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Our File No.: 4889010001

March 11, 2010

Via Electronic Filing

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

**Re: Notice of Ex Parte Meeting
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities;
E911 Requirements for IP-Enhanced Service Providers;
Structure and Practices of the Video Relay Service Program
CG Docket No. 03-123; WC Docket No. 05-196; CG Docket No. 10-51**

Dear Ms. Dortch:

On March 10, 2010, Rosaline Crawford, Director, Law and Advocacy Center, National Association of the Deaf (“NAD”); Cheryl Heppner, Vice Chair, Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”); Elizabeth Spiers, Director of Information Services, American Association of the Deaf-Blind (“AADB”), Sheri Farinha, Vice Chair, California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”) (together “Consumer Representatives”); and the undersigned counsel to Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), met with Mark Stone, Deputy Chief, Consumer & Government Affairs Bureau (“CGB”); Gregory Hlibok, Disability Rights Office (“DRO”), CGB; Nicholas Alexander, Associate Chief, Wireline Competition Bureau (“WCB”); William Dever, Acting Chief, Competition Policy Division (“CPD”), WCB; Carol Simpson, WCB; Heather Hendrickson CPD, WCB; and Richard Hovey, Public Safety & Homeland Security Bureau.

We discussed issues concerning a potential Notice of Proposed Rulemaking that would address ways in which to reduce the use of toll free numbers by iTRS consumers and to encourage the use of ten digit geographic numbers in their place. We raised the following issues of concern to consumers:

- The use of toll free numbers in association with iTRS services must not be completely eliminated because there is a legitimate need for toll free numbers by businesses as well as by some residential users who would want to pay for the toll charges incurred by people calling them. Since hearing people have access to toll free numbers, functional equivalency requires access to toll free numbers by people who are deaf or hard of hearing.

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- In order to facilitate point-to-point video calling and provide for the ability of any user to call the toll free number of any other user in a way that is functionally equivalent to the ability of voice telephone users to call the toll free number of any other voice telephone users, there is a need for toll free numbers associated with iTRS use to both point to ten digit geographic numbers in the SMS/800 database and to be populated in the iTRS database.
- In order to avoid consumer confusion and disruption of service, there will need to be an extensive consumer outreach and education program on the part of those iTRS providers who distributed toll free numbers as well as by the Commission.
- In order to give the consumer outreach and education program a chance to be successful, there will need to be a sufficient transition period to allow for consumers to have sufficient time to be educated on the matter and to elect to either switch their number use to ten digit geographic numbers or to continue to use toll free numbers.
- In order to avoid any disruption of service and to prevent any consumer inability to make point-to-point video calls to iTRS toll free numbers, the Commission must extend the waiver that was granted on December 4, 2009 in Order DA 09-2543. This waiver is currently set to expire on April 4, 2010 and will need to be extended through the rulemaking process as well as through a transition period as discussed above.

We also discussed the Petition for Partial Reconsideration of the iTRS Second Report and Order and Order on Reconsideration, requesting access to iTRS numbers by hearing people who do not require the assistance of a video interpreter communications assistant to communicate by videophone with people who are deaf or hard of hearing, that was filed by the Consumer Representatives on January 29, 2009. We explained that action on this petition would reduce use of VRS by hearing people who are capable of communicating with people who are deaf or hard of hearing by means of point-to-point video calling.

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Very truly yours,

/s/

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Troy F. Tanner

Cc (by e-mail): Nicholas Alexander
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