



PUBLIC NOTICE

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TELECOMMUNICATIONS RELAY SERVICE (TRS) PROVIDERS REQUESTING COMPENSATION FROM THE INTERSTATE TRS FUND MUST COMPLY WITH STANDARD ROUNDING PRINCIPLES IN MEASURING THE CONVERSATION TIME OF TRS CALLS

CG DOCKET NO. 03-123

It has come to our attention that certain telecommunications relay service (TRS) providers may be improperly “rounding” up conversation minutes that are submitted to the Interstate TRS Fund (Fund) each month for payment.¹ Providers submitting minutes for payment from the Fund must measure the conversation time of each call to the nearest second, and when the time for such calls is expressed in decimal form, the relay provider must round the time to the nearest tenth of a minute, as set forth below.

Specifically, when recording the actual conversation time of each completed call,² the decimal representation of the seconds should extend to the tenth of a minute; providers may round up only in those circumstances where the number in the hundredth place is 5 or greater. If the number in the hundredth place is not 5 or greater, then the number in the tenth place remains the same.

For example, if the actual conversation time is 34 minutes and 46 seconds, the decimal expression to the hundredth place is 34.76. Because the number in the hundredth place (6) is 5 or greater, the number in the tenth place (7) may be rounded up to 8. Therefore, the actual conversation time, rounded to the nearest one-tenth of a minute and used to calculate total monthly conversation minutes, is 34.8 minutes.³ A contrasting example, where rounding up is not appropriate, is a situation where the actual conversation

¹ We also understand that some providers have recently changed the manner in which they record conversation minutes for billing purposes.

² The “conversation” time of each call that may be billed to the Fund begins when the communications assistant (CA) reaches the called party and concludes when one of the parties is disconnected. This time period does not include call set-up time, ringing, waiting for answer, call wrap-up, or calls that have reached a busy signal or are not answered. See *Telecommunications Relay Services, The Americans With Disabilities Act of 1990, and the Telecommunications Act of 1996*, CC Docket No. 90-571, Notice of Inquiry, 12 FCC Rcd 1152, 1166, at para. 36 (Jan. 14, 1997); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Further Notice of Proposed Rulemaking, 21 FCC Rcd 8379, 8385, at para. 9 n.41 (July 20, 2006) (*2006 TRS FNPRM*); see also 47 C.F.R. 64.604(c)(5)(iii)(E).

³ Given these rules, it would not be permissible for a provider to, e.g., round 34 minutes and 7 seconds, or 34.11 minutes, to 34.2 minutes. Such a call must be recorded as 34.1 minutes.

time is 34 minutes and 32 seconds. For such a call, the decimal expression to the hundredth place is 34.53. Because the number in the hundredth place (3) is less than 5, the number in the tenth place (5) remains the same and the actual conversation time used to calculate total monthly conversation minutes is 34.5 minutes.

In determining total monthly conversation minutes reported to NECA, the total conversation minutes of all eligible calls (each measured to the tenth of a minute, as described above) are added together. That total is then rounded to the nearest whole number (full minute) under the same principle set forth above. For instance, if the total number of conversation minutes for all calls in a particular month is 123,456.8, that figure would be rounded up to 123,457. Similarly, if the figure was 123,456.4, the figure would be rounded down to 123,456.

For the past several years, NECA has provided TRS providers with instructions for reporting minutes.⁴ In the instructions, NECA advises that the actual conversation time of each completed call, in minutes/seconds or minutes/tenths, should be recorded during the month, and at the end of the month, the provider should total the minutes/seconds or minutes/tenths for each type of call by center and round to the nearest whole number.⁵ The examples set forth herein are consistent with these instructions and standard rounding principles. Therefore, unless and until directed otherwise, TRS providers should follow the guidelines provided in NECA's Reporting Instructions and in this *Public Notice*.

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⁴ Interstate Telecommunications Relay Service (TRS) Fund Instructions for Reporting Minutes Monthly (August 2004) (Reporting Instructions).

⁵ Reporting Instructions at 1. The Reporting Instructions provide examples of how these rounding principles apply in determining total monthly minutes, stating that: (1) a monthly total of 180,095 minutes and 41 seconds, or 180,095.68 minutes, would be rounded up to 180,096; and (2) a monthly total of 2,437 minutes and 15 seconds, or 2,437.25 minutes, would be rounded down to 2,437.