

February 29, 2008

By electronic filing:

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

Re: Ex Parte Presentation
CG Docket No. 03-123

Dear Ms. Dortch:

On February 28, 2008, Tom McGarry, Brian Rosen and I met with Commission personnel to discuss NeuStar's proposed solution for providing telephone numbers to the users of video relay services and for the routing of VRS calls. Present in the meeting were Dana Shaffer, Julie Veach and Nicholas Alexander of the Wireline Competition Bureau; Tom Chandler, Greg Hlibok, Alan Amann, and Lisa Boeahley of the Consumer and Government Affairs Bureau; and Eric Ehrenreich of the Public Safety and Homeland Security Bureau. Our discussion was consistent with the attached presentation.

Sincerely,



Richard L. Fruchterman, III
Public Policy and Regulatory Counsel

cc: Dana Shaffer
Tom Chandler
Eric Ehrenreich

Telephone Numbers and E9-1-1 for Relay Service: Leveraging Existing Mechanisms



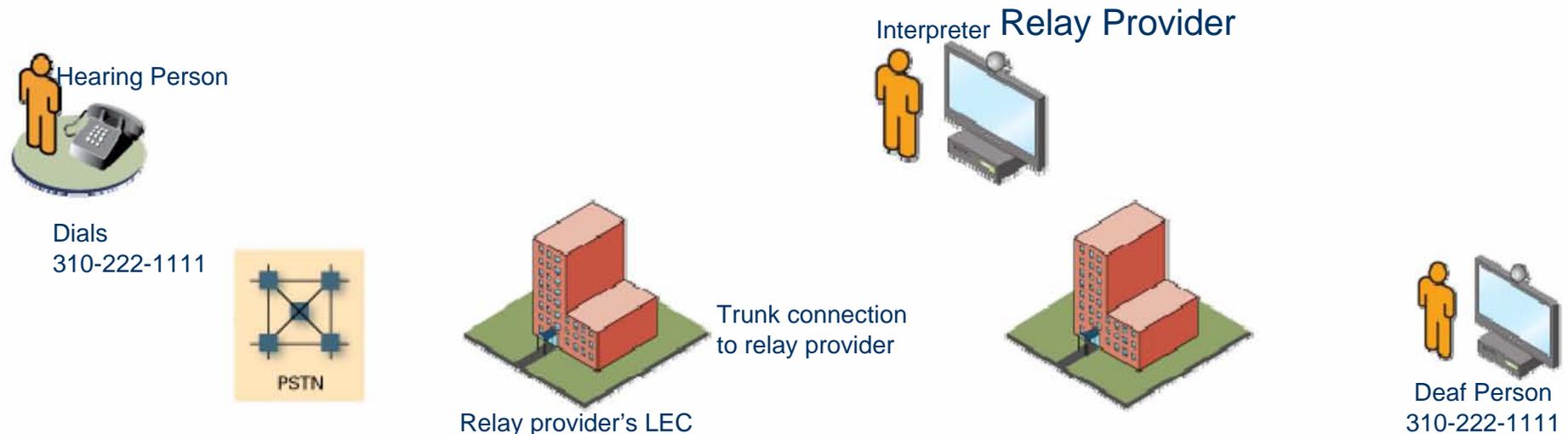
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Telephone number solution objectives



