WILTSHIRE & GRANNIS LLP

February 2, 2011

Ex Parte

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

Re: *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51

Dear Ms. Dortch:

On February1, 2011, James Perry, Michael Cole, Scott Pasquini and Alex Kerr of Madison Dearborn Partners and I, on behalf of Sorenson Communications Inc. ("Sorenson"), spoke with Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis. As the FCC fashions a new VRS compensation mechanism, it should be careful to fashion a transition and ultimate mechanism that would avoid disruption, as well as ensure the continued delivery of high quality, functionally equivalent service to deaf and hard-of-hearing Americans. We also discussed the fact that VRS is not yet serving all deaf and hard-of-hearing Americans that use ASL. The Commission should consider ways to promote continued extension of service to all deaf and hard-of-hearing Americans that want to use the service. We also discussed the fact that the Commission should also clarify and strengthen the existing rules with respect to porting and slamming to ensure that customer choice is respected. Consumer choice is key to maintaining functional equivalence.

On February 1, 2011, Paul Kershisnik, Chief Marketing Officer of Sorenson Communications, Inc., and Mike Maddix, Sorenson's Director of Government and Regulatory Affairs, met with Greg Hlibok, Chief of the Disability Rights Office; John Nakahata and Chris Wright, Sorenson's counsel, also attended the meeting. Sorenson reiterated its arguments that (1) the Commission should not prohibit VRS providers from operating call centers in Canada; (2) so-called "white label" operators should not be permitted to provide service; and (3) interpreters should be required to work in supervised call centers. Sorenson also stated that the Commission should reiterate that (1) providers may not impose financial penalties on users who choose to port to another provider; (2) providers may not attempt to persuade users to cancel a port, but must wait until the port has been completed to attempt to win the user back; (3) providers may not claim to be a user's "agent" or otherwise initiate a port unless the provider has a signed letter of authorization clearly indicating that the user has chosen to port; and (4) providers may not provide financial incentives of any kind, including payments for broadband service or payments to third parties, to induce a user to port.

On February 2, 2011, Paul Kershisnik, Michael Maddix, Grant Beckmann and Scot Brooksby of Sorenson and John Nakahata and Renee Wentzel, on behalf of Sorenson, spoke with Paul de Sa, Richard Hovey and Henning Schulzrinne, all of the FCC. We discussed the

differences between H.323 and SIP and the features that could be enabled through a transition to SIP that are not available under H.323, as summarized in the attached chart. We discussed that a transition to SIP would likely take two years to complete. A chart summarizing the necessary steps is attached. We also discussed the fact that the SIP standard would need VRS-specific extensions to address E911 address provisioning, E911 call-routing, and call security (e.g., spam protection). We noted that competitor claims that Sorenson "de-features" videophones upon porting are misleading and incorrect. When a user ports, Sorenson ceases providing services to that phone, as required by the porting rules. This necessarily means that associated "cloud"-based services, provided from Sorenson's network, are also terminated. Sorenson does not alter the videophone itself, as the term "de-features" implies.

Sincerely,

John T. Nakahata
Counsel to Sorenson Communications, Inc.

cc: Paul de Sa
Richard Hovey
Henning Schulzrinne