

January 23, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51

Dear Ms. Dortch:

The Consumer and Governmental Affairs Bureau is currently considering the pending request of Sorenson Communications, LLC (“Sorenson”) to suspend the RUE Profile implementation deadline of April 27, 2018.<sup>1</sup> Suspending the deadline is a necessary initial step prior to completing consideration of Sorenson’s petition for reconsideration of requirements to implement the RUE Profile.<sup>2</sup> At the request of staff, Sorenson provides this list of actions not within the VRS providers’ control that must be completed *before* providers could complete software development, testing, and deployment to ensure their platforms are interoperable with the Accessible Communications for Everyone, or “ACE” App.<sup>3</sup>

1. There is no stable and near-final ACE App available for providers to use to begin testing implementation of the RUE Profile. While there is a draft version of the ACE App, it is badly flawed and contains many bugs that render it not interoperable with VRS providers’ systems, which now use the SIP Profile. This is a problem of the ACE App, not the providers’ systems, as the providers’ endpoints are able to

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<sup>1</sup> See 47 C.F.R. § 64.621(a)(3); *see also, e.g.*, Letter from Julie A. Veach, Counsel to Sorenson Communications, LLC to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 & 03-123 (filed Oct. 25, 2017); Letter from John T. Nakahata, Counsel to Sorenson Communications, LLC to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 & 03-123 (filed Oct. 13, 2017).

<sup>2</sup> See Sorenson Communications, LLC, Petition for Partial Reconsideration, or in the Alternative, Suspension of the RUE Implementation Deadline, CG Docket Nos. 10-51 & 03-123 (filed May 30, 2017).

<sup>3</sup> See Letter from John T. Nakahata, Counsel to Sorenson Communications, LLC to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 & 03-123 (filed Jan. 22, 2018), at 1.

- interoperate using the SIP Profile. Sorenson understands that in testing, the ACE App has more interoperability problems than any current VRS provider endpoint.
2. The ACE App needs to be updated to include basic security features. The lack of these features is a deficiency in the RUE Profile, on which the ACE App is based.
    - a. The ACE App does not contain the capability to validate that a specific version of the ACE App or specific endpoint is a legitimate VRS endpoint and not a vehicle for the delivery of malware onto VRS providers' systems. The RUE Profile contemplates that some installations of the ACE App may have a "client certificate" to reflect that the installation is legitimate and not a security threat. However, the RUE Profile does not *require* client certificates and indeed allows VRS providers to "reject requests [to initiate a session] that fail to provide a recognized certificate."<sup>4</sup> The optional use of client certificates would force VRS providers to choose between refusing calls that are from non-validated endpoints (defeating the ostensible purpose of the ACE App to provide a non-proprietary soft VP app) or risking their networks and their subscribers' private information.
    - b. In addition to including security features that are currently optional in the RUE Profile, the Commission needs to identify an authority to issue client certificates to valid versions and installations of the ACE App and establish the functional and security elements that the authority would need to assess.
  3. The Commission must reconcile the ACE App and RUE Profile with the Commission's rules regarding a user's default provider. The Commission's rules establish one VRS provider as a consumer's "default provider," which carries all of the user's inbound and outbound calls unless the user chooses to use a different provider.<sup>5</sup> The ACE App and RUE Profile, however, contemplate that every time the user starts up an endpoint, he or she will select a provider.<sup>6</sup> This is a very different approach from the Commission's rules, which result in all calls being handled by the default provider unless a user makes a specific choice otherwise.
  4. The Commission must revise the ACE App is to handle emergency calling to 911. The RUE Profile references RFC 6881, which reports emergency location based on GPS location. The current design of the ACE App and the definition of the standard puts the responsibility on the Application provider to provide the GPS location. This is insufficient for many VRS uses as GPS location information would be restricted to mobile endpoints with GPS information, which the user may not have enabled. The lack of an interface that allows users to update their address and the lack of methods

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<sup>4</sup> Interoperability Profile for Relay User Equipment (RUE) § 5 (dated July 20, 2016, expired Jan. 21, 2017), <https://datatracker.ietf.org/doc/draft-vrs-rue-dispatch/> ("RUE Profile").

<sup>5</sup> See 47 C.F.R. § 64.611(a).

<sup>6</sup> See RUE Profile § 6.

for providers to push address information to the application may result in delays for emergency responders, particularly if dial-around is use for the 911 call. These safety problems need to be addressed before the ACE App progresses further.

5. In order to implement for the ACE App the RUE Profile requirement that an endpoint “shall obtain, on startup, a list of providers from a publicly accessible URL, e.g., hosted by the national regulatory agency,”<sup>7</sup> the FCC must designate an entity to host the URL, maintain it and provide support to users. That has not occurred.

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After these problems have been fully addressed, VRS providers would need a period of one year to implement the Relay User Equipment (“RUE”) Profile to ensure their networks are interoperable with the ACE App.<sup>8</sup>

Please contact the undersigned if you have questions.

Sincerely,



John T. Nakahata  
*Counsel to Sorenson Communications, LLC*

cc: Karen Peltz Strauss  
Eliot Greenwald  
David Schmidt  
Michael Scott

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<sup>7</sup> RUE Profile § 6.1.

<sup>8</sup> *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd. 687, 692 ¶ 14 (2017) (“[W]e conclude that it is reasonable to allow one year for VRS providers to complete software development, testing, and deployment to ensure that their networks are interoperable with the ACE App.”).