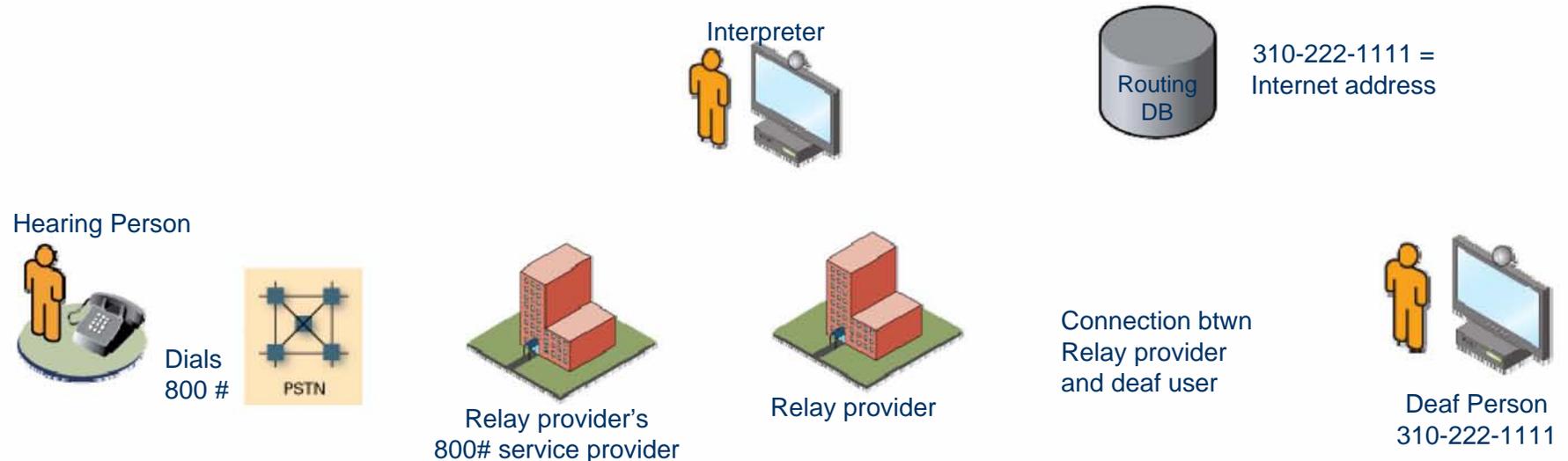
- * Functional equivalency with telecom service for hearing people
- * E911
- * Privacy of consumer data
- * Security from Internet attacks
- * Cost effective
- * Rapid implementation
- * Interoperability between relay providers and all relay users
- * Portability between relay providers
- * Consistent with existing technology standards
- * Mitigate relay fraud
- * One solution to support all relay services
- * A solution that supports future relay services

Call processing – common to NeuStar and AT&T/HOVRS proposals



- * Functionally equivalent with telecom service for hearing people
 - * Deaf relay users have 10 digit telephone numbers (TN)
- * Cost effective
 - * LEC trunks to relay provider leverages existing mechanisms
 - * Does not use call forwarding to an 800#
- CSD's proposal recommends that the ONS provider obtains a TN from an existing LEC and the calls are remote call forwarded to the relay provider's 800#
 - Different than telecom service for hearing people
 - Incurs 800# usage cost

Requirement for a Routing Database – common to all proposals



- A Routing Database is required to enable two scenarios:
 - The hearing person chooses the relay provider by dialing the provider's 800# (example shown above)
 - Deaf person to deaf person calls
- * Functionally equivalent with telecom service for hearing people
 - * Deaf relay users can call each other using 10 digit TNs
- * Interoperability between relay providers and all relay users
 - * Any relay provider can call any relay user using a 10 digit TN

- NPAC is the only existing authoritative database with FCC oversight that supports 10-digit geographic TNs
 - The NPAC is an authoritative database that provisions local routing databases
- The proposed solution would add a field in the NPAC that provides the Internet address in the form of a Uniform Resource Identifier (URI) for the relay provider and user
 - Examples of URIs are <http://www.fcc.gov> and tom.mcgarra@neustar.biz
- The URI data would be provisioned to neutral third party routing database providers
 - Relay providers would contract with a routing database provider to query for the URI
- The calling relay provider would use the URI to get the IP address from the user's chosen relay provider

