

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	CG Docket No. 03-123
Individuals with Hearing and Speech)	
Disabilities)	
)	
E911 Requirements for IP-Enabled)	WC Docket No. 05-196
Service Providers)	

REPLY COMMENTS OF SORENSON COMMUNICATIONS, INC.

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Sorenson Communications, Inc. (“Sorenson”) submits these reply comments in response to the Further Notice of Proposed Rulemaking released in the above-captioned proceeding, in which the Federal Communications Commission sought comment on issues relating to the assignment and administration of ten-digit telephone numbers for Internet-based telecommunications relay services (“TRS”).¹

I. INTRODUCTION AND SUMMARY

The initial comments in this proceeding contain a number of sound ideas that Sorenson strongly supports. For example, Sorenson generally agrees with the Consumer Groups that TRS users deserve to be protected by the Commission’s anti-slamming and

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123 & WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, FCC 08-151 (rel. June 24, 2008) (“*TRS Numbering Order*” or “*FNPRM*”).

customer proprietary network information rules; that the administrative costs of providing ten-digit numbers and 911 emergency service routing should not be assessed as a fee on consumers; and that video relay service (“VRS”) providers should be allowed, but not required, to issue toll-free numbers to IP-based relay users, free of charge.² As noted below, Sorenson also agrees with the National Emergency Number Association (“NENA”) on key issues regarding the manner in which Internet-based TRS providers will handle emergency calls.³

In these reply comments, Sorenson moves beyond these areas of agreement to identify the erroneous factual assumptions of some commenters, and to oppose several proposals that are either unnecessary or that would create perverse incentives for providers. Sorenson also urges the Commission to quickly select a neutral third-party administrator for the TRS Telephone Numbering Directory. Failure to do so will jeopardize the commendable progress that the Commission has made to date in ensuring that all VRS and IP Relay users have functionally equivalent telephone numbers and emergency calling capability by December 31, 2008.

II. DISCUSSION

A. 911 Issues

As Sorenson stated in its comments, it is critical that the Commission adopt rules that encourage each provider to handle 911 calls in the most efficient and effective

² Comments of Telecommunications for the Deaf and Hard of Hearing, Inc., *et al.*, at 8-10, 20-34 (“Consumer Groups”). (Unless otherwise indicated, all comments cited herein were filed in CG Docket No. 03-123 on August 8, 2008.)

³ Consistent with the *TRS Numbering Order*, Sorenson uses the term “Internet-based TRS” to refer to both VRS and IP Relay, but not to IP captioned telephone service. See *TRS Numbering Order* ¶ 1 n.5.

manner possible. Although other parties' comments are generally consistent with this goal, Sorenson has identified four proposals that are not. In particular, the Commission should not adopt rules that would (i) require VRS providers to employ dedicated 911 interpreters; (ii) require video interpreters ("VIs") who process 911 calls to meet certain minimum national standards; (iii) permit Internet-based TRS providers to forward 911 calls to another provider; or (iv) permit Internet-based TRS providers to access every user's registered location. The Commission also should reject the erroneous claims of some commenters that toll-free numbers cannot support E911.

Dedicated 911 VIs. As the industry leader in handling emergency calls, Sorenson has long worked with NENA to devise and implement 911 solutions for VRS users. Sorenson applauds the efforts of NENA and supports many of the solutions proposed in NENA's comments. As Sorenson indicated in its initial comments,⁴ it agrees that:

- the Commission should establish a process by which CAs, under certain circumstances, "call back" an Internet-based TRS user who has made an emergency call;
- the Commission should permit VIs to provide visual information they observe from a 911 VRS call to a public safety answering point, designated statewide default answering point, or appropriate local emergency authority (collectively, "PSAP"); and
- a call back from a PSAP to a TRS center should have priority over non-emergency calls.⁵

Sorenson respectfully disagrees, however, with NENA's proposal that the Commission should require VRS providers to employ a specialized cadre of video

⁴ Comments of Sorenson Communications, Inc. at 2-4 ("Sorenson Comments").

