

March 14, 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:

Earlier this week, representatives from CSDVRS (“CSD”) met with members to the FCC staff to discuss proposals for telephone numbers (“TNs”) for the deaf and hard of hearing (“D&HH”) to use with video relay service (“VRS”). The presentation that CSD provided to the staff not only mischaracterized NeuStar’s proposal in this docket but also demonstrated a fundamental misunderstanding of the principles of telephone numbering.

For example, contrary to CSD’s assertion on page five, NeuStar’s proposal assigns TNs to D&HH end users, not to devices. Under NeuStar’s proposal end users would obtain the TNs from their VRS provider, which in turn would obtain TNs from a local exchange carrier. This is exactly the same model employed for hearing end users that subscribe to VoIP service. Importantly, just like VoIP customers, D&HH end users “own” their numbers and can port them to any VRS provider of their choosing. In using this method, NeuStar ensures that the D&HH users obtains service that is as closely equivalent to the service provided to hearing users as possible.

In contrast, CSD’s proposal for a central database, called ONS, deprives D&HH end users of such equivalency. Because of the way the CSD proposal is structured, the ONS, rather than the end user, is the customer of record for the TNs. The ONS uses remote call forwarding to direct calls to the toll-free number of the VRS provider chosen by an end user. Not only does this mean that D&HH end users have no direct control over their TNs, but it also means that they lose the functionality of important SS7 based services such as inbound and outbound caller ID.

Further, as pointed out in NeuStar's earlier ex parte presentations, if the CSD proposal is implemented, its reliance on an IP routing database on the open Internet and open firewalls on the consumers' equipment will create substantial privacy and security risks for D&HH VRS users. It also raises concerns with respect to CALEA compliance. In contrast, NeuStar proposes a "closed" system, not to benefit any particular VRS provider, but to ensure that only trusted entities – e.g. other VRS providers – have access to the IP routing information, thus mitigating the privacy and security concerns.

These issues were discussed in great depth during the Industry Numbering Council's consideration of proposals for numbering for the D&HH community and many suggestions similar to CSD's proposal were rejected or refined through that process. NeuStar participated in those proceedings for more than eighteen months; CSD could have benefited greatly from similar participation.

Sincerely,

A handwritten signature in dark ink, reading "Richard L. Fruchterman, III". The signature is written in a cursive style with a large, stylized "R" at the beginning and a circular flourish at the end.

Richard L. Fruchterman, III
Public Policy and Regulatory Counsel

cc: Ian Dillner
Chris Moore
Nicholas Alexander
Lisa Boehley
Nicole McGuinness