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June 1, 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 May 31, 2018, Dixie Ziegler, Vice President of Hamilton Relay, Inc. ("Hamilton"), and the undersigned counsel on behalf of Hamilton, met with Amy Bender of Commissioner O'Rielly's office regarding the draft item on Internet Protocol Captioned Telephone Service ("IP CTS").¹ Ms. Ziegler participated by telephone.

During the meeting, Hamilton summarized the arguments reflected in its previously filed comments in this proceeding.² Specifically, Hamilton argued that: 1) all issues related to automated speech recognition ("ASR") should be moved to the *Further Notice*; 2) all issues in the draft *Notice of Inquiry* should be moved to the *Further Notice*; and 3) the Commission should retain the MARS rate methodology until it has appropriately addressed the compensation and other issues raised in the *Further Notice*, or at the very least set the IP CTS rate at \$1.75 for two years or until a permanent rate methodology has been implemented for IP CTS.

Hamilton believes that a thorough review of all ASR-related issues, including peer-reviewed studies analyzing ASR in actual use by consumers, must occur before ASR-only

¹ FCC-CIRC1806-10 (May 17, 2018) ("Draft Item").

² *Ex Parte* Letter from David A. O'Connor, Counsel for Hamilton Relay, Inc., to Marlene H. Dortch, CG Docket Nos. 13-24, 03-123 (May 30, 2018); *Ex Parte* Letter from David A. O'Connor, Counsel for Hamilton Relay, Inc., to Marlene H. Dortch, CG Docket Nos. 13-24, 03-123 (May 24, 2018).

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service can be authorized. As an additional safeguard, the Commission should seek public comment on any application by a party that is not currently providing IP CTS and is proposing an ASR-only form of IP CTS, in order to ensure that such providers are capable of meeting mandatory minimum standards of service and performance requirements.

This filing is made in accordance with Section 1.1206(b)(2)(iv) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2)(iv). 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): Amy Bender