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May 30, 2008

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: Nordia, Inc. Annual Progress Report Regarding Waived TRS Standards for Internet Protocol (IP) and Video Relay Service (VRS)  
CG Docket No. 03-123**

Dear Ms. Dortch:

This is written on behalf of Stellar Nordia Services LLC (Stellar Nordia),<sup>1</sup> regarding the waived TRS standards for Video Relay Service (VRS). In 2007, a *de minimus* volume of such services was offered indirectly by Stellar Nordia through a third party contractor, the Communications Access Center for the Deaf and Hard of Hearing (CAC).<sup>2</sup>

Accordingly, based upon information provided to Nordia by the CAC, Attachment A hereto supplements Nordia's prior submission as to progress made in 2007 toward meeting the waived TRS standards for VRS.

Please contact me directly if you have any questions regarding this submission.

Very truly yours,

/s/ Gregory C. Staple  
Counsel for Nordia, Inc.

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<sup>1</sup> Nordia Inc. (Nordia) assigned its TRS business to Stellar Nordia Services LLC in 2007.

<sup>2</sup> See *In the Matter of Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities and Americans with Disabilities Act of 1990*, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking (Second Report and Order), CC Docket No. 98-67 and CG Docket No. 03-123 (FCC 03-112), released June 17, 2003, ¶ 76.

Attachment

cc: Gregory Hlibok  
Thomas Chandler

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**May 30, 2008**

**Nordia, Inc. Annual Report on Waived TRS Standards for VRS**

**Emergency Call Handling (IP and VRS)**

Stellar Nordia's VRS vendor provides a short-term Emergency Call Handling solution for both VRS and IP. This solution is not fully compliant with the intent of Emergency Call Handling as the current technology does not allow for immediate transfer to the Public Service Answering Point (PSAP). Our vendor continues to participate in an industry provider group that is considering both short-term and long-term solutions and methods of addressing this standard.

**Equal Access to Interexchange carriers (VRS)**

It is Stellar Nordia's view that equal access to different interexchange carriers is not required with VRS because VRS users do not pay for long distance calls. In addition, consumer choice is maintained because VRS users can choose between several VRS providers and can in fact choose a different VRS provider for every individual call. When billing for long distance calls becomes a requirement, it would be appropriate to offer users a choice of carriers.

**Pay-per-call service (900 numbers) (IP and VRS)**

This type of call is user paid and requires the Automatic Numbering Information (ANI) for billing purposes. The technology is not in place at this time. If and when a registration is implemented, the information gathered at the time of registration could include sufficient billing information to allow pay-per-calls to be user billed.

**VCO-to-TTY, HCO-to-TTY & VCO-to-VCO, HCO-to-HCO (IP and VRS)**

Stellar Nordia's vendor is investing in the new technology that would allow the provision of types of services as stand-alone offerings. However, to date, Stellar Nordia has not had a large demand for those services and its vendor consequently is reluctant to deploy those services for a limited potential return.

**Call Release (IP and VRS)**

This service provision is out-dated for IP and VRS and the requirements should be reviewed for appropriateness. Call release is only appropriate for TTY calls.

### **3 Way Conversation (IP and VRS)**

The current preferred video phones do not have the capability to participate in three-way conversations on video as they only support one remote video user at a time. Our vendor currently supports the telephony side of three-way conversations. However, Stellar Nordia has had no requests for this service.

### **Speed Dialing (IP and VRS)**

Stellar Nordia's vendor maintains a Client Profile/preference data base in which clients may store frequently called numbers.