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May 24, 2011

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VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**

*Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities*
CG Docket No. 03-123

Dear Ms. Dortch:

On May 23, 2011, Dixie Ziegler, the Vice President of Hamilton Relay, Inc. (“Hamilton”), and the undersigned on behalf of Hamilton, had a telephone conference with Diane Mason of the Commission’s Consumer & Governmental Affairs Bureau. We discussed various points made in Hamilton’s May 18, 2011 comments filed in response to the proposed interstate Telecommunications Relay Services rates (“TRS”) for 2011-2012.¹ Specifically, we reiterated Hamilton’s concern (a concern shared by Sprint)² that the proposed compensation rate for traditional TRS may not have been correctly calculated. Hamilton requested that the Commission work with the TRS Administrator and all stakeholders to ensure that the TRS rates are correctly calculated.

Hamilton also urged the Commission to include all state data in the Multi-state Average Rate Structure (“MARS”) calculation, including so-called “flat rate” states. We also discussed the fact that the State of California changed its compensation methodology during the applicable reporting period, and that at the very least the MARS calculation should include California data for the period during which California’s rates were derived from a competitive bidding process.

¹ See *National Exchange Carrier Association Submits Payment Formulas and Funding Requirement for the Interstate Telecommunications Relay Services Fund for the July 2011 Through June 2012 Fund Year*, Public Notice, CG Docket No. 03-123, DA 11-826 (rel. May 4, 2011) (“Notice”).

² See Comments of Sprint Nextel Corporation regarding *Notice*, CG Docket No. 03-123 (filed May 18, 2011).

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This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,
WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor
David A. O'Connor
Counsel for Hamilton Relay, Inc.

cc (via e-mail): Diane Mason