

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

In the Matter of

Structure and Practices of the Video Relay
Service Program

Waivers of iTRS Mandatory Minimum
Standards

CG Docket No. 03-123

REPLY COMMENTS OF SORENSON COMMUNICATIONS, INC.

In the Further Notice of Proposed Rulemaking (“FNPRM”) released August 22, 2014,¹ the Commission proposed, among other things, to eliminate the requirement for TRS providers to support VCO-to-VCO and HCO-to-HCO calls. The only comments responding to the FNPRM support the elimination of this requirement, and the Commission should do so. Nevertheless, as the comments of Hamilton Relay, Inc., explain, the Commission needs to clarify that if providers choose to support VCO-to-VCO or HCO-to-HCO calls, these calls are compensable if one or more Communications Assistants is necessary to complete the call.² As Hamilton correctly explains, in a typical VCO-to-VCO call, both parties are able to speak, but each party also has a hearing disability and therefore needs a Communications Assistant. As a result, it is not possible to connect these calls point-to-point—even for VCO-to-VCO or HCO-to-HCO VRS-to-VRS calls where the call would otherwise have been connected point-to-point. In

¹ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities Waivers Of ITRS Mandatory Minimum Standards*, CG Docket No. 03-123, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 14-125 (rel. Aug. 22, 2014) (“FNPRM”).

² Comments of Hamilton Relay, Inc., at 4-8, CG Docket No. 03-123 (Nov. 20, 2014).

the case of a VRS-to-VRS VCO-to-VCO call, Sorenson is able to support such calls through a dual-relay call involving two interpreters. Sorenson respectfully requests that the Commission clarify that these calls are compensable.

Respectfully submitted,



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