

February 23, 2018

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: CG Docket Nos. 10-51 and 03-123

On behalf of Sorenson Communications, LLC, I write to respond to the pending requests for waiver of the upcoming deadline to for Video Relay Service (“VRS”) providers to submit users to the Telecommunications Relay Service User Registration Database (“TRS-URD”).¹ VRS providers have known since June of 2013 that they were required to collect and submit user information to the TRS-URD.² If the Commission nevertheless decides to extend the deadline, Sorenson respectfully requests that it do so for all VRS providers to ensure a level playing field. Like other providers, Sorenson has some users whom it has not been able to validate through the TRS-URD verification process. It would not be fair to cut off those users’ service while allowing unverified users of other providers to continue receiving service. Moreover, it would create perverse incentives if unvalidated users of some providers are able to circumvent the verification process simply by registering with other providers.

Sincerely,

/s/ Mark D. Davis
Mark D. Davis
Counsel for Sorenson Communications, LLC

cc: Zenji Nakazawa
Karen Peltz Strauss
Eliot Greenwald
David Schmidt

¹ Letter from Jeff Rosen, General Counsel at Convo Communications, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 and 03-123, at 2 (filed Feb. 13, 2018); ZVRS Holding Company, parent company of CSDVRS, LLC d/b/a ZVRS and Purple Communications, Inc., Petition for Limited Waiver and Extension of the TRS-URD Implementation Deadline, CG Docket Nos. 10-51 and 03-123 (filed Feb. 15, 2018).

² *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Service for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82, 28 FCC Rcd. 8618 (2013).