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December 3, 2009

Via Electronic Filing

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

**Re: Notice of Ex Parte Conference
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 December 2, 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”).

We discussed the interest of the Consumer Groups (defined below) in working with the Commission to develop a means to reduce toll free number use and to eliminate toll free number abuse in general in the event the Commission orders a stay and return to the status quo ante in regard to Public Notice DA 09-1787 issued on August 11, 2009.

After checking with representatives of TDI, 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, Inc. (“CCASDHH”), Association of Late-Deafened Adults, Inc. (“ALDA”), Hearing Loss Association of America (“HLAA”), and American Association of Deaf-Blind (“AADB”) (collectively, the “Consumer Groups”), I confirm that the Consumer Groups support a notice and comment rulemaking proceeding designed to achieve the following objectives:

- Development of a plan to significantly reduce the use of toll free numbers by Video Relay Service (“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 to the same extent as toll free numbers are interoperable for non-VRS users. Any plan must also include a reasonable period of time for comprehensive consumer outreach and education -- to be conducted by providers and the FCC -- to transition consumers away from using toll free numbers and toward using

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geographic 10-digit numbers, similar to what happens when there is a change of area code.

- Development of rules and policies to ensure that the obtaining and use of toll free numbers by people who are deaf, hard of hearing, deaf-blind and speech-disabled is functionally equivalent to the obtaining and use of toll free numbers by people without disabilities. In particular, the Consumer Groups support direct ownership of toll free numbers by consumers rather than providers as well as number portability of toll free numbers.
- The Consumer Groups take no position on the question of payment for the obtaining and use of toll free numbers.

Very truly yours,
/s/
Eliot J. Greenwald

Cc (by e-mail): Nicholas Alexander
Rosaline Crawford
Sheri A. Farinha
Shane Feldman
Lise Hamlin
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