

January 30, 2007

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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 January 29, 2007, John Nelson, the President of Hamilton Relay, Inc. ("Hamilton"), Dixie Ziegler, the Vice President of Hamilton, Anne Girard of Hamilton's Marketing and Regulatory Management group, and the undersigned on behalf of Hamilton, met with Catherine Seidel, Jay Keithley, Thomas Chandler and Lynne Montgomery of the Consumer & Governmental Affairs Bureau. We discussed the status of Hamilton's response to the Bureau's June 15, 2006 letter regarding compliance with the Internet Relay speed of answer requirements, and Hamilton's responses to the letter. We also discussed various mechanisms employed by Hamilton to combat the fraudulent use of Internet Relay, and Hamilton encouraged the adoption of a registration system as one tool in effectively preventing such fraudulent use.

As an additional tool, we discussed Hamilton's support for AT&T's proposal to have a centralized, global database of Internet Protocol numbers so that providers may pool their resources to prevent Internet Relay fraud. Hamilton agreed to provide the Commission with further information in the near future about the ways in which Hamilton uses its own database to combat Internet Relay fraud. Hamilton also noted the potential problems with permitting Communications Assistants to intervene during relay calls.

In addition, Hamilton encouraged the adoption of a new rate methodology based on a Multi-state Average Rate Structure (or "MARS" Plan) for traditional TRS, Speech-to-Speech, captioned telephone and Internet Relay services. We also discussed possible extractions of a Video Relay Service rate using the MARS Plan.

Finally, Hamilton discussed its outreach efforts, including its "Relay Friendly Business" initiative to encourage businesses to recognize and accept all forms of relay calls.

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

/c/ David A. O'Connor
David A. O'Connor
Counsel for Hamilton Relay, Inc.

Enclosure
cc (via e-mail): Attendees

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