

June 26, 2015

Ex Parte

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

Re: **Ex parte presentation by VRS Providers on Status of Developing and Implementing U.S. VRS SIP Interoperability Profile**—*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51

Dear Ms. Dortch:

On June 24, 2015, Jose Pereira of ASL Services Holdings LLC (“ASL/Global”); Jeremy Jack of Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Access Ability Group (“CAAG”); Jeff Rosen and Joshua Shaffner of Convo Communications, LLC (“Convo”); Lydia Runnels and Mike Strecker of CSDVRS, LLC (“CSDVRS”); John Martin and Lydia Yomogida of Purple Communications, Inc. (“Purple”); Grant Beckmann, Scot Brooksby, and Michael Maddix of Sorenson Communications, Inc. (“Sorenson”) and John Nakahata and Randall Sifers of Harris, Wiltshire & Grannis LLP, on behalf of Sorenson, (collectively, the “VRS Providers” or “Providers”) participated in a meeting with FCC attendees Robert Aldrich, Jonathan Chambers, Darryl Cooper, Alok Doshi, Eliot Greenwald, Gregory Hlibok, Roger Holberg, Diane Mason, Robert McConnell, Andrew Multz, David Schmidt, Henning Schulzrinne, Gayle Radley Teicher, and Caitlin Vogus. Also attending the meeting were Peter Hayes of VTCSecure LLC (“VTCSecure”) and Earl Comstock of Eckert Seamans Cherin & Mellott, LLC on behalf of VTCSecure; and Jeffrey Rogers, Jim Malloy, and Vincent DiGioia of The MITRE Corporation (“MITRE”).¹ John Nakahata also had a follow-up conversation with Darryl Cooper on June 25, 2015.

The VRS Providers requested the meeting to update the Commission on the status of developing the U.S. VRS SIP Interoperability Profile (the “SIP profile”) and on the proposed schedule for implementation.² In addition, the Providers alerted Commission staff to issues that have recently surfaced in connection with development of interoperability standards and inquired about the coming implementation of the TRS user registration database (“TRS-URD”).

¹ Attendees participated in person or by phone.

² The VRS Providers previously met with Commission staff on January 6, 2015 and reported on the substantial progress made on developing the SIP profile and presented a proposed implementation plan. Letter from VRS Providers to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 10-51 (filed Jan. 8, 2015).

Reiterating a request made in the Providers' January 2015 meeting with staff, the Providers (1) informed Commission staff that Neustar should change the iTRS documentation to reflect the fact that Neustar now allows providers to place the new SIP uniform resource indicators ("URIs") in the iTRS database, and (2) asked the Commission to clarify that providers may use SIP URIs that use provider domain names for routing calls between providers. VRS Providers also informed Commission staff that after the SIP profile has been fully implemented, VRS providers will discontinue dialing by URI and only use ten-digit E.164 number dialing.

As to using domain names to route services, Providers note that Purple Communications filed a petition in 2010 seeking confirmation that providers may use server-based routing.³ Sorenson subsequently filed an ex parte letter on January 7, 2011, explaining that the Commission could, alternatively, issue an interpretative clarification that server-based routing is permitted under existing rules.⁴ CSDVRS also submitted comments in support of Purple's petition.⁵ Although the Commission has yet to definitively resolve regulatory uncertainty over server-based routing, all or nearly all of the VRS providers have implemented server-based routing and have been doing so for many years.

Next, the Providers explained that all six VRS providers continue to work collaboratively to develop the SIP profile and participate in bi-weekly calls. Last week, Peter Hayes, from VTCSecure, joined the bi-weekly call for the first time. The most recent quarterly Interoperability Conference was hosted by Sorenson in Salt Lake City in May and attended by engineering representatives from all six providers. The conference included one day of standards review and planning, and four days of testing. Two representatives from The MITRE Corporation attended the conference to observe testing. Participants have not discovered any unresolvable interoperability issues.

Alpha testing for transition to the SIP Profile began in June. The Providers expect the transition to the SIP profile to follow the testing and implementation schedule described below:

Transition Timeframe (subject to test results)

Alpha testing:

- Start June 2015
- Limit to 100-200 users, consisting of company employees using company phones and willing to participate in testing with the understanding that they may experience problems
- Alpha test phones will have both SIP and H.323 URIs listed in the iTRS database

³ Petition for Clarification or Waiver of Purple Communications, Inc., CG Docket No. 10-51 (filed June 2, 2010).

⁴ Letter from Christopher Wright, Counsel to Sorenson Communications, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 10-51, WC Docket No. 05-196 (filed Jan. 7, 2011).

⁵ Comments of CSDVRS, LLC to Petition for Clarification or Waiver Filed by Purple Communications, Inc., CG Docket No. 10-51 (filed Jul. 16, 2010).