⁵ See Replaced Comments of NENA at 7-9 (Aug. 11, 2008) ("NENA Comments").

interpreters dedicated solely to handling 911 calls.⁶ In order to maximize its capacity to handle 911 calls, Sorenson today trains all of its VIs to handle 911 calls. This training ensures that at any given time, Sorenson's entire pool of active VIs is available to handle 911 calls. Thus, if a large-scale disaster were to arise, Sorenson would have a much greater capacity to handle the likely peak emergency call volumes than would a provider that had only a small team dedicated to that task.

In addition to expanding the number of VIs capable of handling 911 calls, Sorenson's system also makes it less likely that 911 service will be unavailable in a particular geographic area. If providers were required to have a dedicated team of 911 VIs, many providers might, for operational, economic or technical reasons, decide to route all emergency calls to a single call center where all 911 interpreters would work. That 911 call center, however, would be vulnerable to a regional disaster, such as an earthquake or hurricane, that could destroy the center or prevent interpreters from reaching it. Whereas a single 911 call center would lack any redundancy (causing a total loss of a provider's 911 capacity during a major disaster),⁷ a system in which all VIs in numerous calls centers handle 911 calls would have robust redundancy and could continue to process 911 calls even if several call centers were knocked out by a disaster.⁸

⁶ NENA Comments at 8.

⁷ For example, if all of Sorenson's 911 interpreters had been in New Orleans when Hurricane Katrina struck, they may have been unavailable to process emergency calls during that disaster.

⁸ Even if a provider were to diversify by establishing two, or even three, call centers, these same concerns would continue to apply because the loss of even one call center could jeopardize the provision of 911 services.

Requiring providers to establish a dedicated team of 911 VIs also would put additional pressure on the supply of qualified interpreters. For any given time period, Sorenson typically handles only a minuscule number of 911 calls relative to its total VRS call volume. If an unexpected major disaster were to strike, Sorenson would be better able to handle the resulting spike in 911 call volume because its entire force of VIs would be available to handle emergency calls. If, however, Sorenson were required to establish a dedicated team of 911 VIs, it would have to continually overstaff that team, relative to the typical 911 call volume, so as to have enough capacity to handle the unpredictable spike in volume that would occur in the event of a disaster. Such overstaffing would reduce the pool of interpreters available to handle non-911 calls. In addition, dedicated 911 interpreters would likely need to receive higher “combat pay” in order to compensate for the rigors of handling only emergency calls, day in and day out.

Even with such overstaffing, a dedicated 911 team would not be as capable of handling a major disaster, such as Katrina, as would a non-dedicated staffing system in which every VI is trained and available to handle 911 calls. For the foregoing reasons, the Commission should not require providers to establish a dedicated cadre of 911 interpreters, but should instead require providers to ensure that their interpreters have sufficient training and skills to handle 911 calls.

National standards for VIs. The Commission has previously declined to adopt national standards for VIs, and instead has placed the onus on VRS providers to ensure that VIs are “qualified interpreters,” *i.e.*, persons who are “able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary

specialized vocabulary.”⁹ Sorenson believes that this general standard should continue to apply regardless of whether an interpreter is handling emergency or non-emergency calls. As noted, Sorenson trains all its interpreters to handle emergency calls, and Sorenson independently assures that all its interpreters are able to interpret any call, including an emergency call, in an “effective, accurate, and impartial” manner, as the FCC’s rules require.¹⁰ Sorenson’s goal is that its entire force of VIs be able to handle and interpret 911 calls with the utmost skill and professionalism.

Sorenson thus urges the Commission not to adopt NENA’s proposal to require VIs who process 911 calls to meet a new, four-pronged “minimum national standard of performance.”¹¹ Under the proposed standard, VIs handling 911 calls would have to hold high levels of interpreter certification, demonstrate five years of community interpreting, as well as one year and one thousand hours of VRS interpreting; and be trained in emergency call handling procedures. These new requirements are not only unnecessary, but would be counterproductive if adopted.

