Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of: Hurricane Response	PS Docket No. 17-344

COMMENTS OF SORENSON COMMUNICATIONS, LLC REGARDING ITS PREPARATION AND RESPONSE TO THE 2017 HURRICANE SEASON

Sorenson Communications, LLC ("Sorenson") comments in response to the Public Safety and Homeland Security Bureau's request that telecommunications providers describe their efforts during the 2017 hurricane season.[1] Since 2003, Sorenson has been the industry-leading provider of communications services and products for Deaf and hard-of-hearing individuals. Sorenson and its affiliate CaptionCall offer two services that allow Deaf and hard-of hearing consumers to communicate with the hearing world: Video Relay Service ("VRS") and Internet Protocol Captioned Telephone Service ("IP CTS").

Sorenson undertook extensive efforts to preserve the safety of the Deaf and hard-of-hearing community before, during, and after the storms. Sorenson prepared its consumers for the storms by providing them with safety information, and addressing their questions. During the hurricanes, Sorenson reallocated resources to ensure that its services were continuously available to users. Sorenson also aided in relief efforts by sending American Sign Language ("ASL") interpreters to shelters in order to help Deaf and hard-of-hearing individuals receive the care they

[1] *See Hurricane Response*, Public Notice, DA 17-1180, PS Docket No. 17-344 (rel. Dec. 7, 2017).

needed. Finally, in the storms' aftermath, Sorenson worked tirelessly to secure functionally equivalent telecommunications service for Deaf and hard-of-hearing individuals to communicate with emergency responders and loved ones. These efforts have provided Sorenson with insight on how to prepare and respond to future natural disasters and emergencies.

A. Sorenson's Efforts to Maintain and Provide VRS During the Hurricanes

VRS is one of the services that Sorenson provides to Deaf and hard-of-hearing individuals. To use VRS, a user connects via video with an ASL interpreter located in one of Sorenson's over one hundred VRS call centers. The interpreter then places a call to the hearing individual or entity requested by the VRS user. During the call, the interpreter translates the hearing individual's speech into ASL, and the Deaf or hard-of-hearing individual's ASL into speech. This process allows the VRS conversation to flow like an ordinary telephone call between two hearing individuals.

Customers can use VRS only if they have access to proper equipment, such as a videophone or smartphone, and an Internet connection. During the hurricanes, some customers in affected areas were forced to evacuate their homes, while others lost power and Internet access. As a result, the hurricanes prevented some customers in affected areas from using VRS through their personal home devices. VRS customers using mobile devices also faced issues during the hurricanes. Mobile devices need strong cellular signals to use VRS, and the hurricanes both took some cellular towers out of service and reduced the ability of those networks to provide adequate data bandwidth for VRS. That problem was aggravated by the fact that more people than usual were making cellular calls in hurricane-affected areas. This overburdened the limited bandwidth and, in some cases, precluded customers from making VRS calls on their mobile devices.

Although Sorenson had to temporarily close nine VRS call centers that were in the hurricanes' path, Sorenson maintained VRS service for those consumers in affected areas who were able to maintain Internet connectivity and power where they had their VRS device. All of Sorenson's call centers handle calls from all over the country, not limited to specific geographic regions, and thus other call centers in its nationwide, interconnected network were able to field calls placed by consumers in hurricane-affected areas. Interpreters in the open call centers worked additional shifts in order to handle the call volume and make VRS continuously available. Due to these efforts, customers with access to the Internet where they had their VRS device could use Sorenson's VRS throughout the hurricanes.

Because Sorenson anticipated that many Deaf and hard-of-hearing individuals could lose access to VRS through their personal devices, Sorenson worked to provide VRS access in shelters. Before the hurricanes landed, Sorenson installed public videophones for Deaf and hard-of-hearing people in shelter locations identified by the Red Cross. These videophones allowed Deaf and hard-of-hearing individuals to place VRS calls during the hurricanes. After the hurricanes made landfall, Sorenson's local outreach teams continued installing public videophones in additional shelters whenever requested by the Red Cross or others. As discussed further below, Sorenson also took additional steps to assist Deaf individuals with face-to-face interactions at shelters.

In the aftermath of the storms, Sorenson has continued its efforts to serve Deaf and hard-of-hearing individuals in affected areas. In particular, the hurricanes damaged some Sorenson customers' VRS equipment. Sorenson has worked to quickly replace equipment as soon as a customer notifies Sorenson of damage.

B. Sorenson's Efforts to Maintain and Provide IP CTS During the Hurricanes

Sorenson also provides a service known as IP CTS through its affiliate, CaptionCall. IP CTS uses a combination of text captions and speech to aid Deaf and hard-of-hearing individuals. In an IP CTS call, a user connects via the Internet to both the call's intended recipient and a call assistant. The call assistant uses voice recognition technology to convert the hearing participant's speech into text captions, which appear in real time on the IP CTS user's telephone. Customers can access IP CTS using a CaptionCall home telephone or on their mobile device.