Routing Database update process using the NPAC

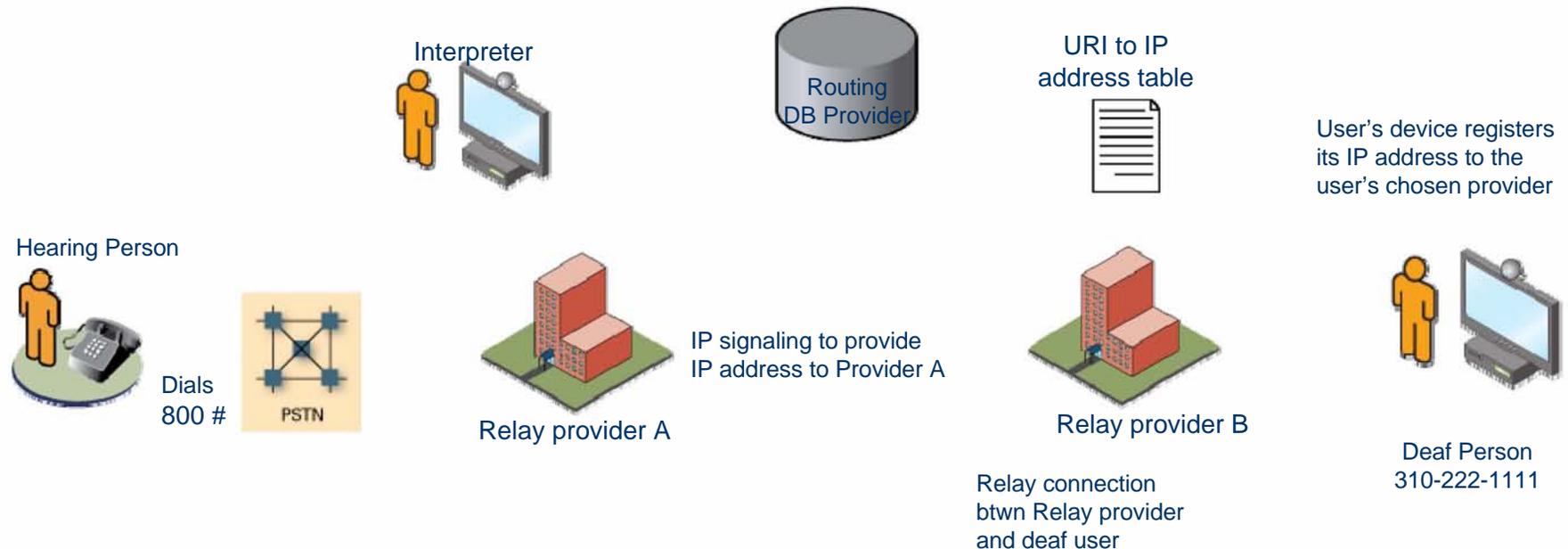


- The relay provider's LEC would provision URIs into the NPAC on behalf of the relay provider
 - The URI data is provisioned to the routing database providers
 - The relay provider contracts with a routing database provider to query for the URI
- * Cost effective / Rapid implementation
 - * Existing providers, i.e., no need to go through the process of setting up a new database provider
 - * Existing competitive market of routing database providers
- * Privacy of consumer data
 - * Relay providers do not get a complete list of all of the TNs and URIs
 - * Existing NPAC contract terms ensure privacy of NPAC data
- * Portability between relay providers
 - * The NPAC enables number portability
- * One solution to support all relay services
 - * Solutions that utilize IP addresses and URIs require two different provisioning methods

