

2300 N STREET, NW  
SUITE 700  
WASHINGTON, DC 20037  
TEL 202.783.4141  
FAX 202.783.5851  
www.wbklaw.com

April 2, 2009

**David A. O'Connor**  
202-383-3429  
doconnor@wbklaw.com

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: **EX PARTE PRESENTATION**

*Telecommunications Relay Services and Speech-to-Speech Services for Individuals  
with Hearing and Speech Disabilities*  
CG Docket No. 03-123

*E911 Requirements for IP-Enabled Service Providers*  
WC Docket No. 05-196

Dear Ms. Dortch:

On April 1, 2009, Dixie Ziegler, the Vice President of Hamilton Relay, Inc. (“Hamilton”) and the undersigned counsel for Hamilton met with Thomas Chandler of the Disabilities Rights Office, William Dever and Stephanie Weiner of the Wireline Competition Bureau (“WCB”), and Richard Hovey of the Public Safety and Homeland Security Bureau. Heather Hendrickson of WCB participated by telephone.

During the meeting, we discussed various issues related to the implementation of 10-digit numbering for IP-based relay services, including the verification procedures being used by Hamilton during the registration process. Hamilton also conveyed the difficulties that providers have encountered in complying with the requirement that all numbers be “geographically appropriate” numbers, and discussed the various methods that Hamilton has employed in order to comply with that requirement.

In addition, in accordance with the Commission's request that relay providers keep the Commission apprised of the status of registrations during the 10-digit number registration period,<sup>1</sup> Hamilton provided an overview of its user registrations to date.

To that end, Hamilton also stressed the critical importance of adjusting the Commission's contract with NeuStar, the relay numbering database administrator, in order to permit "reverse lookups" in the numbering database. Reverse lookup capability must be in place prior to the end of the voluntary registration period on June 30, 2009 in order for providers to determine whether a user has registered with another provider.

Hamilton also discussed the possibility that the IP Relay rate be tied to the MARS rate, and indicated that this issue may be formally raised in a future filing.

Finally, Hamilton raised the points made in its December 30, 2008 Petition for Clarification and we discussed the status of the petition.

This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2).

In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor

David A. O'Connor

Counsel for Hamilton Relay, Inc.

cc (via e-mail): Participants

---

<sup>1</sup> FCC 08-275, para. 23 (rel. Dec. 19, 2008).