

Eliot J. Greenwald
Direct Phone: 202.373.6009
Direct Fax: 202.373.6001
eliot.greenwald@bingham.com
Our File No.: 4889010001

November 25, 2009

Via Electronic Filing

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

**Re: Notice of Ex Parte Conferences
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities
E911 Requirements for IP-Enhanced Service Providers
CC Docket 03-123; WC Docket 05-196**

Dear Ms. Dortch:

On November 24, 2009, the undersigned counsel to Telecommunications for the Deaf and Hard of Hearing, Inc. ("TDI") had an *ex parte* conference with Nicholas Alexander, Associate Bureau Chief, Wireline Competition Bureau ("WCB").

I discussed the consumer confusion when point-to-point video calls are not completed, and explained the Consumer Groups' reasons for an immediate stay of the Public Notice regarding toll free numbers issued by the WCB and the CGB on August 11, 2009, DA 09-1787, and the urgent need for a return to the status quo ante. Once the status quo ante is restored, there is a need for a notice and comment rulemaking proceeding to develop a plan to significantly reduce the use of toll free numbers by VRS users. That plan should include a process to identify businesses and those few residential users who actually have a need for toll free numbers, and ensure that those toll free numbers are interoperable. Any plan must also include a reasonable period of time for consumer outreach and education to transition consumers away from using toll free numbers and to using geographic 10-digit numbers, similar to what happens when there is a change of area code.

I also had a brief follow up discussion with Mark Stone, Deputy Chief, CGB on these same issues.

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com

A/73226062.1

Marlene H. Dortch, Secretary
November 25, 2009
Page 2

Very truly yours,
/s/
Eliot J. Greenwald

Cc (by e-mail): Mark Stone
Nicholas Alexander
Claude L. Stout