Hearing person to deaf person call using the NPAC proposal



310-222-1111 = h323:3102221111@relay.net

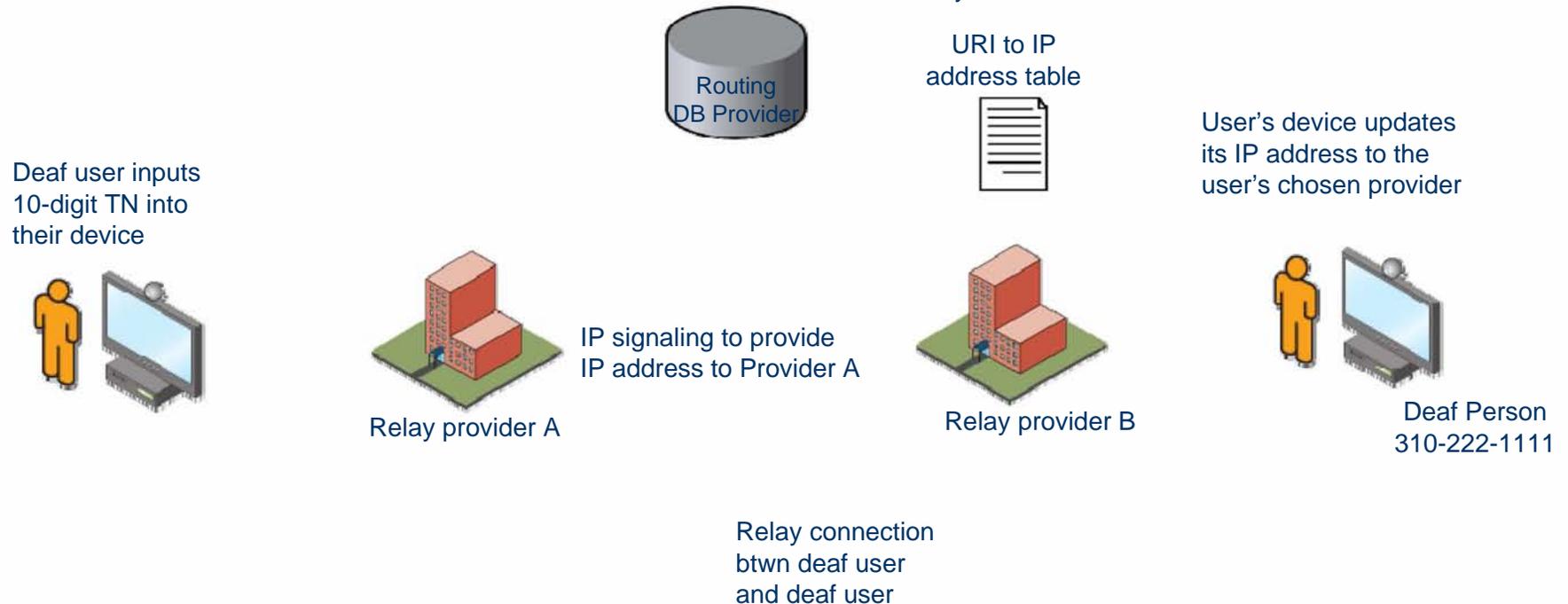


- * Security from Internet attacks
 - * IP signaling between the two relay providers allows deaf users to implement firewall capabilities that they do not have today
- * Consistent with existing technology standards / Functionally equivalent
 - * Identical to how VoIP calls are processed
- * Mitigates relay fraud
 - * User registration with their selected relay provider ensures close linkage btwn caller and relay provider
- * One solution to support all relay services
 - * URI supports all types of relay services
- * A solution that supports future relay services
 - * A URI provides extensibility to future services

