

WILKINSON ) BARKER ) KNAUER ) LLP

1800 M STREET, NW  
SUITE 800N  
WASHINGTON, DC 20036  
TEL 202.783.4141  
FAX 202.783.5851  
WWW.WBKLaw.COM  
DAVID A. O'CONNOR  
202.383.3429  
DOCONNOR@WBKLAW.COM

March 22, 2018

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: **EX PARTE PRESENTATION**  
*Misuse of Internet Protocol (IP) Captioned Telephone Service;  
Telecommunications Relay Services and Speech-to-Speech Services for  
Individuals with Hearing and Speech Disabilities*  
CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On March 20, 2018, Dixie Ziegler, Vice President of Hamilton Relay, Inc. ("Hamilton"), and the undersigned counsel met with Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Pai, regarding the above-captioned proceedings related to Internet Protocol Captioned Telephone Service ("IP CTS"). Ms. Ziegler participated by telephone.

Hamilton's presentation was consistent with the positions previously taken by Hamilton in these proceedings. Hamilton also reiterated that, consistent with Chairman Pai's priority of making the Commission's operations more transparent, the Commission should initiate a pilot program of publicly releasing the draft text of non-enforcement items that are placed on circulation among Commissioners, including any IP CTS-related items. Such a pilot program would be in keeping with the Commission's policy of publicly releasing the text of all agenda items for monthly Commission meetings, and would further the Chairman's goal of providing "equal access to the administrative process."<sup>1</sup>

The text of such draft items on circulation could contain a similar notation as draft agenda item texts, e.g.:

---

<sup>1</sup> News Release, Statement of FCC Chairman Ajit Pai, Announces Pilot Program to Release Commission Documents to the Public (Feb. 2, 2017), [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-343303A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-343303A1.pdf).

Federal Communications Commission

March 22, 2018

Page 2

This document has been circulated among Commissioners for tentative consideration. The issues referenced in this document and the Commission's ultimate resolution of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public's ability to understand the nature and scope of issues under consideration by the Commission, the public interest would be served by making this document publicly available. The FCC's ex parte rules apply and presentations are subject to "permit-but-disclose" ex parte rules. See, e.g., 47 C.F.R. §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission's ex parte rules.

Hamilton noted that the Commission publicly released an advance draft of the Video Relay Services decision,<sup>2</sup> and that IP CTS stakeholders, including consumers of the service, are no less deserving of equal access to the administrative process.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor

Counsel for Hamilton Relay, Inc.

cc (via email): Zenji Nakazawa

---

<sup>2</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, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd 2436 (2017), *appeal docketed sub nom. Sorenson Communications, LLC v. FCC*, No. 17-1198 (DC Cir. Aug. 29, 2017).