

May 5, 2015

VIA ELECTRONIC FILING

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

Re: *Ex Parte* Letter in CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On May 1, 2015, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”); Andrew S. Phillips, Policy Counsel, National Association of the Deaf (“NAD”); Thomas Dowling, Treasurer, Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”); Mark Gassaway, President American Association of Deaf-Blind (“AADB”); Mark Hill, President, Cerebral Palsy and Deaf Organization (“CPADO”); Steve Larew, President Association of Late-Deafened Adults, Inc. (“ALDA”) and the undersigned participated in a meeting (either in person or by phone) with:

- Robert Aldrich, Gregory Hlibok, Eliot Greenwald, Roger Holberg, and Caitlin Vogus of the Consumer & Governmental Affairs Bureau (“CGB”);
- David Schmidt, Diane Mason and Andrew Mulitz of the Office of Managing Director (“OMD”); and
- Jonathan Chambers of the Office of Strategic Planning & Policy Analysis (“OSP”).

The Consumer Group representatives discussed their April 7, 2015 *ex parte* letter in support of the proposals to improve functional equivalency for video relay service (“VRS”) users that are included in the Joint Proposal of All Six VRS Providers¹ (collectively, the “VRS Providers”) for Improving Functional Equivalence and Stabilizing Rates (“Joint Proposal”), filed on March 30,

¹ The “Six VRS Providers” include ASL Services Holdings, LLC, Sorenson Communications, Inc., Convo Communications, LLC, Hancock Jahn Lee & Puckett, LLC (CAAG), CSDVRS, LLC (ZVRS), and Purple Communications Inc.

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2015.² They encouraged permitting a trial of skills-based routing to collect measurable data such as whether enough interpreters are available with certain skill sets (*e.g.*, medical, legal, IT) and whether skills-based routing results in more efficient calls (*e.g.*, shorter call duration, fewer follow-up calls). They also suggested flexibility to allow adjustments to be made, as necessary, during the trial.

In addition, the Consumer Group representatives raised concerns, if rate cuts continue, about ensuring VRS advancements to provide functional equivalency and protecting the quality of VRS. For example, it has been almost two years without the Fund supporting any VRS research and development and without third party outreach being implemented. Consumers (and interpreters) should not have to bear the burden of a rate cut that directly affects quality. The Consumer Group representatives therefore advised the Commission to consider adopting the rate stabilization proposal until such time as the 2013 reforms are fully implemented.

Respectfully submitted,

/s/ Danielle Burt

Danielle Burt

Counsel for TDI

cc (by e-mail):

Robert Aldrich
Gregory Hlibok
Eliot Greenwald
Caitlin Vogus
Roger Holberg
David Schmidt
Diane Mason
Andrew Mulitz
Jonathan Chambers

Claude Stout
Andrew S. Phillips
Thomas Dowling
Mark Gassaway
Mark Hill
Steve Larew

² *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, Joint Proposal of All Six VRS Providers for Improving Functional Equivalence and Stabilizing Rates (filed Mar. 30, 2015) (“Joint Proposal”).