For example, imposing these additional mandates would unnecessarily limit the pool of VIs available to handle 911 calls, thereby creating a potential shortage of available interpreters during a large-scale emergency. Moreover, an interpreter’s certification level does not necessarily predict his or her ability to handle an emergency call in an appropriate manner. It has been the experience of Sorenson, by contrast, that

⁹ 47 C.F.R. § 64.604(a)(1)(iv).

¹⁰ To address the complexity of 911 calls, Sorenson has voluntarily chosen to have a second interpreter assist the primary interpreter to whom the 911 call is placed.

¹¹ NENA Comments at 8.

those interpreters who have been rigorously trained to handle 911 calls and who have demonstrated that they can interpret a 911 call in an “effective, accurate, and impartial” manner have been able to handle even the most exigent of emergency calls – even if those interpreters have certification or experience levels lower than those NENA recommends. Moreover, since many interpreters do not possess the high certification levels that NENA has proposed, it could be difficult in many locales for providers to find interpreters who would meet these standards. Nor does NENA’s proposal take into account the existence of state certification bodies. In many states, the number of interpreters possessing the credentials proposed by NENA are few. The Commission thus should not adopt NENA’s proposal and instead should continue to place the onus on providers to ensure that their VIs are trained and able to interpret 911 calls in an “effective, accurate, and impartial” manner.

Forwarding 911 calls. The Commission should not permit Internet-based TRS providers to forward emergency calls to another provider, nor should the Commission facilitate such call-forwarding by requiring providers to implement a system that monitors the CA availability of each provider.¹² In order to comply with the FCC’s rules, each provider must be able to prioritize and handle all 911 calls that it receives. Providers that have not adequately planned for sufficient capacity to handle 911 calls should not be able to shift responsibility by forwarding 911 calls to another provider. Finding otherwise would effectively absolve the understaffed provider of any responsibility for complying with the rules, and could result in a “round robin” where 911

¹² See Consumer Groups at 4.

calls are shuttled multiple times to different providers before being processed. Far from promoting a faster response time, the potential for additional delay caused by such a forwarding requirement could put lives at risk.

Nor is there any evidence in the record that providers currently lack sufficient capacity to handle 911 calls. Sorenson has worked hard over the past two years to implement a solution that would enable deaf callers to make 911 calls using Sorenson VRS and IP Relay. Sorenson has not experienced any time period in which it was unable to prioritize and process every single 911 call it received. Staffing for 911 volumes should not be overly burdensome because (as explained above) all of a provider's CAs may be trained to handle 911 calls, and the FCC has already stated that each provider must always have enough CAs available to handle 911 call volumes at any given time.¹³ Just as providers have a duty to demonstrate their abilities to process 911 calls, users have a corollary responsibility to be cautious about selecting a default provider. Unless a consumer has complete confidence in a provider's ability to process 911 calls effectively, he or she should not designate that provider as the default.

Indeed, if a provider is not in compliance with the new rules, it is not eligible to be a default provider. Furthermore, for the protection of users in emergency situations – and to assure communication reliability – dynamic routing information associated with assigned numbers must be established by communication between relay equipment or software and the default relay provider. Approaches that introduce dependencies on

¹³ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Report and Order, 23 FCC Rcd 5255, ¶ 17 (2008) (“*Interim Emergency Call Handling Order*”).

other systems that unilaterally provide dynamic routing information without the direct involvement of the user's relay equipment or software should be prohibited.

