

LAWLER, METZGER, MILKMAN & KEENEY, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

RUTH MILKMAN
PHONE (202) 777-7726

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

June 5, 2008

Via Electronic Filing

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

Re: *Ex Parte* Notice, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch:

On June 4, 2008, Joe Romriell, Sorenson Communications, Inc. ("Sorenson") and Ruth Milkman, Lawler Metzger, Milkman & Keeney, counsel for Sorenson, met with Commissioner Tate and Leigh Murray and Zachary Lipp, interns in Commissioner Tate's office, to discuss the attached presentation regarding numbering for Internet-based Relay services.

Pursuant to the Commission's rules, this letter is being submitted for inclusion in the public record of the above-referenced proceeding.

Sincerely,

/s/ Ruth Milkman
Ruth Milkman

cc:

Commissioner Tate
Zachary Lipp
Leigh Murray

Attachment

Uniform Numbering for Internet-Based Relay Services

June 4, 2008

Key Issues in Establishing a System

- How do users acquire numbers?
- How are those numbers managed and provisioned within the NANP system?
- How can these numbers be set up to allow direct dialing between users regardless of the selected relay service provider(s)?
- How does the system provide confidentiality and security?
- How does the numbering system interact with the emergency calling system?

ATIS Recommendations

- Sorenson Communications, along with AT&T, Sprint, and Verizon, took an active role in developing the ATIS report entitled “Numbering for Internet-Based Relay Services” (assigned to ATIS by the NANC)
- Record reflects near-unanimous support for ATIS recommendations
 - Relay users should be assigned geographic NANP numbers, reflecting their location if desired, which will route to the relay provider of their choice when dialed by a hearing caller
 - Relay users should be able to obtain numbers through the relay service providers. Additionally, relay users should be able to obtain NANP numbers directly from a voice service provider, or utilize an existing number, if desired
 - Relay providers can obtain numbering resources either from voice service providers or, if they choose, by qualifying to obtain resources from the NANPA or the Pooling Administrator under existing guidelines
 - A central database managed by a neutral third party should be employed. The INC examined several alternatives contributed by INC members for how this may be accomplished and reported on two of them

National Directory – Preferred Architecture

- Create a centralized database (National Directory) that links NANP numbers to URIs
- National Directory contains static (not dynamic) URIs
- Static URIs point to the network supporting the device or application; that network has the dynamic data needed to connect the call
- This is the approach taken by the NeuStar proposal and by AT&T/GoAmerica proposal for IP Relay

National Directory – Importance of Static URIs

- Additional flexibility (compared to dynamic URIs) allows for use of a variety of different networks and all forms of relay, and adapts to new protocols and technology without mandating changes to the National Directory
- Secure one-time provisioning on number setup (simplifies system implementation including permission and security issues)
- Supports trusted gateway connections, which is significant for users connecting through enterprise systems
- Information localization keeps dynamic connection information within a single network with no need to replicate up
- Reduces complexity of the National Directory

National Directory – Confidentiality and Security

- National Directory must be administered by a neutral third party, unaffiliated with any TRS provider
- Information in National Directory must be kept confidential and secure
 - National Directory must be downloadable only by neutral third parties
 - Information should be accessed by providers making queries only on a per-call basis
 - Providers should access the National Directory only through secure connections
- National Directory should not be public
- NeuStar and AT&T/GoAmerica proposals meet these criteria; CSDVRS approach has major security issues that have not been addressed

Implementation: Vendor Selection and Establishment of Key Provider Processes

- High-level direction provided by FCC to establish system that meets consumer goals
- Selection of vendor
 - RFP – Need technical input from industry
 - Ideally, RFP includes technical standards for provisioning, updating and querying National Directory
- Contract with vendor and ongoing oversight of database – FCC
- Development and documentation of other standards, *e.g.*, Caller ID
- Establishment of processes to allow users to port numbers between relay providers

Implementation, cont.

- Endpoint updates:
 - Limited implementation can be accomplished without endpoint changes under either NeuStar or AT&T/GoAmerica proposals. (Significant back-end changes are still required)
 - Under any of the proposals, it is not possible to fully implement some of the features (e.g., Caller ID) without updating devices
- Providers establish system for acquiring numbers
- Providers establish systems for assigning numbers to users
- Consumer protection rules: CPNI and slamming
- Cost recovery

Essential Elements of Workable Numbering System

- Providers distribute numbers
- National Directory associates TNs with static URIs
- Network owners maintain dynamic connection information
- National Directory managed by neutral third party
 - Directory not downloadable, except by neutral 3P
 - Information in directory accessible by providers on per-call basis
- Implementation: fair, open and based on solid technical work
 - RFP
 - FCC contracts with and oversees selected vendor