



November 13, 2020

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Request for HIGHLY CONFIDENTIAL Treatment – CG Docket No. 03-123**
Application of CaptionCall, LLC and Sorenson Communications, LLC to
Expand Its Internet Protocol Captioned Telephone Service Certification to
Incorporate Automatic Speech Recognition (ASR)-Only Captioning

Dear Ms. Dortch:

CaptionCall, LLC and Sorenson Communications, LLC herein submit a REDACTED version of the Application of CaptionCall, LLC and Sorenson Communications, LLC to Expand Its Internet Protocol Captioned Telephone Service Certification to Incorporate Automatic Speech Recognition (ASR)-Only Captioning in CG Docket No. 03-123 (the “Application”).

CaptionCall is submitting a Highly Confidential version of the Application pursuant to the Third Protective Order adopted for the above-captioned docket.¹ CaptionCall has received written approval from staff to designate for Highly Confidential treatment the marked portions of the attached ex parte, which include “[g]ranular data and test results regarding a provider’s technical and service performance,” detailed information about technology implementation or deployment plans and strategies, and granular information about specific network facilities and operations, including engineering information.²

Pursuant to the Third Protective Order, CaptionCall is submitting the Highly Confidential version for the Secretary and two copies for Eliot Greenwald. Encrypted electronic copies of the Highly Confidential Documents are also being sent by email as set forth below.

¹ See *In re Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order and Third Protective Order, 33 FCC Rcd. 6802 (2018) (“*Third Protective Order*”).

² *Third Protective Order* Appendix B.

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Please contact me if you have any questions or require any additional information.

Sincerely,



John T. Nakahata
*Counsel to CaptionCall, LLC and
Sorenson Communications, LLC*

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Telecommunications Relay Service and) CG Docket No. 03-123
Speech-to-Speech Services for Individuals)
with Hearing and Speech Disabilities)

**Application of CaptionCall, LLC and Sorenson Communications, LLC To Expand Its
Internet Protocol Captioned Telephone Service Certification to Incorporate
Automatic Speech Recognition (ASR)-Only Captioning**

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Before the
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Speech-to-Speech Services for Individuals)
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**Application of CaptionCall, LLC and Sorenson Communications, LLC To Expand Its
Internet Protocol Captioned Telephone Service Certification to Incorporate
Automatic Speech Recognition (ASR)-Only Captioning**

Pursuant to the declaratory ruling authorizing the use and compensation of fully automatic speech recognition (“ASR”) technology to produce captions for Internet Protocol Captioned Telephone Service (“IP CTS”) calls,¹ 47 C.F.R. § 64.606(a)(2), and the Commission’s Notice of Grant of Conditional Certification released on April 24, 2014,² CaptionCall, LLC (individually, and collectively with Sorenson Communications, LLC, “CaptionCall”) and Sorenson Communications, LLC (“Sorenson”) hereby apply to extend Sorenson’s conditional IP CTS certification to permit it to offer ASR-only captioning.

Because CaptionCall already successfully provides a majority of IP CTS service, it has demonstrated its ability to provide IP CTS in accordance with the mandatory minimum standards. CaptionCall currently captions 911-calls; handles all types of calls required by the

¹ See *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd. 5800, 5835 (¶ 65) (2018) (“2018 Declaratory Ruling”).

² *Grant of Conditional Certification for Sorenson Commc’ns, Inc., as Reorganized Pursuant to Chapter 11, to Provide Internet-Based Telecomms. Relay Servs. Pending Comm’n Action on Sorenson’s Application for Certification*, Public Notice, 29 FCC Rcd. 4111 (2014).

mandatory minimum standards; collects, tracks and reports calls and call-related information as required by the TRS Administrator for verification and billing purposes; and carries out the myriad other responsibilities of an IP CTS provider. The company has in place privacy policies and other privacy protections for its captioning operations generally, which are documented in the pending Applications, as updated annually.³ Accordingly, this application focuses only on those aspects of CaptionCall’s IP CTS that would be different for calls for which caption text is generated by ASR only.

