



April 20, 2012

**VIA ECFS**

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 April 19, 2012, I, on behalf of Sorenson Communications Inc., spoke by telephone with Karen Peltz Strauss, Deputy Chief of the Consumer and Governmental Affairs Bureau. I discussed the fact that Sorenson has been very concerned about the use of IP relay by third parties to commit fraud, and thus for a number of years has had screening procedures in place to try to prevent the use of IP Relay to commit fraud. This has been very successful at reducing the instance in which a new but unverified registrant attempts to use Sorenson's IP Relay for fraudulent purposes. I also stated that in addition to changing the "guest" registration rule so that IP Relay providers did not have to permit newly registered users to place calls before they could be verified, the Commission should provide some period after which all current unverified registrations are deemed to be expired. The Commission's orders have not established a definitive limit as to the time period within which unverified registrations may be cancelled. In the absence of guidance, Sorenson has used three months. However, in Sorenson's experience most attempted fraud occurs within the first day or two of the initial registration. For that reason, Sorenson has other policies in place to combat the use of the anonymity of IP Relay by false registrants to perpetrate fraudulent schemes.

Marlene H. Dortch  
April 20, 2012  
Page 2 of 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. Nakahata  
*Counsel to Sorenson Communications, Inc.*

cc: Karen Peltz Strauss