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EX PARTE LETTER

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

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

Dear Ms. Dortch:

On August 31, 2011, Sorenson Communications, Inc. ("Sorenson") petitioned the Federal Communications Commission ("Commission") for a waiver of the requirement in 47 C.F.R. § 64.604(c)(5)(iii)(C)(2) to collect and submit IP addresses for IP Relay calls involving applications that use the XMPP protocol, as such applications do not provide the IP address from the caller. AT&T supports Sorenson's request and proposes that the Commission extend to all IP Relay providers any waiver granted to Sorenson on this matter.

As Sorenson explains, XMPP (the acronym for "Extensible Markup and Presence Protocol") is an open-standard communications protocol that is sometimes used with real-time instant messaging services. Although XMPP, originally called "Jabber," has been slow to gain in popularity, its open-source attributes, such as low development costs, proven history, and robust security, have accelerated its use in recent years. Google Talk™, which utilizes XMPP, was launched in 2005 to combine VoIP and IM systems. In 2006, XMPP was extended to server-to-server applications. And, in 2011, the XMPP specifications were modified due to XMPP's increased application. In addition to Google Talk™, XMPP is currently used with other public IM services, such as LiveJournal "LJ Talk," Nokia's OVI, IBM Lotus Sametime, and Microsoft's Lync Server. Sorenson accurately describes the fact that XMPP implements a security rule which prohibits the transmission of the IP address of the instant messenger and that this rule effectively prevents an IP Relay provider from capturing the IP address for an incoming IP Relay call. Although Sorenson focuses mainly on calls from Google Talk™, this restriction impacts calls from other instant messaging applications, such as those identified above. Even calls from AOL Instant Messenger ("AIM"), which is used by AT&T, Sorenson, and other IP Relay providers, could be impacted, as customers utilizing an application based on XMPP can also place calls through AIM and the IP address of the caller would not transfer to AIM or to the IP Relay provider handling the call. With the growing popularity of instant messaging, it is inevitable that IP Relay calls from applications based on XMPP will increase in the coming years. These applications should be available to deaf and hard-of-hearing consumers seeking to make an IP Relay call and should not be off-limits merely because technology and security protections have evolved beyond the

Commission's rules. In fact, restricting the use of XMPP applications would violate the Congressional mandate and the Commission's rules that no telecommunications relay service rule should restrict the development and use of improved technology that fosters the availability of telecommunications to person with disabilities. *See* 47 U.S.C. §225(d)(2); 47 C.F.R. §64.604(b)(5). For these reasons, AT&T agrees with Sorenson that a waiver of Section 64.604(c)(5)(iii)(C)(2) is in the public interest because it will ensure that deaf and hard-of-hearing individuals can use and/or communicate with other individuals who use Google Talk™ and other instant messaging applications that are based on XMPP. AT&T supports the extension of such a waiver to all IP Relay providers.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Respectfully Submitted,

/s/ Toni R. Acton

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Director