

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

In the Matter of)
)
)
Structure and Practices of the Video Relay)
Service Program)
)

CG Docket No. 10-51

FILED/ACCEPTED

DEC 03 2012

Federal Communications Commission
Office of the Secretary

Update and Verification of Internet-Based TRS Certification
Application

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December 3, 2012

No. of Copies rec'd 0+1
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I. Introduction and Summary

Pursuant to 47 C.F.R. § 64.606(g), and in accordance with the Commission's orders released on July 28 and October 17, 2011, Sorenson Communications, Inc. ("Sorenson") submits this update and verification of its December 2, 2011 application for certification as a provider of Internet-based telecommunications relay service ("iTRS").¹

Sorenson is the industry-leading provider of communications services and products designed to enable deaf and hard-of-hearing individuals to communicate with the hearing world. By offering consumers cutting-edge equipment and applications, and by staffing its network of 109 call centers (102 VRS, 1 IP Relay, 6 IP CTS) with highly skilled communications assistants ("CAs"), Sorenson has demonstrated its commitment to working closely with the deaf and hard-of-hearing community to ensure that communications services continue to meet their needs. The company has provided service under contract with the State of Utah for more than eight years, and its award-winning iTRS offerings have earned a reputation for quality, reliability, and efficiency. Indeed, Sorenson has established a proven record of meeting and exceeding the Commission's minimum standards, and it continues to set the pace among iTRS providers with respect to robust internal compliance systems and efforts to combat fraud. By virtually any measure, Sorenson has proven itself to be the industry leader in terms of service quality, equipment innovations, efficiency, ease-of-use, fraud prevention, and consumer responsiveness.

Sorenson began providing iTRS in 2003, when it entered into a contract with the State of Utah's FCC-certified TRS program to provide video relay service ("VRS"). Sorenson began providing IP Relay services in 2005 and IP Captioned Telephone Service ("IP CTS") in 2011.

¹ Sorenson's application consists of this document and the exhibits saved on the attached thumb drive. Due to their sensitive nature, the exhibits have been redacted from the public version of the application.

Sorenson currently serves approximately ***BEGIN CONFIDENTIAL*** [REDACTED]

[REDACTED] ***END

CONFIDENTIAL***

II. Forms of iTRS to Be Provided (47 C.F.R. § 64.606(a)(2)(i))

Pursuant to the Commission’s July 28, 2011 Order, Sorenson currently provides VRS, IP Relay, and IP CTS services under a grant of interim eligibility.² Sorenson, which formerly operated under contract with the State of Utah’s FCC certified TRS program, timely filed its Certification Application on December 2, 2011, and the Commission has neither granted nor denied that Application.

III. Meeting Non-Waived Minimum Standards (47 C.F.R. § 64.606(a)(2)(ii))

As explained in the chart that follows, Sorenson’s services meet all of the non-waived minimum standards applicable to VRS, IP Relay, and IP CTS.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN’S COMPLIANCE
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² See *Structure and Practices of the Video Relay Service Program*, Second Report and Order and Order, FCC 11-118, ¶ 59 (2011) (granting interim eligibility for “any iTRS provider currently eligible to receive compensation directly from the TRS Fund via a means other than Commission certification,” to expire “(1) 35 days after this application deadline, in the event no application is timely filed; (2) 35 days after Commission dismissal or denial of the application for certification in the event of Commission dismissal or denial; or (3) upon Commission grant of the application for certification in the event of Commission grant.”).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<p>CA Training</p> <p>47 C.F.R. § 64.604(a)(1)(i)</p>	<p>VRS IP Relay IP CTS</p>	<p>--</p>	<p>Sorenson has developed a robust in-house training program in which its VRS, IP Relay, and IP CTS CAs are instructed in depth on meeting the needs of deaf and hard-of-hearing consumers, complying with the regulatory standards applicable to CAs, and the operational and technological aspects of Sorenson's services and equipment. VRS CAs are trained for an average of ***BEGIN CONFIDENTIAL*** [REDACTED] ***END CONFIDENTIAL***. IP Relay CAs and IP CTS CAs are trained for an average of ***BEGIN CONFIDENTIAL*** [REDACTED] ***END CONFIDENTIAL***.</p>
<p>CA Skills</p> <p>47 C.F.R. § 64.604(a)(1)(ii)</p>	<p>VRS IP Relay IP CTS</p>	<p>Partial waiver for IP CTS³</p>	<p>As part of its robust training program, Sorenson ensures that its CAs handling VRS, IP Relay, and IP CTS calls are sufficiently skilled in typing, grammar, spelling, and interpretation of typewritten ASL (where applicable); that they are familiar with hearing and speech-disability cultures, languages and etiquette; and that they possess clear and articulate voice communications skills.</p>
<p>CA Typing</p> <p>47 C.F.R. § 64.604(a)(1)(iii)</p>	<p>IP Relay IP CTS</p>	<p>Not applicable to VRS</p>	<p>Sorenson's IP Relay and IP CTS CAs are all able to type more than 60 words per minute (including with the use of technological aides). Sorenson tests its IP Relay CAs' oral-to-text typing speeds to ensure compliance.⁴</p>

