

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Structure and Practices of the Video Relay Service Program	)	PS Docket No. 10-51
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	PS Docket No. 03-123
	)	

**COMMENTS OF NEUSTAR, INC.**

Neustar, Inc. (“Neustar”) submits these comments in response to the Further Notice of Proposed Rulemaking in the above captioned proceedings (“Further Notice”).<sup>1</sup> The Notice sought comment on structural issues surrounding the Commission’s Video Relay Service (“VRS”) program.

Neustar, pursuant to a contract with the Federal Communications Commission (“Commission”), operates the Internet-based Telecommunications Relay Service (“iTRS”) Telephone Number Directory (“iTRS Directory”) that enables iTRS providers to route calls to deaf, hard of hearing and speech impaired users that have selected another company as their default provider. The iTRS Directory also enables iTRS users to communicate directly with each other without the use of an interpreter for the call. There are two components to iTRS:

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<sup>1</sup>*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, Further Notice of Proposed Rulemaking, FCC 11-184 (Dec. 15, 2011)(“Further Notice”)

VRS, in which an interpreter translates a call from voice into American Sign Language over a video link to the iTRS users; and IP Relay, in which an interpreter translates voice into instant messaging sent to an iTRS user's device. Neustar will comment on two areas in which the Commission sought comment: the proposed VRS User Database ("VRSURD") and iTRS Access Technology Standards.

## **I. THE VRS USER DATABASE**

The Commission sought comment on whether it should establish a VRSURD "to facilitate four primary functions required to implement the reforms proposed in the Further Notice: (i) ensuring that each VRS user has at least one default provider, (ii) allowing for the identification of new-to-category users, (iii) supporting the operation of the TRS Broadband Pilot Program . . . , and (iv) ensuring efficient program administration."<sup>2</sup> Neustar will reserve comment on the merits of creating such a database, but observes that the types of data contemplated for inclusion in the database<sup>3</sup> could easily be added to the iTRS Directory currently administered by Neustar. While the current database is organized by telephone numbers, it would be a simple extension to add the ability to associate a user with a telephone number, provided that both situations where one telephone number is shared by multiple users, and where one user has multiple telephone numbers are accommodated. The simplest and most direct way to address this would be for the current contract between the Commission and Neustar for the iTRS directory to be modified to include any information desired by the Commission. Alternately, any additional data requirement could be included as part of the Commission's needs when the iTRS Directory contract is rebid. In Neustar's view, it makes little sense for the

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<sup>2</sup> *Id.*, at ¶68.

<sup>3</sup> *See* Further Notice, Appendix D

TRS Fund to be forced to bear the cost of supporting two databases, nor does it make sense to require iTRS providers to provision information into more than one database. Having a single database rather than two will help to ensure the Commission’s goal of “efficient program administration.”

Neustar already maintains a high level of security for the data in the iTRS Directory; it would extend such security to any other data added to it. Neustar can also compartmentalize access to the iTRS Directory so that querying entities are only able to view data that they are authorized to see. For example, while an iTRS provider has the ability to query for the IP address of a VRS user, a broadband provider would only be able to see whether a user is eligible for discounted broadband service under the Telecommunications Relay Service Broadband Pilot Program. And, of course, Neustar fulfills the neutrality requirement as it continues to be a trusted, neutral third party that has no affiliation or relationship with any iTRS provider.

Neustar believes that it has served both the Commission and the iTRS community well as the iTRS Directory Administrator. It is privilege to provide a service that in some modest way assists the deaf, hard of hearing and speech impaired, and also helps the Commission in administering this program. Neustar hopes to continue in that role and, if the Commission decides to move forward with this additional VRS data, Neustar hopes to expand its responsibilities.

## **II. iTRS ACCESS TECHNOLOGY STANDARDS**

The Commission also asked for comment on a set of proposed iTRS access technology standards.<sup>4</sup> Neustar believes that it is appropriate for the Commission to be raising this issue with the iTRS community. Neustar recently hosted a successful interoperability test event for

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<sup>4</sup> See Further Notice, Appendix B.

iTRS providers who had prototypes of SIP devices and servers. The results of the testing were promising – all participating providers were able to send and receive calls from each other. This is encouraging for the Commission and the industry.

For now, Neustar will leave it to the iTRS providers to discuss the Commission's access technology revisions. Neustar observes, however, that there appears to be a significant trend in the industry to move toward the use of gateways for the routing of traffic, which Neustar can identify by the number of telephone numbers in the iTRS Directory that are associated with a single IP address. This suggests that the iTRS industry is already changing its access technology even though the Commission's rules require a one-to-one relationship between a geographic ten digit telephone number and an IP address. Given that the industry usage is trending away from this one to one relationship, it would be good for the Commission's rules to account for the changes underway and to accommodate further technological change.

Neustar looks forward to reviewing the comments that are filed and to participating in the reply round of this proceeding.

Respectfully submitted,

A handwritten signature in dark ink, reading "Richard L. Fruchterman, III". The signature is written in a cursive style with a large, stylized initial "R".

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