

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1650 TYSONS BOULEVARD, SUITE 1500

MCLEAN, VIRGINIA 22102

703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ*
ELIZABETH R. SACHS*
GEORGE L. LYON, JR.
PAMELA L. GIST
DAVID A. LAFURIA
TODD SLAMOWITZ*
B. LYNN F. RATNAVALE*
STEVEN M. CHERNOFF*
KATHERINE PATSAS*

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEILA REZANAVAZ
OF COUNSEL
LEONARD S. KOLSKY*
JOHN CIMKO*
J. K. HAGE III*
JOHN J. MCAVOY*
HON. GERALD S. MCGOWAN*
TAMARA DAVIS-BROWN*

*NOT ADMITTED IN VA

GEORGE L. LYON, JR.
(703) 584-8664

November 7, 2007

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

RE: Ex Parte Presentation Hands On Video Relay Services, Inc.
CG Docket 03-123

Dear Madam Secretary::

On November 5, 2007, Kelby Brick, George Sutcliffe, David Routhier (via speakerphone) and the undersigned, representing Hands On Video Relay Services, Inc., met with Catherine Seidel, Nicole McGinnis, Lisa Boehley, and Greg Hlibok from the Consumer and Governmental Affairs Bureau.

The topic of the discussion was the current proceeding looking toward the assignment of telephone numbers to Internet based relay users. Hands On's position is set forth in the attached PowerPoint presentation which was distributed to the participants. Hands On is urging the assignment of NANP numbers to Internet based relay users to facilitate hearing to deaf, deaf to deaf, and E911 calling.

Several questions arose on which additional comment is appropriate.

A question arose concerning whether it was Hands On's position that actual NANP telephone numbers need to be assigned to relay users. The answer to that question is that real telephone numbers are required for several reasons.

First, without using real telephone numbers, direct dialed calls from hearing to deaf users cannot be placed since the PSTN will be incapable of routing such calls. Among other problems this would make PSAP call backs difficult if not impossible in emergency situations. Second, if faux telephone numbers were used, it would be

impossible to prevent routing ambiguities with deaf to deaf calls as more than one relay user may select the same faux telephone number from different providers. Third, there is simply no reason to create a separate "deaf numbering system" when NANP numbering is available for call routing not only in the wired PSTN, but in the VoIP world as well.

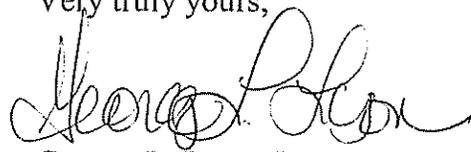
A question also arose concerning how numbers would be assigned. HOVRS believes the most efficient methodology would be for relay providers to make numbers available for consumers. The idea of a third party issuer has been suggested by some; however, the third party issuer would have less incentive than relay providers to efficiently distribute numbers. In addition, issues of how the third party provider would be compensated would also arise. Requiring relay users to obtain numbers directly from their local LECs is likewise problematic. Not only would LEC customer service personnel likely be unfamiliar with the relay program, but the costs of administration of a retail numbering program would be substantial. By contrast, LEC wholesale departments regularly distribute blocks of telephone numbers at reasonable charges. In addition, creating a third party to manage network connectivity between the PSTN and the various VRS providers would create a potential single point of failure in the networks that could disrupt all calls from hearing to deaf users in the event of a problem.

Another question which arose was whether there should be a separate NPA code for relay users or whether local telephone numbers should be used. HOVRS opposes the creation of a separate NPA for relay users. The creation of a "deaf" area code would likely be considered stigmatizing by consumers.

Lastly a question arose concerning exhaustion of NANP numbers. Although number exhaustion is a substantial concern throughout the telephone industry, it is no reason to deny relay users the benefits of NANP numbers. Normal number conservation rules and policies would apply to relay users and providers. In addition, many relay users are giving up their TTYs and land line phone lines in favor of broadband service so to some extent telephone numbers are being released as a result of Internet based relay. Furthermore, since we are not suggesting that relay providers obtain numbers directly from NANPA (which would be excessive), the Hands On proposal of having companies use readily available commercial agreements will actually help to conserve numbering resources since relay providers will only have to obtain what they need or in worst case carry a very minimal inventory far below the current allocations given out through NANPA (of 1,000 number blocks or larger).

Should any further questions arise concerning this matter, kindly contact this office.

Very truly yours,

A handwritten signature in black ink, appearing to read "George L. Lyon, Jr.", written in a cursive style.

George L. Lyon, Jr.

cc: Catherine Seidel, Esquire
Nicole McGinnis, Esquire
Greg Hlibok, Esquire
Lisa Boehley, Esquire