



June 29, 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 – CG Docket Nos. 03-123 and 13-24.**

Dear Ms. Dortch:

On June 27, 2018, Michael Strecker, Vice President of Regulatory and Strategic Policy for ClearCaptions, LLC (“Clear Captions” or “Company”) met separately with Amy Bender, Legal Advisor, Wireline, to Commissioner Michael O’Rielly; Nirali Patel, Special Counsel to Chairman Ajit Pai; Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety, to Commissioner Jessica Rosenworcel; and Jamie Susskind, Chief of Staff to Commissioner Brendan Carr.

The Company conveyed its concerns in regards to the current call handling rules for 911 in Internet Protocol Captioned Telephone Service (“IP CTS”), specifically, as those rules relate to sections 64.605(a)(2)(iv) and 64.605(a)(2)(v) of the Commission’s rules. In those scenarios where the IP CTS provider has assigned a registered ten-digit number to its customer, or where the customer could be using a ten-digit number assigned by the PSTN or telephone provider of record, the requirements for (1) the Communications Assistant (“CA”) to provide the CA call back number, the CA’s identification number, as well as the name of the relay provider and (2) for the IP CTS providers to attempt to re-establish contact between the TRS user and/or the appropriate PSAP/local emergency authority (collectively “PSAP”) have the potential to delay deployment of new technology, interfere with the reconnect between the PSAP and the customer in the case of one or both legs of the call disconnecting, and actually degrade the overall 911 experience.

Unlike other forms of TRS, where the CA is in the middle of the call flow and is facilitating conversation back and forth, for IP CTS the CA only hears the audio from the non-assisted users side of the conversation, which is then captioned for the assisted user. Requiring the CA to provide the call back number and the CA identification number to the PSAP could interfere with the actual 911 emergency call taking place. Furthermore, requiring the CA to attempt to reconnect either leg of the call should the call disconnect could actually interfere with the PSAP’s own attempted reconnect to the ten digit number passed to them via the customer’s caller ID.

While ClearCaptions has asked for a waiver of these rules, the Company sees a need for the Commission to either amend the current rules specific to sections 64.605(a)(2)(iv) and 64.605(a)(2)(v) for IP CTS, or, at a minimum, issue an industry wide waiver for IP CTS providers to ensure that IP CTS customers are offered the best 911 solutions possible and that those solutions are not encumbered by legacy 911 rules/procedures that have the potential to degrade 911 service offerings and present possible safety hazards to these IP CTS customers.

Respectfully submitted,

/s/ Michael Strecker

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cc: Narali Patel  
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