



PUBLIC NOTICE

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CLARIFICATION REGARDING THE USE OF TOLL FREE NUMBERS FOR INTERNET-BASED TELECOMMUNICATIONS RELAY SERVICES

CG Docket No. 03-123
CC Docket No. 98-67
WC Docket No. 05-196

In this Public Notice, we clarify the use of toll free numbers for Internet-based Telecommunications Relay Services (TRS) under the *Second Internet-based TRS Order*.¹ In so doing, we ensure that the use of toll free numbers for Internet-based TRS is functionally equivalent to the use of toll free numbers for voice telephone services.²

In the *Second Internet-based TRS Order*, we concluded that “Internet-based TRS users should transition away from the exclusive use of toll free numbers” and required all Internet-based TRS users to obtain “ten-digit geographically appropriate numbers, in accordance with our numbering system.”³ We further concluded that after June 30, 2009, now extended to November 12, 2009, an “Internet-based TRS user may retain a current toll free number or obtain a new toll free number so long as that toll free number is directed to the ten-digit, geographically appropriate number.”⁴

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; CC Docket No. 98-67, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, 806-07, 815-16, paras. 29-32, 52-54 (2008) (*Second Internet-based TRS Order*). On June 15, 2009, the Consumer & Governmental Affairs Bureau extended from June 30, 2009 to November 12, 2009 the date for the end to the permissive calling period during which Internet-based Telecommunications Relay Service providers may continue to complete the non-emergency calls of unregistered users. See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Order, DA No. 09-1323 (rel. June 15, 2009).

² Title IV of the Americans with Disabilities Act of 1990 (ADA) requires the creation of a nationwide TRS program to allow persons with hearing and speech disabilities access to the nation’s telephone network. Pub. L. No. 101-336, § 401, 104 Stat. 327, 336–69 (1990); 47 U.S.C. § 225. TRS must offer telephone system access that is “functionally equivalent” to voice telephone services. 47 U.S.C. § 225(a)(3).

³ See *Second Internet-based TRS Order*, 24 FCC Rcd. at 806-07, para. 32.

⁴ *Id.* at 807, para. 32. In finding that the costs relating to the use and acquisition of a toll free number are not compensable from the Interstate TRS Fund, we reiterated that “any toll free number held by an Internet-based TRS user should, on or before June 30, 2009 [extended to November 12, 2009], point to the user’s assigned ten-digit, geographically appropriate number.” *Id.* at 815, para. 53. Thus, we concluded, “[a]fter June 30, 2009 [extended to November 12, 2009], Internet-based TRS providers may not route calls to users’ telephone numbers other than

We now clarify that the requirement that an Internet-based TRS user's "toll free number be directed to the ten-digit, geographically appropriate number"⁵ means that a user's toll free number must be directed to the user's ten-digit geographic number in the Service Management System (SMS)/800 database,⁶ and not in the Internet-based TRS numbering directory.⁷ Thus, as of November 12, 2009, any toll free number retained or acquired by Internet-based TRS users must be directed to their ten-digit geographic number in the SMS/800 database. Toll free numbers and ten-digit geographic numbers should not be directed to the same Uniform Resource Identifier (URI)⁸ in the Internet-based TRS numbering directory. At a user's request, Internet-based TRS providers are permitted to assign a toll free number along with a ten-digit geographic number to an Internet-based TRS user only so long as that toll free number points to the user's assigned ten-digit number in the SMS/800 database.

Directing Internet-based TRS users' toll free numbers to their ten-digit geographic numbers in the SMS/800 database is functionally equivalent to the use of toll free numbers by voice telephone users. As we explained in the *Second Internet-based TRS Order*, it is consistent with the goal of functional equivalency that Internet-based TRS users can acquire and use toll free numbers in a manner that is comparable to the manner in which voice telephone users can acquire and use such numbers.⁹ Internet-

their ten-digit, geographically appropriate numbers that have been associated with the users in the numbering database." *Id.*

⁵ *See id.* at 807, para. 32.

