WILTSHIRE & GRANNIS LLP

February 15, 2012

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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

Dear Ms. Dortch:

On February 13, 2012, Mike Maddix and Paul Kershisnik of Sorenson Communications, Inc. and John Nakahata of Wiltshire & Grannis, LLP, on behalf of Sorenson, met with:

- Paul de Sa and Henning Schulzrinne, Office of Strategic Planning and Policy Analysis;
- Nicholas Alexander, Richard Hovey, Andy Mullitz, and Heather Hendrickson of the Wireline Competition Bureau;
- Karen Peltz Strauss, Gregory Hlibok, Bob Aldrich, Elliot Greenwald, and Susan McLean of the Consumer and Governmental Affairs Bureau;
- Sean Lev and Diane Griffin Holland of the Office of General Counsel;
- Sharon Diskin of the Office of the Inspector General;
- Diane Mason of the Office of the Managing Director;
- Sharon Lee and Rick Hindman of the Enforcement Bureau.

During the meeting, Sorenson explained that, with respect to 911 calls, one of the advantages of VRS providers handling these calls is that Sorenson has over 100 call centers, with 911 calls handled by the first available interpreter. This provides redundancy in the case of closure of a particular center, as well as the capacity better to accommodate a large simultaneous influx of 911 calls. Moreover, with only approximately 600 911 calls per week, it would be difficult to staff a dedicated 911 relay center at adequate levels to accommodate an influx of calls.

Furthermore, with respect to equipment standards, Sorenson supports developing SIP-based standards. The primary focus of these standards should be interoperability to ensure that VRS users can reach all other VRS users seamlessly through point to point communications, as well as "dial-around" to reach their VRS provider of choice. Portability of proprietary equipment should be a secondary, follow-on focus. With software-based VRS applications, such as Sorenson's nTouch Mobile and nTouch PC and similar products offered by other vendors, a consumer can download and run the application associated with the provider he or she wishes to use, including any advanced features that provider supports. Even with respect to hardware, consumers have

choices for equipment both among providers and, with the software-based applications, using open platforms. Frequently consumers can obtain that VRS hardware (or in the case of the software applications, the software) at little or no cost. Portability, as distinguished from interoperability, will be much more difficult to implement, will entail significant changes to back-office systems and would likely extinguish incentives to develop innovative VRS equipment and features, to the detriment of VRS users. Sorenson, however, believes that industry should work together to define standards and processes to ensure that consumers can obtain data such as their speed dial lists and contacts when they change providers, so that this information does not have to be manually re-entered.

Finally, Sorenson noted that permitting skills-based routing may require an FCC rule change. In a Public Notice issued January 26, 2005 (DA 05-141), the Commission stated:

> Finally, we understand that some VRS (or TRS) providers may selectively answer calls from preferred consumers or locations, rather than answer the calls in the order they are received. For example, the VRS provider may monitor a list of incoming callers waiting for a CA and, rather than handling the calls in order, will first handle calls from preferred customers or from a specific location. This practice also constitutes an improper use of information obtained from consumers using the service and is inconsistent with the notion of functional equivalency. Providers must handle incoming calls in the order that they are received.

A copy of this letter is being filed in the above-referenced dockets.

Sincerely,

John T. Nakahata
Counsel to Sorenson Communications, Inc.

cc: Bob Aldrich
Nicholas Alexander
Paul de Sa
Sharon Diskin
Elliot Greenwald
Heather Hendrickson
Rick Hindman
Gregory Hlibok
Diane Griffin Holland
Richard Hovey
Sharon Lee
Sean Lev
Diane Mason
Susan McLean
Andy Mullitz
Henning Schulzrinne
Karen Peltz Strauss