



WILTSHIRE  
& GRANNIS LLP

March 23, 2012

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

Dear Ms. Dortch:

On March 21, 2012, Paul Kershisnik and Mike Maddix of CaptionCall® and I met with Karen Peltz Strauss, Bob Aldrich, Greg Hlibok, and Diane Mason (by phone) of the Consumer and Governmental Affairs Bureau and Rich Hovey of the Wireline Competition Bureau.

At the meeting, we provided examples of situations in which CaptionCall is not able to obtain all the call detail record information required by the recently-adopted 47 C.F.R. § 64.604(c)(5)(iii)(C)(2). Specifically, with respect to Caption Call service, CaptionCall does not obtain the information relating to the caller's endpoint if (1) the call is answered before the second ring; (2) the user does not subscribe to caller ID; (3) the caller blocks their caller ID using \*67; (4) the user lives in a community that has a PBX and the PBX interferes with the transmission of the caller ID; (5) someone else in the residence answers on a regular phone and then the person needing captioning goes to their captioned phone; (6) the user starts using the captioning after trying to listen without captioning but has to turn the captioning on mid-call; and (7) the user is added in to a conference call. We noted that Sorenson recently had called a similar problem relating to Google Talk to the Commission's attention and also had filed a general request for clarification that providers should be compensated in situations where they were not able to obtain the information required by the rule.<sup>1</sup> We asked that the Commission act on the request for clarification.

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<sup>1</sup> Those submissions were made in CG docket 10-51 on August 31, 2011, and November 18, 2011, and Sorenson filed in CG docket 03-123 on March 22, 2012.

Marlene H. Dortch  
March 23, 2012  
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Sincerely,

/s/

Christopher J. Wright  
*Counsel to CaptionCall*

cc:

Karen Peltz Strauss  
Bob Aldrich  
Greg Hlibok  
Diane Mason  
Rich Hovey