³ See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Declaratory Ruling, 22 FCC Rcd. 379, 392 ¶ 30 n.105 (2007) (“*IP CTS Waiver Order*”) (waiving in certain circumstances the requirement that IP CTS CAs are competent in interpreting written ASL).

⁴ See *IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement to test typing speeds of IP CTS CAs).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	Not applicable to IP Relay and IP CTS	Through its applicant screening and in-house training systems, Sorenson ensures that all of its VRS CAs are "qualified interpreters" – that is, that they are able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.
Ten Minute Rule 47 C.F.R. § 64.604(a)(1)(v) ⁵	VRS	Not applicable to IP Relay and IP CTS	Sorenson's procedures provide that VRS CAs must stay with any given call for a minimum of ten minutes, unless (a) the VRS end user terminates the call earlier or requests another CA, or (b) either the VRS user or CA finds that they are not communicating effectively given the nature of the call.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	VRS IP Relay	Waived for IP CTS ⁶	As part of its operating procedures, Sorenson makes its best efforts to accommodate its customers' requests regarding the gender of the VRS or IP Relay CA handling their calls – both at call initiation and in the event of a transfer to another CA.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	VRS IP Relay IP CTS	--	Sorenson bars its CAs from disclosing the content of any relayed conversation, except as authorized by 47 U.S.C. § 605.
Accuracy Rule 47 C.F.R. § 64.604(a)(2)(ii)	VRS IP Relay IP CTS	--	Sorenson bars its CAs from intentionally altering the conversations they relay, except to the extent (i) the iTRS end user requests summarization or similar alterations, (ii) necessary to comply with federal, state and local law regarding use of telephone company facilities for illegal purposes; and (iii) necessary to provide information to emergency responders.

⁵ See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Order, 21 FCC Rcd. 6733, 6736 ¶ 9 (2006) ("If the party using sign language or the VRS CA find that they are not communicating effectively given the nature of the call, the VRS provider may have another CA handle the call without violating the 10-minute in-call replacement rule.").

⁶ See *IP CTS Waiver Order* ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	VRS IP Relay	Waived for IP CTS ⁷	Sorenson bars its VRS and IP Relay CAs from refusing single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	VRS IP Relay IP CTS	--	Sorenson does not limit the length of calls.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	VRS IP Relay IP CTS	Waived for VRS and IP Relay as applied to operator assisted calls and long distance calls ⁸	Except to the extent the requirement has been waived, Sorenson's iTRS services are capable of handling any type of call normally provided by telecommunications carriers.
Pay-Per-Call Calls 47 C.F.R. § 64.604(a)(3)(iv)	--	Waived for VRS, IP Relay, and IP CTS ⁹	--
Text-to-voice and voice-to-text 47 C.F.R. § 64.604(a)(3)(v)(1)	IP CTS IP Relay	Not applicable to VRS	Sorenson's IP Relay CAs handle text-to-voice and voice-to-text communications, and Sorenson's IP CTS CAs handle voice-to-text communications.
VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO 47 C.F.R. § 64.604(a)(3)(v)(2)	Two-line VCO applies to VRS and IP Relay.	Full waiver for IP CTS; ¹⁰ partial waiver for VRS and IP Relay ¹¹	Sorenson's VRS and IP Relay services support two-line VCO.

⁷ See *IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement that IP CTS CAs may not refuse sequential calls).

⁸ See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Order, 26 FCC Rcd. 9449, 9456 ¶ 17 (2011) ("2011 Waiver Order").

⁹ See *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 15 (VRS and IP Relay).

