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October 17, 2012

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Meeting, CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

On October 15, 2012, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), Andrew S. Phillips, Policy Attorney, National Association of the Deaf (“NAD”) (together, the “Consumer Representatives”), and the undersigned met with Jonathan Chambers, Acting Chief, Office of Strategic Planning and Policy Analysis, Henning Schulzrinne, Chief Technology Officer, Kris Monteith, Acting Chief, Consumer and Governmental Affairs Bureau, Gregory Hlibok, Eliot Greenwald, and Robert Aldrich of the Consumer and Governmental Affairs Bureau, Diane Mason, Office of the Managing Director, and Andrew Multz, Wireline Competition Bureau, to discuss the Video Relay Service (“VRS”) Notice of Proposed Rulemaking (“NPRM”) released on December 15, 2011.

The Consumer Representatives thanked the FCC for continuing the dialogue on the issues in the NPRM and expressed a desire to work cooperatively with the FCC throughout the process. The Consumer Representatives applaud the FCC’s action to update the VRS program and share the FCC’s goal of ensuring true interoperability of VRS service and equipment. The long term goal must be to make mainstream video conferencing services accessible to VRS users, not just for VRS use, but for peer-to-peer video communication between video phones and mainstream video conferencing services. Deaf and hard of hearing consumers should no longer function in silos. Consumers would also like their hearing contacts who use ASL to receive ten-digit numbers and access to necessary video phone software and/or equipment. This would permit more peer-to-peer calls, thus reducing the use of VRS-compensated services.

The participants discussed working cooperatively to get input from the community both on the record and during the process of implementing any new rules that govern VRS. The Consumer Representatives reiterated recommendations that the Commission establish a committee (or reconstitute a committee) comprised of Commission staff, the TRS Fund Administrator, industry representatives, independent technology experts, and organizations representing deaf and hard-of-hearing individuals to evaluate the VRS industry and program administration. Among other areas, this committee with consumer input should focus on interoperability, ensuring VRS service keeps pace with technology improvements, and service quality.

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The participants also discussed the importance of research and development. Innovations and improvements in technology for people with disabilities are dependent upon research and development, and are mandated under Section 225(d)(2) of the Act. While the Consumer Representatives share the FCC's goal of reducing waste, fraud and abuse, they cautioned the Commission not to lose sight of the need to ensure that any changes to the VRS compensation methodology not act as an effective cap on improvements in other program areas, such as outreach to expand the program to new users or encourage research and development that leads to service innovation.

Respectfully submitted,

/s/ Tamar Finn

Tamar Finn

Counsel for TDI

cc (by e-mail):

Jonathan Chambers
Henning Schulzrinne
Kris Monteith
Gregory Hlibok
Eliot Greenwald
Robert Aldrich
Diane Mason
Andrew Mulitz