



1934 Old Gallows Rd. Suite 350  
Tysons Corner, VA 22182  
[www.razmobility.com](http://www.razmobility.com)

May 25, 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 Conference Call: 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 May 23, 2018, Robert Felgar, CEO of RAZ Mobility, had a conference call with Bob Aldrich and Michael Scott from the Consumer and Government Affairs Bureau.

Mr. Felgar urged the Commission to add language in the Notice of Inquiry section of the proposed *In the Misuse of Internet Protocol (IP) Captioned Telephone Service*, that requests comment on whether there are new technologies that could be supported as telecommunications relay services. Mr. Felgar noted that in the very near future companies will offer solutions that personalize smartphone audio based on a user's personal hearing profile. Within the next few weeks, a company called TuneFork will be releasing an application that will do just that.

An audio personalization service offers the ultimate in functional equivalency since it allows hard of hearing individuals to place and receive phone calls without using captions. Further, audio personalization services are less expensive than either existing IP CTS service or the use of automatic speech recognition ("ASR").

Mr. Felgar explained that supporting certain services, like ASR, while not supporting other innovative services, such as audio personalization services, would violate 47 U.S.C. § 225(d)(2), which directs the Commission not to "discourage or impair the development of improved technology."

RAZ Mobility thanks the Commission for its efforts to improve telecommunications relay services.

Sincerely,

Robert Felgar, CEO

cc: Karen Peltz Strauss  
Nirali Patel  
Bob Aldrich  
Eliot Greenwald  
Michael Scott