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November 20, 2017

Marlene H. Dortch, Secretary

Office of the Secretary

Federal Communications Commission

445 12th Street, S.W., Rm TW-A325

Washington, DC 20554

Re: *Ex Parte Meeting:* Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123.

Dear Ms. Dortch:

On November 28, 2017, Robert Felgar, Nermin Selimic and Klaus Schafer of RAZ Mobility, LLC (“RAZ”), and Steve Jacobs of IDEAL Group, met with Karen Peltz Strauss (CGB), Eliot Greenwald (CGB and DRO) and Michael Scott (CGB and DRO).

RAZ and IDEAL Group demonstrated an Android application called Speech2RTT that transcribes speech to real-time text. RAZ plans on making the application available for free to state equipment distribution programs that purchase Android equipment from RAZ. Other users will be able to purchase Speech2RTT for a small fee from the Google Play Store.

RAZ suggested that if the state equipment distribution programs assume a heightened role in determining users’ eligibility for IP CTS equipment and relay service, that these state programs should be required to educate consumers regarding applications, such as Speech2RTT, that use automatic speech recognition and that represent a free or low-cost alternative to Relay service. Doing so would enhance consumer choice and materially reduce the size of the Telecommunications Relay Service Fund.

RAZ also urged the Commission to encourage state equipment distribution programs to include mobile devices in their programs. Many states still do not offer such devices. Mobile devices offer individuals who are deaf or hard of hearing the ability to access alternative methods of communication, such as SMS, email, iMessage, Facebook Messenger, WhatsApp, Viber, Google Allo, video calling and social media. Access to these alternative methods of communication will reduce reliance on IP CTS.

Attached is the power point presentation that accompanied the demonstration of Speech2RTT to Commission staff.

RAZ Mobility and IDEAL Group greatly appreciates the opportunity to contribute to this important proceeding.

Sincerely,

Robert Felgar, CEO

cc: Karen Peltz Strauss

Eliot Greenwald

Michael Scott