LAWLER, METZGER, MILKMAN & KEENEY, LLC

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

GIL M. STROBEL
PHONE (202) 777-7728

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 and Mike Maddix, Sorenson Communications, Inc. ("Sorenson") along with Ruth Milkman and Gil Strobel, Lawler, Metzger, Milkman & Keeney, counsel for Sorenson, met with Gregory Hlibok, Heather Hendrickson, Richard Hovey, Thomas Chandler, Michael Jacobs, and Nicole McGinnis of the FCC to discuss the attached presentation regarding numbering for Internet-based relay services.

During the meeting, Sorenson urged the Commission to seek additional comment on emergency calling issues, in order to ensure that the record is robust and up-to-date, thereby enabling the Commission to move forward to E911 as quickly as possible. Parties should be invited to comment on any issues that they regard as important to the provision of E911 by Internet-based relay providers. In addition, the Commission should seek comment on the following specific issues.

1. Whether the role of an interpreter handling an emergency call should be different from the role of an interpreter handling a non-emergency call;

2. Whether interpreters should be required to deliver to the Public Safety Answering Point ("PSAP") the name of the relay user and the location of the emergency, even when the caller is using voice carry over ("VCO"), or whether the VCO user should be permitted to deliver this information directly to the PSAP;

3. The circumstances under which it still will be necessary for a provider to route calls to a PSAP's 10-digit administrative lines;

4. How location information will be updated;

5. How location information will be passed to a PSAP when a caller dials 911 through a provider other than his or her default provider;

6. Whether callbacks from PSAPs through VRS providers should also be given priority, and if so for how long after the original 911 call is placed; and

7. How registration will work for users of 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/ Gil M. Strobel*
Gil M. Strobel

cc:
Thomas Chandler
Heather Hendrickson
Gregory Hlibok
Richard Hovey
Michael Jacobs
Nicole McGinnis

