

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

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

REPLY COMMENTS OF SORENSON COMMUNICATIONS, INC.

Pursuant to the Public Notice issued in the above-captioned proceedings,¹ Sorenson Communications, Inc. (“Sorenson”) files these reply comments in response to comments on Sorenson’s request for a limited waiver of the Federal Communications Commission’s (“FCC’s” or “Commission’s”) prohibition on the use of “proxy” or “alias” numbers.² As Sorenson explained in its petition,³ the requested waiver is necessary in order to minimize the disruption to users of video relay services (“VRS”) during the transition to North American Numbering Plan (“NANP”) numbers.

¹ Public Notice, *Pleading Cycle Established for Comments on Petition of Sorenson Communications, Inc. for Limited Waiver*, CG Docket No. 03-123 and WC Docket No. 05-196, DA 08-2255 (rel. Oct. 8, 2008).

² *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 and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591, ¶ 22 (2008) (“*Report and Order*”); 47 C.F.R. § 64.611(d).

³ Petition for Limited Waiver of Sorenson Communications, Inc., CG Docket No. 03-123 and WC Docket No. 05-196 (Sept. 30, 2008) (“*Petition*”).

I. DISCUSSION

The comments filed in response to Sorenson's Petition appear to misapprehend both the purpose and the effect of the requested waiver. Contrary to the claims of some commenters, granting Sorenson's petition would not reduce Sorenson's commitment to rolling out NANP numbers to VRS users.⁴ As GoAmerica correctly points out,⁵ Sorenson already has begun to advertise the availability of NANP numbers and is distributing NANP numbers. Sorenson will ramp up its efforts later this quarter as the December 31, 2008 implementation deadline approaches.⁶ Moreover, Sorenson will not be issuing any new proxy numbers after December 31, 2008, so concerns that Sorenson will "aggressively market" its proxy numbers rather than NANP numbers are completely unfounded.⁷

Despite commenters' speculation to the contrary, Sorenson's request is based on a desire to minimize the disruption associated with the transition to NANP numbers. For example, a VRS user who obtains a new NANP number may not remember to update his or

⁴ See Opposition of GoAmerica, Inc. at 7-8 ("GoAmerica Comments"); Comments of Hamilton Relay, Inc. at 3 ("Hamilton Comments"). (Unless otherwise indicated, all comments and oppositions cited herein were filed in CG Docket No. 03-123 on Oct. 15, 2008.)

⁵ GoAmerica Comments at 6.

⁶ Sorenson has long been involved in the effort to obtain NANP numbers for users of VRS and IP Relay and was one of a small number of providers that actively participated in the ATIS process that laid the groundwork for the FCC's order enabling users of Internet-based TRS to obtain such numbers.

⁷ See GoAmerica Comments at 7-8. Absent Commission action on Sorenson's Petition for Reconsideration and Clarification (filed in CG Docket No. 03-123 and WC Docket No. 05-196 on August 18, 2008), Sorenson may not issue proxy numbers beginning December 31, 2008. Sorenson has not sought a waiver that would permit it to continue issuing proxy numbers. Several of the comments repeat arguments made in response to Sorenson's Petition for Reconsideration, which also addressed proxy numbers. Many of these arguments are driven by concerns about discouraging users from obtaining NANP numbers. Sorenson's waiver request is limited to situations in which the user already has obtained an NANP number, however. Thus, the only relevant question is how best to manage the transition from proxy numbers to NANP numbers.

her doctor's office with the new number, particularly because the user may be contacted by the doctor only infrequently (*e.g.*, when it is time for an annual appointment). Sorenson seeks to address this situation by allowing these calls to be completed while also informing the caller about the VRS user's new number. Refusing to complete the call and simply providing the caller with the user's new number, as some commenters suggest,⁸ will not expedite the roll-out of NANP numbers. Nor will it serve VRS users or their hearing callers. Instead, it likely will irritate hearing callers who do not have the deaf user's updated contact information and may, in some instances, deter the caller from contacting the VRS user at all.

For example, consider the situation in which a doctor's office tries to contact a VRS user by using Sorenson's toll-free number and the proxy number the user has previously provided to the doctor. First, the caller, who is unlikely to be very familiar with VRS, dials Sorenson's toll-free number, 1-800-FASTVRS, to reach a Sorenson interpreter. The caller does not instantaneously connect to the deaf user, but has to wait for the call to reach the front of the queue before connecting to an interpreter.⁹ Once the interpreter answers, the caller provides the interpreter with the number of the party he or she is trying to reach. Sorenson would like to have the interpreter provide the calling party with the called party's new number, but then connect the call. In contrast, some commenters would like the interpreter to inform the caller that the call cannot be completed and instruct the caller to hang up and dial the new number. Under this approach, the hearing person, who has already waited for one interpreter, would need to dial the new number, reenter the queue, and wait

⁸ *See, e.g.*, Opposition of CSDVRS, LLC at 4-5 ("CSDVRS Comments").

⁹ Unlike the traditional telephone calls that the hearing caller is used to making, VRS calls do not connect to the called party immediately. Rather, there is usually a slight delay before callers are connected to an interpreter. *See* 47 C.F.R. § 64.604(b)(2)(iii) (requiring VRS providers to answer 80% of all calls within 120 seconds, measured on a monthly basis).

for the second call to reach the front of the queue again before connecting to a second interpreter. This approach seems counterproductive to the effort to facilitate hearing-to-deaf calls. Requiring callers to hang up and re-dial the called party using the new NANP number also would be inconsistent with the Commission's rule requiring interpreters to accept "sequential calls."¹⁰ At a minimum, such an approach would not be consumer friendly. Users would be better served if the initial call were completed as dialed, even as the interpreter used the opportunity to inform the caller of the called party's new number.

Finally, concerns about the effect of proxy numbers on 911 calls are unfounded. Sorenson agrees with commenters that it is essential for relay users to obtain NANP numbers and provide their registered location information to their default providers. When a user dials 911 via Sorenson, it does not matter whether the user has a proxy number. If the caller has received an NANP number and given a registered location, the PSAP will be identified based on that registered location; the NANP number will be passed as the call-back number; and the location information will be transmitted to the PSAP. If the caller has not yet provided his or her registered location, the interpreter will obtain the information manually, use Sorenson's third-party provider to identify the appropriate PSAP, and will give the interpreter's call-back number to the PSAP. In neither situation is the proxy number relevant.

¹⁰ 47 C.F.R. § 64.604(a)(3)(i).

II. CONCLUSION

For all the reasons stated above, the Commission should grant Sorenson a limited waiver of 47 C.F.R. § 64.611(d) in order to minimize customer disruption as users transition to NANP numbers.

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Respectfully submitted,

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Certificate of Service

I hereby certify that on this 21st day of October, 2008, I caused true and correct copies of the foregoing Reply Comments of Sorenson Communications, Inc. to be served by first class U.S. mail, except where otherwise indicated, addressed to:

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