

KPS CONSULTING

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June 17, 2008

By electronic filing:

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

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

Dear Ms. Dortch:

On June 15, 2009, Sean Belanger and the undersigned, outside counsel for CSDVRS, held meetings with the following FCC offices:

Office of Chairman Copps – Scott Deutchman
Office of Commissioner Adelstein – Mark Stone
Consumer and Governmental Affairs Bureau – Suzanne Tetreault
Wireline Competition Bureau – William Dever, Stephanie Wiener

At these meetings, the following issues were discussed:

Equipment Porting: The request was made for the FCC to expeditiously resolve the pending petition to eliminate the requirement for video relay service (VRS) equipment porting (while keeping the requirement for number porting). It was noted that a fast resolution would eliminate the need for providers to continue investing resources on a porting standard that may never be used.

Automating Minute Reporting: As a follow up to CSDVRS’s petition filed with the FCC on May 22, 2009, CSDVRS requested that the FCC require all providers to automate the recording and reporting of session and conversation minutes with a non-manual computerized system that is subject to audit. It was noted that when a manual method is used to report minutes, the likelihood of error and abuse are high. Only a fully automated accounting method can provide fully accurate data about call start and ending times.

VRS Rates: CSDVRS emphasized that the FCC should not change the VRS rates in the final year of its promised three-year rate period because providers have relied on these rates in their business plans. To change the rates now would be highly disruptive to the ability of small VRS providers to continue competing in the VRS market. If the FCC is intent on changing the rate for 2010 and beyond, CSDVRS proposes that it do so in a way that reflects full economies of scale, for example, by adding a fourth, and possibly a fifth, tier. CSDVRS presented these options in a PowerPoint handout, attached to this filing.

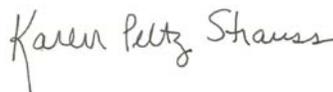
VRS Fraud and Abuse: CSDVRS expressed concerned about the extent to which reports are circulating about VRS fraud and abuse, including telemarketing schemes that employ deaf people to use VRS to call hearing businesses at random.

White Labels: As per arguments already made in CSDVRS' comments on the record, it was requested that the FCC apply an even-handed policy with respect to white label companies that do not have their own relay infrastructures (network systems, interpreters, facilities, etc.). More specifically, while the FCC has prohibited *non-profit* entities, such as associations for the deaf, from being paid based on usage for branding and marketing activities performed for a certified provider, payment by the minute to *for-profit* companies that provide such branding and marketing is occurring without opposition from the FCC. While CSDVRS believes that white labels generally should be permitted, the FCC should end the discrepancy in the way it treats each of these white label categories.

Outreach Specialists: As the numbering system is being put into place, the FCC should take action, in the form of public notices and enforcement proceedings, to force providers and their outreach specialists to cease spreading misinformation about what consumers may do and not do with respect to making VRS calls. For example, no provider should be telling consumers that they must only make calls from the provider that they choose as their default provider or from the provider from whom they acquire video equipment. Such users need to know that they retain the right to make calls to other providers by dialing around to those companies. Misrepresentations about provider interoperability is in violation of the FCC's rules and should be handled accordingly.

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). Please contact the undersigned if there are any questions about this filing or the ex parte presentation.

Sincerely,



Karen Peltz Strauss
Legal Consultant, CSDVRS, LLC

Attachment

cc: Cathy Seidel
Suzanne Tetreault
William Dever