

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CG Docket No. 03-123
	)	
Structure and Practices of the Video Relay Service Program	)	CG Docket No. 10-51
	)	
Interstate Telecommunications Relay Services Fund Payment Formula and Fund Size Estimate for the July 2012 Through June 2013 Fund Year	)	

**Reply Comments of CaptionCall**

CaptionCall, the Sorenson business unit that provides Internet Protocol Captioned Telephone Service (“IP CTS”), submits these reply comments in response to the Public Notice issued on May 2, 2012 by the Consumer and Governmental Affairs Bureau in the above captioned proceedings.<sup>1</sup> In the Public Notice the Bureau seeks comment on the compensation rates for various forms of interstate Telecommunications Relay Services for the rate year running July 1, 2012 through June 30, 2013. Rolka Loube Saltzer Associates, the TRS Fund Administrator (“Administrator”), submitted the proposed rates in its May 1, 2012 filing.<sup>2</sup> CaptionCall thanks the Fund Administrator for its diligent work in this proceeding and expresses its support for the proposed 2012-2013 IP CTS rate.

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<sup>1</sup> *Rolka Loube Saltzer Associates Submits Payment Formulas and Funding Requirement for the Interstate Telecommunications Relay Services Fund for July 2012 Through June 2013 Fund Year*, Public Notice, CG Docket Nos. 03-123 & 10-51, DA 12-696 (rel. May 2, 2012) (“Public Notice”).

<sup>2</sup> *Rolka Loube Saltzer Associates LLC, Interstate Telecommunications Relay Service Fund Payment Formula and Fund Size Estimate*, CG Docket No. 03-123 (filed May 1, 2012) (“2012 TRS Rate Filing”).

The Administrator uses the Multi-state Average Rate Structure (MARS) plan to calculate the compensation rate for IP CTS.<sup>3</sup> Using the state provided data the Administrator calculated a proposed rate of \$1.7730 per minute for IP CTS, approximately a 1% increase from the 2011-2012 year.<sup>4</sup> CaptionCall believes the proposed 2012-2013 IP CTS rate reasonably compensates service providers. CaptionCall therefore supports the Administrator's proposed 2012-2013 IP CTS rate.

Respectfully submitted,

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May 23, 2012

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<sup>3</sup> *Id.* at 4.

<sup>4</sup> *Id.* at 12.