Deaf person to deaf person calling using the NPAC proposal

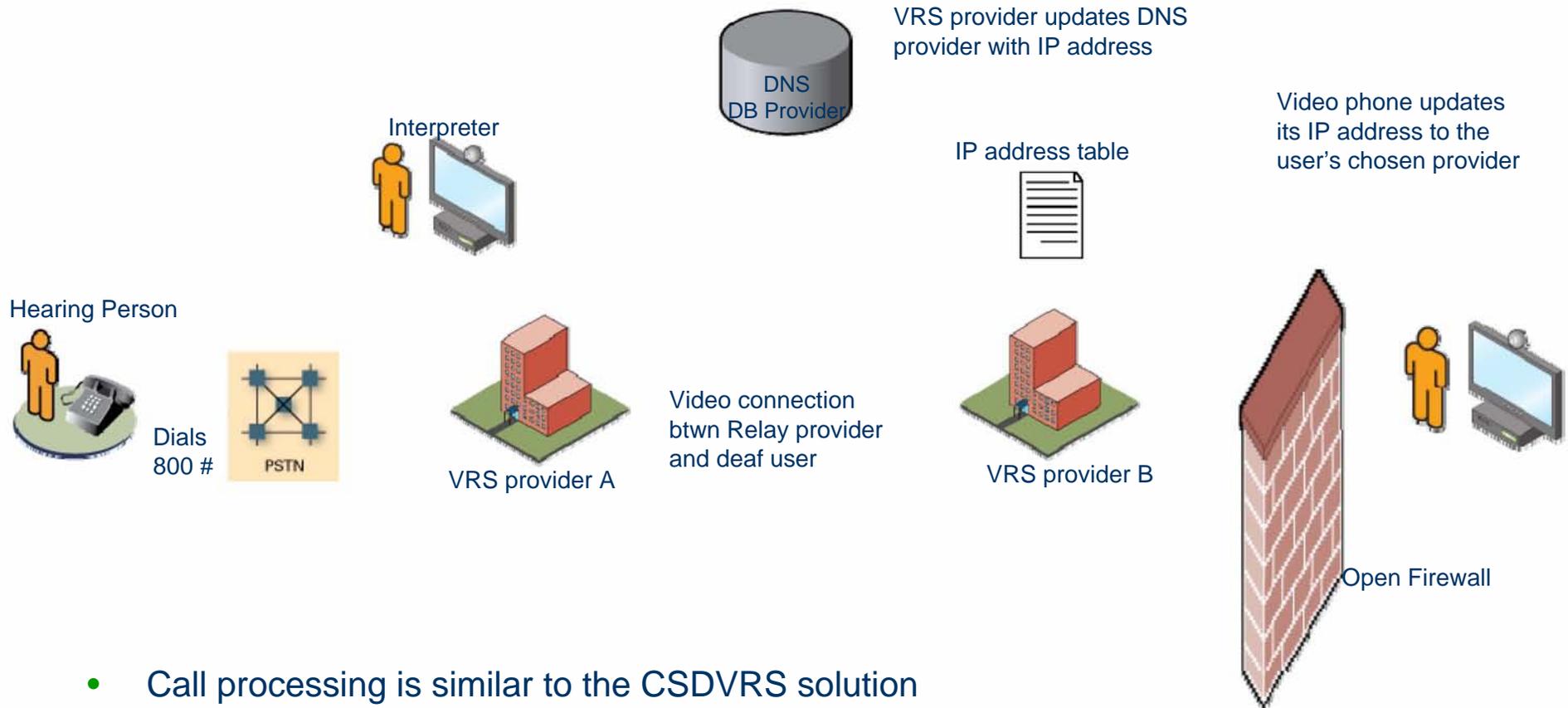


310-222-1111 = h323:3102221111@relay.net



- * Mitigates relay fraud
 - * User signaling through their selected relay provider ensures close linkage btwn caller and relay provider
- * Security from Internet attacks
- * Consistent with existing technology standards / Functionally equivalent
- * One solution to support all relay services
- * A solution that supports future relay services

Hearing person to deaf person call using the AT&T/HOVRS proposal



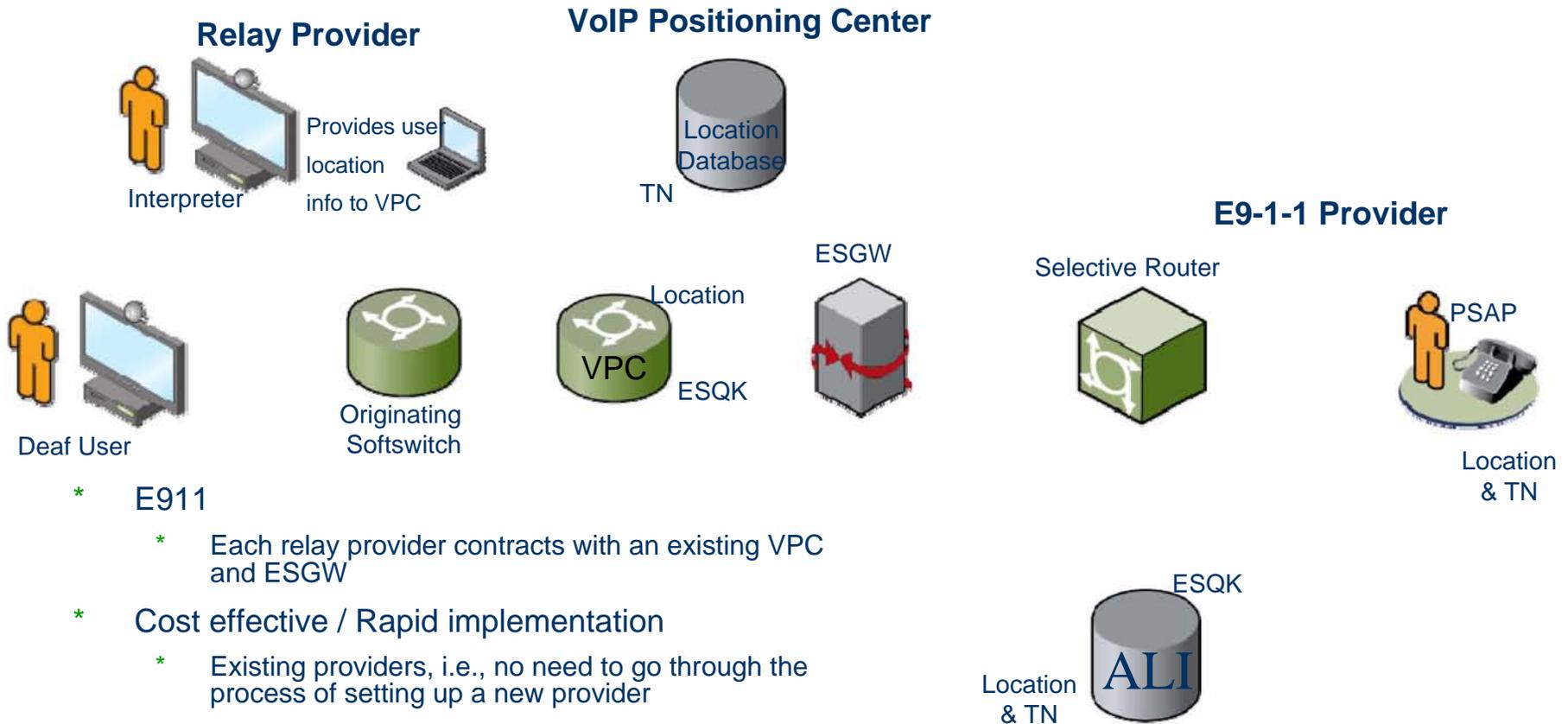
- Call processing is similar to the CSDVRS solution
 - In the CSDVRS solution the user's device updates its IP address directly to the DNS DB Provider