¹⁰ *IP CTS Waiver Order* ¶ 30.

¹¹ *2011 Waiver Order* ¶ 9.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO 47 C.F.R. § 64.604(a)(3)(v)(3)	Two-line HCO applies to VRS and IP Relay.	Waived for IP CTS; ¹² partial waiver for VRS and IP Relay ¹³	Sorenson's VRS and IP Relay services support two-line HCO.
Call Release 47 C.F.R. § 64.604(a)(3)(vi)(1)	--	Waived for VRS, IP Relay, and IP CTS ¹⁴	--
Speed Dialing 47 C.F.R. § 64.604(a)(3)(vi)(2)	VRS IP Relay	Waived for IP CTS ¹⁵	Sorenson makes speed-dialing functionality available to its VRS and IP Relay customers.
Three-way calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	VRS IP Relay	Waived for IP CTS ¹⁶	Sorenson makes three-way-calling functionality available to its VRS and IP Relay customers.
Voice Mail 47 C.F.R. § 64.604(a)(3)(vii) & (viii)	VRS IP Relay IP CTS	--	Sorenson makes voice mail and/or sign mail available to its VRS, IP Relay, and IP CTS customers. Sorenson's voice mail and SignMail® (video mail) offerings include interactive menus and, where applicable, hot keys to access the services.

¹² *IP CTS Waiver Order* ¶ 30.

¹³ *2011 Waiver Order* ¶ 11.

¹⁴ *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 13 (VRS and IP Relay).

¹⁵ *IP CTS Waiver Order* ¶ 30.

¹⁶ *IP CTS Waiver Order* ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<p>Privacy Screen</p> <p>47 C.F.R. § 64.604(a)(6)</p>	<p>VRS</p>	<p>Not applicable to IP Relay or IP CTS</p>	<p>Sorenson bars its VRS CAs from using privacy screens. Sorenson's VRS CAs do, however, employ temporary transition screens when transferring a call from one CA to another. Sorenson's call handling system automatically places the call in non-billable status while the transition screen is in use.</p> <p>Sorenson's VRS CAs are required to disconnect a VRS call if either the calling or called party employs a privacy screen or similar feature for more than five minutes or is otherwise unresponsive for more than five minutes, except in the case of a 911 call or in circumstances where the calling or called party has legitimately been placed on hold. Sorenson's VRS CAs disconnect calls in these circumstances only after announcing the upcoming disconnection.</p>
<p>International Calls</p> <p>47 C.F.R. § 64.604(a)(7) (rule applicable to VRS); 26 FCC Rcd. 5545, 5563 ¶ 31 (2011) (rule applicable to IP Relay).</p>	<p>VRS, IP Relay</p>	<p>Not applicable to IP CTS</p>	<p>Sorenson does not seek compensation for (a) VRS calls that originate from an international IP address, with the exception of calls made by a U.S. resident who has pre-registered with Sorenson prior to leaving the country, as required under the FCC's rules, or (b) IP Relay calls that originate or terminate outside of the United States.</p>
<p>ASCII / Baudot Format</p> <p>47 C.F.R. § 64.604(b)(1)</p>	<p>--</p>	<p>Waived for IP CTS;¹⁷ not applicable to VRS or IP Relay</p>	<p>--</p>
<p>Speed of Answer for IP Relay and IP CTS</p> <p>47 C.F.R. § 64.604(b)(2)(ii)</p>	<p>IP Relay IP CTS</p>	<p>Not applicable to VRS</p>	<p>As reflected in its monthly data submissions to the Fund administrator, Sorenson's IP Relay and IP CTS routinely exceed the speed-of-answer requirement that 85% of all calls are answered within 10 seconds measured on a daily basis.</p>