- SIP protocol will be used by test participants when calling other Alpha phones
- H.323 protocol will be used by test participants when calling non-Alpha users
- Test duration: 1-3 months
- Each provider will share problem reports and interoperability problems
- Weekly provider technical calls will be held to resolve problems

Beta testing:

- Start Summer 2015
- Limit to 400-600 users initially; may expand to thousands depending on test results
- Users consist of all Alpha users plus selected end users who opt-in to participate in Beta test
- Beta test phones will have both SIP and H.323 URIs listed in iTRS database
- Provider-specific collection of glitches to capture problems from users
- Users who decide not to participate will be rolled back
- Weekly provider technical calls will be held to resolve problems

Launch:

- Winter 2015 (likely in conjunction with VRS November Interoperability event in Florida)
- Will commence after resolution of interoperability glitches
- Includes all users, but implementation will be staged with migration from H.323 to SIP occurring at a rate of several thousand phones per week
- Launch users will have only SIP URIs in iTRS database
- Launch will be paused to remediate or be rolled back if problems persist and cannot be resolved
- January 1, 2016 target for fully implemented transition to SIP profile

Post-rollout (2016 and beyond):

- Interoperability testing will be ongoing and continue among providers
- Interoperability testing with reference endpoint

Participants next discussed the scope of the first phase of SIP profile. The Providers confirmed that the SIP profile protocol at launch will support both voice and video and video-mail. Participants noted that discontinuance of dialing by URI in favor of ten-digit number only dialing is expected to resolve connectivity and video quality issues. The next phase of the SIP profile is projected to incorporate real-time texting and address security.

Next, the Providers alerted Commission staff about three issues that have surfaced and relate to development of interoperability standards. First, the Providers noted that only three providers (Convo, CSVDRS, and Sorenson) were invited to meetings with The MITRE Corporation and all three were required to sign non-disclosure agreements (“NDAs”) that appear to limit the ability to share information with the other three providers. FCC staff and MITRE representatives explained that the purpose of the NDA is to prevent public disclosure of information, not disclosure to the other providers. The expectation is that information from each

meeting will be shared among all providers. In addition, the goal is to eventually rotate membership of attendees at the MITRE meetings among all providers.

The second issue involved the award of the contract for developing the TRS-URD. The Providers understand that the Commission has operated under the presumption that the TRS-URD would be ready in September 2015. The Providers understand they must provide information for existing registered users to the TRS-UD within 60 days of notice from the Commission that the TRS-URD is ready to accept such information. The Providers understand that Rolka Loube has been awarded the contract but no formal announcement has been made. Further, it is now within 60 days of the anticipated September ready date, yet no information about requirements and process have been disseminated.

The third issue relates to interoperability standards and the Video Access Technology Reference Platform (“VATRP”). The Providers noted that specific language appears on the VTCSecure website that declares VTCSecure is setting the interoperability standards. Although the Providers understand that all VRS providers must interoperate with the VATRP, that is not the same as VTCSecure (as the entity responsible for building VATRP) being the entity responsible for setting the standards or requirements for all videophone applications. If, however, the intent is for VTCSecure to set interoperability standards for VRS apps, the Providers asked if they should stop work on developing VRS interoperability standards pursuant to the SIP profile. Commission staff affirmed that VTCSecure would work through SIP Forum with the providers and others to propose and publish standards. Commission staff also confirmed that VTCSecure is under contract with the FCC to produce standards under a defined timetable and it is expected to incorporate all VRS interoperability standards.

As to development of VRS interoperability standards in the SIP Forum, the Providers explained that because the SIP Forum process included numerous conflicting requirements, it made progress slow during the first year. Thus, the Providers drafted the initial U.S.-specific SIP interoperability profile, which has now been published within the SIP Forum as U.S. VRS SIP Profile Version 1.0. Providers have been attempting – without success – to obtain a SIP Forum VRS Task Force vote or other action with respect to Version 1.0. Providers requested Commission assistance in moving the SIP Forum VRS Task Force process forward. Providers requested that the Commission designate a point person from whom Providers could request further assistance in moving the SIP Forum process forward to avoid such non-consensual developments.

The Providers recognize that there is a need for work on a Version 2.0 of the SIP Profile. With respect to issues such as encryption, there are tradeoffs between implementing encryption and excluding some potential endpoint devices (for example, some, but not all, smartphones will not be able to support encrypted VRS). These issues highlight why a consensus-driven process is important, but it must also be timely. In the interim, the SIP transition will go forward under Version 1.0 – which will help improve current interoperability for VRS users. Providers explained that it is important, therefore, that the VATRP build from Version 1.0, and participate in the SIP Forum process. Providers have already begun to include the VATRP contractor in their industry-wide interoperability events.

The VRS Providers are proud of the progress made on working cooperatively. The Providers look forward to working with Commission staff on fully implementing VRS interoperability.

Respectfully submitted,

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