



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

October 14, 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 October 13, 2015, Carl Billek, Counsel for IDT Telecom, Inc. (“IDT”), James Courter, former Chairman of the Board of IDT Corporation and John Windhausen of Telepoly Consulting met with Maria Kirby, Legal Advisor to Chairman Tom Wheeler.

During the meeting, IDT discussed issues raised previously in the above-listed dockets, namely the Commission’s need to secure the funding from the intrastate jurisdiction to support the provision and cost of intrastate IP-based relay services. IDT explained that it believed the Commission had the authority under 47 USC § 225 to expand the contribution base 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 IP-based relay services.

IDT also addressed proposals by the Commission to transfer management of and cost recovery for intrastate IP-based relay services. While IDT believes this is a lawful approach, IDT expressed its concern that absent support for this proposal by state relay service administrators, relay service users and relay service providers, the prospect of this transfer being undertaken in a timely and efficient manner seemed dubious. IDT also noted its frustration that while the Commission contemplates various proposals, IDT continues to contribute to the TRS Fund pursuant to a methodology which IDT deems in violation of 47 USC § 225.

Separate and apart from their meeting with Ms. Kirby, on October 13, 2015, Carl Billek, James Courter and John Windhausen of Telepoly Consulting also met with Jonathan Chambers, Chief of the Office of Strategic Planning and Policy Analysis.

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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

cc (by e-mail):

Maria L. Kirby @ Maria.Kirby@FCC.gov
Jonathan Chambers @ Jonathan.Chambers@FCC.gov
John Windhausen @ JWindhausen@SHLB.org
James Courter @ Jim.Courter@IDT.net