

May 15, 2018

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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th 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; *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24.

Dear Ms. Dortch:

On May 11, 2018, Sam Feder and the undersigned of Jenner & Block LLP, counsel to CaptionCall, LLC, met with Niral Patel, Special Counsel to Chairman Ajit Pai. In the meeting, we encouraged the Federal Communications Commission to evaluate a variety of market-based mechanisms for setting Internet Protocol Captioned Telephone Service (“IP CTS”) rates in lieu of moving to an approach based on providers’ submitted historical or projected costs.

We explained CaptionCall’s efforts to evaluate the status of Automated Speech Recognition (“ASR”) to help facilitate the development of an ASR solution that is capable of delivering functionally equivalent IP CTS calls to hard-of-hearing consumers in the future.<sup>1</sup> We also expressed support for recent requests for transparency.<sup>2</sup>

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<sup>1</sup> See Letter from John T. Nakahata, Counsel to CaptionCall, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 03-123. (Sept. 7, 2017); see also Letter from John T. Nakahata, Counsel to CaptionCall, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123, 13-24 (Sept. 19, 2017); Letter from Rebekah P. Goodheart, counsel to CaptionCall, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123, 13-24 (Aug. 25, 2017).

<sup>2</sup> See Letter from Blake E. Reid, Counsel to Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123, 13-24 (May 9, 2018); Letter from David A. O’Connor, Counsel for Hamilton Relay, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123, 13-24 (Mar. 22, 2018).

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Please contact me if you have any questions.

Sincerely,

*/s/ Rebekah P. Goodheart*

Rebekah P. Goodheart  
*Counsel to CaptionCall, LLC*

cc: Niral Patel