

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. P-100, SUB 110

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)
Establishment of Telecommunications Relay System (TRS), Relay) ORDER CONCERNING 711 SERVICE
North Carolina)

BY THE COMMISSION: On May 11, 2000, the Public Staff filed a Motion to Require the Filing of Comments Concerning 711 Service. The Public Staff asked the Commission to issue an Order directing all local exchange companies (LECs) and facilities-based competing local providers (CLPs) to file comments concerning their requirements for implementing the 711 service code for intrastate telecommunications relay service (TRS) in North Carolina.

The Public Staff noted that, on February 19, 1997, the FCC released its First Report and Order and Further Notice of Proposed Rulemaking (the "FCC Order") in CC Docket No. 92-105, which addressed the use of N11 codes and other abbreviated dialing arrangements. In the Order, the FCC concluded that a three-digit TRS number would offer significant benefits to persons with hearing or speech disabilities and directed Bellcore to designate 711 exclusively for TRS use. The FCC tentatively concluded that the nationwide implementation of 711 should occur within three years of the effective date of the Order.

Pursuant to the FCC Order, several states have already taken steps to implement 711 service within their borders. Progress has been particularly evident in the ten eastern states that are served by Bell Atlantic, which has taken the lead in supporting the 711 proposal and has made a commitment to absorb the costs of 711 implementation within its service areas. Two Bell Atlantic states, Maryland and Massachusetts, have already begun offering 711 service, and 711 service is scheduled to begin on May 1, 2000 in Pennsylvania. On March 28, 2000, the Virginia State Corporation Commission issued an Order Initiating Investigation and Requesting Comments on the implementation of 711 access to TRS, proposing a possible startup date of June 26, 2000.

In North Carolina, LECs, telephone membership corporations (TMCs), and facilities-based CLPs are likely to implement 711 service by routing incoming 711 calls into a toll-free number that will terminate at Sprint's TRS center. The 711 code would be available for TRS use in addition to all of the currently existing numbers. While several LECs have informally investigated the upgrades that they must make in order to allow the completion of 711 calls, each LEC, facilities-based CLP and payphone service provider (PSP) will need to carefully assess the changes that are required within its own service area. Two of the largest LECs in North Carolina have informally advised the Public Staff that they would be able to implement 711 by simply updating number translations at their host central offices. The Public Staff believes that the updates could be accomplished by most companies at a nominal cost within 90 days from the date that the Commission issues an Order requiring implementation of 711 service.

The Public Staff stated that it believes that the provision of 711 service would offer significant benefits to the hearing and speech impaired community and to the other members of the using and consuming public with whom they communicate. Accordingly, the Public Staff requested that the Commission issue an Order directing each LEC and facilities-based CLP in North Carolina to file comments concerning the changes that must be made in its network to allow the provision of intrastate 711 service. These filings should also describe in detail any extraordinary costs that would be required to implement the new 711 code; provide an estimate of the time that will be required for implementation; and provide any additional comments which the respondent deems appropriate. The Public Staff recommends that the Commission require the filing of these comments no later than thirty days after the date of the Commission order on this issue. The Public Staff also recommends that PSPs be invited to file comments. The Public Staff further recommends that a copy of the order be forwarded to each TMC in North Carolina to allow them the opportunity to voluntarily participate in this process.

On May 16, 2000, the Commission issued an Order Requiring Filing of Comments Concerning 711 Service as

follows:

1. That all LECs and facilities-based CLPs be required to file comments in this matter. Such comments shall include:
 - a. changes that must be made to the network to allow provision of 711 service;
 - b. a description in detail of any extraordinary costs required to implement 711 service; and
 - c. such other additional comments as the parties desire to make.
2. That the Chief Clerk send a copy of this Order to all PSP providers and all TMCs. Both PSP providers and TMCs are invited to file comments, and TMCs are invited to voluntarily participate in the provision of 711 service.