Attachment

sorenson communications™

# Uniform Numbering for Internet-Based Relay Services

June 3-4, 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

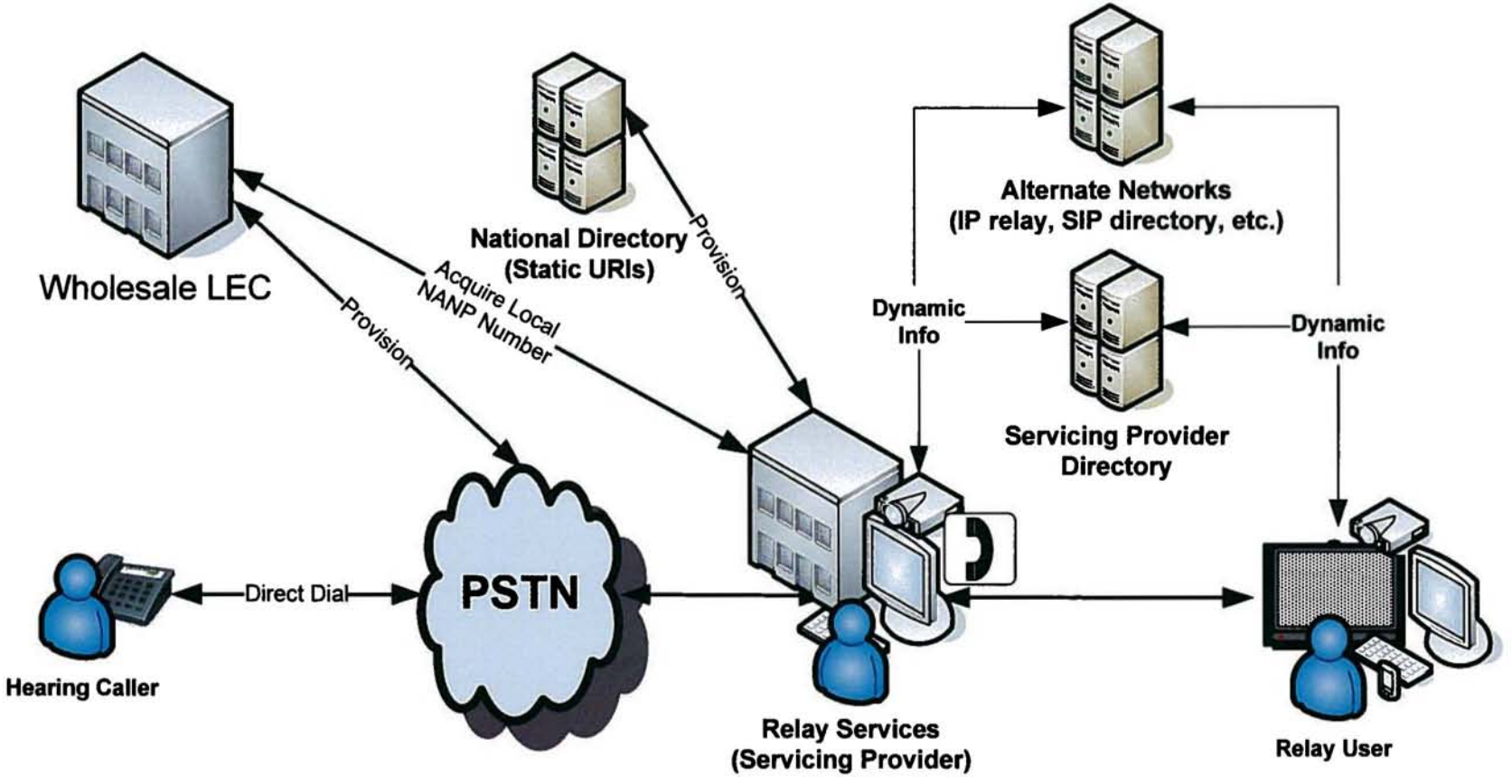
# National Directory – Value of URIs

- The structure of URIs specifies protocol and user network address
- URIs, whether dynamic or static, allow for a variety of protocols, supporting changes in technology and mixed technologies
- AT&T/GoAmerica proposal now includes dynamic URIs for VRS and static URIs for IP Relay
  - VRS dynamic URI example: protocol (SIP or H.323) and IP address plus port
  - IP Relay static URI example: IM:username@host
- Static URIs, which point to the source of dynamic data needed to connect a call, are preferable to dynamic URIs

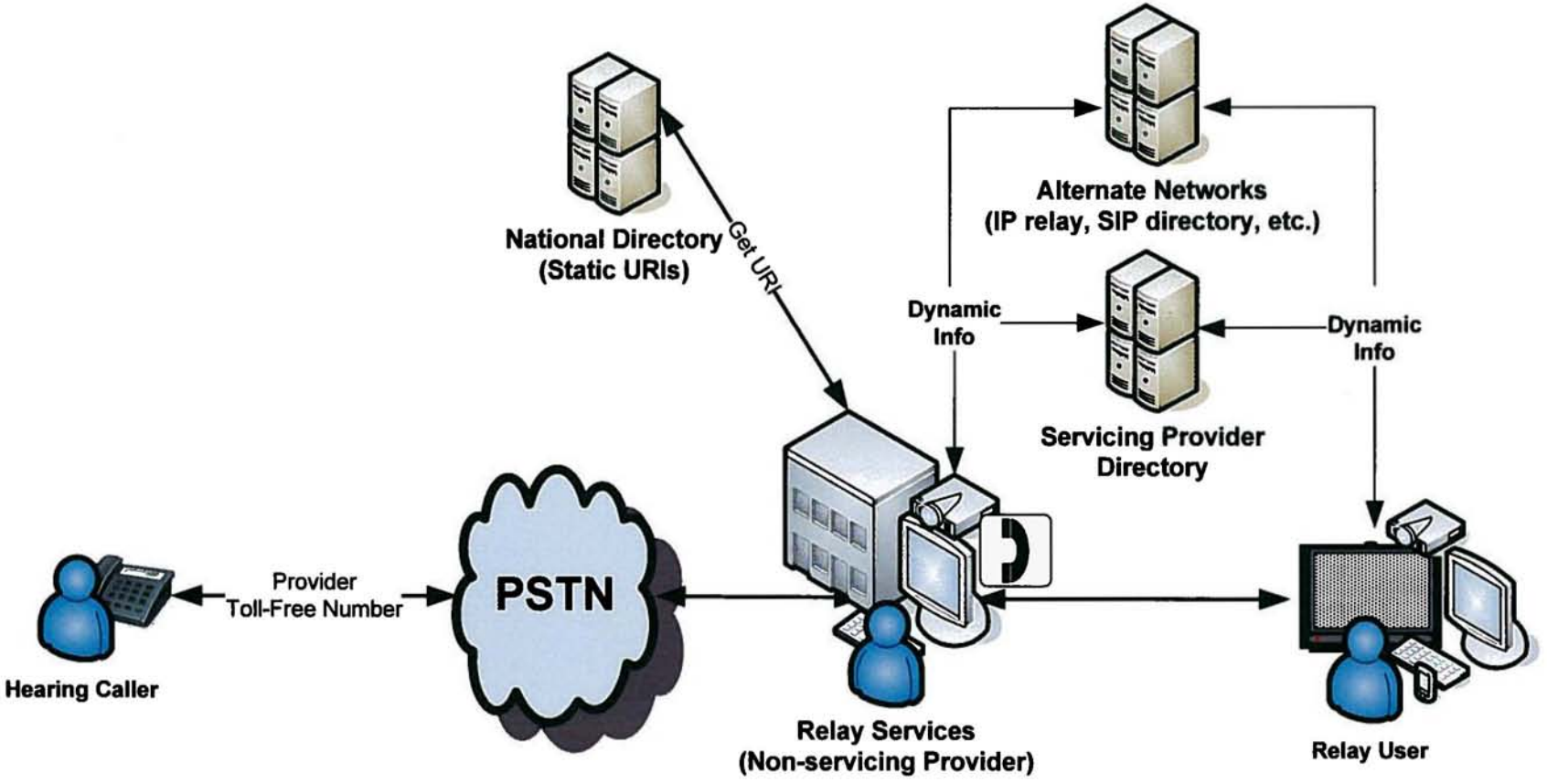
# National Directory – Importance of Static URIs

