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March 8, 2018

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Rm TW-A325
Washington, DC 20554

Re: *Ex Parte Meeting*: Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123

Dear Ms. Dortch:

On February 15, 2018, Robert Felgar, CEO of RAZ Mobility, LLC ("RAZ Mobility"), had a phone conversation with Eliot Greenwald from the Commission's Consumer and Government Affairs Bureau.

During the call, Mr. Felgar noted that relay service providers currently are compensated on a per minute-of-service basis, but that such a structure may not be appropriate if relay service is provided using automatic speech recognition ("ASR"). The cost of using a cloud-based ASR engine, such as Google's cloud-based service, is indeed time sensitive. However, under certain circumstances ASR can also occur locally on android devices with no time sensitive cost element whatsoever. Moreover, in the future Google and other speech-to text service providers could change the way they charge for their cloud-based services.

Given the uncertainty of the cost structure associated with using ASR services, RAZ Mobility urges the Commission to adopt a flexible approach to compensating relay service providers for ASR-based services. For example, if there are no time sensitive costs, the Commission could consider compensating relay service providers based on the number of users.

Flexibility in the manner in which relay service providers are compensated will encourage innovation in the use of ASR-based relay services and ultimately help reduce the cost of the program.

Respectfully,

Robert Felgar, CEO
RAZ Mobility, LLC