



WILTSHIRE  
& GRANNIS LLP

July 27, 2011

Ex Parte

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

Re: *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196; *Internet-Based Telecommunications Relay Service Numbering*, WC Docket No. 10-191

Dear Ms. Dortch:

Michael Maddix of Sorenson Communications, Inc. (“Sorenson”), together with Chad Breckinridge and the undersigned, both from Wiltshire & Grannis LLP, participated in four meetings this week related to the dockets identified above. On July 25, 2011, we met with Sherrese Smith (Chairman Genachowski’s Senior Counsel and Legal Advisor for Media, Consumer and Enforcement Issues), and on July 27, 2011 we met separately with Angela Kronenberg (Commissioner Clyburn’s Wireline Legal Advisor), Margaret McCarthy (Commissioner Copps’s Wireline Policy Advisor), and Christine Kurth (Commissioner McDowell’s Policy Director and Wireline Counsel (Chad Breckinridge did not participate in this meeting)). The discussions in each of the four meetings related to the Commission’s pending Further Notice of Proposed Rulemaking (“FNPRM”) related to national certification for VRS providers (CG Docket No. 10-51) and its pending Notice of Proposed Rulemaking related to VRS toll-free numbering (CG Docket No. 03-123, WC Docket No. 05-196, WC Docket No. 10-191).

With respect to the certification proceeding, we reiterated the positions that Sorenson made in the comments and reply comments filed on June 1, 2011, and June 16, 2011. In particular, we encouraged the Commission to reconsider the need for mandatory national certification considering that state-certified VRS providers have not been the source of waste, fraud, and abuse that has generated the most concern. In any event, we argued, national certification of an existing VRS provider with a proven track record of compliance with the federal standards should be streamlined. We explained further that, if adopted as proposed, the data collection requirements in the FNPRM would create enormous administrative burdens for providers and for FCC staff without addressing the waste, fraud, and abuse concerns that have at

Marlene H. Dortch

July 27, 2011

Page 2 of 2

least in part prompted the Commission to propose national certification. Finally, we urged the Commission to ensure that any national certification regime that emerges does not require VRS providers to be common carriers to obtain certification.

With respect to the toll-free numbering NPRM, we reiterated the positions that Sorenson made in the comments and reply comments filed on December 2, 2010, and December 17, 2010. In particular, we explained that barring VRS providers from providing toll-free numbers to end users without charge would generate widespread confusion and aggravation in the deaf and hard-of-hearing community. We reiterated Sorenson's position that the Commission should refrain from instituting such a prohibition altogether. In the event that the Commission does implement such a rule, we urged it to apply the requirement prospectively only (thus allowing existing VRS customers to maintain their toll-free numbers under the arrangements through which they obtained them) and to exempt any customer for whom the VRS provider is unable to provide a geographically appropriate ten-digit local number. Finally, we explained that to the best of Sorenson's knowledge the assignment and use of toll-free numbers has not resulted in any material delay in response times in emergency calling situations.

Sincerely,

/s/

Christopher J. Wright

*Counsel to Sorenson Communications, Inc.*

cc: Sherrese Smith  
Angela Kronenberg  
Margaret McCarthy  
Christine Kurth