Through this application, CaptionCall seeks authorization to utilize ASR in lieu of communications assistants (“CA”) to generate captions. CaptionCall is proposing to use ASR-only captioning during non-911 calls⁴ first in overflow situations when a CA is not available for the start of a call. Although CaptionCall maintains an excellent average speed of answer, implementing ASR means that users will never have to wait more than a couple seconds for captions to start—which is less time than it takes to answer the phone and say “Hello.” CaptionCall will then have the flexibility to expand its use of ASR-only captioning over time

³ Sorenson, which previously operated under contract with the State of Utah’s FCC-certified TRS program, filed its Certification Application on December 2, 2011, and updated that application on December 3, 2012, December 2, 2013, February 28, 2014, May 15, 2014, December 2, 2014, December 2, 2015, December 2, 2016, December 4, 2017, December 6, 2018, and December 20, 2019. CaptionCall filed its Certification Application on December 2, 2014, and updated that application on December 2, 2015, December 2, 2016, December 4, 2017, December 6, 2018, and December 20, 2019. Annual updates are routinely filed in December. Throughout this application, we refer to these prior applications collectively as “Applications.”

⁴ Given the importance of ensuring accurate captioning in an emergency, for now CaptionCall will continue to provide CA-assisted IP CTS for all 911 calls. Providing service in this way will ensure that CaptionCall’s IP CTS services support 911 emergency calling and meet the applicable emergency call handling requirements.

when doing so makes sense and would improve service to consumers. As the Commission is aware, ASR may be better suited for some types of calls than others, and grant of this application will allow CaptionCall to evolve ASR as appropriate. As the holder of an existing conditional authorization to provide CA-based IP CTS, and consistent with the Commission’s determination to allow providers to incorporate ASR “in a[ny] manner that meets the Commission’s minimum TRS standards for functionally equivalent service,” and the two applications granted to date for ASR-only IP CTS, CaptionCall seeks approval to utilize ASR with the flexibility to do so for less than 100% of the provider’s customers and calls.⁵

CaptionCall respectfully requests that the Commission act expeditiously to approve its ASR application. CaptionCall is the largest provider of IP CTS, and grant of this application will allow the company to utilize IP CTS to benefit consumers, increase competition, promote innovation, and provide cost-effective and functionally-equivalent service.

I. Background

Since 2011, CaptionCall has provided award-winning IP CTS offerings. Indeed, CaptionCall has established a proven record of meeting and exceeding the Commission’s minimum standards. Currently, CaptionCall produces captions utilizing a CA. A highly trained CaptionCall CA listens to what the non-user says and re-voices that speech into speech recognition software using a profile that has been customized specifically to that CA’s voice; the CA also provides any contextual notes, such as “crying” or “laughing.” Because the software

⁵ *2018 Declaratory Ruling* ¶ 62; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Memorandum Opinion and Order, 35 FCC Rcd. 5635 (2020) (“Clarity Order”); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Memorandum Opinion and Order, 35 FCC Rcd. 4568 (2020) (“MachineGenius Order”).

creates a vocal profile specific to each CA, the software generates high-quality captions, which the CA can then correct or supplement. This allows the CA to communicate context and disfluencies, as well as to avoid distortions from accents. The CA can edit the captions as necessary. This combined use of technology with human oversight is flexible and delivers a high quality and user-friendly service to customers across a wide range of scenarios, settings, and speakers. Those captions are transmitted via the internet to the IP CTS user, who can read the captions using his or her CaptionCall device or application.

In the *2018 Declaratory Ruling*, the Commission found that ASR-only IP CTS can be a compensable TRS service if provided in compliance with applicable TRS mandatory minimum standards⁶ and invited any interested provider operating under conditional certification or interim eligibility to update its existing application to incorporate ASR-only captioning into its offerings.⁷

CaptionCall is committed to innovation and has made significant investments in ASR. CaptionCall recognizes that ASR is well-suited to certain types of calls, and thus can help improve IP CTS services to the benefit of consumers. CaptionCall began to test and develop ASR-only captioning technology in 2017.⁸ It has tested all extant major ASR engines using its own internal tests, as well as tests patterned on MITRE's tests. CaptionCall has utilized MITRE's audio files to test caption accuracy and latency, achieving accuracy in these laboratory tests with sample files that is at least as good as results achieved by applicants that have already

⁶ *2018 Declaratory Ruling* ¶ 48.