Comments

The Commission has received comments from the following:

The Alliance of North Carolina Independent Telephone Companies, together with ALLTEL Carolina Inc. and TDS Telecom (collectively, Alliance) stated that each of its members had reviewed the network requirements necessary to implement utilization of the 711 service codes and had concluded that implementation of the 711 service code should be able to be accomplished with only minor network changes and within the 90 days period suggested by the Public Staff. Moreover, implementation will result in only minimal costs and no extraordinary costs will be incurred based on an evaluation of the Public Staff's proposed plan and assuming there are no major changes. The Alliance noted that N11 codes are a scarce resource and the Commission should weigh this fact in determining when and under what circumstances they should be assigned for dedicated use.

Access Integrated Networks, Inc. stated that it utilizes UNE platform services purchased from BellSouth Interconnection Services and therefore any costs required to implement the 711 service will be provided by BellSouth.

ALLTEL Communications, Inc. stated that only minor network modifications were necessary to provide the 711 service and there would be no extraordinary costs under the current proposal.

BellSouth Telecommunications, Inc. stated that implementation of 711 service will require BellSouth to program all of its switches with translations to automatically route 711 calls to the TRS provider's toll free number. There will be no extraordinary costs associated with the establishment of this service, but there will be certain costs relating to implementation and to network changes. The average cost of adjusting the switches will be less than \$250 per switch. The remainder of the network costs include call setup charges and charges associated with the creation and delivery of customer bills. BellSouth said that it is currently testing its ability to program its switches to point abbreviated dialing to a toll free number. This testing is scheduled for completion by July 15, 2000. BellSouth recommended a ninety day timeframe to allow implementation.

Broadband Office Communications, Inc. said that, as a new CLP, it lacks facilities in this State and cannot comment on the 711 proposal. Broadband will comply with any rules adopted by the Commission.

Cardinal Communications of North Carolina, Inc. stated that it is a high-speed data communications and business-class internet service provider utilizing Digital Subscriber Line (DSL) technology. Cardinal indicated that it cannot provide voice-grade services at this time because it has not deployed the network necessary to switch voice traffic and interconnect with the Public Switched Telephone Network. Cardinal noted that it utilizes Internet Protocol addressing. Its current network only has the technical capability of transmitting data traffic. However, based on the company's background, the implementation of 711 service will not have an adverse effect on Cardinal's network configuration, implementation, and/or costs.

Carolina Telephone and Telegraph Company and Central Telephone Company (collectively, Carolina) believes that 711 service can best be implemented by routing all 711 calls into a toll-free number that will terminate to the relay service center. Incoming 711 calls can be routed into the toll-free number through a translations process in each of Carolina's 54 North Carolina host switches. Two hours of technician time is required per host switch to complete the programming. Carolina does not view these translations costs as extraordinary and will therefore not propose a

recovery mechanism, nor will Carolina seek to recover any costs involved with bill messaging or telephone book information. Carolina did request that the Commission allow 90 days from the issuance of a final Commission Order for Carolina to complete and test the translations programming.

CCCNC, Inc. d/b/a Total Connect! stated that it has just received authority to operate in North Carolina and has not yet begun providing service and therefore it has no comments to offer.

CTC Exchange Services adopted by reference the comments of the Alliance, ALLTEL Carolina, Inc. and the TDS Telecom Companies.

CTSI, Inc indicated that, only recently having received authority, it has not yet deployed facilities and therefore cannot provide comments

DSLnet stated that it does not provide any voice services at this time but, when it does, it would implement 711 service as required

GTE South Incorporated stated that, based on its experience in Pennsylvania, all GTE switches would have to be modified to automatically route 711 calls to the TRS. GTE would assign a project manager to coordinate activities. The primary labor cost would be associated with database changes to each switch and there would be other incidental costs associated with project management, establishing local telephone numbers in certain switches, and the distribution of a bill insert message. GTE recommended that the Commission establish a minimum three-month timeframe for implementation.

