

July 31, 2015

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**

Misuse of Internet Protocol (IP) Captioned Telephone Service; Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities
CG Docket Nos. 13-24, 08-15, 03-123

Dear Ms. Dortch:

On July 30, 2015, John Nelson, President of Hamilton Relay, Inc. (“Hamilton”), Dixie Ziegler, Vice President of Hamilton, and the undersigned counsel on behalf of Hamilton, spoke by telephone with Darryl Cooper, Eliot Greenwald, and Caitlin Vogus of the Disabilities Rights Office of the Commission’s Consumer and Governmental Affairs Bureau.

During the meeting, Hamilton discussed potential improvements to the emergency call handling requirements for Internet Protocol Captioned Telephone Service (“IP CTS”), which were adopted on an interim basis in 2008. Hamilton encouraged Commission staff to move forward with a proposed rulemaking which would clarify those requirements and incorporate technical improvements that the industry has made over the last 7 years. Hamilton looks forward to providing additional comments on these issues when a proposed rulemaking is released.

Hamilton also responded to several questions about its Speech-to-Speech (“STS”) services for individuals with speech disabilities. Hamilton provided the following information about its training program for STS Communications Assistants (“CAs”):

Hamilton STS CAs must receive extensive training before handling any STS calls. As part of this training, STS CAs in training must pass the same tests as other CAs and be recommended to become an STS CA by a supervisor. At that point the STS CAs in training must pass a test demonstrating their ability to understand a variety of speech patterns. In

addition, they are given a hearing acuity test by a licensed Audiologist to assure that they are competent to understand people with a variety of speech patterns.

Once they are accepted into the STS program, they receive additional specialized training, which includes learning about speech disabilities and strategies to use while facilitating STS calls. Hamilton trains STS CAs on STS-specific profile options, policies, and procedures. They must receive at least 8 hours of training from a certified Speech Language Pathologist, focusing on the anatomy and mechanics of speech production and effective communication strategies, in order to hone their skills for processing STS calls.

As follow-up to the initial training, the STS Program Supervisor continually educates all STS CAs on speech disabilities and their respective implications, and on etiquette, through the use of STS resource materials, workshops, and in-service meetings. Each STS CA spends a minimum of 10 hours listening to live calls with an experienced STS CA, observing and learning the various speech patterns of STS users. When the new STS CA is deemed ready by the STS Program Supervisor, the STS CA may begin to relay calls with another CA or the STS Program Supervisor acting as observer and helper.

New STS CAs are never allowed to relay STS calls alone until they have demonstrated an acceptable level of comprehension with most consumers. Even after that level of comprehension has been reached, a new STS CA is regularly observed in order to ensure quality performance and progress. Each STS CA is re-tested quarterly to measure their ability. These quarterly assessments consist of audio tapes designed to measure the CA's ability to understand a variety of speech patterns, and a written test designed to measure understanding of STS policies and procedures.

Finally, Commission staff requested information about the existence and amount of STS user-based fraud and abuse, and especially whether STS is abused by prison inmates. Hamilton responded that although STS abuse was a considerable problem three to five years ago, particularly with prison inmates, there is now little to no fraudulent or abusive activity with STS due to better policing of inmate activities by correctional institutions, and due to internal detection steps taken by Hamilton.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor

Counsel for Hamilton Relay, Inc.

cc (via e-mail): Participants