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Via Electronic Filing

September 20, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities. CG Docket No. 10-51 and CG Docket No. 03-123

Dear Ms. Dortch:

On September 18, 2012, Robert Vitanza, General Attorney, Eileen Hansen, AVP-Marketing Management, Gail Sanchez, Senior Product Marketing Manager and I, all from AT&T, met with Kris Monteith, Chief, Consumer and Governmental Affairs Bureau, Karen Strauss, Deputy Bureau Chief, Gregory Hlibok, Disability Rights Office and Robert Aldrich, Legal Advisor also of the Consumer and Governmental Affairs Bureau.

At this meeting AT&T and Commission staff discussed the criteria for eligibility to provide IP-Captioned Telephone Service (IP-CTS) and to receive reimbursement from the Interstate TRS Fund for IP-CTS minutes prior to the recent rules changes. AT&T explained that the FCC's 2007 IP CTS Declaratory Ruling and subsequent 2008 Public Notice allow for IP CTS eligibility for providers that are part of a certified state program. AT&T emphasized that the Ruling and Public Notice do not require the certified state program to include IP CTS, which makes sense, as states do not provide oversight of IP CTS because those services are compensated solely under the Interstate TRS Fund. AT&T further explained that the IP CTS eligibility rules are intended to insure oversight of providers and that providers providing any form of TRS under a certified state program would be eligible to provide IP CTS. Finally,

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AT&T demonstrated how it is eligible to provide IP CTS and that, as required by FCC rules, AT&T provided notice to the TRS Administrator of its intention to begin offering IP CTS before the service was offered to customers. The attached document was used during the course of the discussion.

Respectfully submitted,

A handwritten signature in cursive script that reads "Celia Magales".

cc: Kris Monteith
Karen Strauss
Gregory Hlibok
Robert Aldrich