

July 24, 2019

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:

Hamilton Relay, Inc. (“Hamilton”) writes in response to the comment cycle that recently closed on Hamilton’s Petition for Reconsideration of the Commission’s standard for recovery of costs associated with implementing the Telecommunications Relay Service User Registration Database (“Database”) during the interim IP CTS compensation period.¹

Commenters universally supported Hamilton’s petition, and no party opposed it.² CaptionCall urged the Commission “to grant the Petition to cure violations of the Administrative

¹ *Consumer and Governmental Affairs Bureau Seeks Comment on Hamilton Relay, Inc. Petition for Partial Reconsideration of Internet Protocol Captioned Telephone Service Report and Order, Further Notice of Proposed Rulemaking, and Order*, Public Notice, CG Docket Nos. 13-24, 03-123 (rel. June 5, 2019); *Petition for Reconsideration of Hamilton Relay, Inc.*, CG Docket Nos. 13-24, 03-123 (filed Apr. 8, 2019).

² Comments of ClearCaptions, LLC, CG Docket Nos. 13-24, 03-123 (filed July 3, 2019) (“ClearCaptions Comments”); Comments of CaptionCall, LLC on Hamilton Relay, Inc.’s

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Procedure Act ('APA') and to avoid causing disruption to the IP CTS market.”³ ClearCaptions stated that “the Commission should allow recovery of Database costs without applying the three-pronged limitation outlined in the *Order*, and move quickly to adopt a permanent IP CTS rate that appropriately compensates providers for all reasonable costs and allows a reasonable operating margin.”⁴ Hamilton agrees with these commenters. Given the absence of any opposition, Hamilton respectfully asks the Commission to move expeditiously to grant its petition.

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

Petition for Reconsideration, CG Docket Nos. 13-24, 03-123 (filed July 3, 2019) (“CaptionCall Comments”).

³ CaptionCall Comments, at 2.

⁴ ClearCaptions Comments, at 2.