



WILTSHIRE
& GRANNIS LLP

April 20, 2012

Ex Parte Notice – Via ECFS

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; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196; *Internet-Based Telecommunications Relay Service Numbering*, WC Docket No. 10-191

Dear Ms. Dortch:

On April 19, 2012, Michael Maddix of Sorenson Communications, Inc. (“Sorenson”), together with the undersigned, met with William Dever (Chief, Competition Policy Division, Wireline Competition Bureau), Carol Simpson (Deputy Chief, Competition Policy Division, Wireline Competition Bureau), Richard Hovey (Competition Policy Division, Wireline Competition Bureau), and Heather Hendrickson (Competition Policy Division, Wireline Competition Bureau) to discuss the Commission’s *Toll-Free Numbering Order*, 26 FCC Rcd. 11,779 (2011).

Following up on a previous meeting on the same topic in late 2011, we discussed the process for seeking a waiver of the rule barring providers from issuing toll-free numbers to subscribers. We explained that a waiver is necessary to ensure functional equivalence for the small minority of subscribers to whom Sorenson is unable to issue geographically appropriate local numbers. For these subscribers, Sorenson issues numbers from the closest available rate center — which means as a practical matter that a neighbor would have to make a long distance call to reach a VRS user living next door.

In response to questions that Commission staff had raised in the earlier meeting, we explained that Sorenson lacks direct access to numbering resources and instead relies on intermediary numbering providers for access to blocks of numbers to assign to subscribers. Those numbering providers cover the vast majority of local calling areas (“LCAs”) across the country but they do not reach all of them. We noted that Sorenson’s numbering providers have informed Sorenson that there are two reasons they may not have numbers in a particular LCA: (1) cost (in some LCAs, it does not make sense as a business matter for the numbering provider to bear the cost of numbers based on its expectation about demand), and (2) exclusivity (in some

Marlene H. Dortch

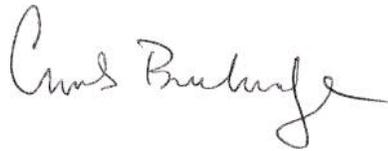
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LCAs, the local exchange carrier has entered into an exclusive arrangement with another numbering provider, meaning that Sorenson's numbering provider is contractually barred). We explained further that Sorenson has encountered these problems in every state, but that they tend to be concentrated in a handful of locations. Finally, we explained that only a very small fraction of the numbers that Sorenson supports are affected by this issue and, accordingly, that a petition for waiver would apply only to a very small volume of numbers.

We concluded by proposing that Sorenson file a single waiver petition that would cover all numbers affected by this issue, including numbers that it issues to new subscribers in the future. The FCC staff in attendance responded by saying they would consider Sorenson's proposed approach and provide guidance in the future.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles Breckinridge".

Charles Breckinridge
Counsel to Sorenson Communications, Inc.

cc: William Dever (by email)
Carol Simpson (by email)
Richard Hovey (by email)
Heather Hendrickson (by email)