



IDT Telecom, Inc.  
520 Broad Street  
Newark, New Jersey 07102

September 17, 2015

**VIA ELECTRONIC FILING**

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

**Re: CG Docket No. 03-123 - Notice of Ex Parte Presentation Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities**

**CG Docket No. 13-24 - Notice of Ex Parte Presentation Misuse of Internet Protocol (IP) Captioned Telephone Service**

Dear Secretary Dortch:

On September 16, 2015, Carl Billek, Senior Regulatory Counsel for IDT Telecom, Inc. ("IDT"), Jim Courter, former CEO of IDT Corporation and John Windhausen of Telepoly Consulting met with Amy Bender, Legal Advisor for Commissioner O'Rielly.

IDT explained that it believed the Commission had the authority under 47 USC § 225 to expand the contribution base for the TRS Fund to include intrastate revenue and that if the Commission were to do so, it would strengthen the base of the TRS Fund and would provide a more equitable contribution methodology by ensuring that service providers generating revenue from the intrastate jurisdiction would support funding of intrastate Internet-based relay services.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter has been filed via ECFS and sent by email to each of the FCC staff members who participated in the meeting. If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

*/s/ electronically signed*

Carl Billek

c: [Amy.Bender@FCC.gov](mailto:Amy.Bender@FCC.gov)

