

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matters of	)	
	)	
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
	)	

**Opposition to Petition for Clarification and Declaratory Ruling  
Telecommunications for the Deaf and Hard of Hearing, Inc.;**  
**Association of Late-Deafened Adults, Inc.;**  
**National Association of the Deaf;**  
**Deaf and Hard of Hearing Consumer Advocacy Network;**  
**California Coalition of Agencies Serving the Deaf and Hard of Hearing;**  
**American Association of the Deaf-Blind; and**  
**Hearing Loss Association of America**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), through its undersigned counsel, Association of Late-Deafened Adults, Inc. (“ALDA”), National Association of the Deaf (“NAD”), Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”), California Coalition of Agencies Serving the Deaf and Hard of Hearing (“CCASDHH”), American Association of the Deaf-Blind (“AADB”), and Hearing Loss Association of America (“HLAA”) (collectively, the “Consumer Groups”), hereby respectfully submit their opposition to the Petition for Clarification and Declaratory Ruling filed by Sorenson Communications, Inc. with the Federal Communications Commission’s (“FCC” or “Commission”).<sup>1</sup>

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<sup>1</sup> Petition for Clarification and Declaratory Ruling, Sorenson Communications, Inc., *In the Matters of 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 (August 4, 2009).

For many years, the FCC has worked to ensure that deaf and hard of hearing individuals have access to telecommunications services and the vital links necessary to reach emergency responders. Last year, the Commission released its order establishing the procedure and guidelines for the assignment and use of ten-digit numbers for users of Internet-based Telecommunications Relay Services (“iTRS”).<sup>2</sup> Specifically, this new procedure will enable users of Video Relay Service (“VRS”) and Internet-Protocol Relay (“IP Relay”) to use ten-digit numbers from the North American Numbering Plan. The Commission found that use of standard ten-digit numbers was important to ensure that these users “can be called in the same manner that voice telephone users are called ... and that emergency calls placed by Internet-based TRS users will be routed directly and automatically to appropriate emergency service authorities.”<sup>3</sup>

In response to the FCC’s order, Sorenson Communications, Inc. (“Sorenson”) filed a Petition for Clarification and Declaratory Ruling (“Petition”) asking the Commission to clarify that only one VRS provider would be allowed to assign ten-digit telephone numbers to any particular iTRS device<sup>4</sup> and to each IP address regardless of how many devices operate at that address. The Consumer Groups oppose this Petition and believe it would result in unreasonable and unnecessary limitations on consumer rights and use of iTRS services.

The restrictions proposed by Sorenson would diminish access by deaf and hard of hearing individuals by interfering with competitive choices. Contrary to FCC policy, these limitations

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<sup>2</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, Second Report and Order and Order on Reconsideration, FCC No. 08-275 (2008) (“*TRS Reconsideration Order*”).

<sup>3</sup> *Id.* at ¶ 1.

<sup>4</sup> For purposes of this Opposition, Consumer Groups interpret Sorenson’s use of the term “iTRS device” to mean “VRS device,” and not devices used to access text-based IP Relay services. If Sorenson’s Petition is intended to request that only one iTRS provider be permitted to provide ten-digit numbers to any and all VRS and IP Relay users or devices that share a single Registered Location or are associated with an IP address, Consumer Groups reserve the right to file further comments in opposition to such a request.

would serve to move iTRS services further from the goal of full functionally equivalency with voice telephone services, and instead would differentiate how iTRS users manage their communications services by placing an artificial limitation on choices that are inferior to options provided to every voice telephone user. Currently, there are no restrictions on the ability of voice telephone users to utilize more than one telephone service provider at the same location, and there are millions of voice telephone users who have more than one telephone number assigned to one location. Instead of improving options and services for iTRS users and making these services more like voice telephone services, Sorenson's proposal would unnecessarily restrict service provider options of these consumers without technical reason or purpose, and the FCC must reject the Petition.

There are multiple reasons and situations in which deaf and hard of hearing VRS users may want or need to access more than one VRS provider in a specific location. First, many VRS users maintain the software from multiple VRS providers on one computer, which allows them to access the services of any provider at any time. This allows users to choose providers based upon their needs at the moment and affords them the flexibility to change to another provider if one is particularly busy or having technical difficulties, or simply to obtain the best and most efficient service. In order to continue to reach multiple providers without the need to dial around, VRS users need a separate telephone number for each provider, which would be foreclosed under Sorenson's plan.

In addition, there are countless situations where family members or roommates sharing a house or apartment, and therefore sharing the same location and possibly the same IP address, may want to have separate VRS devices for their individual use. Each roommate should have the option to use their own unique telephone number and the freedom to choose a separate and

different VRS device and provider without being unduly restricted by the choices of the entire residence. In other situations, a consumer may wish to use one VRS device to manage a home business, but also have other VRS devices in the home for personal use, for which he or she would want separate telephone numbers and may want to choose different service providers for different uses.

