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April 10, 2002  
Magalie Roman-Salas  
Secretary  
Federal Communications Commission  
445 12 St., S.W.  
Washington, D.C. 20554

**Re: Ex Parte, Telecommunications Relay Services and Speech-to-Speech Services  
For Individuals With Hearing And Speech Disabilities, CC Docket No. 98-67**

Dear Ms Salas:

Yesterday, Larry Fenster, Hadi Alosegaf, Bill McClelland, Alana Beal, Beth Schreiber from WorldCom, and Ruth Milkman from Lawler, Metzger, and Milkman, met with Peter Tenjula from Chairman Powell's Office to discuss WorldCom's Petition to obtain reimbursement for its Internet Protocol Relay Service ("IP-Relay Service") from the Interstate TRS Fund. In addition to demonstrating the features of WorldCom's IP-Relay service, we also discussed the Commission's authority to approve a relay service where the call originates from the Internet.

We explained that the Commission derives its authority to regulate relay service from Title IV of the Americans With Disabilities Act, which defines telecommunications relay service to "...include services that enable two-way communication between an individual who uses a TDD or other nonvoice terminal device and an individual who does not use such a device." We explained that the Commission had authority to regulate any service that fit this definition of relay service, even if the service might *also* fit the definition of a telecommunications service, an information service, or a hybrid service.

If you have any questions, please contact me at the telephone number above.

Sincerely,

**Larry Fenster**

Larry Fenster

cc: Dan Gonzales  
Margaret Egler  
Pam Gregory