



November 26, 2014

**Via Electronic Filing**

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

*Re: Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; Misuse of Internet Protocol (IP) Captioned Telephone Service, CG Docket No. 13-24.*

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.606(f)(2), CaptionCall, LLC, an affiliate of Sorenson Communications, Inc., (collectively “CaptionCall”) hereby notifies the Commission about a substantive change in its TRS service. In response to competition, on November 11, 2014, CaptionCall began activating a default-on captioning option for consumers who use CaptionCall’s hardware-based IP CTS equipment. For a customer to take advantage of this option, he or she must have (1) complied with the Commission’s registration requirements, (2) submitted a self-certification that complies with the Commission’s rules, and (3) submitted a valid third-party professional certification form. Existing customers who meet these criteria will receive a message that asks them if they need captions for all of their calls. If they answer “yes,” their captions setting will be set to default-on. If they answer “no,” their captions will remain set to default-off. For new customers, CaptionCall will continue to ship its equipment with a default captions-off setting. During installation, the trainer will explain the default-on captions option to the customer, and the customer will have the option to activate the feature themselves. All customers will retain the ability to activate and deactivate captions during a call. All customers who meet the criteria listed above will also have the ability to change the captions default setting through the CaptionCall phone interface. The rollout to existing customers will take place over several months. CaptionCall does not anticipate this feature to impact its ability to meet federal minimum standards.

Sincerely,

/s/ Walter E. Anderson

*Counsel for CaptionCall, LLC*

cc: Karen Peltz-Strauss  
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