July 26, 2019

**VIA ECFS**

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

Re: *Internet Protocol Captioned Telephone Service (IP CTS), Further Notice of Proposed Rulemaking (FNPRM), adopted June 7, 2018, CG Docket No. 03-123, expanding the Telecommunications Relay Services (TRS) Fund Base.*

Dear Ms. Dortch:

On July 26, 2019, Shmuel Jonas, Chief Executive Officer (CEO), and Carl Billek, Senior Regulatory Counsel of IDT Telecom, Inc., along with former Congressman Jack Fields, CEO, and Peggy Binzel and Lindsay Flynn, Principals of Twenty-First Century Group, Inc., met with Chairman Ajit Pai and his Special Counsel, Michael Carowitz. During the meeting, we discussed IDT’s November 25, 2005 Petition for Rulemaking and the Commission’s June 7, 2018 Further Notice of Proposed Rulemaking regarding IP CTS, CG Docket No. 03-123. Specifically, we urged the Commission to move expeditiously on the proposal contained within the FNPRM regarding expanding the TRS Fund Base.

IDT reiterated its support for the Commission’s proposal to create a separate IP CTS Fund, which would include intrastate revenue within its contribution base.

IDT also restated its position that 47 U.S.C. 225(d)(3)(B) presents the issue of jurisdictional separations of costs solely as it pertains to carrier cost recovery from end users (i.e., subscribers) and does not apply to Fund Administrator/FCC cost recovery from common carrier contributors. As such, all concerns raised in this proceeding regarding jurisdictional separation of costs are moot.

Please contact me if you have any questions.

Sincerely,

/s/ Peggy Binzel

Peggy Binzel

Principal

Twenty-First Century Group, Inc.

*On behalf of Twenty-First Century Group and IDT attendees*