⁷ *2018 Declaratory Ruling* ¶ 65.

⁸ No ASR-only captioned call minutes have been submitted for reimbursement.

been approved by the Commission, with a shorter latency than CA-based captions. The company is now ready to deploy ASR as part of its IP CTS service alongside its CA-based captioning, and to do so in ways that improve its high-quality IP CTS for the benefit of its users.

II. Deployment of ASR-Only Captioning

CaptionCall proposes to incorporate ASR-only captioning initially as part of its IP CTS offerings as a replacement for a CA only for *non-911* calls in overflow situations when a CA is not available. In time, CaptionCall would seek to expand the use of ASR-only as it identifies other ways to enhance its services.⁹ CaptionCall will not change any other processes or functionalities currently in place to provide IP CTS to its registered users. The introduction of ASR-only captioning will not change CaptionCall’s user registration and certification, 911 call handling and routing, collection and reporting of billing-related data for the TRS Administrator, or network monitoring and complaint processes.

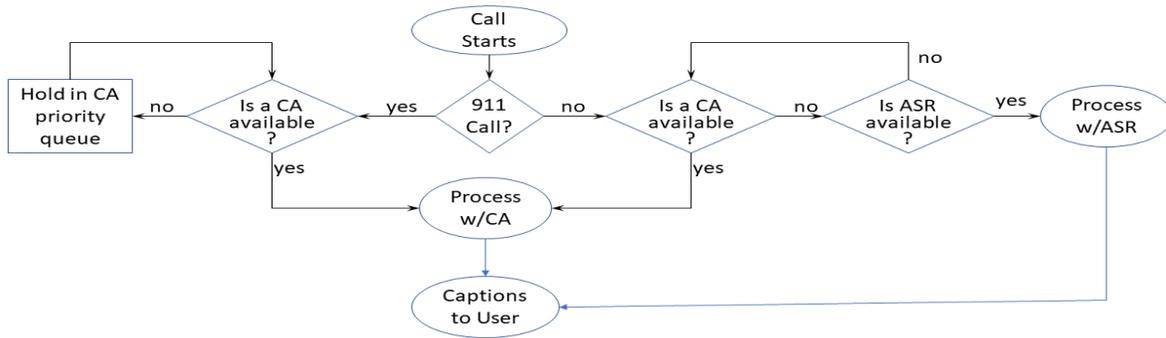
CaptionCall’s existing call-handling processes already identify 911 calls from CaptionCall users and immediately place those calls at the top of the call queue, in accordance with IP CTS 911 call-handling requirements. Those processes will continue unchanged. CaptionCall will continue to identify 911 calls and prioritize them for CA-based call handling.¹⁰ Calls identified as 911 then will *not* be routed to the ASR system for captioning. CaptionCall envisions that adding ASR for non-911 calls will enhance IP CTS availability for the full range

⁹ Irrespective of the captioning modality used, the readability of captions will not change from the level that exists today—which will be delivered on CaptionCall’s IP CTS devices or through CaptionCall’s mobile applications.

¹⁰ CaptionCall does not terminate ongoing calls in order to begin captioning a 911 call. That would continue to be the case.

of emergency call situations, as 911 calls will continue to be placed at the top of the CA queue and handled immediately by CAs. Non-911 emergency calls would be routed to the ASR engine rather than experiencing a delay when a CA is not immediately available.¹¹ The following high-level call flow illustrates CaptionCall’s initial approach to incorporating ASR-only captioning as part of its IP CTS offerings:

Figure 1



Whether generated by a CA or by ASR, once captions are generated, they will be transmitted via the internet to the end user for display on the end user’s device—whether a CaptionCall phone or another device running a CaptionCall app. All current internal processes to monitor and score call quality on a continuous basis will apply to ASR.

