



December 12, 2012

Ex Parte

Ms. Marlene H. Dortch
Secretary
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 Service and Speech-to-Speech Services for Individuals with
Hearing and Speech Disabilities, CG Docket No. 03-123*

Dear Ms. Dortch:

On Tuesday, December 11, 2012, I, on behalf of Sorenson Communications, spoke with Zachary Katz, Chief of Staff to Chairman Genachowski. I told Mr. Katz that the rate-of-return methodology and the proposed rates generated through that method were not economically feasible, and that the comment record confirmed as much. A more rational approach would be, as Sorenson stated in its comments, to set rates that approximate those that would be generated through a competitive bid that produced at least two winners. In such an approach, the Commission would consider all costs, not just a subset of costs. Moreover, proceeding along these lines, with appropriate transitions, would be much less likely to lead to service degradation and disruption. Such an approach presents a much more reasonable path to a functionally-equivalent VRS service that fulfills the Americans with Disabilities Act's commands.

Sincerely,

John T. Nakahata
Counsel to Sorenson Communications, Inc.

cc: Zachary Katz