Most importantly, the Petition raises only a minor technical impediment to the use of multiple telephone numbers and multiple providers at the same location, which can be easily resolved. Sorenson suggests that if two VRS devices operate from the same IP address (and hence the same location), they would have to share the same Uniform Resource Identifier (“URI”) and thus telephone calls could not be properly routed to the correct device. However, as articulated by Purple Communications, Inc. (“Purple”) in its Opposition to the Sorenson Petition, if there are multiple URIs operating from a single IP address, then simple steps can be taken to resolve any routing issues.<sup>5</sup> Specifically, in the short term, users may add a custom port device to process and forward the H.323 communications traffic to the correct device.

In the longer term, the VRS industry is likely to transition to server based (“SIP”) routing and/or signaling. These and other technologies are expected to resolve any concerns about routing to multiple telephone numbers at a single location. Because these and other technologies will resolve the minor technical issues raised by Sorenson, it makes little sense for the Commission to enact a permanent restrictive rule on consumers to resolve a technical problem for which there are work around solutions and long-term solutions anticipated in the near future.

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<sup>5</sup> Purple Communications, Inc. Opposition to Petition for Clarification and Declaratory Ruling, *Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123 and WC Docket No. 05-196, at 12 (Oct. 5, 2009).

Based upon these technical solutions, both in the short term and long term, it remains technically possible to assign more than one ten-digit telephone number to a specific location, and users are able to access multiple providers from one specific IP address. Therefore, there is no reason for the FCC to restrict and limit consumers' options when any routing issues can be resolved.

Furthermore, there are no legitimate public safety concerns to support Sorenson's Petition. Since every telephone number will have a Registered Location, users making E911 calls from VRS devices will automatically have their calls and location information routed and provided to the correct Public Safety Answering Points ("PSAPs"). In fact, access to PSAPs is *enhanced* by allowing consumers to use more than one device, with different telephone numbers at a single location with access to multiple providers. For example, in a house fire, the user may not be able to reach a device on the upper level of the home, but may be able to access a device on the main floor or may only be able to reach emergency personnel from a mobile device after fleeing the house. In other situations, it may not be the device that is inaccessible, but the provider. In a wide-spread local or national emergency, it is possible that one or more VRS providers could be inundated by an overwhelming number of E911 calls or may simply not be functioning. VRS users should be free use other VRS devices with ten-digit numbers registered with other providers in order to reach emergency personnel. In such cases, if the user has been assigned a ten-digit telephone number from that additional service provider, the user's location will have been registered and therefore more easily accessible to emergency responders.

### **Conclusion**

The Consumer Groups urge the Commission to reject Sorenson's Petition and to clarify that iTRS users may use multiple VRS devices, at the same location, with multiple ten-digit

telephone numbers from multiple providers. Consumers with hearing and speech disabilities must have the same rights to competitive service as voice telephone users, and the Commission must not foreclose their choices. In addition, the Petition provides no legitimate technical obstacles or public safety concerns that would justify limiting users' choices and harming competition.

Respectfully submitted,

/s/Tamar E. Finn

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Claude L. Stout  
Executive Director  
Telecommunications for the  
Deaf and Hard of Hearing, Inc.  
8630 Fenton Street, Suite 604  
Silver Spring, MD 20910

Tamar E. Finn  
Eliot J. Greenwald  
Kimberly A. Lacey  
BINGHAM MCCUTCHEN LLP  
2020 K Street, NW  
Washington, DC 20006  
(202) 373-6000

*Counsel to Telecommunications for the  
Deaf and Hard of Hearing, Inc.*

Jamie Pope  
Executive Director  
American Association of Deaf-Blind  
8630 Fenton Street, Suite 121  
Silver Spring, MD 20910

Kathy Schlueter  
President  
Association of Late-Deafened Adults, Inc.  
8038 MacIntosh Lane  
Rockford, IL 61107

Nancy J. Bloch  
Chief Executive Officer  
National Association of the Deaf  
8630 Fenton Street, Suite 820  
Silver Spring, MD 20910

Brenda Battat  
Executive Director  
Hearing Loss Association of America  
7910 Woodmont Avenue, Suite 1200  
Bethesda, MD 20814

Sheri A. Farinha Vice Chair  
California Coalition of Agencies Serving  
the Deaf and Hard of Hearing, Inc.  
4708 Roseville Rd, Ste 111  
North Highlands, CA 95660

Cheryl Heppner  
Vice Chair  
Deaf and Hard of Hearing Consumer  
Advocacy Network  
3951 Pender Drive, Suite 130  
Fairfax, VA 22030

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