

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

In the Matter of)	
)	
Telecommunications Relay Services)	CG Docket No. 03-123
And Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	WC Docket No. 05-196
)	
Petition for Clarification on Default Provider))	
Obligations In Ten-Digit Numbering Order)	
_____)	

REPLY TO OPPOSITION OF SORENSON COMMUNICATIONS, INC.

I. Introduction and Background

Pursuant to Section 1.45(c) of the Commission’s rules¹ CSDVRS, LLC hereby submits a Reply to Sorenson’s Opposition to CSDVRS’ Petition for Clarification on Default Provider Obligations in Ten-Digit Numbering Order, originally filed by CSDVRS on August 15, 2008.

As Sorenson notes in its Opposition, the FCC’s *Interoperability Ruling*² prohibits providers from taking any steps that would “restrict a consumer’s unfettered access to other providers’ service.”³ In accordance with this prohibition, for the past two years, relay users have grown accustomed to being able to dial around to any provider from any provider’s equipment by following a few simple steps. Specifically, when a consumer has the equipment of one provider and wishes to dial another provider, that consumer simply adds the address of

¹ 47 C.F.R. §1.45(c)

² *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling and Further Notice of Proposed Rulemaking, Dkt. No. 03-123, FCC 06-57, 21 FCC Rcd 5442 (2006) (*Interoperability Ruling*).

³ *Interoperability Ruling* at ¶34.

the alternate provider in the equipment's address book or speed dial list, and then retrieves that number as needed for the calls the user wants to make. This mode, which allows a user to easily and swiftly dial any relay provider by clicking on that provider's name, should remain in place so that the consumer can continue to enjoy complete VRS interoperability.

Alternatively, relay users can now enter any provider's URL in order to be routed to that provider, and this method of dialing around should also be retained.

CSDVRS is not attempting to have the FCC "micromanage the methods of ensuring interoperability," as is suggested by Sorenson's Opposition.⁴ Nor is CSDVRS suggesting that the method of accessing one's default provider must be identical to the method of dialing around to an alternative provider. However, CSDVRS is very concerned that Sorenson's statement that "[t]he new numbering regime will necessarily change the manner in which the end user experiences interoperability" may translate to dial-around methods that could be overly burdensome for consumers. In order to preserve functional equivalency and give the *Interoperability Ruling* its full effect, CSDVRS urges the FCC to ensure that consumers continue to have the same freedom and easy ability to access alternative providers as they have for the past few years.

Respectfully submitted,

/s/

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⁴ Opposition at 4.

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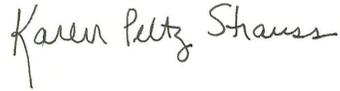
September 2, 2008

Certificate of Service

I hereby certify that on this 2nd day of September, 2008, I caused a true and correct copy of the Reply to Opposition of Sorenson Communications Inc. to be mailed by first class U.S. mail, postage prepaid, to:

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