



February 26, 2015

**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 No. 10-51**

Dear Ms. Dortch:

On Wednesday, February 25, 2015, Dr. Christian Vogler and Norman Williams of the Gallaudet University Technology Access Program (TAP) and Andrew Phillips of the National Association of the Deaf (NAD) met with Gregory Hlibok and Gayle Radley Teicher of the Consumer & Governmental Affairs Bureau (CGB), Jonathan Chambers and Henning Schulzrinne of the Office of Strategic Planning & Policy Analysis (OSP), David Schmidt of the Office of Managing Director (OMD), and Heather Hawley, Sophia Scoggins, Ryan Wilson, and Jeanne Vasterling of MITRE to discuss improving Video Relay Service (VRS).

The discussion focused on the recent draft<sup>1</sup> on provider-to-provider interoperability that was published by the SIP Forum VRS task group<sup>2</sup>. While the publication of this draft is a step in the right direction, we shared concerns about the limited scope of this document, omissions, and the security of VRS calls. We stressed that provider to provider interoperability is not sufficient. The profile needs to be extended to cover the interoperability between clients and VRS providers in an expeditious manner.

TAP and NAD also stressed that the current draft has insufficient provisions for ensuring that VRS calls are secure. Deaf and hard of hearing consumers have every right to the same level of telecommunications security, confidentiality, and protection from data theft that is available to those using the traditional telephone system – anything less is not functional equivalency. This includes calls between deaf and hard of hearing users and VRS, point-to-point videophone calls between deaf and hard of hearing users, as well as videomail messages. Currently VRS calls are unencrypted and vulnerable to interception. The present draft makes no attempt to address this problem, and we

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<sup>1</sup> VRS US Providers Profile TWG-6-0.10. Published 2/9/2015. Online: [http://www.sipforum.org/component/option.com\\_docman/task.cat\\_view/gid,160/Itemid,261/](http://www.sipforum.org/component/option.com_docman/task.cat_view/gid,160/Itemid,261/) - Retrieved on 2/26/2015

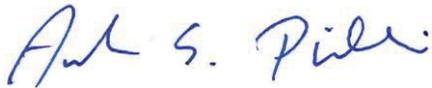
<sup>2</sup> <http://www.sipforum.org/content/view/404/291/> - Retrieved on 2/26/2015

expressed concern that this could result in entrenched poor security practices that will be difficult and expensive to rectify in the future. We emphasized that the current draft needs to be amended with a firm and enforceable timeline for TLS and SRTP transport between providers, as a step toward full end-to-end security.

Moreover, TAP and NAD discussed the need to make sure that there is an abundance of client-side features on the VRS platform. Deaf and hard of hearing people deserve to have telephone features similar to what non-deaf and hard of hearing people enjoy when making voice calls. Moreover, features should be provided that promote accessibility such as for deaf and hard of hearing people with additional disabilities – like those who are Deaf-Blind or have mobility disabilities.

TAP and NAD appreciate the opportunity to share these concerns and urge the FCC to make sure that security issues are addressed and that the client side of the profile is included. We also ask that the FCC ensure compensation for the possible added costs of these improvements.

Respectfully submitted,

A handwritten signature in blue ink that reads "Andrew S. Phillips". The signature is written in a cursive, flowing style.

Andrew S. Phillips, Esq.  
Policy Counsel

cc (by email): Gregory Hlibok, CGB  
Gayle Radley Teicher, CGB  
Jonathan Chambers, OSP  
Henning Schulzrinne, OSP  
David Schmidt, OMD