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November 1, 2011

**VIA ELECTRONIC FILING**

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

Re: Notice of Ex Parte Meeting, CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

On October 31, 2011, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDFI”); Shane Feldman, Chief Operating Officer, National Association of the Deaf (“NAD”); Sheri A. Farinha, Vice Chair, California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”); and the undersigned met with Sherrese Smith, Senior Counsel & Legal Advisor to Chairman Julius Genachowski; Jessica Almond, Special Counsel to Chairman Julius Genachowski; Karen Peltz Strauss, Deputy Chief of the Consumer & Governmental Affairs Bureau; and Gregory Hlibok, Chief of the Disability Rights Office to discuss a likely Notice of Proposed Rulemaking (“NPRM”) that may include proposed changes to the per-minute rate of compensation mechanism for Video Relay Service (“VRS”).

The consumer organization representatives were asked to share their thoughts on possible changes to VRS. They expressed concerns about maintaining and improving the quality of service under a possible per user compensation system. They noted that competition under the per-minute compensation system motivates service providers to surpass minimum standards of service, such as answer speed. The consumer organization representatives suggested that minimum standards of service be examined as part of a discussion about changes to the compensation system and expressed support for adopting appropriate service benchmarks for a compensation system. The consumer organization representatives also encouraged examination of interoperability requirements to ensure that consumers have more freedom to be able to use existing devices or equipment when changing providers.

Additionally, the consumer organization representatives pointed out the importance of considering *all* applicable costs. For example, they suggested that cost methodology should incorporate applicable expenses for improving technology and for customer outreach and education about the availability and use of VRS. They also raised questions about what data would be used to calculate costs, how costs would initially be calculated, and what methods might be used to adjust costs over time in a per user compensation mechanism.

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The consumer organization representatives recommended that consumers not be restricted to one service provider for both fixed and mobile services. They explained that consumers may have different service providers preferences depending on the type of service and that consumers should be able to choose between different providers.

The consumer organization representatives further recommended that workshops involving consumer, industry and Commission representatives be held to analyze the details of proposed changes to the compensation mechanism. They noted that workshops will help evaluate the potential effects of a changed compensation mechanism on consumers as well as service providers.

Respectfully submitted,

*/s/ Danielle Burt*

Danielle Burt

Counsel for TDI

cc (by e-mail): Sherrese Smith, Chairman Genachowski's Office  
Jessica Almond, Chairman Genachowski's Office  
Karen Peltz Strauss, CGB  
Gregory Hlibok, DRO  
Claude Stout, TDI  
Shane Feldman, NAD  
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