

# KPS CONSULTING

“Building an Access Bridge in Technology and Telecommunications”

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December 16, 2008

By electronic filing:

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Ex Parte Presentation**  
CG Docket No. 03-123  
WCB Docket No. 05-196

Dear Ms. Dortch:

On December 15, 2008, the following meetings were held to discuss various issues concerning the implementation of the FCC’s ten-digit numbering order:

- Meeting with Michelle Carey, Office of Chairman Martin – Andy May and Sean Belanger of CSDVRS participated by conference call; Karen Peltz Strauss, outside legal consultant for CSDVRS, participated in person.
- Meeting with Cathy Seidel and Nicole McGinnis of the Consumer and Governmental Affairs Bureau; Bill Dever and Nicholas DeGani of the Wireline Competition Bureau – Andy May and Sean Belanger of CSDVRS participated by conference call; Karen Peltz Strauss, outside legal consultant for CSDVRS, participated in person.
- Meeting with Scott Deutchman, Office of Commissioner Copps; Scott Bergmann, Office of Commissioner Adelstein – Andy May of CSDVRS participated by conference call; Karen Peltz Strauss, outside legal consultant for CSDVRS, participated in person.

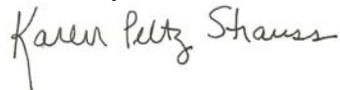
At the above meetings, the following issues were discussed:

1. The need for explicit language in the upcoming numbering order that makes clear the prohibition against a provider penalizing or retaliating against a consumer who exercises his right to dial around his default provider, including the prohibition against degrading or diminishing the functionality of the equipment or network services

needed by that consumer to make either relay or point to point calls using the default provider's end user equipment.

2. The need for a temporary waiver from 47 C.F.R. §64.611(e), which presently requires each VRS provider to equate routing information to a phone number for devices given out by other providers by December 31, 2008. A waiver should be granted until such time that there is an industry standard enabling providers to accept routing information from devices they did not supply or manufacture. In addition, the FCC should consider carefully the practicality of any standard that would result in having consumers left with devices that do not have most of their features and functionalities after being ported to a new default provider.
3. The need for an industry-wide notice to consumers that provides consumers with clear and accurate information about what ten digit numbering will mean for them. Such notice should inform consumers of their right to choose any default provider, what it means to have a default provider, and the continued right to dial around after a provider is chosen, without any penalty or retaliation from the default provider.

Sincerely,

A handwritten signature in cursive script that reads "Karen Peltz Strauss".

Karen Peltz Strauss  
Legal Consultant  
CSDVRS, LLC