Proposal comparison



Proposal Characteristic	NeuStar	AT&T/HOVRS	CSDVRS
TN acquisition – consumer	From relay provider	From relay provider	ONS acts as TN administrator for deaf people
TN acquisition – relay provider or ONS	Trunking from LEC	Trunking from LEC	ONS obtains TN from LEC and sets remote call forwarding to user's chosen relay provider
Service provider portability	Existing processes, i.e., NPAC	Existing processes, i.e., NPAC	ONS resets remote call forwarding
Database provider	NPAC and existing NPAC users	New entity, called DNS provider, selected by industry	New entity, called ONS, selected by industry
Database access	Secure interface between database provider and relay provider	Secure interface between DNS provider and relay provider	Publicly available on the public Internet
Internet address	URI	IP address for VRS, URI for IP relay, TBD for future services	IP address or URI
Call processing between relay providers	Originating relay provider obtains IP address from terminating relay provider	Originating relay provider obtains IP address (or URI) from routing database	Originating relay provider obtains IP address (or URI) from routing database
Deaf user to hearing user call origination	User inputs TN into device and the user's chosen relay provider sets up the call	Same as today, i.e., user establishes session with a relay provider and signs the TN they wish to call	Same as today, i.e., user establishes session with a relay provider and signs the TN they wish to call
E911	Relay providers contract with existing VPC/ESGW services provided to VoIP providers	May be different than existing solution due to call origination (above)	ONS acts as VPC and contracts with ESGW, all relay providers contract with ONS

E9-1-1 Call – Deaf person to PSAP



- * E911
 - * Each relay provider contracts with an existing VPC and ESGW
- * Cost effective / Rapid implementation
 - * Existing providers, i.e., no need to go through the process of setting up a new provider
 - * Existing competitive market of providers
- * Consistent with existing technology standards / Functionally equivalent
 - * Identical to E911 service used by VoIP providers

Summary – NPAC proposal supports all TN solution objectives



- ✓ Functional equivalency with telecom service for hearing people
- ✓ E911
- ✓ Privacy of consumer data
- ✓ Security from Internet attacks
- ✓ Cost effective
- ✓ Rapid implementation
- ✓ Interoperability between relay providers and all relay users
- ✓ Portability between relay providers
- ✓ Consistent with existing technology standards
- ✓ Mitigate relay fraud
- ✓ One solution to support all relay services
- ✓ A solution that supports future relay services