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Our File No.: 4889010001

October 29, 2008

Via Electronic Comment Filing System

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: NOTICE OF EX PARTE MEETING

Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services CG Docket No. 03-123 and CG Docket No. 08-15

Dear Ms Dortch:

On October 24, 2008, Dr. Bob Segalman, President, Speech Communications Assistance by Telephone, Inc. (“SCT”) (by speakerphone), Rebecca Ladew, East Coast Liaison Representative, SCT, Jennie Ladew, and the undersigned counsel to Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), met with Cheryl King, Greg Hlibok (by speakerphone) and Susan Kimmel of the Disability Rights Office of the Consumer & Government Affairs Bureau.¹ We discussed the positions taken by SCT, TDI and the other Consumer Groups in their September 12, 2008 Comments and September 29, 2008 Reply Comments regarding Speech-to-Speech (“STS”) and Internet Protocol Speech-to-Speech (“IP STS”) Telecommunications Relay Services (“TRS”).

We indicated that the comments filed by the various parties generally showed a consensus in favor of (1) the 20 minute rule for the Communications Assistant (“CA”) staying with the call after effective communications has been established; (2) consumers with speech disabilities being provided the option to mute their voice on the call; (3) the CA confirming the confidentiality of the call with new STS and IP STS users; (4) the CA

¹ TDI requests waiver of 47 C.F.R. § 1.1206(b) to permit it to file this notice of *ex parte* meeting more than one business day after the occurrence of the *ex parte* meeting.

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not disconnecting an STS or IP STS call until after there has been 60 seconds of silence; (5) IP STS is a form of STS; (6) IP STS should be compensated at the same rate as STS; and (7) substantial outreach and consumer training for STS and IP STS.

We expressed our concern that STS and IP STS are different from other forms of TRS in that for STS and IP STS it takes a substantial amount of time to establish effective communications between the CA and a person with speech disabilities before the conversation can begin. In order to make sure that STS and IP STS providers have the proper incentives to establish effective communications and do not have any disincentives, we recommended that compensation be based on session minutes rather than conversation minutes. However, we also explained that the clock for the 20 minute rule ought not begin until effective communications is established and the conversation begins. Otherwise, there could be a situation where very little time is left to have the conversation after having established effective communications.

We discussed that Section 225 of the Communications Act of 1934, as amended, 47 U.S.C. § 225, gives the Commission authority to establish TRS standards, including standards for outreach and consumer training. We recommended the establishment of an advisory committee composed of state regulatory, industry and consumer representatives to develop such standards.

We also discussed 7-1-1 dialing. After mentioning that branded phones are automatically connected to an STS CA, we recommended that for non-branded phones the Commission require that there be a prompt such as to press 1 for STS. However, some people with speech disabilities have other disabilities that inhibit their ability to press 1 within the time provided to press 1. In such case, we recommended that the call be transferred either to a CA who is trained as an STS CA or who is trained to recognize callers with speech disabilities so that the call will then be transferred to an STS CA. We also explained that having an 800 number for STS calls was not a viable alternative because some people with speech disabilities have other disabilities that would make it difficult for them to dial an 800 number. We mentioned that Texas has established a system that works well and that other states should be encouraged to follow that model.

Lastly, we mentioned that the small number of complaints received by the Commission regarding STS does not mean that people with speech disabilities are not having difficulties with STS. Rather, most people with speech disabilities are not even aware of STS, and many of the people with speech disabilities that actually use STS are either not aware of the Commission's complaint procedures or would not file a complaint due to their finding the complaint process difficult.

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Very truly yours,

/S/

Eliot J. Greenwald

cc: Greg Hlibok
Susan Kimmel
Cheryl King
Jennie Ladew
Rebecca Ladew
Dr. Bob Segalman