

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

In the Matter of

Structure and Practices of the Video Relay  
Service Program

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

CG Docket No. 10-51

CG Docket No. 03-123

**REPLY COMMENTS OF SORENSON COMMUNICATIONS, LLC ON THE  
INTERSTATE TELECOMMUNICATIONS RELAY SERVICE ADVISORY COUNCIL  
PETITION FOR RECONSIDERATION OF THE VRS RATES ORDER**

Sorenson Communications, LLC (“Sorenson”) submits these reply comments on the responses to the Commission’s October 6, 2017 Public Notice<sup>1</sup> seeking comment on a petition filed by the Interstate Telecommunications Relay Service Advisory Council (“TRS Advisory Council”) on September 21, 2017,<sup>2</sup> which seeks reconsideration of the commencement date and compensation rates established in the 2017 VRS Rate Order to compensate video relay service (“VRS”) providers for an eight-month trial of skills-based routing (the “Trial”).<sup>3</sup>

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<sup>1</sup> *Consumer and Governmental Affairs Bureau Seeks Comment on Interstate Telecommunications Relay Service Advisory Council Petition for Reconsideration of the VRS Rates Order*, Public Notice, DA 17-980, CG Docket Nos. 03-123 & 10-51 (rel. Oct. 6, 2017) (“VRS Skill-Based Rates PN”).

<sup>2</sup> *Petition for Reconsideration of the Report and Order and Order, FCC 17-86, On Behalf of the Interstate Telecommunications Relay Service Advisory Council*, CG Docket Nos. 03-123 & 10-51 (filed Sep. 21, 2017) (“Petition”).

<sup>3</sup> *Structure and Practices of the Video Relay Service Program, et al.*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436 ¶¶ 4-9 (2017) (“Report and Order”) (authorizing a voluntary trial of skills-based routing for three categories of specialized calls and announcing that participating VRS providers will be

All commenters are in broad agreement to fully fund the Trial by setting the compensation rates for skills-based calls at a level that will encourage Sorenson and other providers to participate in the Trial.<sup>4</sup> Sorenson strongly supports fully funding the Trial because funding the path to offering skills-based routing on a non-trial basis is a prerequisite to achieving truly functionally equivalent service. As Sorenson noted in its Comments, all providers should be compensated at the same rate for participating in the Trial. Sorenson also believes that a rate of at least \$5.29 per-minute for skills-based calls is necessary considering the additional costs involved in providing skills-based routing.<sup>5</sup> Sorenson is confident that the fully funded Trial will yield the data the Commission seeks to develop metrics to assess the costs and benefits of skills-based routing, consistent with the objectives outlined in the Commission's Report and Order.

Further, Sorenson acknowledges the Consumer Groups' desire for the Trial to commence as soon as possible,<sup>6</sup> but reiterates that the Trial should begin no earlier than 120 days after the deadline for providers to decide whether to participate in the Trial. Sorenson agrees with ZVRS and Purple's recommendation that the Trial start six months following the date of an order announcing the Trial.<sup>7</sup> As Sorenson explained in its Comments, the Commission must account

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compensated at the applicable rates for minutes of use whether handled by a generalist or specialist communications assistant).

<sup>4</sup> See Sorenson Communications, LLC Comments on the Interstate Telecommunications Relay Service Advisory Council Petition for Reconsideration of the VRS Rates Order, CG Docket Nos. 10-51 & 03-123, Nov. 9, 2017 ("Sorenson Comments"); Comments of ASL Services Holdings, LLC DBA GlobalVRS, CG Docket Nos. 10-51 & 03-123, Nov. 9, 2017 ("Global Comments"); Comments of Consumer Groups, CG Docket Nos. 10-51 & 03-123, Nov. 9, 2017 ("Consumer Groups Comments"); Comments of Convo Communications, LLC, CG Docket Nos. 10-51 & 03-123, Nov. 9, 2017 ("Convo Comments"); Comments of ZVRS Holding Company, ZVRS and Purple Communications, CG Docket Nos. 10-51 & 03-123, Nov. 9, 2017 ("ZVRS Comments").

<sup>5</sup> Sorenson Comments at 2-3.

<sup>6</sup> Consumer Groups Comments at 4.

<sup>7</sup> ZVRS Comments at 4.

for the substantial time and investment VRS providers will incur to make changes to their networks and IT systems prior to participating in the Trial.<sup>8</sup> The 120 days Sorenson proposes is itself an aggressive schedule from an engineering perspective—anything shorter runs the risk of preventing providers from being fully prepared for the beginning of the Trial, which in turn would limit the usefulness of the data the Trial would yield.

Sorenson also reiterates its belief that the VRS providers should have the option to add to the proposed and current categories of medical, legal, and technical computer support language skills other specialized categories, such as DeafBlind, prison, mental health, emergency, government, and corporate language skills, contingent upon approval from the Consumer & Governmental Affairs Bureau.<sup>9</sup> Indeed, there are myriad other skills from which the Deaf community, and Deaf-owned businesses in particular, would benefit.<sup>10</sup>

Finally, Sorenson reiterates that Commission should prevent the discontinuation of service at the end of the Trial by maintaining the proposed rate of \$5.29 per conversation minute until a permanent rate is adopted. Maintaining this rate would ensure that Deaf users' services remain constant during and after the Trial and avoid unwarranted confusion.<sup>11</sup>

Accordingly, Sorenson respectfully requests that the Commission grant the Petition and set the compensation rates for skills-based routing of calls to a level that will encourage Sorenson and other providers to participate in the Trial.

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<sup>8</sup> Sorenson Comments at 4.

<sup>9</sup> *Id.* at 5.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with the first name "John" being more prominent.

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