¹⁷ IP CTS Waiver Order ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
Speed of Answer for VRS 47 C.F.R. § 64.604(b)(2)(iii)	VRS	Not applicable to IP Relay or IP CTS	As reflected in its monthly data submissions to the Fund administrator, Sorenson's VRS routinely exceeds the speed-of-answer requirement that 80% of all calls are answered within 120 seconds measured on a monthly basis.
Equal Access to IXCs 47 C.F.R. § 64.604(b)(3)	--	Waived for VRS, IP Relay, and IP CTS ¹⁸	--
24/7 Operations 47 C.F.R. § 64.604(b)(4)(i)	VRS IP Relay IP CTS	--	Sorenson VRS, IP Relay, and IP CTS are available 24 hours per day, 7 days per week. Sorenson has the capacity to handle up to ***BEGIN CONFIDENTIAL*** [REDACTED] ***END CONFIDENTIAL*** Sorenson also has the ability to scale these capacities upwards to meet growing demand.
Redundancy 47 C.F.R. § 64.604(b)(4)(ii)	VRS IP Relay IP CTS	--	Sorenson's operations include multiple redundancy features and safeguards, including emergency generators to ensure uninterrupted power for emergency use.
At-Home Interpreting 47 C.F.R. § 64.604(b)(4)(iii)	VRS	Not applicable to IP Relay or IP CTS	Sorenson does not permit or enable its VRS CAs to relay calls from their homes (or from any location other than a Sorenson call center).
Caller ID 47 C.F.R. § 64.604(b)(6)	VRS IP Relay IP CTS	--	On all VRS and IP Relay calls that originate with a Sorenson iTRS customer, Sorenson passes through the number of the iTRS facility, 711, or the calling party's number. For IP CTS calls, the customer's underlying carrier, not the IP CTS provider, handles all call routing and passes through data to the interconnecting carrier. Accordingly, Sorenson (like other IP CTS providers) is not in a position as a matter of call architecture to pass through any IP CTS call or numbering data.

¹⁸ IP CTS Waiver Order ¶ 30 (IP CTS); 2011 Waiver Order ¶ 19 (VRS and IP Relay).

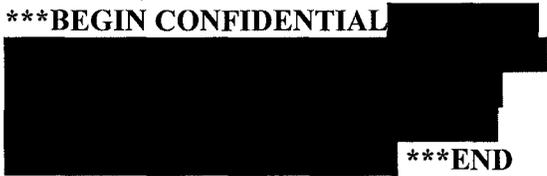
STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
Complaint Logs and Procedures 47 C.F.R. § 64.604(c)(1), (6)	VRS IP Relay IP CTS	--	Sorenson maintains logs of all complaints it receives related to its provision of iTRS. The logs include the date the complaint was filed, the nature of the complaint, the date of resolution, and the nature of resolution. Sorenson annually submits to the FCC a summary of its complaint logs. Sorenson's complaint procedures are detailed in § XI below.
Complaint Contact Point 47 C.F.R. § 64.604(c)(2)	VRS IP Relay IP CTS	--	Sorenson's contact person for iTRS consumer information and complaints is: Michael D. Maddix Director of Government and Regulatory Affairs 4192 South Riverboat Road Salt Lake City, UT 84123 Voice: (801) 287-9461 Fax: (801) 287-9401 Email: mmaddix@sorenson.com
Publicity re iTRS 47 C.F.R. § 64.604(c)(3)	VRS IP Relay IP CTS	--	Sorenson publicizes the availability of iTRS through print promotional materials, web-based promotional materials, sponsorship arrangements, and other means.
Rates 47 C.F.R. § 64.604(c)(4)	VRS IP Relay IP CTS	--	Sorenson does not charge its customers anything for its iTRS.
Cost Information and other Data Submissions 47 C.F.R. § 64.604(c)(5)	VRS IP Relay IP CTS	--	Sorenson maintains and submits required cost data and other data to the FCC and to the Fund administrator.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(iii)(M)	VRS IP Relay IP CTS	--	Sorenson has provided a complete description of the iTRS whistleblower protections to all of its employees. Copies of the English and Spanish language whistleblower policy materials distributed to all employees on May 27, 2011, were attached as Exhibit 1 to Sorenson's December 2, 2011 Certification Application, and Sorenson certifies that these documents have not changed. This information is also included in new hire training.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
VRS Service Name 47 C.F.R. § 64.604(c)(5)(iii)(N)(1) (ii)	VRS	Not applicable to IP Relay or IP CTS	Sorenson's primary VRS services (known as "SVRS") and its Spanish-language sub-brand (known as "RapidoVRS") clearly identify Sorenson as the provider of the service.
URL Routing 47 C.F.R. § 64.604(c)(5)(iii)(N)(1) (ii)	VRS	Not applicable to IP Relay or IP CTS	All of Sorenson's VRS traffic is routed through IP addresses to which Sorenson's URL (svrs.tv) resolves.
Contracting 47 C.F.R. § 64.604(c)(5)(iii)(N)(1) (iii)	VRS	Not applicable to IP Relay or IP CTS	Sorenson does not contract with or otherwise authorize any third party to provide interpretation services or call center functions.
Written Contracts 47 C.F.R. § 64.604(c)(5)(iii)(N)(1) (v)	VRS	Not applicable to IP Relay or IP CTS	All of Sorenson's contracts with third parties are in writing. Copies of all such contracts are available to the Commission and the iTRS Fund administrator upon request.
Call Center Reports 47 C.F.R. § 64.604(c)(5)(iii)(N)(2)	VRS	Not applicable to IP Relay or IP CTS	Sorenson files the required call center reports with the FCC and the Fund administrator.
CA Compensation 47 C.F.R. § 64.604(c)(5)(iii)(N)(3)	VRS	Not applicable to IP Relay or IP CTS	Sorenson does not compensate, provide preferential work schedules, or otherwise benefit its VRS CAs based on the number of VRS minutes or calls that the CA handles, either individually or as a group.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
Remote Training Calls 47 C.F.R. § 64.604(c)(5)(iii)(N)(4)	VRS	Not applicable to IP Relay or IP CTS	Sorenson acknowledges that it is not entitled to compensation for VRS calls to remote training sessions or comparable activities when it (or its affiliates or related parties) has been involved in any manner with the session or activity. Sorenson removes any such minutes from its data submissions before submitting them to the TRS Fund administrator when seeking compensation.
TRS Customer Information 47 C.F.R. § 64.604(c)(7)	VRS IP Relay IP CTS	--	Sorenson does not use its subscribers' profile data for any purpose other than to connect TRS calls. ¹⁹ Neither Sorenson nor its employees sell, distribute, share, or reveal the profile data unless compelled by law to do so.
Emergency Call Handling 47 C.F.R. § 64.605	VRS IP Relay IP CTS ²⁰	--	Sorenson provides emergency calling service in full compliance with the FCC's rules. More specifically, it provides E911 service to its customers; handles and routes emergency calls to the applicable PSAP; immediately attempts to reestablish contact in the event of disconnection; automatically places 911 calls at the front of call queues; and obtains Registered Location information from its customers. In the case of VRS and IP Relay calls, Sorenson also delivers the following to the PSAP: Sorenson's role as iTRS provider, the ANI, the caller's Registered Location, and the CA's identification number. In the case of IP CTS calls, Sorenson provides captioning for emergency calls, and the customer's underlying carrier handles call routing and delivery to and from the PSAP. Sorenson also provides its users with methods of updating their Registered Locations.

