and Systems Committee to create this SS7 solution. This document provides detailed information that TRS vendors need to attach to each call to ensure its connection and completion across multiple carriers' SS7 networks. In particular, the guidelines identify that the existing Carrier Selection Parameter (CSP) value of 7 within the SS7 Initial Address Message parameter should now be used by TRS providers and vendors to prevent the unnecessary blocking of calls using TTY and similar technologies.

The guidelines are available electronically free of charge from the ATIS website at <https://www.atis.org/docstore>. More information regarding this matter and other work of the ATIS NIIF can be found on the NIIF website at www.atis.org/niif.

If you have any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'T Goode', is positioned above the typed name.

Thomas Goode
General Counsel

cc: Thomas Chandler, Chief, Disabilities Rights Office, CGB
Jay Keithley, Deputy Bureau Chief (Policy), CGB