Accordingly, unless and until there is a demonstrable need for alternative arrangements, the FCC should soundly reject this proposal, and continue to require providers to adequately staff in order to handle all 911 calls received.¹⁴

Access to every user's location information. Sorenson agrees with the FCC and commenters that implementation of a uniform ten-digit numbering regime for Internet-based TRS users, including the ability to make emergency calls that will automatically route to an appropriate PSAP, is critical. However, Sorenson also agrees with Sprint Nextel that it would not at this time be the best use of resources, particularly given the work that needs to be completed to implement the new numbering system, to establish a mechanism to ensure that all providers have access to every Internet-based TRS user's location information.¹⁵ CSDVRS argues that "there are going to be occasions when an individual is forced to try a second provider [*i.e.*, a provider other than the user's default provider] to call 9-1-1 in the evening or the middle of the night, when interpreter staffing is at its lowest."¹⁶ In the vast majority of circumstances, users will place 911 calls to their default provider. Because, as noted, each provider should be capable of handling all the 911 calls it receives, there is no need for providers to have access to every user's registered location. Only in rare circumstances will a provider receive a 911 call from a

¹⁴ See, e.g., Comments of Sprint Nextel Corporation at 3 ("Sprint Nextel Comments") (the FCC should not adopt 911 requirements that do not address a "demonstrable problem").

¹⁵ Sprint Nextel Comments at 3-4.

¹⁶ Comments of CSDVRS, LLC at 3 ("CSDVRS Comments").

user that has not chosen that provider as his or her default provider. In those rare instances, the provider that receives the 911 call must have in place a process to obtain the user's location information manually, *e.g.*, by asking the user his or her name and location at the outset of the emergency call and by directing the call as quickly as possible to the correct PSAP by electronically matching the caller's phone number with the appropriate PSAP.¹⁷

Toll-free numbers. Under the Commission's new numbering rules, any provider that offers a ten-digit NANP number to Internet-based TRS users must support full E911 functionality for that number.¹⁸ Some commenters have suggested that toll-free numbers cannot support this functionality.¹⁹ Sorenson already has designed and tested systems to support full E911 functionality for toll-free numbers and expects to implement E911 for toll-free and geographic numbers at the same time.²⁰ Moreover, as discussed more fully below, functional equivalency requires that users of VRS and IP Relay have the same access to toll-free numbers as that enjoyed by users of voice service. Thus, whatever the capability of other providers with respect to toll-free numbers, it is wrong to suggest that

¹⁷ See Sprint Nextel Comments at 4. Under such circumstances, the Commission should permit providers to route such calls to the ten-digit (so-called "administrative") numbers for PSAPs, if the ten-digit number is the only one available. See Sorenson Petition for Reconsideration and Clarification, CG Docket No. 03-123, at 3-5 (Aug. 18, 2008) (discussing circumstances in which providers may have to obtain caller's location information manually and route calls to a PSAP over ten-digit lines).

¹⁸ *TRS Numbering Order* ¶ 32.

¹⁹ See CSDVRS Comments at 10 (stating that "toll free numbers do not have access to 9-1-1 services"); Comments of AT&T Inc. at 11 ("AT&T Comments") (expressing "concerns about the ability of E911 databases to effectively route 911 calls when those calls are associated with a toll-free number").

²⁰ See Sorenson Comments at 9.

toll-free numbers are inherently incapable of supporting E911 service,²¹ and the Commission should not adopt any policies based on this erroneous premise.

B. Eligibility for Multiple Telephone Numbers

Commenters generally agreed with Sorenson that users of VRS and IP Relay should be entitled to receive separate numbers for different devices with unique IP addresses, much like hearing users can have different numbers for home telephones, cell phones and second lines. As the Consumer Groups explained, “[m]ultiple numbers are likely to be necessary to receive and place calls on . . . equipment that uses different technologies . . . and for multiple video-based . . . equipment that operate[s] on systems with different IP addresses.”²² CSDVRS similarly observed, “[h]earing individuals have telephone numbers associated with telephones used in various facets of their lives – home, work, school, etc. In order to ensure functional equivalency, relay users who are deaf, hard of hearing, and speech disabled should similarly be able to acquire telephone numbers as needed for the telephones that they use in their residences, places of employment, educational institutions, etc.”²³

GoAmerica is mistaken, however, in its claim that it is not possible for a single device to have multiple numbers assigned to it simultaneously.²⁴ As Sorenson explained

²¹ If a provider assigns both a toll-free and a geographic NANP number to a user, the provider should ensure for purposes of 911 that the geographic number is passed to the PSAP. Of course, if only a toll-free number is assigned to a user, the provider must ensure that that number passes to the PSAP.

