

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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| In the Matter of |) | |
| |) | |
| Telecommunications Relay Services and |) | CG Docket No. 03-123 |
| Speech-to-Speech Services for Individuals with |) | |
| Hearing and Speech Disabilities |) | |
| |) | |
| Misuse of Internet Protocol (IP) Captioned |) | CG Docket No. 13-24 |
| Telephone Service |) | |
| |) | |
| Petition for Declaratory Ruling of Sorenson |) | |
| Communications, Inc. and CaptionCall, LLC to |) | |
| Ensure Competition in Internet Protocol Captioned |) | |
| Telephone Service |) | |

To: Secretary, FCC
For: Chief, Consumer & Governmental Affairs Bureau

REPLY COMMENTS OF HAMILTON RELAY, INC.

Hamilton Relay, Inc. (“Hamilton”), by its counsel, hereby submits these reply comments in response to the *Public Notice* (“*Notice*”) issued November 25, 2014 by the Consumer & Governmental Affairs Bureau (“Bureau”) in the above-captioned proceedings.¹ In the *Notice*, the Bureau seeks comment on a petition (“Petition”) filed by Sorenson Communications, Inc. and CaptionCall, LLC (collectively, “Sorenson”) regarding the licensing of patents held by Ultratec, Inc. and/or Captioned Telephone, Inc. (collectively, “CapTel, Inc.”) for the provision of Internet Protocol Captioned Telephone Services (“IP CTS”).²

¹ *Request for Comment on Petition Filed by Sorenson Communications, Inc., and CaptionCall, LLC, Regarding Licensing of Internet Protocol Captioned Telephone Service Technology*, Public Notice, CG Docket Nos. 03-123, 13-24, DA 14-1709 (CGB rel. Nov. 25, 2014).

² *Petition for Declaratory Ruling of Sorenson Communications, Inc. and CaptionCall, LLC to Ensure Competition in Internet Protocol Captioned Telephone Service*, CG Docket Nos. 03-123 & 13-24 (filed Nov. 19, 2014) (“Petition”).

Hamilton takes this opportunity to simply note that it has licensed CapTel, Inc.'s patented technology since 2003, when Hamilton and CapTel, Inc. entered into a licensing arrangement for PSTN-based captioned telephone service. Hamilton and CapTel, Inc. amended the terms of the licensing arrangement in 2007 to incorporate IP CTS. Hamilton licenses CapTel, Inc.'s technology under terms and conditions that the companies mutually negotiated.

Hamilton also wishes to clarify a statement in CapTel, Inc.'s comments which suggests that Hamilton is certificated by the Commission to provide IP CTS.³ Hamilton has a pending application for federal certification,⁴ and is authorized on an interim basis to continue providing IP CTS while its application remains pending.⁵

Respectfully submitted,

HAMILTON RELAY, INC.

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³ Comments of Ultratec, Inc. and CapTel, Inc. on Petition Filed by Sorenson Communications, Inc. and CaptionCall, LLC Regarding Licensing of Internet Protocol Captioned Telephone Service, CG Docket Nos. 03-123, 13-24, at 7 (filed Dec. 29, 2014).

⁴ Application of Hamilton Relay, Inc. for Certification as a Provider of Internet Captioned Telephone Services, as amended, CG Docket Nos. 03-123, 10-51 (filed Dec. 5, 2011); *see also Structure and Practices of the Video Relay Service Program*, Second Report and Order and Order, CG Docket No. 10-51, 26 FCC Red 10898 (2011) ("*Second R&O*") (requiring all IP-based TRS providers to file an application for federal certification with the Commission).

⁵ *Second R&O*, ¶ 59.