¹⁹ See *Telecommunications Relay Services*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5173-76 ¶¶ 77-84 (2000) (defining "profile data" and limitations on its use).

²⁰ See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order, 23 F.C.C.R. 5255, 5257 ¶ 1 n.7, 5263 ¶ 13 n.59 (2008) (describing the circumstances in which IP CTS providers must provide access to emergency services).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<p>Default Provider Registration</p> <p>47 C.F.R. § 64.611(a), (b), (c)</p>	<p>VRS IP Relay</p>	<p>Not applicable to IP CTS</p>	<p>Sorenson provides VRS and IP Relay users with the capability to register with Sorenson as their default provider. Sorenson routes and delivers all such users' inbound and outbound calls unless the user chooses to place a call with, or receives a call from, an alternate provider. Sorenson updates the TRS Numbering Directory for such users as required under the FCC's rules.</p>
<p>Ten-Digit Numbering</p> <p>47 C.F.R. § 64.611(a)(1), (d)</p>	<p>VRS IP Relay</p>	<p>Not applicable to IP CTS</p>	<p>For each user that registers with Sorenson as his or her default provider, Sorenson either (a) facilitates the user's valid porting request from another provider, or (b) assigns the user a geographically appropriate ten-digit number (or, when such numbers are not available in the user's rate center, a geographically approximate ten-digit number). Sorenson does not assign or issue proxy numbers.</p> <p>For access to ten-digit numbers to assign to its subscribers, Sorenson contracts with ***BEGIN CONFIDENTIAL  ***END CONFIDENTIAL***.</p>
<p>Toll-Free Numbering</p> <p>47 C.F.R. § 64.611(e)(1)</p>	<p>VRS IP Relay</p>	<p>Not applicable to IP CTS</p>	<p>Sorenson no longer assigns toll-free numbers to its VRS and IP Relay users, and has transitioned all existing toll-free numbers assigned to Sorenson's registered users to toll-free providers or terminated the provision of those toll-free numbers.</p>
<p>CPE</p> <p>47 C.F.R. § 64.611(f)</p>	<p>VRS IP Relay</p>	<p>Not applicable to IP CTS</p>	<p>The CPE that Sorenson provides to VRS and IP Relay users delivers routing information only to the user's default provider, except to the extent necessary to complete dial-around calls.</p>

