



January 29, 2015

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:

CaptionCall, LLC, an affiliate of Sorenson Communications, Inc., (collectively “CaptionCall”) submits this letter regarding the Petition for Limited Waiver (“Petition”) that Hamilton Relay, Inc. (“Hamilton”) and Sprint Corporation (“Sprint”) filed on July 25, 2012.¹ In their Petition, Sprint and Hamilton seek a waiver of the Commission’s requirement that telecommunications relay service (“TRS”) providers, including providers of Internet Protocol Captioned Telephone Service (“IP CTS”), report the captioned telephone’s ten-digit number (“TDN”) on all call detail records (“CDRs”) submitted to the Administrator for compensation.

CaptionCall supports the relief that Sprint and Hamilton request in the Petition. As with Sprint’s and Hamilton’s customers, customers using CaptionCall’s hard endpoints rely on their existing PSTN service to carry the voice portion of an IP CTS call. As a result, CaptionCall’s call centers do not receive ANI necessary to identify the TDN associated with the PSTN line connected to the CaptionCall telephone. To remedy this, CaptionCall asks each customer to provide their TDN when they register, as required by the Commission’s rules. CaptionCall reports that number as the captioned telephone’s number on its CDRs. If, however, a customer, without notifying CaptionCall, changes telephone numbers, or if they move their equipment to a different location and uses a PSTN line with a different TDN, CaptionCall has no reliable method of detecting the change in telephone number, and it cannot guarantee accuracy in reporting the captioned telephone’s TDN on its CDRs. At this time, there is no foolproof technological solution for this issue. Accordingly, CaptionCall concurs that the waiver sought in the Petition is appropriate, and CaptionCall has not opposed it.

¹ Hamilton Relay, Inc. and Sprint Communications Company, L.P., Petition for Limited Waiver, CG Docket Nos. 10-51, 03-123 (filed Jul. 25, 2012).

However, in a recent filing, Hamilton asserts that “the requested waiver could be issued to Sprint and Hamilton only, rather than to IP CTS providers generally.”² As discussed immediately above, all providers that rely on the PSTN to carry the voice portion of an IP CTS call—including CaptionCall—face precisely the same technological challenges that the Petition raises. Thus, it would be inappropriate to limit a waiver to Sprint and Hamilton only. Rather, if the Commission grants the Petition, CaptionCall respectfully requests that the waiver apply to all providers similarly situated to Sprint and Hamilton.

Sincerely,

/s/ Walter E. Anderson

Counsel for CaptionCall, LLC

² Letter from David A. O’Connor, Counsel for Hamilton Relay, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 13-24, 10-51, 03-123, at 3 n. 3 (filed Jan. 16, 2015).