²² Consumer Groups at 7.

²³ CSDVRS Comments at 8; *see also* Comments of GoAmerica, Inc. at 9 (“GoAmerica Comments”).

²⁴ GoAmerica Comments at 10.

in its initial comments, as long as the user obtains all numbers for a particular device from a single provider, it is possible for a single device to have multiple numbers. By contrast, allowing users to obtain multiple numbers from multiple providers for a single device would create significant challenges. For example, no single provider would be responsible for ensuring that the device's network address and the user's last reported Registered Location were current. Designating a single default provider for each device would solve this problem, ensuring that the device and user information – each of which is critical to providing 911 services – will be promptly and properly updated.

C. Assignment of Toll-Free Numbers

As Sorenson explained in its comments, users of Internet-based TRS should be free to obtain a geographic number and/or a toll-free number for a particular device.²⁵ As noted, full E911 functionality for toll-free numbers is available today.²⁶ The FCC thus should reject AT&T's proposal to discourage use of toll-free numbers by VRS or IP Relay users. According to AT&T, "[w]ith the assignment of ten-digit numbers to Internet-based TRS users, toll-free numbers are not needed to make Internet-based TRS functionally equivalent to voice services, and in fact, now risk distinguishing Internet-based TRS users."²⁷ Yet, hearing users today are able to obtain toll-free numbers. Indeed, AT&T itself offers a toll-free service that permits customers to have both a local, geographic number and one or more toll-free numbers associated with a single standard

²⁵ Sorenson Comments at 9.

²⁶ *See supra* at 10-11.

²⁷ AT&T Comments at 11.

telephone line, thus “Multipl[y]ing the Uses of Regular Telephone Lines.”²⁸ Given that there is no impediment to providing full E911 functionality for toll-free numbers, functional equivalency requires that users of VRS and IP Relay have the same access to toll-free numbers as that enjoyed by users of voice service.

D. Signaling

Like Sorenson, a number of parties generally support the goal of transitioning to SIP-based VRS devices.²⁹ Commenters who address the issue of timing, however, caution that any transition is not essential to and should not delay implementation of the new numbering requirements. GoAmerica, for example, stated that “nothing should stand in the way of providers meeting the 10 digit numbering deadline of December 31, 2008.”³⁰ Similarly, CSDVRS proposed that any transition to SIP should “not be started until these ‘SIP standards’ [have been] defined and approved by an industry forum.”³¹ In any event, as commenters acknowledge, H.323 is widely used today for VRS.³² To the extent that the FCC determines it is necessary, it can revisit the issue of standards-based signaling in the future, once it has fully resolved pending issues critical to implementation of the new numbering regime.

²⁸ See “AT&T Toll-Free Readyline Service,” attached as Exhibit 1, at 3.

²⁹ See, e.g., Comments of Viable Communications, Inc. and Viable Inc. at 5 (“Viable Comments”); CSDVRS Comments at 10-11; Consumer Groups at 10. *But see* Sprint Nextel Comments at 8-9 (arguing against adoption of a specific signaling standard).

³⁰ GoAmerica Comments at 12; *see also* Sorenson Comments at 10.

³¹ CSDVRS Comments at 11.

³² CSDVRS Comments at 10 (“video relay services currently rely primarily on the H.323 protocol”); *see also* Viable Comments at 5; GoAmerica Comments at 11-12.

