



Telecommunications for the Deaf and Hard of Hearing, Inc.
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December 20, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 03-123 - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities: EX PARTE FILING

Dear Ms. Dortch:

Telecommunications for Deaf and Hard of Hearing, Inc., National Association of the Deaf, California Coalition of Agencies Serving the Deaf and Hard of Hearing ("CCASDHH), Cerebral Palsy and Deaf Organization, Deaf Seniors of America, and the Hearing Loss Association of America (the "Consumer Groups"), submit this letter in support of the Petition for Rulemaking filed by IDT Telecom, Inc. ("IDT") on November 25, 2015 (the "Petition"). The Consumer Groups ask the Commission to issue a Notice of Proposed Rulemaking, or include the Petition in a broader rulemaking on Telecommunications Relay Service ("TRS") issues, on the appropriate base of contribution to the TRS Fund. The Consumer Groups supported opening a rulemaking in their February 4, 2016 comments and urge the Commission to take such action without further delay.

The Petition, among other positions, asks the Commission to open a rulemaking with the explicit purpose of considering the addition of intrastate revenue to the TRS contribution base. Currently, interstate and international revenue funds certain TRS programs. Yet the TRS system also provides support for intrastate calls using some TRS supported services, such as IP Relay. Expanding the overall TRS contribution base would more closely align the use of the services with the revenue that supports such use.

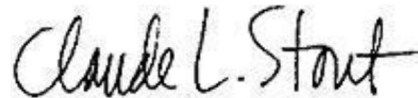
Expanding the contribution base to include intrastate revenue likely would result in a significant reduction of the rate charged on assessable revenue. The assessment rate has continued to grow, notwithstanding substantial efforts by the Commission to reduce the outlays and compensation rates for the providers. This continued rate growth is a matter of demand increasing faster than the supply. Simply put, demand for use of TRS-supported services by deaf and hard of hearing individuals has continued to rise, as awareness and availability of the services improves among eligible consumers. Meanwhile, the amount of assessable telecommunications revenue has remained flat or even declined due to changes in the industry. Broadening the TRS Fund base will assist in reversing these trends.

The Consumer Groups do not necessarily agree with every position in the Petition. The Consumer Groups

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believe that state commissions should continue to have a role in regulating certain legacy TRS services that are intrastate in jurisdiction. Similarly, the Commission should ensure that state TRS funds should continue to be adequately supported by intrastate revenue. Nonetheless, the Consumer Groups agree with IDT that the Commission has the statutory authority to broaden the contribution base to include intrastate telecommunications revenue. The Consumer Groups would support such a broadening of the base in a rulemaking. As such, the Consumer Groups urge the Commission to issue an NPRM as described in the Petition and seek broader comment on the proposals therein.

Sincerely,



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***Providing Leadership in Achieving Equal Access
to Telecommunications, Media, and Information Technologies
for Deaf and Hard of Hearing People***