ICG Telecom Group, Inc. stated that 711 service would require an upgrade in software for its switches, but there would be no extraordinary costs associated with these measures, provided that there was sufficient lead time. ICG suggested six months.

Intermedia Communications, Inc. stated that changes to its network to allow 711 service would entail making changes to the translation tables in its switches. It has identified no extraordinary costs required to implement 711 service.

KMC Telecom, Inc. set out comments identical to those of ICG.

Level 3 Communications LLC informed the Commission that it is not offering or providing any local exchange telecommunication services and therefore does not wish to file any substantive comments.

Madison River Communications, LLC adopted by reference the comments of the Alliance, ALLTEL Carolina, Inc. and the TDS Telecom Companies. In a later filing, Madison River confirmed that implementation of 711 service could be accomplished with only minor network changes within the 90 day period suggested by the Public Staff. There would be only minimal costs for implementation and therefore no extraordinary costs given the present configuration of the proposal.

MCImetro Access Transmission Services, LLC stated that it is a facilities-based CLP which maintains a local switch in Cary, which is connected to a 45 route mile local fiber network serving Cary, Raleigh and surrounding areas. MCImetro is planning a local network for Charlotte and noted that WorldCom has toll switches and toll fiber and microwave routes throughout the State. The cost of implementing 711 access at its local switch should be minimal, perhaps less than \$1,000, nor should it require a long period, although there should be a testing period to ensure that the calls process correctly. MCImetro assumes that with its local switch, it would have to add translations, which would "outpulse" either an 8XX number or a local number. The 8XX or local number would be routed through the TRS platform. MCImetro noted that there are other cost issues associated with implementation of 711. Any charges with regard to 8XX database queries should be billed to the owner of the 800 number and participating carriers should not be responsible for incurring the costs of those and usage detail charges, notwithstanding contrary provisions in any interconnection agreements. Appropriate 800 access billing records would need to be generated so that calls would fall into the proper access billing category. Originating TRS traffic routed via a 8XX number is typically regarded as toll. If these calls access the network via 711, then there will be a shift in cost recovery from toll to local, meaning the TRS service provider will over-recover and the LEC or CLP will under-recover. Local switches would have to recognize 711

as toll and the underlying 800 service provider would have to be charged originating access in order to correct this situation.

Network Plus, Inc. stated that it has not yet deployed facilities and therefore cannot offer comment.

New Edge Network, Inc. stated that implementation of 711 service would not impact its ability to do business.

New South Communications Corp. Incorporated by reference the comments of the Alliance, ALLTEL Carolina, Inc. and TDS Telecom Companies.

NEXTLINK indicated that it concurred with the comments of ICG, KMC, and TriVergent regarding the changes necessary and notice required to implement the 711 service code for TRS in North Carolina.

PaeTec Communications, Inc. stated that it has not yet deployed facilities in this State and therefore cannot provide comments. However, PaeTec will fully comply with any rules the Commission adopts with reference to 711 service once it begins to offer service.

Teligent Services, Inc. stated that its switch would be programmed to direct 711 calls to an 800 number. Teligent would issue a translation request to implement the routing. Although Teligent can support the use of standard translations to route all 711 calls from a Teligent switch to a single toll-free number, the ability to selectively route 711 calls from within one switch to multiple toll-free numbers is not currently feasible. The cost of implementation would be negligible.

Telephone Membership Corporations indicated that no TMC opposes utilization of the 711 code for TRS and will participate in its implementation.

Time Warner Telecom of North Carolina, LP, stated that it currently uses the 711 code of automatic circuit identification announcement. Therefore, that access code would need to be changed in order to implement the 711 service code for TRS. Time Warner would need to be provided the actual 10 digit number of the service along with the identification of the tandem associated with the service and a designate to test with at that office. The translations costs associated with this change would be minimal, since the switches that Time Warner uses are capable of making the required changes and providing the proposed service. No problems in implementation are anticipated provided a reasonable amount of time is allowed.

