

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544**

In the Matter of:

Structure and Practices of the Video Relay
Service Program

CG Docket No. 10-51

Telecommunications Relay Services and
Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities

CG Docket No. 03-123

**REPLY COMMENTS OF SORENSON COMMUNICATIONS, LLC IN SUPPORT OF
PETITION FOR PARTIAL RECONSIDERATION OF VIDEO RELAY SERVICE
INTEROPERABILITY ORDER**

Sorenson Communications, LLC (“Sorenson”) files this reply in support of its petition for partial reconsideration of the *2017 VRS Interoperability Order*.¹ Sorenson’s petition sought reconsideration of the requirement that providers of video relay service (“VRS”) implement the Relay User Equipment (“RUE”) Profile for purposes of communications with the Accessible Communications for Everyone Application (“ACE App”).²

Requiring VRS providers to implement the RUE Profile to facilitate communications with the ACE App is unlawful, will waste valuable Commission and provider resources for no clear benefit, and will distract everyone from positive steps to improve interoperability. The parties that have responded to Sorenson’s petition agree that relief is warranted, and no one has

¹ *Structure and Practices of the Video Relay Service Program et al.*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd. 687 (Consumer & Gov’tl Affs. Bur. 2017) (“*2017 VRS Interoperability Order*”).

² Sorenson Communications, LLC, Petition for Partial Reconsideration, or in the Alternative, Suspension of the RUE Implementation Deadline, CG Docket Nos. 10-51 and 03-123 (filed May 30, 2017) (“Petition”).

come forward in support of the requirement as adopted. The Consumer and Governmental Affairs Bureau or the Commission should reconsider the decision and lift the requirement.

I. DISCUSSION

Sorenson provided multiple independent and detailed reasons why the Bureau's decision must be reversed:

- It will cost VRS providers millions of dollars to implement the RUE Profile just for purposes of supporting communications with the ACE App. Yet the benefits of the ACE App are very doubtful at this point given the strides that VRS providers have made and continue to make in addressing interoperability concerns.³
- Interoperability testing using the ACE App does not even require providers to implement the RUE Profile in their backend systems.⁴
- The RUE Profile was not within the Bureau's authority to adopt because it was not the product of a voluntary, consensus standard organization. Rather, it was developed by a group dominated by Commission representatives that did not comply, as the Commission had instructed, with OMB requirements including balance, openness, and consensus. For similar reasons, the RUE Profile was not properly codified in the Code of Federal Regulations.⁵
- The RUE Profile is an incomplete draft that expired months ago, not a finished standard. Notwithstanding that work on the RUE Profile first began under an

³ *See id.* at 4-5.

⁴ *See id.* at 17-18.

⁵ *See id.* at 6-13.

FCC contract awarded more than two years ago,⁶ it continues to lack basic security and safety features such as a client certificate and procedures for updating a user's Registered Location for 911 purposes.⁷ Similarly, the ACE App is not ready for testing as a benchmark; it has a number of significant bugs and lacks the necessary security and safety functions already mentioned.

- The RUE Profile may implicate Sorenson's intellectual property, yet no arrangements have been made, or even discussed, regarding appropriate licensing.⁸

No one has come forward to rebut these arguments. To the contrary, VRS providers—who presumably would support the requirement if it would genuinely improve interoperability—also support its reversal. As ZVRS explains, “neither the substance of the RUE Profile, nor the process by which it was adopted, will help resolve” alleged interoperability problems.⁹ And notwithstanding that GlobalVRS also remains concerned about interoperability, it maintains that the RUE Profile should not be mandatory and that the Commission should address the issues in

⁶ See PRWeb, VTCSEcure, LLC is Awarded a Five Year Contract to Develop Video Communication Software to Increase Communication Access for the Deaf and Hard of Hearing Communities (May 21, 2015), <http://www.prweb.com/releases/vtcsecure/vatrp/prweb12738672.htm>.

⁷ See Petition at 14-15.

⁸ See *id.* at 18-20.

⁹ Comments of ZVRS Holding Company, ZVRS, and Purple Communications in Response to Sorenson Petition, CG Dockets No. 10-51 and 03-123, at 2 (filed Aug. 7, 2017) (“ZVRS Comments”). ZVRS's comments express that it opposes mandatory use of the RUE Profile both for communication with the ACE App and with VRS provider-distributed endpoints. See *id.* at 2-3; see also Comments of Sorenson Communications, LLC, CG Docket Nos. 10-51 and 03-123 (filed June 12, 2017) (opposing mandatory use of the RUE Profile in VRS provider-distributed endpoints). Sorenson disagrees with ZVRS as to the extent of continued interoperability problems and the degree to which they affect competition at this date or after implementation of the xCard format for customer data later this year.

Sorenson's petition "before any further action on implementing the RUE Profile is even considered."¹⁰

The record is clear and without disagreement. No VRS Provider, consumer group, or any other party has come forward to support the mandatory use of the RUE Profile to connect the ACE App, or any other uncertain application that may be built, to the critical infrastructure used for VRS communications. Of equal note, in recent SIP interoperability testing conducted in cooperation with MITRE, the current version of the Windows ACE App (the only version available for testing) performed worse than any provider's current endpoints. The Bureau or Commission should grant Sorenson's petition. Doing so would not only address the multiple legal and policy problems with the requirement, but it would allow VRS Providers and the Commission's contractor to focus their resources on efforts that industry participants agree will actually improve interoperability and the user experience: the VRS Provider Interoperability Profile, the xCard standard for address books, and the National Test Lab.¹¹

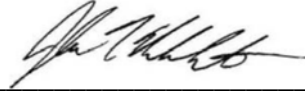
¹⁰ Letter from Andrew O. Isar, Regulatory Consultant to ASL Services Holdings LLC dba GlobalVRS, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 and 03-123, at 1 (filed Aug. 7, 2017).

¹¹ *See also* ZVRS Comments at 3-4 (urging the Commission to direct its efforts to implementation of the VRS Provider Interoperability Profile, the xCard format, and an independent test lab).

II. CONCLUSION

For the reasons provided in its Petition and above, Sorenson urges the Bureau or Commission to reverse its decision to require implementation of the RUE Profile for communications with the ACE App.

Respectfully submitted,



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August 17, 2017

CERTIFICATE OF SERVICE

I, Remington Pool, certify that I have, on August 17, 2017, served a copy of the foregoing Reply Comments of Sorenson Communications, LLC In Support of Petition for Partial Reconsideration of Video Relay Service Interoperability Order by U.S. Mail postage prepaid to the addresses below:

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