

June 1, 2015

Ex Parte

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

Re: *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch:

On May 28, 2015, Scott Wood of Sorenson Communications (“Sorenson”) and Christopher Wright and I, of Harris, Wiltshire & Grannis LLP, on behalf of Sorenson, met with Nicholas Degani, Legal Advisor to Commissioner Pai, Amy Bender, Legal Advisor to Commissioner O’Rielly, Travis Litman and Jennifer Thompson, Legal Advisors to Commissioner Rosenworcel, and Maria Kirby, Legal Advisor to the Chairman. On May 29, 2015, the same parties met with Jonathan Chambers of the Office of Strategy Planning and Policy Analysis.

During these meetings, the Sorenson participants discussed the following. We urged that the Commission promptly complete the certification process for all internet-based TRS providers. In VRS, for example, no provider is currently operating on a five-year certification; all are operating under interim certifications. The failure to complete the certification process creates problems for providers as they seek to raise additional capital and tends to limit providers to raising capital through debt rather than equity.

We also reminded the Commission participants that, in February 2013, Sorenson proposed a price cap mechanism based on historical MARS rates to supplant the existing recalculation of MARS rates every year. Sorenson’s support for these compensation levels is limited to being part of a long-term price cap plan, which allows providers to plan and invest in a more stable environment. We noted that had the Commission adopted this formula, IP CTS expenditures would be approximately \$40 million lower in the coming funding year than has been proposed.

We also stated that it is critical to preserving VRS service quality to adopt the rate stability proposed by the Joint VRS Providers. Continued rate reductions mean that providers must plan ahead for cost reductions – which will directly affect service through VRS interpreters and customer service operations. We noted that the amount of compensation in 2015-2016

Ms. Marlene H. Dortch

June 1, 2015

Page 2 of 2

associated with the proposed freeze is far less than the amount of compensation that would be reduced through adoption of Sorenson's IP CTS price cap proposal.

Please contact me if you have any questions.

Sincerely,



John T. Nakahata

Counsel to Sorenson Communications

cc: Nicholas Degani
Amy Bender
Travis Litman
Jennifer Thompson
Maria Kirby
Jonathan Chambers