Presentation On TRS Numbering Issues And Default Provider Obligations

To Amy Bender, Office of Chairman Martin

October 6, 2008

Ed Routhier, President, GoAmerica, Inc.
Kelby Brick, Vice President, Strategic and Regulatory Policy, GoAmerica, Inc.
George Sutcliffe, Vice President and General Manager, for VRS, GoAmerica, Inc.
George L. Lyon, Jr., Director of Compliance, GoAmerica, Inc.
Amy Mehlman, Mehlman Capital Strategies, Inc.

Hands On VRS® Powered by Purple™

GoAmerica

The Numbering Order presents two serious implementation issues

- The TRS numbering order should be commended as a great step forward for the civil rights of relay users across the country.

- There are two issues that can actually counteract the intent of this order and work against the best interest of the relay users.

Hands On VRS® Powered by Purple™

GoAmerica

The Numbering Order presents two serious implementation issues

- End point modifications of existing videophones should not be required.
  - Proprietary videophones need to continue to be managed by the provider distributing those devices.
  - Prohibiting providers from managing proprietary videophones will force these devices to cease working as designed.
- Mandatory registration will inhibit or prevent dial-around capabilities and limit consumer access.

Hands On VRS® Powered by Purple™

GoAmerica

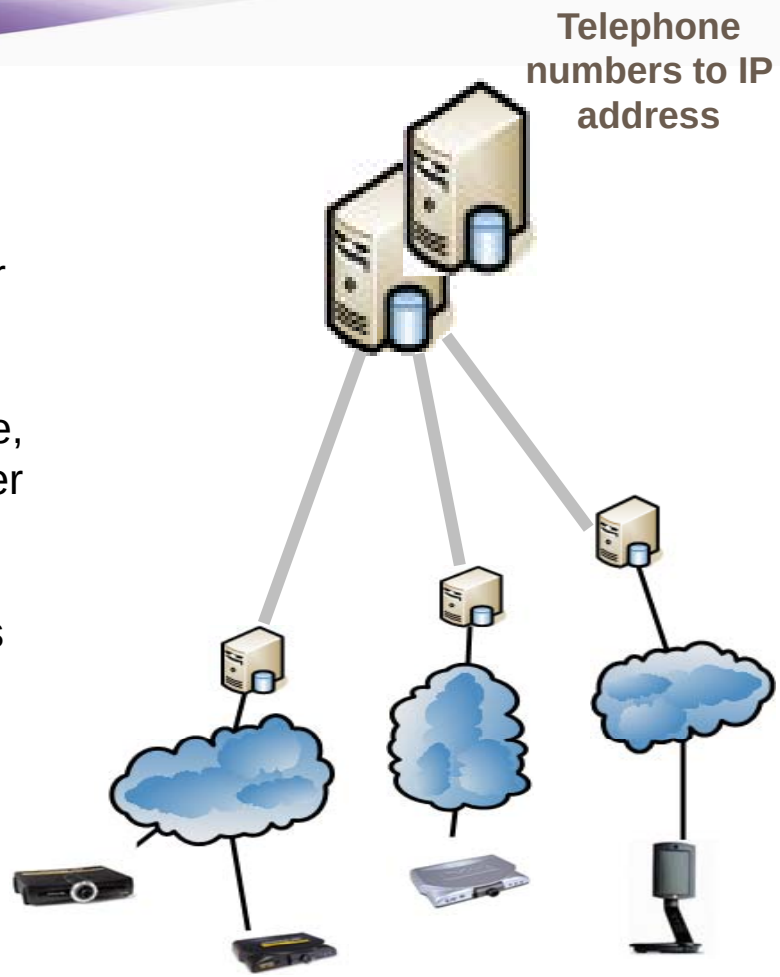
Simple solution for creating dialing parity

1. New secure 3rd Party database containing current IP address & telephone numbers of VRS users.

2. Each VRS provider must keep the Central Database current with end user IP address & telephone number using a secure database interface.

3. The 100,000+ existing video phones remain the same, communicating their current IP address to the provider of the device as they do today.

