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October 3, 2014

Via Electronic Filing

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

Re: Notice of Ex Parte Meeting; CG Docket Nos. 13-24, 10-51 and 03-123

Dear Ms. Dortch:

On October 1, 2014, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”); Randall Pope, Representative for American Association of the Deaf-Blind (“AADB”); Mark Hill, President, Cerebral Palsy and Deaf Organization (“CPADO”); Sheri A. Farinha, Vice Chair, California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”); Thomas Dowling, Treasurer, Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”); Lise Hamlin, Director of Public Policy, Hearing Loss Association of America (“HLAA”); Andrew S. Phillips, Policy Counsel, National Association of the Deaf (“NAD”); and the undersigned participated in a meeting (either in person or by phone) with:

- Karen Strauss, Robert Aldrich, Gregory Hlibok, Eliot Greenwald, Elaine Gardner, and Caitlin Vogus of the Consumer & Governmental Affairs Bureau (“CGB”);
- David Schmidt, Diane Mason and Andrew Mulitz of the Office of Managing Director (“OMD”); and
- Jonathan Chambers of the Office of Strategic Planning & Policy Analysis (“OSP”).

During the meeting, the Consumer Group representatives expressed support for adopting a deadline for Video Relay Service (“VRS”) providers to make video mail interoperable. Video mail is an essential function for functional equivalency. Although one provider has announced that it will be interoperable by December, consumers remain skeptical of the timing due to a history of delays and hope that the VRS Providers’ SIP meeting in November finalizes the implementation timeframe to have interoperable devices. In addition to adopting an interoperability deadline, the representatives voiced their support for using the reference platform to help resolve implementation issues if problems arise.

The participants discussed a request to designate or appoint an FCC executive as the focal point person or as “a Czar” to the run the national telecommunications relay

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service (“TRS”) program.¹ A person in such a position could work closely with those individuals within the FCC already immersed in TRS issues as well as consumers and industry representatives to develop detailed strategic plans for the TRS program, including outreach and research.

The Consumer Group representatives reiterated their support for an advisory committee that has a broader role than the Interstate TRS Fund Advisory Council and urged the FCC to move forward with such a committee in the near term.

The Consumer Group representatives also raised concerns about registration requirements for any form of TRS. Specifically, they repeated their concerns about a certain IP Relay provider requiring a copy of social security cards for registration² and about having a VRS registration option for non-Americans who reside in the U.S. and do not have social security numbers (“SSNs”).³ They talked about consumers’ security concerns with being required to provide the last four digits of their SSNs to register for VRS, particularly in light of several recent security breaches of major retailers’ systems. They suggested “better messaging” needs to be provided to inform consumers about what information must be provided and to assure consumers that confidential information will be protected when it is required to be produced. They pointed out that it may make sense to request the last four digits of a SSN when initiating a new VRS service, but makes no sense to request it from existing users. They asked whether the FCC would consider allowing an alternative method to providing the last four digits of a SSN to register for VRS service as either a new or existing user.

In prior comments, the Consumer Groups expressed opposition to the collection of SSNs to receive VRS service due to privacy concerns and suggested alternatives such as providing a driver’s license number or using Experian’s Precise ID.⁴ They have been, and continue to be, wary of any requirement to collect personally identifiable data from deaf and hard of hearing constituents,⁵ which was acknowledged by the FCC.⁶

¹ See Letter from Sheila Conlon-Mentkowski, President of TDI, to Chairman Wheeler, CG Docket No. 03-123 (dated June 20, 2014).

² See *Ex Parte* Letter from Danielle Burt, Counsel for TDI, to Marlene H. Dortch, Secretary, CG Docket Nos. 10-51 and 03-123 (dated April 10, 2014).

³ See *Ex Parte* Letter from Danielle Burt, Counsel for TDI, to Marlene H. Dortch, Secretary, CG Docket Nos. 13-24, 10-51 and 03-123 (dated June 2, 2014).

⁴ See Comments of Consumer Groups, CG Docket Nos. 10-51 and 03-123, at p. 21 (dated November 14, 2012).

⁵ See Comments of Consumer Groups, CG Docket Nos. 10-51 and 03-123, at p. 45 (dated March 9, 2012).

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Finally, the Consumer Group representatives expressed their support for volume control requirements for hearing aid compatible mobile devices using WiFi.

Respectfully submitted,

/s/ Danielle Burt

Danielle Burt

Counsel for TDI

cc (by e-mail):

Karen Strauss
Robert Aldrich
Gregory Hlibok
Eliot Greenwald
Elaine Gardner
Caitlin Vogus
David Schmidt
Diane Mason
Andrew Mulitz
Jonathan Chambers

Claude Stout
Randall Pope
Mark Hill
Sheri A. Farinha
Thomas Dowling
Lise Hamlin
Andrew S. Phillips

⁶ See *Structure and Practices of the Video Relay Service Program*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82, at ¶ 70, n.170 (rel. June 10, 2013).