Like VRS, IP CTS depends on appropriate equipment and the Internet. As a result, some customers in hurricane-affected areas lost access to IP CTS when they evacuated their homes or lost power and Internet access. IP CTS customers using mobile devices faced the same issues affecting VRS users: the hurricanes prevented some cellular towers from providing adequate bandwidth for IP CTS, and the increased demand for cellular bandwidth impeded customers from using IP CTS.

Nonetheless, IP CTS customers who had the proper equipment and access to the Internet were able to continue using Sorenson's service during the storms. Sorenson's IP CTS call centers were not located in areas affected by the hurricanes, and all remained open and continued providing IP CTS. For customers whose IP CTS equipment was damaged by the hurricane, Sorenson is working diligently to replace their equipment.

C. Sorenson's Additional Efforts in Response to the Hurricanes

In addition to maintaining the availability of its services, Sorenson endeavored to assist the Deaf and hard-of-hearing community in other ways. Before the hurricanes made landfall, Sorenson provided safety information to its customers through English and Spanish notifications on social media, as well as emails and ASL video messages to customers in affected areas. The

messages discussed the impending hurricanes and encouraged customers to follow public safety guidelines. The messages also informed customers that they could email help@Sorenson.com if they needed help finding a shelter. Sorenson forwarded emails from customers seeking information about shelters to the Red Cross, and otherwise answered questions directly.

Sorenson also provided on-the-ground support to Deaf individuals in shelters. Sorenson sent interpreters to shelters to provide in-person interpreting and help Deaf and hard-of-hearing people there. Sorenson also sent interpreters to assist the Red Cross and FEMA in relief efforts. These were community interpreting efforts, and were not VRS services.

D. Lessons from the Hurricane Efforts

Through its experience with the 2017 hurricanes, Sorenson has gained valuable information for responding to and preparing for future natural disasters and emergencies.

First, the 2017 hurricane season reaffirmed the importance of providers like Sorenson supplying important and timely information to, and answering a wide range of questions from, the Deaf and hard-of-hearing community. As noted above, Sorenson issued a message to customers in the storms' predicted path to inform them that they could email Sorenson if they needed help finding a shelter. Some individuals, however, contacted Sorenson regarding issues unrelated to shelters, such as the location of the hurricane. Sorenson responded by directly answering these questions, and Sorenson will continue to do so during future emergencies.

Second, Sorenson found that collaborations with the Red Cross and FEMA were highly effective. Because Sorenson's interpreters could provide in-person ASL translation, Deaf and hard-of-hearing people were better served during relief efforts. Sorenson encourages partnerships between relief organizations and VRS and IP CTS providers in the future.

Third, Sorenson's experience has underscored the need for the Commission to account for natural disasters when regulating providers. In particular, the Commission is currently developing and implementing a Telecommunications Relay Service User Registration Database ("the URD"). Once the URD is functional, Deaf and hard-of-hearing users will be unable to make VRS calls unless a provider can validate their eligibility by querying the URD.[2] This task is more difficult when a consumer uses a public videophone, since that equipment is not associated with just one user.

The Commission is considering a proposal to require users of public videophones to "log in" to verify or establish their registration before making a call.[3] Sorenson has previously filed comments questioning the need for such a requirement for VRS, given the extremely low likelihood of misuse of VRS by an ASL-speaking hearing person.[4] These hurricane relief situations provide another example of why a "log in" requirement would not be in the public interest: in situations in which Deaf consumers are already suffering significant location and life disruption, the "log-in" requirement would impose another hurdle to communicating with hearing family and friends, without any significant fraud or abuse to prevent.

The Commission has also proposed requiring VRS providers to register the location and installation of every public videophone.[5] As the Commission develops these requirements, it should ensure that its regulations permit rapid installation of public videophones in emergency

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[2] *See* 47 C.F.R. § 64.615(a)(1).

[3] *Structure & Practices of the Video Relay Serv. Program*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436, 2482, ¶ 119 (2017) ("FNPRM").

[4] *See* Comments of Sorenson Communications, LLC Regarding Part III and Sections IV.C-E and G-H of the Further Notice of Proposed Rulemaking at 19–23, CG Docket Nos. 03-123 & 10-51 (filed May 30, 2017).

[5] FNPRM at 2483, ¶ 123.

shelters and other temporary locations without significant paperwork burdens on shelter managers or other emergency responders with significant competing duties. Otherwise, the registration requirements will become an unintended obstacle to deploying public VRS calling stations in these type of emergency settings, and would thus effectively deny the Deaf and hard-of-hearing individuals the functionally equivalent ability to communicate by telephone in these emergencies.

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