CaptionCall’s infrastructure for captioning has been modified so that, when ASR is used to create captions, [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

¹¹ In the unlikely event that neither ASR nor a CA is available, the call would be routed to whichever is first available.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]

At this time, CaptionCall is not implementing a system that would permit users to switch between ASR-based and CA-based captioning. CaptionCall expects that the vast majority of calls will continue to be CA-captioned, with ASR captioning expanded only as CaptionCall determines it can do so without sacrificing caption quality. As the largest IP CTS provider, CaptionCall has a significant incentive to maintain high service quality, and to implement ASR beyond overflow only when doing so will help enhance its service.

A. Identification of 911 Calls

All calls coming into CaptionCall are already screened to identify any that contain a “911” call string. All 911 calls are already identified, prioritized, and placed at the top of the CA queue by the Automated Call Distributor (“ACD”) engine. These calls are handled immediately. This process will continue notwithstanding the implementation of ASR, and will ensure that all 911 calls continue to be handled by CAs. With respect to 911 calls for which CaptionCall also provides the underlying voice connection to 911, the implementation of ASR creates no changes.

Such calls will continue to be routed expeditiously in accordance with the IP CTS call-handling requirements.

B. Impact on Speed of Answer

CaptionCall already maintains a rapid speed of answer. On average, and excluding COVID-related impacts, CaptionCall answers and begins providing captions within two seconds of the user activating captions. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]

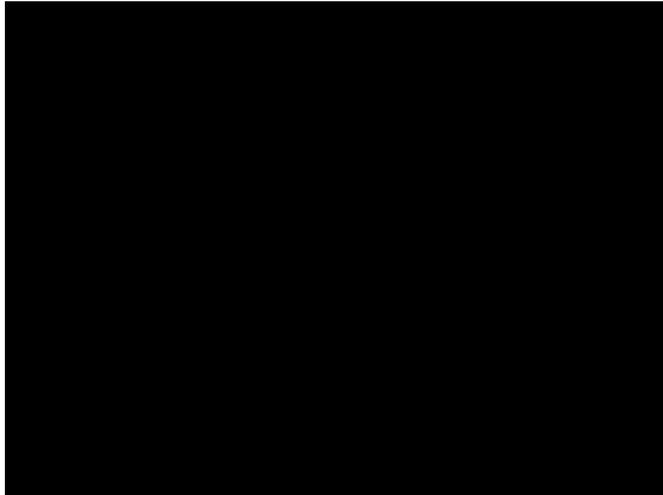
For calls for which the CaptionCall user has configured captions on by default and places the call, this means that captions generally become available as or before the distant party answers. Even on calls placed to the CaptionCall users, two seconds is about the same amount of time that it takes to pick up the phone and say “Hello.”

On occasion, however, call queues can become longer. CaptionCall employs sophisticated models to project calling demand for a given day and time, and then schedules its CAs to work accordingly. Overall, CaptionCall efficiently matches staffing to projected demand. Occasionally, however, demand can spike unexpectedly, beyond the ordinary cushion that CaptionCall maintains, which can lead to situations in which a user must wait for a CA to become available to begin captioning. During the initial period of COVID, demand spikes were compounded by difficulties in scheduling CAs to come into call centers, during which wait times

¹² This, of course, could change depending upon how, when, and where COVID outbreaks take place, and the nature of local response measures.

Table 1
Word Error Rate

[BEGIN HIGHLY CONFIDENTIAL]



[END HIGHLY CONFIDENTIAL]

The Word Error Rate results are comparable with results that the Commission has already approved as sufficient for an ASR-only certification, and the Caption Delay results are better than for CA-based services. There is no reason to believe that CaptionCall’s implementation of ASR-only as described herein will lead to service degradation.

D. Call Confidentiality

CaptionCall's ASR-only system is designed not to collect, store, or otherwise cache the content of any conversation beyond the duration of the call. When the call terminates, the session is dropped and any call content is removed from our and our partner's systems. As with CA-assisted IP CTS, CaptionCall retains the data necessary to bill for calls, and protects that information securely and in accordance with the Commission's CPNI rules.

