

KPS CONSULTING

“Building an Access Bridge in Technology and Telecommunications”

3508 Albemarle Street, NW

Washington, DC 20008

202.363.1263

kpsconsulting@starpower.net

December 19, 2008

By electronic filing:

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

Re: **Ex Parte Letter**
CG Docket No. 03-123

Dear Ms. Dortch:

As we approach the deadline for the implementation of a ten digit numbering system for VRS users, CSDVRS is concerned about the confusion that consumers are expressing with respect to what occurs when consumers have the device of one provider, but port their numbers to a different provider. In prior pleadings to the FCC, CSDVRS has already pointed out that in this situation, the user’s new default provider does not have the ability to collect routing information from that device, and therefore has no way of updating the database on its own, without the assistance of the provider who had given that device to the user. Nor does the new default provider have the ability to support the various functionalities of that device. The lack of an industry-wide standard to enable control of one provider’s device by another provider means that – in effect – the consumer who ports his number to a different provider will no longer have a working device, and will have to acquire a new device from the new default provider.

While ultimately, this model may serve to promote competition and encourage innovation by smaller providers – who will develop equipment with improved features and functions to entice consumers to their equipment and services – CSDVRS is concerned that implementation of such a model by December 31st will be very confusing for consumers who have expected their equipment to fully function in the manner in which it has always functioned when they port a telephone number.

Accordingly, CSDVRS is proposing that for a six month period, until June 30, 2009, providers who have distributed video devices for which a number has been ported, continue to support the following basic functions on those devices on behalf of the new

default provider (where the distributing provider has ceased being the default provider for the user of that equipment):

1. dialing 10 digit phone numbers for point-to-point or VRS calls
2. calling 9-1-1
3. VRS (video) mail
4. the user's address book
5. notification of missed calls

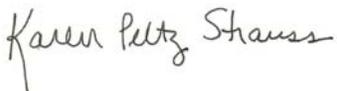
CSDVRS believes that the above functions are needed to achieve functional equivalency, and that having the distributor of such devices support these features is the minimum needed to ensure that consumers have basic communication capabilities. During the interim six month period, the FCC should work with industry and consumers on educational, technical, and other efforts to develop a porting model that is acceptable to all stakeholders.

Respectfully submitted,

/s/

Sean Belanger, CEO
CSDVRS, LLC
600 Cleveland Street
Suite 1000
Clearwater, FL 33755

By:



Karen Peltz Strauss
KPS Consulting
3508 Albemarle Street, NW
Washington, D.C. 20008
202-363-1263
kpsconsulting@starpower.net

cc: Amy Bender
Scott Deutchman
Scott Bergmann
Nicholas Alexander
Greg Orlando
Cathy Seidel
Dana Shafer

Julie Veach
William Dever
Nicholas Degani
Nicole McGinnis
Thomas Chandler