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Via Electronic Filing

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

Re: *Written Ex Parte: Telecommunication 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 and WC Docket No. 05-196

Dear Ms. Dortch:

Sorenson Communications, Inc. ("Sorenson") respectfully submits this written *ex parte* communication in order to update its position regarding the treatment of costs associated with obtaining multiple numbers for users of IP Relay and Video Relay Service ("VRS").

In its Further Notice of Proposed Rulemaking in the above-captioned proceeding, the FCC sought comment on whether Internet-based Telecommunications Relay Service ("TRS") users should be allowed to obtain multiple numbers, and if so, at what cost.¹ In its comments, Sorenson suggested that although users should be entitled to multiple numbers (that is, a toll-free number as well as a 10-digit local number), providers should only be compensated for the costs of providing a single number to each device.² In making that suggestion, Sorenson assumed that Internet-based TRS providers would have the

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, 23 FCC Rcd 11591, ¶ 110 (2008).

² Comments of Sorenson Communications, Inc., CG Docket No. 03-123 and WC Docket No. 05-196, at 9 (Aug. 8, 2008).

ability to decide whether they wanted to give their users the choice of a 10-digit local number, a toll-free number, or both.

On November 19, 2008, Sorenson and other Internet-based TRS providers were informed by NeuStar, the administrator of the TRS Numbering Database, that in order to enable portability of toll-free numbers, providers would need to obtain a 10-digit local number to be associated with each toll-free number. Because providers will not have the option of obtaining (and paying for) only a toll-free number for a given user, Sorenson now requests that providers be compensated for up to two numbers per user.

Pursuant to the Commission's rules, this letter is being submitted for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Ruth Milkman

Ruth Milkman

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