



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

November 4, 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 November 3, 2015, Carl Billek, Counsel for IDT Telecom, Inc. (“IDT”) and James Courter, former Chairman of the Board of IDT Corporation met separately with Travis Litman, Legal Advisor for Commissioner Jessica Rosenworcel and Jennifer Thompson, Confidential Assistant and Special Advisor for Commissioner Jessica Rosenworcel; Edward “Smitty” Smith, Legal Advisor for Chairman Tom Wheeler; and Nick Degani, Legal Advisor for Commissioner Ajit Pai.

During the meetings, IDT discussed issues raised previously in the above-listed dockets, namely the Commission’s need to secure funding from the intrastate jurisdiction to support the provision of and compensation for intrastate IP-based relay service calls. IDT explained that the Commission has the authority under 47 USC § 225 to expand the Telecommunications Relay Service (“TRS”) Fund contribution base to include intrastate revenue and that if the Commission were to do so, it would strengthen the TRS Fund contribution base, reduce the TRS Fund contribution factor and 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 service calls.

IDT also addressed proposals by the Commission to transfer management of and cost recovery for intrastate IP-based relay services to individual state administrators. 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 in accordance with the present methodology which IDT believes violates the jurisdictional separations requirement of 47 USC § 225(d)(3)(B).

Finally, IDT expressed its position that the company has submitted numerous filings in the above-listed proceedings, thereby establishing a record upon which the Commission can take the necessary action.

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

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