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
User Notification re Ten-Digit Numbering and Toll-Free Numbering 47 C.F.R. § 64.611(g)	VRS IP Relay	Not applicable to IP CTS	Sorenson's website and promotional materials related to numbering or E911 service include an advisory addressing (a) the process for obtaining a ten-digit number, (b) number portability, and (c) the process for updating Registered Location information. Sorenson has also prepared and posted an advisory explaining the process by which an iTRS user can acquire a toll-free number; transfer control of a toll-free number to the user; and/or request that a toll-free number be linked to the user's ten-digit number in the TRS Numbering Directory.
Speech-to-Speech Service	--	Waived for VRS, IP Relay, and IP CTS. ²¹	--

IV. VRS Call Center Leases

A. Leases for U.S. Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(2))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(2), copies of the leases for a representative sampling of Sorenson's U.S. VRS call centers were attached as Exhibits 2-6 to Sorenson's December 2, 2011 Certification Application. The sample includes the Sorenson call centers located in Sacramento, CA (Exhibit 2); Tucson, AZ (Exhibit 3); Kansas City, MO (Exhibit 4); Tampa, FL (Exhibit 5); and Portland, ME (Exhibit 6). Sorenson hereby incorporates those Exhibits by reference and certifies that they have not materially changed since Sorenson filed its December 2, 2011 Certification Application.

B. Leases for Call Centers Outside of the United States (47 C.F.R. § 64.606(a)(2)(ii)(A)(3))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(3), copies of the leases for all of Sorenson's VRS call centers located outside of the United States were attached as Exhibits 7-14

²¹ *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 20 (VRS) & ¶ 21 (IP Relay).

to Sorenson's December 2, 2011 Certification Application. Sorenson's non-U.S. call centers are located in the following cities (all in Canada): Victoria, BC (Exhibit 7); Vancouver, BC (Exhibit 8); Calgary, AB (Exhibit 9); Edmonton, AB (Exhibit 10); Winnipeg, MB (Exhibit 11); Ottawa, ON (Exhibit 12); Toronto, ON (Exhibit 13); and Halifax, NS (Exhibit 14). Sorenson hereby incorporates those Exhibits by reference and certifies that they have not materially changed since Sorenson filed its December 2, 2011 Certification Application.

C. List of Call Center Leases (47 C.F.R. § 64.606(a)(2)(ii)(A)(2))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(2), a list of all of Sorenson's VRS call centers including the information required by 47 C.F.R. § 64.604(c)(5)(iii)(N)(2) is attached as Exhibit 1.

V. Description of Technology and Equipment Used to Support VRS Call Center Functions (47 C.F.R. § 64.606(a)(2)(ii)(A)(4))

A. Description of Technology and Equipment (47 C.F.R. § 64.606(a)(2)(ii)(A)(4))

Sorenson's VRS call center functions utilize the following technology and equipment:

- CAs' Desktop Computers and Monitors. A desktop computer and a monitor are installed at every CA's work station to allow the CA to manage and service VRS calls.
- CAs' Desktop Televisions. A television is installed at every CA's work station and connected to the CA's videophone to allow the CA to see the VRS user on the call.
- CAs' Videophones. A Sorenson videophone is installed at every CA's work station to allow the CA to communicate with the VRS user over a video link.
- CAs' Telephone Handsets. A telephone handset is installed at every CA's work stations to allow the CA to speak with the hearing party.
- Custom Call Management Client. Sorenson employs a call management software system that the company developed in-house to manage call flow and routing. It is installed on every CA's desktop computer.

