WILTSHIRE & GRANNIS LLP

REDACTED – FOR PUBLIC INSPECTION

June 5, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Gregory Hlibok
Chief, Disability Rights Office
Bureau of Consumer and Governmental Affairs
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 and Mr. Hlibok:

On behalf of Sorenson Communications, Inc., undersigned counsel submits the attached letter containing Highly Confidential Information under seal pursuant to the *Second Protective Order* issued in the above-captioned proceedings on May 31, 2012.

As required by paragraph 12 of the *Second Protective Order*, we submit: (a) one copy of the filing containing Highly Confidential Information to the Secretary's Office along with this cover letter; (b) two copies of the filing in redacted form to the Secretary's Office along with this cover letter; and (c) two copies of the filing containing Highly Confidential Information to Gregory Hlibok along with this cover letter. We will also file a copy of the redacted version via ECFS. As required by paragraph 3 of the *Second Protective Order*, we have received written approval from Commission staff for the confidentiality designations in the filing.

Sincerely,

Charles Breckinridge
Counsel to Sorenson Communications, Inc.

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Dear Ms. Dortch and Mr. Hlibok:

As noted in more detail in an ex parte letter filed on May 7, 2012, representatives of Sorenson Communications, Inc. ("Sorenson") met on May 3, 2012, with Federal Communications Commission staff to discuss the Commission's pending *Further Notice of Proposed Rulemaking* related to reform of the video relay service ("VRS") industry.[1]

In addition to the discussion described in the May 7 letter, the FCC representatives also requested specific information that Sorenson provides below:

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[1] *See Structure and Practices of the Video Relay Service Program and Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Further Notice of Proposed Rulemaking, CG Docket Nos. 10-51 & 03-123 (rel. Dec. 15, 2011) ("FNPRM").

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- *What is the average monthly VRS minutes of use ("MOU") for Sorenson's customers?*

  Measured over the course of the last year, Sorenson's customers average ***BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL*** VRS MOU per month. This statistic measures minutes based on compensable conversation time, and it measures individual customers (not ten-digit numbers or devices).

- *What is the average VRS MOU for Sorenson's non-enterprise subscribers?*

  Measured over the course of the last year, Sorenson's non-enterprise customers average ***BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL*** VRS MOU per month. This statistic measures minutes based on compensable conversation time, and it measures individual customers (not ten-digit numbers or devices).

- *What is the average VRS MOU for Sorenson's enterprise subscribers?*

  Measured over the course of the last year, Sorenson's enterprise customers average ***BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL*** VRS MOU per month. This statistic measures minutes based on compensable conversation time, and it measures individual customers (not ten-digit numbers or devices).

- What is the average length of a Sorenson VRS call?

  The average length of a Sorenson VRS call is ***BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL*** minutes of compensable conversation time. This average ***BEGIN HIGHLY CONFIDENTIAL***

  END HIGHLY CONFIDENTIAL The average for enterprise users is ***BEGIN HIGHLY CONFIDENTIAL***
  END HIGHLY CONFIDENTIAL than for non-enterprise users.

- *On average, how many 10-digit numbers does a Sorenson user have for VRS?*

  Sorenson's VRS customers average ***BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL*** ten-digit numbers each, spread across different endpoint devices (videophone, PC, mobile).

- *How many customers have exercised an "equipment license fee" – that is, how many have paid the applicable fee and kept the equipment?*

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  *****END HIGHLY CONFIDENTIAL*****

- *What percentage of Sorenson's video interpreters are NAD-RID certified?*

  Approximately *****BEGIN CONFIDENTIAL***** *****END CONFIDENTIAL***** percent of Sorenson's video interpreters are NAD-RID certified.

- *What is Sorenson's average-speed-of-answer for VRS?*

  On average measured over a month, Sorenson answers VRS calls in *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL***** seconds.

- *What percentage of Sorenson's outreach efforts are targeted at attracting new-to-category customers, as compared to efforts to attract customers served by other providers?*

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  *****END HIGHLY CONFIDENTIAL*****

- *How many complaints does Sorenson receive per year, and how many relate to quality of interpretation?*

  Out of approximately *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL***** VRS calls that reached a Sorenson video interpreter from June 1, 2010 to May 31, 2011, Sorenson received *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL*****

complaints related to compliance with the mandatory minimum standards and other aspects of the FCC's rules applicable to VRS. (This equates to a complaint rate of about one for every *****BEGIN HIGHLY CONFIDENTIAL*****
*****END HIGHLY CONFIDENTIAL*****) Of these *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL***** complaints, *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL***** related in some manner to interpreting quality. (This equates to an interpreting-quality complaint rate of about one for every *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL*****)

- *Does Sorenson have data related to broadband penetration and/or adoption among potential but currently unserved VRS users?*

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*****END HIGHLY CONFIDENTIAL*****

Sorenson looks forward to discussing these issues and others with the Commission and staff in greater depth in future meetings.

Sincerely,

Charles Breckinridge
Counsel to Sorenson Communications, Inc.