

Morgan Lewis

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June 21, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

**Re: NOTICE OF EX PARTE COMMUNICATION
CG Docket No. 13-24 - In the Matter of the Misuse of Internet Protocol (IP)
Captioned Telephone Service; CG Docket No. 03-123 - Telecommunications
Relay Services and Speech-to-Speech Services for Individuals with Hearing
and Speech Disabilities**

Dear Ms. Dortch:

ClearCaptions, LLC ("ClearCaptions" or the "Company"), through its undersigned counsel, files this Notice of an *Ex Parte* meeting. Michael Strecker, Vice President of Regulatory and Strategic Policy and the undersigned met with Jamie Susskind, Chief of Staff to Commissioner Brendan Carr. Mr. Strecker participated by phone.

ClearCaptions urged the Commission to adopt its proposed four-tier model for the IP CTS rate structure.¹ The discussions were consistent with the attached handout provided to the meeting participants. ClearCaptions encouraged the Commission to begin now its analysis of ClearCaptions' and others' rate proposals to ensure that it can complete that analysis and adopt IP CTS rates before June 30, 2020.

¹ See Initial Comments of ClearCaptions, LLC, CG Docket Nos. 13-24 and 03-123, at 11-23 (filed Sept. 17, 2018); Reply Comments of ClearCaptions, LLC, CG Docket Nos. 13-24 and 03-123, at 5-6 (filed Oct. 16, 2018); see also ClearCaptions, LLC Ex Parte, CG Docket Nos. 13-24 and 03-123, Exhibit 1 at slides 8-9 (filed Nov. 7, 2018).

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ClearCaptions stated that it would not oppose a rate freeze on July 1, 2019, for InnoCaptions, as a small, emergent provider. ClearCaptions noted that if the Commission had a tiered rate model in place today, InnoCaptions' emergency request likely would not have been necessary.

ClearCaptions looks forward to working with the Commission on a long-term rate solution for IP CTS and stands ready to continue those productive discussions.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Tamar Finn

Tamar E. Finn

Counsel to ClearCaptions, LLC

Enclosure

cc: Jamie Susskind