



WILTSHIRE
& GRANNIS LLP

March 30, 2012

Ex Parte

Ms. 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 March 28, 2012, Mike Maddix of Sorenson Communications, Inc. and I met with Sean Lev, Diane Holland, and Marcus Maher of the Office of General Counsel, Nick Alexander of the Wireline Competition Bureau (by phone), and Bob Aldrich of the Consumer and Governmental Affairs Bureau.

We addressed Purple's practice of placing deaf individuals at call centers for employers such as Allstate. As we had stated at a prior meeting on March 21, we noted that Sorenson strongly supports the use of VRS to support deaf individuals at work. However, because the size of the TRS Fund would double if 1,773 deaf individuals were employed at call centers, Sorenson recognizes that the Commission likely would be concerned about this practice. We made clear that Sorenson's primary interests are in ensuring that (a) there is a level playing field on which all VRS providers either may or may not provide service to call centers, and (b) that the Commission acts quickly to clarify the rules. Sorenson also made it clear that should the Commission determine that such a program is permissible within the existing rules, Sorenson will in fact immediately start a similar program.

We stated that the issue presented by the practice at issue is novel. However, the Commission's rules barring the use of incentives by VRS providers are relevant. If the use of VRS by deaf individuals at call centers is compensable, Sorenson believes that it would be appropriate for a VRS provider provide videophones, installation, and training, as is the common practice with residential and other business users. However, it appears that Purple additionally provides other services, and may do so at a discount in return for also providing VRS. The Commission could conclude that such additional services are improper incentives.

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In addition, we noted that the Commission might interpret Section 225 to prohibit the practice of employing deaf individuals at call centers and urged caution with such an interpretation. The language of that provision requires the Commission to “ensure” that “functionally equivalent” VRS is “available, to the extent possible,” to deaf Americans, and Sorenson agrees with the Consumer Groups that Section 225 should be interpreted liberally to advance the goals of advancing the civil right of deaf persons created by the provision.

Sincerely,

/s/

Christopher J. Wright

Counsel to Sorenson Communications, Inc.

cc: Sean Lev
Diane Holland
Marcus Maher
Nick Alexander
Bob Aldrich