Town of Pineville had the same comments as ALLTEL Communications, Inc.

TriVergent Communications, Inc. indicated that it does not currently have customers in North Carolina, but would not in any event incur extraordinary expenses were it to implement 711 service. TriVergent said that it needed at least three months advance notice.

WHEREUPON, the Commission reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that it is in the public interest to require LECs, CLPs, and PSPs to implement the 711 code for intrastate TRS in North Carolina. The Commission further concludes that the costs for implementation of the service should be borne by the companies concerned and that a ninety (90) day implementation period is sufficient.

The Commission appreciates the voluntary participation of the TMCs in implementing 711 service for TRS. For the convenience of the companies, the Commission notes that the contact person for Sprint for technical questions is Paul Ludwick, Senior Product Manager at 913-661-8927 (e-mail address: paul.ludwick@mail.sprint.com). Sprint's North Carolina TRS contact person is Andy Leffler, who may be reached through Relay North Carolina (1-800-735-8262) at 919-875-1242 or 877-437-1242. His e-mail address is andy.leffler@mail.sprint.com.

IT IS, THEREFORE, ORDERED as follows:

1. All ILECs and facilities-based CLPs operating in North Carolina shall modify their switches to translate calls dialed as 711 to the assigned TRS toll free number, 800-735-8262, in order to route 711 dialed calls to the TRS provider.
2. All PSPs shall modify their programmable phones to translate calls dialed as 711 to the assigned TRS toll free number, 800-735-8262, in order to route 711 dialed calls to the TRS provider.
3. Existing TRS toll free numbers shall remain active for those customers who desire to continue using the existing system.
4. ILECs, facilities-based CLPs, and PSPs must implement 711 for public access by no later than November 1, 2000. CLPs without customers must have 711 implemented before adding North Carolina customers for intrastate calling.
5. A bill insert or bill message shall be included, by December 31, 2000, in all customer bills announcing service availability. The content of the insert/message is attached as Appendix A. This bill insert/message should be considered a replacement for the yearly TRS insert/message required by the Commission.
6. The Customer Guide pages of telephone directories shall be updated for the next scheduled publication to include the use of 711 abbreviated dialing access. The existing toll free numbers for NC Relay should continue to be published.
7. TMCs are requested to implement the provisions of this Order.

ISSUED BY ORDER OF THE COMMISSION.

This the 18th day of July, 2000.

NORTH CAROLINA UTILITIES COMMISSION
Geneva S. Thigpen, Chief Clerk

mz071200.02

APPENDIX A

RELAY NORTH CAROLINA - IT'S AS EASY AS 7-1-1

Effective November 1, 2000, you can dial 7-1-1 to reach the North Carolina Telecommunications Relay Service (Relay North Carolina) 24 hours a day, every day.

What is Relay North Carolina and how does it work? It is a service that relays a conversation between a person with a speech or hearing disability using a TDD/TTY (Test Telephone) and a hearing person using a regular telephone. The person using the TDD/TTY types his or her conversation and the message is relayed to the other party by a Relay Operator (RO). The RO then relays the hearing person's exact words by typing them back to the TDD/TTY user. All ROs have been specially trained to help conversations flow with ease and accuracy. All calls are handled with strictest confidentiality.

From now on, when you call Relay North Carolina from inside North Carolina, simply dial 7-1-1. You may still use Relay North Carolina by dialing the 800 numbers you currently use. These numbers are 1-800-735-2962 (TDD/TTY) and 1-800-735-8262 (Voice). TTY users should call Sprint Customer service at 800-676-3777 (TTY and Voice) and request that Sprint brand their dedicated lines so that 711 TTY calls will be answered automatically.

For more information on Relay North Carolina, you may call the Relay Customer Service Center at 1-800-735-0533 (TDD/TTY) or 1-800-735-0341 (Voice) or Relay North Carolina Administration Office at 1-800-205-9914 (TDD/TTY) or 1-800-999-5737 (Voice).