



Richard Juhnke
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July 10, 2003

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Presentation**
CC Docket No. 98-67

Dear Ms. Dortch:

On July 9, 2003, Ann Marie Mickelson and Karen Peltz Strauss, on behalf of Communications Services for the Deaf, Inc., Sue Decker and Mike Del Casino, on behalf of AT&T, and Mike Fingerhut, Mike Ligas, Paul Ludwick and the undersigned, on behalf of Sprint, met with Dane Snowden, Margaret Egler, Tom Chandler, and Warren O'Hearn of the Consumer and Governmental Affairs Bureau, to discuss the Bureau's June 30, 2003 Order in CC Docket No. 98-67 (DA 03-2111), which cut the rate for Video Relay Service (VRS) from the \$14.023 per minute recommended by the National Exchange Carrier Association (the TRS fund administrator) to an interim \$7.75 per minute. AT&T, CSD and Sprint explained that existing VRS services were unsustainable at the rate set in the Order, and that, even though the rate established by the Order was "interim" and subject to later adjustment, the lack of certainty as to what the final rate would be would necessarily require cut-backs in the existing level of services, which in turn would harm the consumers that have come to depend on VRS for their communications needs. We explained that the Order's analogy to lower-cost VRI service was inapposite because of significant differences between VRI and VRS, and that the Order's reference to the jump in the compensation rate for VRS from an initial rate of \$5 per minute to more than \$17 last year is misleading because, in fact, virtually no VRS service was compensated at the lower rates and because the costs that were submitted as the basis for the \$5 rate reflected an entirely different, and far more restrictive, method of offering VRS service than the one in use today. The parties urged the Bureau to reconsider its Order, *sua sponte*, and to adopt the NECA-recommended rate of \$14.023 as a final rate. The parties also requested that if the Commission, after appropriate proceedings, makes additional changes in this rate, such changes only be given prospective effect.

Marlene Dortch
Secretary
Federal Communications Commission
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This letter is being filed electronically.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. ...". The signature is written in a cursive style with a long horizontal flourish at the end.

cc: Tom Chandler
Warren O'Hearn
Ann Marie Mickelson
Karen Peltz Strauss
Sue Decker
Mike Del Casino
Dane Snowden
Margaret Egler
Mike Fingerhut
Mike Ligas
Paul Ludwick