- Similar to ENUM, which is an industry standard that links PSTN numbers to network addresses
- Additional flexibility (compared to dynamic URIs) allows for use of a variety of different networks, all supported by the URI structure
  - Flexibility to support all forms of relay and to adapt to new protocols and technology without mandating technology changes to the National Directory
  - Already required for proposed IP Relay approaches
- 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

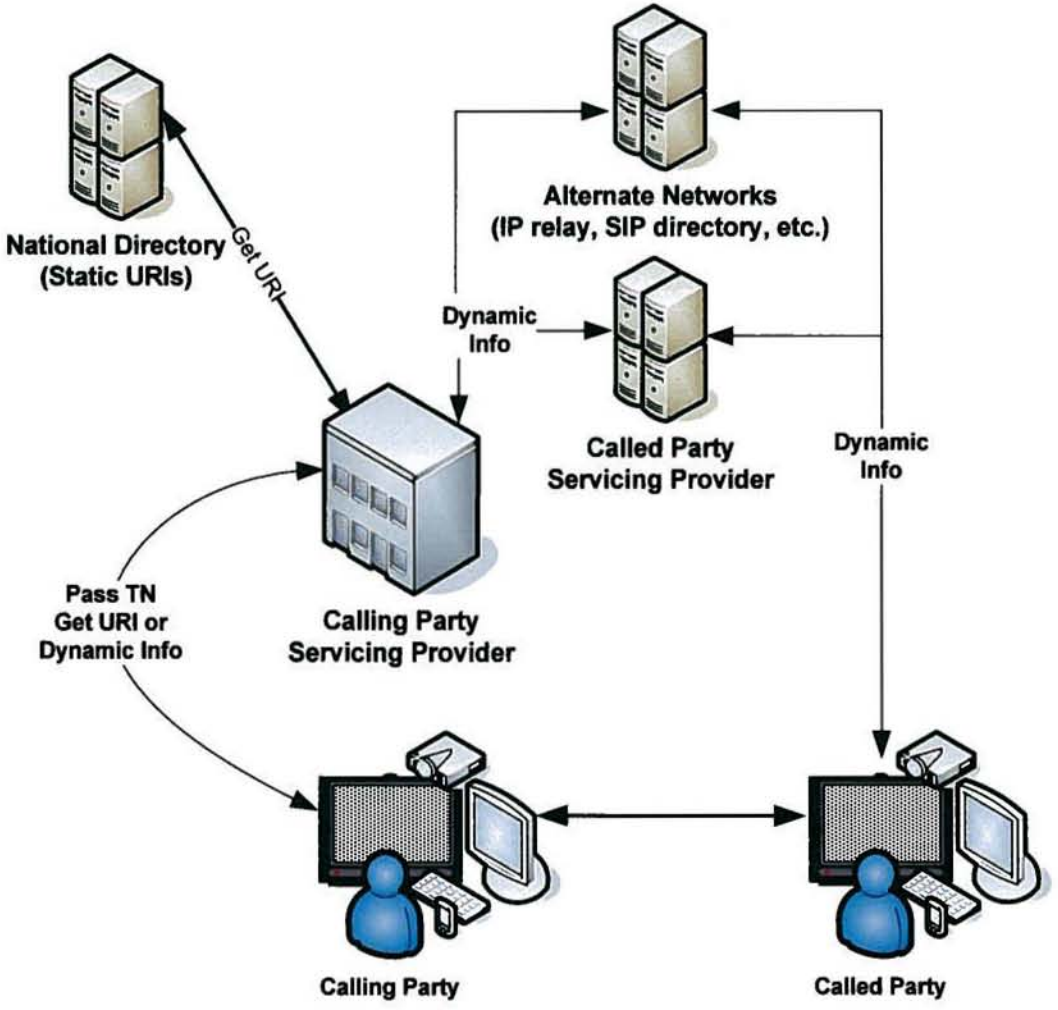
# Servicing Provider View



# Non-servicing Provider View



# Point-to-Point Calling



# 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

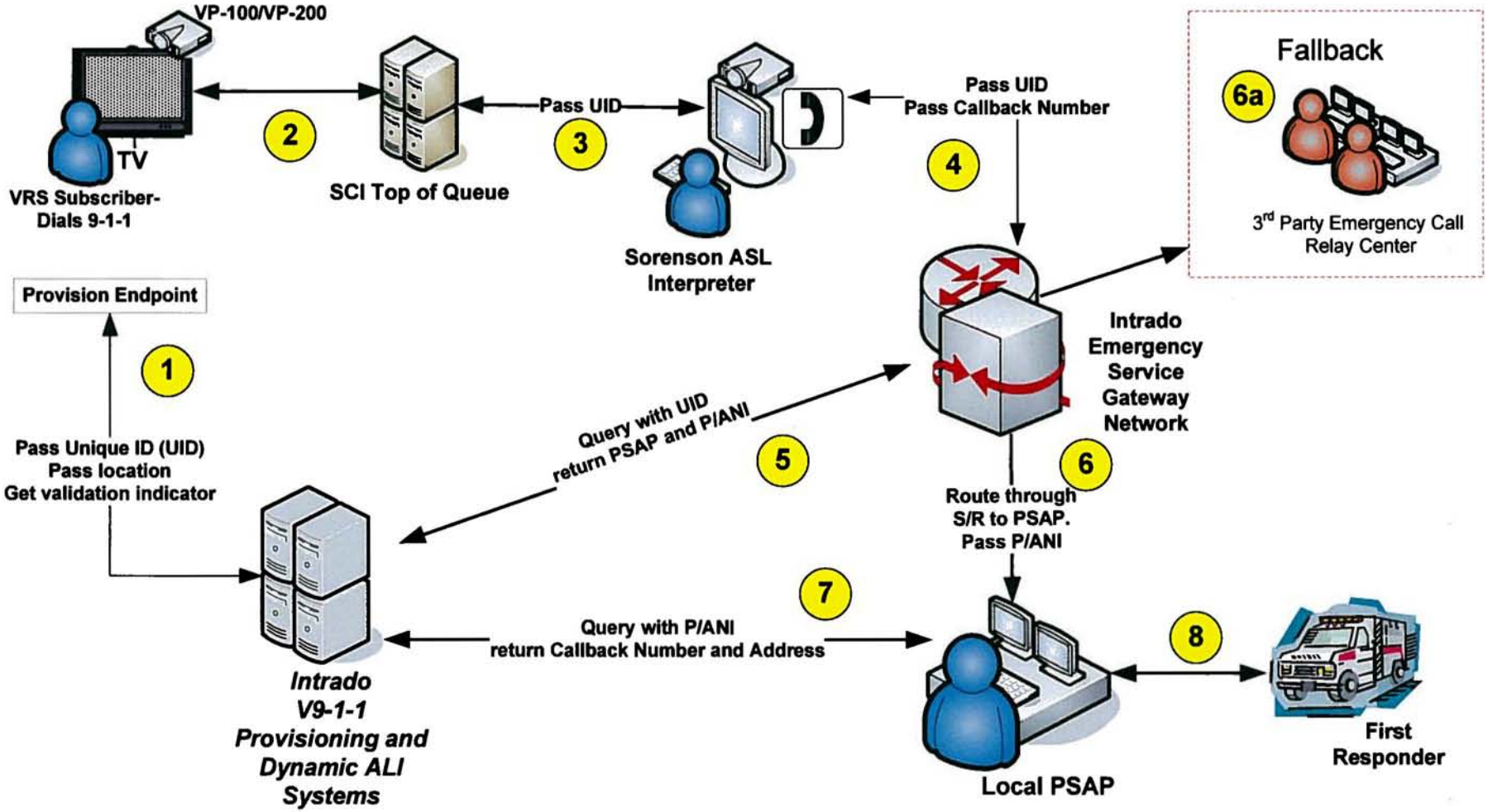
## Implementation, cont.

- 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

# Numbering system interaction with emergency calling system

- ALI requires a unique identifier for each device
  - Unique identifier is used to map calling device to location
  - Unique identifier can be, but need not be, a TN
  - If TN is associated with more than one device, it may not be a unique identifier for location
- Pass TNs to PSAPs to use for call-backs
  - Require provider to give priority to calls to that TN for specified period of time (e.g., 60 minutes) to ensure that call backs are given priority (critical issue for VRS)
- Record on 911 issues needs development and updating – recommend refreshing the record on 911

# Future Integrated VRS 9-1-1



# 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