

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

In the Matter of)	
)	
Structure and Practices of the Video Relay Service)	CG Docket No. 10-51
Program)	
)	

**RESPONSE OF SNAP TELECOMMUNICATIONS, INC. TO
HAMILTON RELAY, INC.’S PETITION FOR LIMITED RECONSIDERATION**

Snap!VRS hereby submits its response in support of Hamilton Relay, Inc.’s (“Hamilton”) Petition for Limited Reconsideration of the Federal Communication Commission’s (“Commission”) Report and Order in the above captioned proceeding (“Petition”), filed on June 1, 2011.¹

In the Petition, Hamilton requested that “the Commission consider and adopt” its proposal for “a 1.6% interest rate on reimbursements to Telecommunications Relay Service (“TRS”) providers where the TRS Fund Administrator or the Commission ultimately determines that disputed minutes of use are legitimate.”²

For the reasons explained in the Petition, Snap!VRS supports Hamilton’s Petition, also noting its own requests for regulatory procedures governing the suspension of payment for minutes of review and subsequent handling of minutes deemed to be legitimate in prior meetings with the Commission.³ Specifically, such handling should include application of the recommended interest rate on reimbursements due to TRS providers, applied on a retroactive basis.

¹ Hamilton Relay, Inc., Petition for Limited Reconsideration, *Structure and Practices of the Video Relay Service Program*, CG Docket 10-51 (June 1, 2011)(“Petition”).

² See Hamilton Comments, CG Docket No. 10-51 (September 13, 2010).

³ *Ex Parte Notice*, Snap Telecommunications, Inc. CG Docket 10-51 (December 16, 2010).

Accordingly, Snap!VRS requests that the Commission adopt and institute TRS regulations in line with Hamilton's Petition for Limited Reconsideration.

Respectfully submitted,

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June 16, 2011

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