CaptionCall's agreement with its vendor partners for speech-to-text mandate that they do not allow collection of, storage of, or otherwise cache any user data or captions text beyond the end of a particular customer session. CaptionCall's agreements ensure that these vendor partners will not use, or otherwise monitor, any audio or caption data for their personal use, be sold to other parties for marketing or other purposes, or be analyzed in any way that could violate the confidential nature of the users' phone calls. Specific information tying the user to call content is not transmitted to the ASR vendor and is not stored by them in any manner.

III. Compliance with Applicable Mandatory Minimum Standards Affected by Introduction of ASR in Existing Processes.

CaptionCall's use of ASR-only captioning in conjunction with CaptionCall's existing CA-based IP CTS services and processes will meet or exceed all applicable mandatory minimum standards.¹³ As explained above, CaptionCall's processes other than the use of CAs to produce captions will not be altered by the introduction of ASR-only captioning. For that reason, the table below enumerates only those mandatory minimum standards that could be affected by the

¹³ As a form of IP CTS, ASR-only captioning is subject to the waivers and exemptions previously granted for IP CTS. *See 2018 Declaratory Ruling* n.195.

introduction of ASR-only captioning. With respect to the remaining mandatory minimum standards, those are addressed in CaptionCall’s pending Applications.¹⁴

STANDARD	WAIVER	CAPTIONCALL’S COMPLIANCE
Speed 47 C.F.R. §§ 64.604(a)(1)(iii)		CaptionCall has tested its ASR and consistently achieved the Commission’s requirement of 60 words per minute in simulations using audio files used for stenographer tests. ¹⁵ CaptionCall ASR-only system experiences average captioning delay of less than 2 seconds from the time the phrase ends, comparable with the levels the Commission has already found sufficient for ASR-only IP CTS certification. The ASR system connects 99% of calls within less than 2 seconds.

¹⁴ See *supra* n.3.

¹⁵ The Commission has not mandated a quantitative standard for captioning delay, instead stating that captions to be delivered “fast enough so that they keep up with the speed of the other party’s speech,” and “if captions are not keeping up with the speech (although a short delay is inevitable), at some point the provider is no longer offering relay service and the call is not compensable.” *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Internet-based Captioned Telephone Service*, 22 FCC Rcd. 379, 388–89, ¶ 22 & n.69 (2007) (“2007 IP CTS Declaratory Ruling”). In the absence of a specific quantitative standard for caption delay, the typing speed standard for text-based TRS is applicable. See *id.*; 47 CFR § 64.604(a)(1)(iii) (requiring TRS CAs to have a minimum typing speed of 60 words per minute). In the 2007 IP CTS Declaratory Ruling, the Commission stated that “when the captions are generated by voice recognition technology, the captions are generated at a speed well above the 60-wpm standard.” 2007 IP CTS Declaratory Ruling at 388, ¶ 22 n.69.

STANDARD	WAIVER	CAPTIONCALL’S COMPLIANCE
<p>Confidentiality Rule</p> <p>47 C.F.R. § 64.604(a)(2)(i)</p>		<p>Providers of ASR-only IP CTS are subject to the same confidentiality requirements as other TRS providers. <i>2018 Declaratory Ruling ¶ 60</i>. No IP CTS provider may allow its ASR service to retain IP CTS user call content for any purpose, either locally or in the cloud.</p> <p>The ASR engine used by CaptionCall will not retain any of the captions, call audio, or call content from the call beyond the duration of the session.</p>
<p>Transmitted Verbatim</p> <p>47 C.F.R. §§ 64.604(a)(1)(ii), (2)(ii)</p>		<p>CaptionCall’s ASR search engine uses transcription software that automatically transcribes and relays calls verbatim, which makes impossible intentionally altering a relayed conversation.</p> <p>Although the TRS rules do not currently provide metrics for accuracy and reliability, the typing, grammar, and spelling of captions must be competent. <i>2018 Declaratory Ruling ¶ 60</i>.</p> <p>CaptionCall selected its ASR vendor after evaluating the performance of leading vendors based on accuracy; transcription formatting, including punctuation and capitalization; user-friendly handling of acronyms, prices, dates, and numerics.</p> <p>CaptionCall’s internal testing shows its ASR is currently capable of a word error rate (“WER”) that matches that of other ASR certified providers.</p>

