

March 5, 2018

Ex Parte

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

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

Dear Ms. Dortch:

On March 1, 2018, Grant Beckmann, Chief Technology Officer and Isaac Roach, Vice President of Engineering, both of Sorenson Communications, LLC (“Sorenson”), and Randall Sifers and I, outside counsel to Sorenson, met with Richard L. Fruchterman, III, Sr. External Affairs Counsel and Brian Rosen, Senior Director, both of Neustar Inc., Dave Rolka, President (via teleconference) and Kelly Kearn, Chief Information Officer (via teleconference), both of Rolka Loube Associates, LLC, and Karen Peltz Strauss, Deputy Bureau Chief, Consumer & Government Affairs Bureau, David Schmidt, TRS Fund Program Coordinator (via teleconference), Eliot Greenwald, Deputy Chief and Michael Scott, Attorney Advisor, both of the Disability Rights Office, and Andrew Mulitz, Compliance & Oversight Group, Office of Managing Director, to discuss the technical issues associated with using an OAuth approach to implement a requirement that users log in before using public and enterprise videophones, as well as potential near-term alternatives to strengthening program protections.

Sorenson discussed the technical designs of its flagship ntouch VP1 and VP2 video phones that are in use as public and enterprise phones. These devices are not capable of implementing the OAuth proposal through use of a web browser because neither platform includes a web browser of any type. These video phones were purposefully built with limited memory and capabilities. Sorenson has researched the memory requirements of all currently available web browsers, including “lightweight browsers,” and discovered all exceed the available free memory in their devices. Thus, there is no path forward to fit a recognized web browser into either device. Sorenson released the VP2 in 2016 and has no plans to design and deploy next generation devices for many years.

Sorenson also identified security vulnerabilities with implementing a passcode requirement. Meeting participants discussed other alternatives to the passcode requirement, such as provider reporting of enterprise and public phones and having a Deaf consumer enter his or

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her VRS phone number, which would allow for tracking of individual use. Sorenson stated that it believed reporting of enterprise and public phones would be possible, and registration could be possible as well. This would permit Rolka Loube to monitor usage trends at these phones to identify any anomalous patterns that may require further investigation, and allow for a data-driven evaluation of whether individual user identification is necessary for enterprise and public phones.

As requested by FCC staff, following is the text of the self-certification Sorenson requires all users who place a VRS call from a public phone to digitally sign to indicate they are deaf or hard of hearing and need VRS in order to communicate:

“By clicking the ‘Accept’ button, you hereby certify that you have a hearing or speech disability and need VRS to be able to communicate with other people. You understand that the cost of VRS calls is paid for by contributions from other telecommunications users to the TRS Fund. You further attest by clicking the ‘Accept’ button that you are eligible to use VRS.”

Please contact the undersigned if you have questions.

Sincerely,



John T. Nakahata

Counsel to Sorenson Communications, LLC

cc: Karen Peltz Strauss
Eliot Greenwald
Andrew Mulitz
Kelly Kearn
Brian Rosen

David Schmidt
Michael Scott
Dave Rolka
Richard Fruchterman