⁶ The SMS/800 database is the centralized database for all toll free numbers in the North American Numbering Plan (NANP) along with the electronic records for those numbers. *See Toll-Free Service Access Codes*, CC 95-155, Order on Reconsideration, 22 FCC Rcd 22188, 22188-89, paras. 2-3 (2007) (describing the toll free number administration system).

⁷ The Internet-based TRS numbering directory is the central numbering directory mechanism, created pursuant to our prior orders, "that maps the Internet-based TRS user's ten-digit NANP telephone number to the current Internet address of his or her end device." *See Second Internet-based TRS Order*, 24 FCC Rcd. at 794, para. 6. Likewise, our statement that "any toll free number held by an Internet-based TRS user should . . . point to the user's assigned ten-digit, geographically appropriate number," *see id.* at 815, para. 5, means that the toll free number must point to the ten-digit geographic number in the SMS/800 database, not the Internet-based TRS numbering directory.

⁸ Internet-based TRS providers must provision routing information to the Internet-based TRS numbering directory on behalf of their registered users in the form of a URI. *See id.* at 791, para. 6. As we have explained, "[a]t its simplest, a URI specifies both how (the protocol) and where (the address) to access a resource on the Internet." *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591, 11612 n.132. (2008) (*First Internet-based TRS Order*). For Video Relay Service (VRS) devices, the URI "must contain information other than a user's [Internet Protocol (IP)] address (*e.g.*, a device-specific protocol identifier and, in some instances, a non-standard port number)." *Id.* at 11612-13, para. 51. For purposes of the Internet-based TRS numbering directory, we note that URI uniqueness is defined solely by the combination of the URI scheme (either "H323" or "SIP"), the user's IP address, and the port number, and does not include optional user information that may be provided as part of generic URI syntax. We remind providers that if multiple ten-digit geographic telephone numbers are assigned to a single URI, made up of a VRS device's URI scheme, IP address, and port number, "they must all be provided by a single Internet-based TRS provider . . . [who] is responsible for managing the Registered Location information associated with that URI." *Second Internet-based TRS Order*, 24 FCC Rcd at 812, para. 44. Having properly updated Registered Location information serves a critical public safety goal of these proceedings. *See id.* ("This requirement will reduce the likelihood of conflicting Registered Location information for the same URI.").

⁹ *See Second Internet-based TRS Order*, 24 FCC Rcd at 807, 815 paras. 32, 53.

based TRS users, just like voice telephone users, may acquire toll free numbers that are directed to their ten-digit geographic numbers in the SMS/800 database to allow others to call them without paying a toll charge.

In clarifying this requirement, we understand that callers wishing to place a direct “point-to-point”¹⁰ call to an Internet-based TRS user will be required to dial that user’s ten-digit geographic number, rather than any toll free number the user may have acquired, because the user’s toll free number will not point to the user’s ten-digit number in the Internet-based TRS numbering directory. Similarly, we recognize that callers wishing to place a “dial around”¹¹ call to an Internet-based TRS user will be required to provide the alternative provider with the user’s ten-digit geographic number, rather than any toll free number the user may have acquired, because the toll free number will not point to the geographic number in the Internet-based TRS numbering directory. We note, however, that such calls—like calls to toll free numbers—impose no additional costs on callers. Point-to-point calls are within the Internet, and thus not subject to toll charges, and dial around calls typically can be placed by dialing the toll free number of the alternative provider.

For further information about this Public Notice, please contact Heather Hendrickson at 202-418-7295.

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¹⁰ Point-to-point calls are those in which persons with hearing and speech disabilities utilize TRS equipment to communicate directly with each other. *Id.* at 793, para. 3. Such calls are not TRS calls.

¹¹ As we made clear in the *Second Internet-based TRS Order*, under the new numbering system, Internet-based TRS users can still “dial around to competing providers” other than their default provider. *Id.* at 823, para. 70. Typically, such calls are placed by dialing the alternative provider’s *own* toll free number.