E. Verification of Registration

As Sorenson pointed out in its comments, any process to verify a user's registration information should not impose "undue burdens on legitimate Internet-based TRS users."³³ Sorenson further agrees with those commenters who argue that the FCC should not impose a mandatory process for verification of registration for relay services. Sprint Nextel, for example, acknowledged that there are a number of ways to verify registration, but urges the Commission not to "prescribe one verification method and instead leave it to each IP Relay provider to design and implement its own verification method."³⁴ The Consumer Groups objected to any registration process that would be overly burdensome to relay service users, or would be more extensive than those required of voice telephone users.³⁵ GoAmerica likewise argued that use of a mandatory registration system would burden legitimate use of relay service by consumers and erode functional equivalency.³⁶

As Sorenson and others have demonstrated, providers currently have substantial incentives to compete for default provider status among relay consumers.³⁷ At the same time, relay service consumers have a complementary incentive to "comparison shop" among relay service providers before selecting a default provider. Under these circumstances, the FCC should permit the "marketplace" to dictate acceptable methods of

³³ Sorenson Comments at 11 (quoting *FNPRM* ¶ 118).

³⁴ Sprint Nextel Comments at 7.

³⁵ Consumer Groups at 18-19.

³⁶ GoAmerica Comments at 19-20.

³⁷ *See FNPRM* ¶ 120.

verification, thus ensuring that providers offer – and consumers obtain – the most effective and least burdensome means of verification of registration.

F. Incentives for Selecting and Switching Default Providers

The FCC has repeatedly recognized the importance of competition for relay services.³⁸ Among other things, the FCC has found that competition among providers enhances consumer choice, service quality, and the development of new equipment and innovative features.³⁹ As it has in the past, the FCC should continue to permit providers to compete with each other based on service quality, new equipment and innovative features. The FCC should not, however, permit providers to offer financial or other incentives as a condition of initially registering with or switching default providers.

In its initial comments, Sorenson urged the Commission to make clear that providers cannot condition the receipt of financial or other incentives, such as t-shirts, gift cards, movie tickets, DVDs or any other one-time or ongoing incentives, on a user changing a default provider, keeping a default provider for some period of time, or increasing usage of service.⁴⁰ At least one commenter, however, argued that providers

³⁸ See, e.g., *TRS Numbering Order* ¶ 85; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Notice of Proposed Rulemaking, FCC 08-149, ¶¶ 10, 19 (rel. June 24, 2008); Report and Order and Declaratory Ruling, 22 FCC Rcd 20140, ¶ 77 (2007); Declaratory Ruling, 22 FCC Rcd 379, ¶ 25 (2007); Declaratory Ruling and Further Notice of Proposed Rulemaking, 21 FCC Rcd 5442, ¶ 19 (2006).

³⁹ See, e.g., *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Order on Reconsideration, 20 FCC Rcd 20577, ¶¶ 21, 26, 29 (2005).

⁴⁰ Because of the relationship between devices and numbers, many providers will want to give a user a new device when the user selects that provider as his or her default provider. This decision to give a user a device should be permitted as long as the granting of the device is not conditioned on any minimum usage requirements.

should be allowed to condition the receipt of “nominal gifts,” such as “a company ink pen, an ice cream cone, a bag of popcorn or a DVD disk of an ASL movie,” on a user registering with that provider.⁴¹ Permitting providers to give away such “nominal gifts” as a condition of registering would effectively encourage a “bidding war” among providers, as each provider is motivated to escalate the war by offering users greater and greater incentives for selecting them as their default provider. Indeed, the Commission witnessed just such a “bidding war” among long distance providers during the 1990s, when providers routinely offered long distance users checks for \$50, \$100, or, in some cases, even more, as an incentive to select them as the user’s default provider.⁴² The Commission accordingly should clarify that providers are prohibited from conditioning the receipt of any financial or other incentive on (1) registering initially with a default provider; or (2) switching from one provider to another.⁴³

G. Neutral Third-Party Administrator

Sorenson is working very hard to meet the December 31, 2008 deadline for the various mandates of the *TRS Numbering Order*. As Sorenson and other parties recently explained, however, progress on a number of fronts cannot be made until the FCC selects a neutral third-party administrator to map NANP telephone numbers assigned to Internet-

⁴¹ GoAmerica Comments at 7-8.

