

June 13, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte – Request for Partial Waiver of Sections 64.605(a)(2)(iv) and 64.605(a)(2)(v) of the Commission’s Rules in Connection with ClearCaptions, LLC Web and Wireless Forms of Internet Protocol Captioned Telephone Service (“IP CTS”), Filed March 2, 2018 – CG Docket Nos. 03-123 and 13-24

Dear Ms. Dortch:

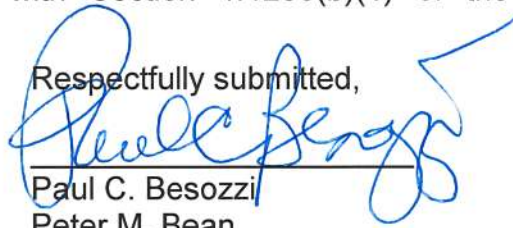
On June 12, 2018, Michael Strecker, Vice President of Regulatory and Strategic Policy for ClearCaptions, LLC (“Clear Captions” or “Company”) met with Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau to discuss the status of the referenced waiver request.

ClearCaptions conveyed that it is eagerly awaiting the Commission to approve the Company’s waiver. The legacy 911 call handling requirements for IP CTS, specifically the role of the Communications Assistant (“CA”) during the call and the requirement to provide the CA call back number and the agent number for scenarios where the IP CTS provider has provided the customer with a ten-digit number, is delaying the Company from launching new products into the market. Furthermore, the lack of this waiver is preventing the Company from releasing a new mobile product with enhanced 911 capabilities. Specifically, this new product will utilize the customer’s GPS information, as collected by their mobile phone, in

order to ensure the correct Public Safety Answering Point is contacted during an emergency situation.¹

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules.²

Respectfully submitted,



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Counsel to ClearCaptions, LLC

cc: Karen Peltz Strauss

¹ In order for ClearCaptions to utilize the phone's GPS information, the customer must provide prior express authorization for ClearCaptions to use their location information as captured by their device. Additionally, utilization of GPS is limited based on the customer's phone having access to GPS as certain conditions could limit this capability.

² 47 C.F.R. § 1.1206(b)(1).