



WILTSHIRE  
& GRANNIS LLP

July 25, 2012

Ex Parte

Ms. 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 July 23, 2012, Paul Kershisnik and Mike Maddix of Sorenson Communications, Inc. and John Nakahata and I, representing Sorenson, met with Nick Delgani, Commissioner Pai's legal adviser, and on July 24, the same group met with Priscilla Argeris, Commissioner Rosenworcel's legal adviser. We emphasized that:

- Sorenson entered the VRS market after Purple and Z and attained a large market share on account of its superior products and services.
- Sorenson suffered a much steeper rate cut than all other providers in 2010.
- There is no room for further rate cuts below the current Tier III rate without harming VRS users.
- The tiered rate system should be abolished and other VRS providers' compensation should be gradually reduced to the same level Sorenson receives.
- The use of a per-user compensation system or a hybrid system would discourage the minute-pumping abuse practiced by other providers.
- VRS providers need long-term rate stability.
- Sorenson supports developing an interoperable SIP-based standard for point-to-point communications.

These submissions are spelled out in the attached slide deck. We also distributed the attached description of Sorenson's latest videophone.

Sincerely,

/s/

Christopher J. Wright  
*Counsel to Sorenson Communications, Inc.*

cc: Nick Delgani  
Priscilla Argeris

attachments