

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Telecommunications Relay Services and)
Speech-to-Speech Services for Individuals) CG Docket No. 03-123
with Hearing and Speech Disabilities)

REPLY COMMENTS OF SORENSON COMMUNICATIONS, INC.

Sorenson Communications, Inc. (“Sorenson”) submits these Reply Comments in response to the Further Notice of Proposed Rulemaking¹ released in the above-captioned proceeding, in which the Federal Communications Commission (“Commission” or “FCC”) seeks comment on approaches to enabling hearing callers to reach Relay users without having first to ascertain the called party’s IP address.²

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling and Further Notice of Proposed Rulemaking, 21 FCC Rcd 5442 (rel. May 9, 2006) (FCC 06-57) (“*Declaratory Ruling*” or “*Further Notice*,” as appropriate).

² The Commission also seeks comment on whether it should adopt specific Internet protocols or standards to ensure Video Relay Service (“VRS”) interoperability. Most commenters, including Sorenson, urged the FCC not to mandate such standards or protocols because doing so would inhibit innovation and otherwise harm the public interest, and would be contrary to the FCC’s general preference for allowing the marketplace to develop the proper standards. *See* Comments of Sorenson Communications, Inc., at 2, 7-10 (“Sorenson Comments”); Hands On Video Relay Services, Inc., Comments on Further Notice of Proposed Rulemaking, at 15-17 (“Hands On Comments”); Comments of Snap Telecommunications, Inc., at 2-3, 19-25; Comments of Sprint Nextel Corporation, at 2, 4 (“Sprint Nextel Comments”); Comments of Verizon, at 5-6 (“Verizon Comments”). Sorenson believes this record is sufficient to demonstrate the inadvisability of dictating specific protocols or standards, and therefore does not further address this issue in these Reply Comments. (Unless otherwise indicated, all comments cited herein were filed in CG Docket No. 03-123 on July 17, 2006.)

I. DISCUSSION

The initial comments in this proceeding evince broad support for assigning users of Video Relay Service (“VRS”) and IP Relay 10-digit North American Numbering Plan (“NANP”) numbers as a means of facilitating functionally equivalent and interoperable communications.³ Beyond this general consensus, however, there is little, if any, agreement on how NANP numbering should be implemented. For example, the record reveals no consensus regarding the precise methodology under which NANP numbers would be made available for assignment to VRS and IP Relay users.⁴ Moreover, even if the FCC were prepared to choose a particular methodology, the Commission, providers, and others would have to resolve various operational, technical, and regulatory issues prior to implementing the chosen method on an industry-wide basis.⁵ For example, it is not clear whether or how providers or other entities would resolve the dynamic IP addresses of most VRS and IP Relay users to NANP numbers that are permanently assigned to those users.

Given the lack of consensus on how best to implement NANP numbering, and the practical difficulties associated with any such implementation, the Commission should adopt a two-pronged approach on a going-forward basis. First, the Commission should allow Sorenson and other providers to continue to work with the Industry Numbering Committee (“INC”) of

³ See Sorenson Comments, at 2-7; Comments of Telecommunications For the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, and California Coalition of Agencies Serving the Deaf and Hard of Hearing (“Consumer Groups”), at 5; Comments of AT&T, Inc., at 2 & n.3; Comments of Communication Service for the Deaf, Inc., at 5-6 (“CDC Comments”); Hands On Comments, at 3-4 & n.2; Sprint Nextel Comments, at 3; Verizon Comments, at 1-2.

⁴ Compare, e.g., Hands On Comments, at 4-5 (NANP administrator would establish a new area code for VRS and then assign NXX codes to providers), with CSD Comments, at 5-6 (neutral third party, such as a LEC, would assign VRS users a 10-digit regionally recognizable phone number).

⁵ See, e.g., Verizon Comments, at 3-5; Sorenson Comments, at 6-7.

the Alliance for Telecommunications Industry Solutions to determine the best method for permitting users of VRS and IP Relay to obtain NANP numbers.⁶ Second, once the INC has settled on a particular solution, the Commission should work with consumer groups, providers, and any other interested parties to develop a consensus regarding how and when that solution should be implemented on an industry-wide basis. In developing such a consensus, parties would have to determine the best means to resolve the operational, technical, and regulatory issues mentioned above.

As the INC, the Commission, consumer groups, and providers work to make the goal of NANP numbering a reality for VRS and IP Relay users, they should bear in mind four guiding principles. First, if the Commission ultimately opts for a solution that involves modifying endpoints, it should apply any new requirements (on a prospective basis only) to all devices that potentially could be used for VRS and IP Relay.⁷ Second, the Commission should not endorse any solutions that would facilitate discrimination against VRS and IP Relay users. For instance, in its initial comments, Hands On proposed that a new area code be established for VRS-only use.⁸ Such an area code could stigmatize deaf, hard-of-hearing, and speech-disabled users of VRS, and provide a ready means for others to identify and block calls originating from VRS users. The Commission should not adopt any proposal that would lead to such results. Third, under any approach eventually adopted in this proceeding, the costs associated with developing, implementing, and administering NANP numbering for VRS and IP Relay should be borne by the Interstate TRS Fund. Such costs will be incurred to enhance the functional equivalency of VRS and IP Relay, and therefore should be reimbursed under the Americans

⁶ Sorenson Comments, at 4-5; *see also* CSD Comments, at 2-5 (describing joint Sprint/CSD proposed numbering solution submitted to the INC).

⁷ Sorenson Comments, at 7.

⁸ Hands On Comments, at 4.

with Disabilities Act and the Commission's rules. Fourth, any solution involving access to a shared database would have to provide for a neutral third-party administrator that is not in any way connected to any TRS provider.⁹

II. CONCLUSION

For the reasons stated above, the Commission should continue to allow Sorenson and other providers to pursue the goal of affording VRS and IP Relay users access to NANP numbers, and to devise an efficient, effective, and competitively neutral means for implementing the use of NANP numbers.

Respectfully submitted,

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⁹ See Sorenson Comments, at 6; Sprint Nextel Comments, at 3; Verizon Comments, at 4.