STANDARD	WAIVER	CAPTIONCALL’S COMPLIANCE
<p>Types of Calls</p> <p>47 C.F.R. § 64.604(a)(3)(ii)</p>	<p>Conditional exemption¹⁶</p>	<p>CaptionCall’s hardware-based phone connects to the user’s selected carrier. Through that carrier users can make and receive any type of call they choose.</p> <p>CaptionCall’s <i>CaptionCall Mobile</i> service allows for any type of call utilizing an all-distance, over-the-top VoIP service that CaptionCall purchases from a third party and integrates into its IP CTS.</p> <p>Neither CA-assisted nor ASR-only calls differentiate among call types, except that CaptionCall handles all 911 calls using CAs.</p>
<p>Speed of Answer for IP CTS</p> <p>47 C.F.R. § 64.604(b)(2)(ii)</p>		<p>As reflected in its monthly data submissions to the Fund administrator, CaptionCall’s IP CTS, provided through Sorenson, routinely exceeds the speed-of-answer requirement that 85% of all calls are answered within 10 seconds measured daily, except as otherwise waived by the FCC’s COVID-19 waivers.¹⁷ CaptionCall meets the applicable speed of answer requirement as modified by the waivers.</p> <p>Test results show that ASR-only captioned calls are answered within 2 seconds by a method which results in the caller’s call immediately being placed, and because of adequate network facilities, the probability of a busy response is functionally equivalent to what a voice caller would experience in attempting to reach a party through a voice telephone call.</p>

¹⁶ See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 29 FCC Rcd. 10697 ¶¶ 11–15 (2014) (“*2014 Waiver Order*”).

¹⁷ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of Video Relay Service Program*, Order, 35 FCC Rcd. 2715 (CGB 2020) (“*March 16 TRS Waiver Order*”) (temporarily granting conditional waivers of (1) certain regulations governing at-home VRS call handling

IV. Certification

Pursuant to 47 C.F.R. § 64.606(a)(2)(v), the declaration of Cindy Williams is attached as an addendum to this submission.

and (2) speed-of-answer requirements for other forms of TRS); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of Video Relay Service Program*, Order, 35 FCC Rcd. 3018 (CGB 2020) (“*April 3 TRS Waiver Order*”) (temporarily waiving rule prohibiting VRS providers from contracting for interpretation services with non-VRS certified entities); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, Order, 35 FCC Rcd. 4894 (CGB 2020) (“*May 14 TRS Waiver Order*”) (extending and modifying previously granted COVID-19 waivers); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of Video Relay Service Program*, Order, 35 FCC Rcd. 6432 (CGB 2020) (“*June 22 TRS Waiver Order*”) (extending previously granted COVID-19 waivers); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of Video Relay Service Program*, Order, 35 FCC Rcd. 9783 (2020) (“*August 26 TRS Waiver Order*”) (extending all previously granted COVID-19 waivers through Nov. 30, 2020); *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of Video Relay Service Program*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 35 FCC Rcd. 10866, 10892 ¶ 54 (2020) (“*Oct 2 TRS Waiver Order*”) (extending previously granted COVID-19 waivers through Feb. 28, 2021).

V. Conclusion

In light of the foregoing, CaptionCall requests that the Commission grant forthwith this application to extend Sorenson's existing IP CTS conditional certification to include ASR-only services. Doing so will benefit consumers and continued innovation by allowing the provider serving the majority of IP CTS users to incorporate ASR.

Respectfully submitted,



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*Counsel for CaptionCall, LLC and
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Date: November 13, 2020

Addendum 1

Declaration of Cindy Williams
General Counsel of Sorenson Communications, LLC

Pursuant to 47 C.F.R. § 64.606(a)(2)(v), I declare under penalty of perjury that I am Cindy Williams, General Counsel of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

/s/ Cindy Williams _____
Cindy Williams
General Counsel
Sorenson Holdings, LLC