- ACD Servers. Sorenson’s ACD servers manage inbound call queues and route VRS calls within and among Sorenson’s VRS call centers. (In the documentation attached to Sorenson’s December 2, 2011 Certification Application at Exhibit 16, these servers are referred to as “session border controllers.”)
- Billing Servers. Sorenson’s billing services house the billing databases that store all VRS call data, including time stamps and the identity of the CA and call center that handled the call.
- Storage Area Networks (“SAN”). Sorenson’s SAN is highly redundant storage hardware housed in collocation facilities used to warehouse billing, registration and call data.
- Uninterruptible Power Supply (“UPS”). Sorenson’s UPS utilizes battery resources that are engaged to keep production infrastructure online in the event of a power outage or surge.
- Switches. These are network components used to connect servers to each other, to disk resources, and to network resources.
- Routers. These are network components used to manage transmission control protocol / Internet protocol (“TCP/IP”) traffic, including internal data traffic and traffic bound to or from the Internet.
- Firewall. Sorenson’s firewall is a combined hardware and software network component that prevents unauthorized network access to Sorenson infrastructure.
- Load Balancer. Sorenson’s load balancer assesses servers’ current load levels and directs incoming and outgoing network communications to the server with the lowest current load, thereby ensuring the fastest response time.
- Call Managers. Sorenson’s call managers are pieces of telephony equipment that allow the CA to manage inbound and outbound telephone conversations with the hearing party.

B. Technology and Equipment in U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(6))

Section 64.606(a)(2)(ii)(A)(6) of the Commission’s rules requires providers operating more than five VRS call centers within the United States to provide a copy of each proof of purchase, lease or license agreement for technology and equipment used to support call center

functions in a representative sampling of five call centers within the United States. Section 64.606(a)(2)(ii)(A)(4) of the Commission's rules requires providers to include a statement indicating whether such technology and equipment is owned, leased or licensed.

The call center sample Sorenson has selected mirrors the sample it selected for purposes of providing call center leases, as reflected in Section IV.A above. The technology and equipment documentation for these call centers was attached to Sorenson's December 2, 2011 Certification Application at Exhibit 16, Sorenson hereby incorporates that Exhibit by reference and certifies that it has not materially changed since Sorenson filed its December 2, 2011 Certification Application.

C. Technology and Equipment in Non-U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(7))

Section 64.606(a)(2)(ii)(A)(7) of the Commission's rules requires providers to submit a copy of each proof of purchase, lease or license agreement for technology and equipment used to support call center functions in each VRS call center located outside of the United States. Section 64.606(a)(2)(ii)(A)(4) of the Commission's rules requires providers to include a statement indicating whether such technology and equipment is owned, leased or licensed.

As noted above in Section IV.B above, all of Sorenson's non-U.S. VRS call centers are located in Canada. The technology and equipment documentation for these call centers is included in Exhibit 16, as explained in Section V.B above. With the exception of software licenses (included in the records contained in Exhibit 16), Sorenson owns all of the technology and equipment used to support its call center functions.

D. ACD Lease or License Agreement (47 C.F.R. § 64.606(a)(2)(ii)(A)(8))

Sorenson has developed its own ACD system. Accordingly, there is no ACD lease or license agreement to submit.

VI. Entities With Ownership / Control Interests (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission’s rules requires applicants to list all “individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant.” There are *****BEGIN CONFIDENTIAL** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *****END**

CONFIDENTIAL***

VII. Description of Organizational Structure (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission’s rules requires applicants to describe their organizational structure. A copy of a diagram presenting Sorenson’s organizational structure is attached as Exhibit 17 to Sorenson’s December 2, 2011 Certification Application..

VIII. Names of Executives, Officers, Members of Board (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission’s rules requires applicants to provide “the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company).” Sorenson does not have any general partners or managing members. The names of its executives, officers, and board members are included on the list attached as Exhibit 2.

IX. Number of TRS Employees (47 C.F.R. § 64.606(a)(2)(ii)(C))

[REDACTED]

*****END CONFIDENTIAL*****

XII. Statement Regarding Annual Compliance Reports (47 C.F.R. § 64.606(a)(2)(iv))

Pursuant to 47 C.F.R. § 64.606(a)(2)(iv), Sorenson states that it will file annual compliance reports demonstrating continued compliance with the Commission's rules governing Telecommunications Relay Service.

XIII. Certification

I declare under penalty of perjury that I am Paul Kershnik, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.



Paul Kershnik
Chief Marketing Officer
Sorenson Communications, Inc.

Date: 12/3/2012

List of Exhibits

- Exhibit 1 List of VRS Call Centers
- Exhibit 2 Names of Sorenson's Executives, Officers, and Board Members
- Exhibit 3 Sponsorship Agreements