4. Current proprietary communications between devices and providers handle multiple key functions:
    - **Reporting / tracking current IP address**
    - **Routing calls via 10 Digit Numbers**
    - Providing updates and software fixes
    - Managing Address Books and other enhanced features



Hands On VRS® Powered by Purple™

GoAmerica

Device management should not change

- Section 64.611(c) & (e) prohibits the former default provider who has given out a device from acquiring routing information from the user following a default provider switch, but nevertheless requires the former provider to ensure that the device delivers information to the new default provider.

- The requirements of Section 64.611(c) & (e) are unworkable.

- This requirement will serve to limit consumer choice and perpetuate the current monopoly market dynamics.

Hands On VRS® Powered by Purple™

GoAmerica

Section 64.611(c & e)'s requirements are unworkable

- The provider supplying a device would have to effect an end-point modification to direct the device to report its IP Address (and other data communications) to the new default provider and away from the former provider.
- Assuming this is even possible, other providers are incapable of receiving and utilizing incoming data from a proprietary videophone of another provider, e.g., the Sorenson VP.
- The result will be that end users will not have their IP address information kept current in the new central database and their video phone will not be able to query the central database to place a 10 digit call if the new provider can not receive or support the devices information.
- Additionally, enhanced features of the device will be lost such as address books, call logs, and video mail causing consumers to immediately cancel the porting of their number to a new provider.

Hands On VRS® Powered by Purple™

GoAmerica

End point modifications will stop consumer choice

- It is likely most videophones will be rendered near useless following an end point modification due to a default provider switch.
- To the extent they are not rendered useless, most videophones will lose their enhanced features, such as address books, call logs, and video mail.
- Consumers will immediately cancel the porting of their number to a new provider in order to retain these key features.
- Since Sorenson currently has more than 90 percent of the existing videophones placed with deaf and hard of hearing persons, its near monopoly will be strengthened and competition stifled.

Hands On VRS® Powered by Purple™

GoAmerica

The distributor of CPE must maintain responsibility for updating the central database

- Providers cannot therefore comply with Section 64.611(c).
- Consumers will not be able to port numbers back and forth from proprietary CPE as Section 64.611(c) is now written.
- Thus, the distributor of a device must maintain responsibility for updating the central database as to that device's IP Address and managing the device.

Hands On VRS® Powered by Purple™

GoAmerica

Section 64.611 should **not** be read to require end point modification of CPE

- The default provider requirement was adopted:
  - -- To allow providers to associate users' 10 digit telephone numbers with their IP Addresses.
  - -- To facilitate provision of 911 service.
  - -- To facilitate implementation of appropriate network security measures.
- None of these goals require end point modification of CPE.

Hands On VRS® Powered by Purple™

GoAmerica

End point modifications for many text devices simply cannot be made

- IP Relay is currently provided on a wide variety of text platforms including web, AIM and wireless, each with unique technical challenges.
- Many of those platforms, such as cell phones and other wireless devices simply cannot accept an end point modification.
- Any requirement for end point modification of these devices will mean providers can no longer serve these platforms.
- There is no justification for denying consumers the flexibility these various platforms offer for IP Relay service.
- For text, functional equivalence is simply keying the called number into the “client” no matter what the platform – forced registration and log-in prevents this ease of use

Hands On VRS® Powered by Purple™

GoAmerica

The FCC should **not** require registration to use relay service

- We agree registration should be encouraged and is necessary to provide a 10 digit number, but registration should nevertheless be voluntary.
- Mandatory registration will prevent acceptance of dial-around calls and use of many text service platforms.
- Consumers traditionally have balked at registration for privacy reasons due to the involvement of a third party in the call.
- Registration presents particular problems requiring log-in for many text users since they are use a variety of platforms, including AIM, web, and wireless devices with multiple and often changing IP addresses to access text relay.
- Registration is unnecessary to combat fraud given recently adopted anti-fraud measures.

Hands On VRS® Powered by Purple™

GoAmerica

GoAmerica requests the FCC to:

- Require providers that supply CPE to continue to manage the devices in the event of a preferred provider switch.
- Not require end point modifications of CPE to route outbound calls, or in the event of preferred provider changes.
- Not require mandatory registration to use Internet based TRS.

Hands On VRS® Powered by Purple™

GoAmerica