

May 18, 2012

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: EX PARTE Presentation in CG Docket No. 10-51

On May 16, 2012, Bob Gorman, Gail Sanchez, Melissa Guthrie, Toni Acton, Doug Coutee for AT&T; Kevin Colwell, Pam Holmes and Tim Engelke for Ultratec/Captel; Dixie Ziegler, David O'Connor for Hamilton Relay; Mike Fingerhut and Mark Tauscher for Sprint met with Greg Hlibok, Eliot Greenwald, and Diane Mason of the Consumer and Governmental Affairs Bureau via conference call.

Kevin Colwell discussed how calls are routed via the PSTN network and the Internet. Discussion addressed how IP Captel calls are routed and what detail is available to report in CDR billing detail. Specifically the Captel providers seek clarification on the reporting of minutes of use for IP Captel phones.

In the April 6, 2011 Report and Order the FCC outlined a number of new requirements for VRS and IP Relay. Some of these requirements apply to IP CapTel. Specifically, in Appendix E Section C (2) the R & O states:

(2) *Call data required from all TRS providers.* In addition to the data requested by section 64.604(c)(5)(iii)(C)(1), **TRS providers seeking compensation from the TRS Fund** shall submit the following specific data associated with each TRS call for which compensation is sought: (1) the call record ID sequence; (2) CA ID number; (3) session start and end times noted at a minimum to the nearest second; (4) conversation start and end times noted at a minimum to the nearest second; (5) **incoming telephone number and IP address** (if call originates with an IP-based device) at the time of the call; (6) **outbound telephone number (if call terminates to a telephone) and IP address** (if call terminates to an IP-based device) at the time of call; (7) total conversation minutes; (8) total session minutes; (9) the call center (by assigned center ID number) that handled the call; and (10) the URL address through which the call is handled.

The specifications highlighted in (5) and (6) are not possible for some IP CTS (the Model 800i and Model 840i) calls. Captel discussed a reference document for the FCC and RLSA outlining the call flow and network information that is available for each type of Captel call, and discussed why (5) and (6) call data is not available.

In Paragraph 79 of the April 6, 2001 Report and Order, the FCC further discusses the Call data requirement and states that a provider should report the following:

79. The rule that we now adopt requires all TRS providers to use an automated record keeping system to capture the following data when seeking compensation from the Fund: (1) the call record ID sequence; (2) CA ID number; (3) session start and end times, at a minimum to the nearest second; (4) conversation start and end times, at a minimum to the nearest second; (5) incoming telephone number (if call originates with a telephone) and IP address (if call originates with an IP-based device) at the time of the call; (6) outbound telephone number and IP address (if call terminates to an IP-based device) at the time of call; (7) total conversation minutes; (8) total session minutes; and (9) the call center (by assigned center ID number) that handles the call.

The requirements in paragraph 79 are workable for IP Captel phones, but the requirement as stated in Appendix E is not.

The parties suggested that this matter might be resolved by the issuance of an *Erratum* to amend Section 64.604(c)(5)(iii)(C)(2)(v) to provide: “Incoming telephone number **and/or** IP address (if call originates with an IP-based device) at the time of the call” (emphasis added).

A conforming amendment would need to be made to Section 64.604(c)(5)(iii)(C)(2)(vi) to provide: “Outbound telephone number (if call terminates to a telephone) **and/or** IP address (if call terminates to an IP-based device) at the time of the call” (emphasis added).

Gregory Hlibok of the FCC noted they would get back to us in follow-up on this matter within a few weeks.

Respectfully submitted,

/s/ Pam Holmes
Director, Consumer & Regulatory Affairs
Ultratec, Inc.

cc (via e-mail): Gregory Hlibok, Eliot Greenwald, Diane Mason