

November 3, 2006

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VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**
Telecommunications Relay Services and Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities
CG Docket No. 03-123

Dear Ms. Dortch:

On November 2, 2006, Dixie Ziegler, the Vice President of Hamilton Relay, Inc. ("Hamilton"), Anne Girard of Hamilton's Marketing and Regulatory Management group, and the undersigned on behalf of Hamilton, met with Tom Chandler and Jay Keithley of the Commission's Consumer & Governmental Affairs Bureau. John Nelson, the President of Hamilton, participated via telephone. We discussed Hamilton's comments filed in response to the Commission's July 20, 2006 *Further Notice of Proposed Rulemaking* in the above-captioned proceeding. Hamilton reiterated its support for changing the rate-setting methodology for telecommunications relay services ("TRS") by adopting the Multi-state Average Rate Structure (or "MARS" Plan) for traditional TRS, Speech-to-Speech services, captioned telephone services and Internet Protocol relay service ("Internet Relay"). Various approaches to the rate-setting methodology for Video Relay Services also were discussed.

Hamilton also discussed the Commission's June 15, 2006 letter regarding compliance with the Internet Relay speed of answer requirements, and Hamilton's response to the letter. Finally, Hamilton noted that it had not yet received a letter from the Interstate TRS Fund Administrator regarding cost data submissions due in early January 2007, and suggested that a waiver or extension may be appropriate, particularly if the Commission were to adopt the MARS Plan, which would eliminate the necessity for cost data submissions.

This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ David A. O'Connor

David A. O'Connor

Counsel for Hamilton Relay, Inc.