

February 4, 2016

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;
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities
CG Docket Nos. 13-24, 03-123*

*Petition for Rulemaking to Update the Commission's Rules for Access to Support
the Transition from TTY to Real-Time Text Technology, and Petition for Waiver
of Rules Requiring Support of TTY Technology
GN Docket No. 15-178*

Dear Ms. Dortch:

On February 2, 2016, the undersigned counsel on behalf of Hamilton Relay, Inc. ("Hamilton") met with Greg Hlibok, Darryl Cooper, and Eliot Greenwald of the Disabilities Rights Office of the Commission's Consumer and Governmental Affairs Bureau ("Bureau"). Dixie Ziegler, Vice President of Hamilton, participated by telephone. Karen Peltz Strauss and Robert Aldrich of the Bureau attended a portion of the meeting.

During the meeting, participants discussed the waivers that have been issued to several carriers recently in connection with their use of real-time text ("RTT") technologies,¹ and the potential impact of RTT on Telecommunications Relay Services ("TRS"). Hamilton noted its intention to submit additional information into the record should the Commission move forward with a formal rulemaking proceeding on these issues.

In addition, the participants discussed the current registration and certification procedures for Internet Protocol Captioned Telephone Services ("IP CTS"), and pending proposals to amend

¹ See e.g., Petition for Waiver of Rules Requiring Support of TTY Technology, *Order*, 30 FCC Rcd 10855 (CGB, PSHSB, WCB, WTB rel Oct. 6, 2015).

those procedures. Hamilton reiterated its request that current IP CTS users who have already registered through: 1) payment of \$75 or more for an IP CTS phone and self-certification; 2) obtaining a third party certification from a qualified hearing health professional; or 3) Equipment Distribution Programs or other governmental programs, should be deemed grandfathered under any new IP CTS certification requirements.

Finally, Hamilton discussed the September 23, 2015 Joint Petition for Rulemaking filed by Hamilton and Sprint Corporation (“Sprint”), and the separate Petition for Interim Waiver filed by Sprint, requesting elimination of the equal access and billing option requirements for TRS providers. Hamilton indicated that in light of a recent proposal by one of its underlying carriers to discontinue certain operator services, and the potential impact of that discontinuance on Hamilton’s provision of TRS to users, Hamilton is considering filing a waiver request similar to Sprint’s pending waiver request.

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