⁴² See, e.g., Tariff Transmittal Public Reference Log, 1992 FCC Lexis 2791, at *2 (May 22, 1992) (“Modifies AT&T’s Long Distance Message Telecommunications Service Promotion in which AT&T customers are offered . . . a check (not to exceed \$100) if they select AT&T as their primary interexchange carrier . . .”) (AT&T Tariffs FCC Nos. 1 & 13, Transmittal No. 4121, issued May 20, 1992, effective June 3, 1992).

⁴³ See *supra* note 40 (prohibition does not apply to new equipment).

based TRS users to appropriate Internet addresses.⁴⁴ If that selection is not made soon, providers will remain in the dark on key technical specifications regarding the TRS Telephone Numbering Directory. The Commission should not jeopardize the December 31 deadline in this manner, but rather should promptly select a neutral third-party administrator.

III. CONCLUSION

The Commission should ensure that Internet-based TRS users have functionally equivalent telephone numbers and emergency calling capabilities by adopting rules consistent with these reply comments, as well as with Sorenson's initial comments.

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August 25, 2008

⁴⁴ See letter from Toni R. Acton, AT&T, to Cathy Seidel, FCC, CG Docket No. 03-123 (Aug. 7, 2008). In addition to AT&T, the letter was filed on behalf of the following TRS providers: Sprint Nextel, Healinc Telecom, Inc.; Viable, Inc.; CSDVRS, LLC; GoAmerica, Inc.; Sorenson; Snap!VRS; Hamilton Relay, Inc.; Hawk Relay, LLC; UURelay, Inc., and Communications Access Center.

Exhibit 1

AT&T TOLL-FREE READYLINE Service



at&t

AT&T Toll-Free

- What is AT&T Toll-Free Readyline Service?
- How does it work?
- What can it offer my business?
- What are the benefits of using AT&T Toll-Free Readyline?

What is AT&T Toll-Free

AT&T Toll-Free Readyline's Advantages:

- Terminates On An Existing Local POTS Line
- Gives Customers, Employees and Business Partners Reliable, Toll-Free Access To Your Business
- Delivers Maximum Efficiency, Low Costs and Optimal Customer Service Capabilities
- Calls Can Originate In Domestic Locations, Canada, Mexico and Overseas

How does it work?

Access:

- Uses Existing POTS Line
- Multiplies the Uses of Regular Telephone Lines
- You Keep Your Local Telephone Number and Get a New Toll-Free Number
- Customers Reach Your Business By Using a Single, Simple Toll-Free Number
- This Number Can Be Used For All Domestic, Mexico, Canada and Overseas Calls

What can it offer my business?

AT&T Toll-Free Readyline Features:

- Interstate and Intrastate Calls Complete Over the Same Line
- Fast and Responsive Start-up
- Customizable Calling Areas
- Expanded Service Coverage
- AT&T Toll-Free Service Assurance Policy 5-Minute Guarantee

What can it offer my business? (cont'd.)

AT&T Toll-Free Readyline Features

- Consolidated, Continuous Billing Plan
- AT&T Toll-Free Advanced Features Are Available
- Monthly Executive Summary Reports
- Monthly Call Detail Reports
- UNIPOTS Enables Multiple Toll-Free Numbers To Operate On the Same POTS Line

What are the benefits of using AT&T Toll-Free Readyline?

AT&T Toll-Free Readyline's Benefits

- Simplicity
- Responsiveness
- Controls Expenses
- Increased Savings

What are the benefits of using AT&T Toll-Free Readyline? (cont'd.)

AT&T Toll-Free Readyline's Benefits

- Improves Customer Service
- Simplifies Billing
- Increased Sales
- Precise, Targeted
Telemarketing
- Boosts Advertising Efforts