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ATTORNEYS AT LAW

December 28, 2012

**REDACTED VERSION VIA ECFS,**  
**CONFIDENTIAL VERSION VIA HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**CONFIDENTIAL AND REDACTED VERSIONS BY EMAIL**

Gregory Hlibok  
Chief, Disability Rights Office  
Consumer and Governmental Affairs Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**CONFIDENTIAL AND REDACTED VERSIONS BY EMAIL**

Matt Saltzer  
Rolka Loubé Saltzer Associates  
MSaltzer@r-l-s-a.com

**Re: Submission of Additional Justification for Compensable Telecommunications  
Relay Service Calls Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(L)(2)**

**Request for Confidential Treatment Pursuant to 47 C.F.R. §§ 0.457, 0.459**

**Structure and Practices of the Video Relay Service Program, CC Docket No.  
10-51**

Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(L)(2), Sorenson Communications, Inc. (“Sorenson”) hereby provides additional justification for its position that certain calls as to which Rolka Loubé Saltzer Associates (“RLSA”) withholds support are properly compensable. Specifically, Sorenson establishes herein that, contrary to RLSA’s determination on October 30, 2012 (the “Determination”), deaf-to-hearing TRS calls to misdialed numbers are compensable where the call results in a connection to a recording or some other endpoint requiring the telecommunications relay service (“TRS”) provider’s Communications Assistant (“CA”) to perform relay services.

This submission relates to a TRS-compensation clarification request that Sorenson, through counsel, submitted by e-mail dated September 20, 2012.<sup>1</sup> On October 30, 2012, Matt Saltzer from RLSA responded, explaining that RLSA will withhold compensation “for misdialed phone numbers (such as [numbers] with 8 digits or 5 digits).”<sup>2</sup> Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(L)(2), Sorenson is filing additional information and requests that the Commission and RLSA reevaluate and reverse the Determination.<sup>3</sup>

As a TRS provider, Sorenson must handle all calls from or to deaf, hard-of-hearing or speech-disabled individuals.<sup>4</sup> But no TRS provider can know in real-time whether a dialed number will fail, and thus they must deploy the resources to complete it and to relay the failure in order to provide the functional equivalent of a “dial tone.”<sup>5</sup> These TRS communications impose the same demands on providers’ resources as any other compensable call, and should therefore be compensated. In addition, hearing users are able to receive recorded information when they misdial calls; accordingly, functional equivalence dictates that TRS providers should handle these calls as well and receive compensation for doing so.

In its Determination, RLSA stated that it will continue to withhold compensation for misdialed TRS calls even when they result in CAs providing relay services. RLSA stated: “RLSA maintains that support for misdialed phone numbers (such as one with 8 digits or 5 digits) will continue to be withheld.” These are, of course, not the only situations in which a caller misdials. A caller, for example, may dial a number that is no longer in service, or that was never placed in service. As a logical matter, it makes no sense to ban compensation for relaying the messages that are played when a caller misdials. From the provider’s perspective, CAs providing relay services for misdialed calls is no different from CAs providing relay services for

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<sup>1</sup> See Email from Chad Breckinridge to Gregory Hlibok and Diane Mason (with carbon copies to David Rolka, Matt Saltzer, Michael Maddix, John Nakahata and Chris Wright) (Sept. 20, 2012) (included in the email chain attached as Exhibit A).

<sup>2</sup> Mr. Saltzer subsequently sent clarification in an email dated November 7, 2012. Both of these emails—the Determination Mr. Saltzer sent on October 30 and the clarification he sent on November 7—are included in the email chain attached as Exhibit A. RLSA also reached a determination related to emergency calls routed to an Emergency Contact Routing Center and related to missing data from the hearing party on TRS calls. Sorenson is not submitting any additional information related to those aspects of the Determination.

<sup>3</sup> The regulation states that a submission of “additional justification for payment” must be submitted within two months of the date on which the Fund administrator notifies the provider that compensation will be withheld. 47 C.F.R. § 64.604(c)(5)(iii)(L)(2). The deadline for this submission is therefore two months after October 30, 2012.

<sup>4</sup> See 47 C.F.R. § 64.604 (a)(3)(i) (“Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.”); § 64.604 (a)(3)(ii) (“Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so.”).

<sup>5</sup> *Structure & Practices of the Video Relay Serv. Program*, 26 FCC Rcd. 5545, 5560 ¶ 23 (2011).

calls to numbers that were dialed correctly. In both cases, the call results in an audio communication from the other endpoint that the CA must relay back to the VRS user. Indeed, providers have no way to determine in real time when an end user has misdialled. Accordingly, the service provided and costs incurred are precisely the same for misdialled numbers as for any other number.

The underlying principle of functional equivalence requires that providers handle these calls. In the hearing world, a caller who misdials a number typically reaches a recording indicating that the caller has misdialled, should check the number, and should try the call again. TRS users are entitled to receive the same information when they misdial, but they can receive that information only when it is relayed to them by a CA. Because TRS providers and their CAs are providing service when relaying this information to end users, they are entitled to compensation.

Moreover—even if providers are not entitled to compensation for misdialled calls (which, as explained above, they should be)—many calls that RLSA may believe to be misdialled are in fact genuine calls. With respect to IP CTS, for example, users may dial truncated sequences (like \*98 or other user-specific numbers) to reach their voicemail, to connect with their office, to contact a nurse’s aide, or for other reasons. These are all fully compensable communications, and RLSA should not withhold payment on the mistaken assumption that they are misdialled.

In light of this additional justification for payment provided pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(L)(2), Sorenson requests that the Commission and RLSA reevaluate and reverse RLSA’s Determination as applied to misdialled calls.

\* \* \*

Sorenson requests pursuant to Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459, that the Commission withhold from any future public inspection and accord confidential treatment to (a) the ten-digit number associated with the Emergency Contact Routing Center operated by Sorenson’s E911 provider, and (b) email addresses that are not publicly available (together, the “Confidential Information”). The Confidential Information—which appears only in Exhibit A—has been removed from the redacted version of this filing. The redacted information could, if disclosed, impact emergency response and jeopardize the privacy interests of Sorenson employees.

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, Sorenson hereby states as follows:

**1. Identification of the Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))**

Sorenson seeks confidential treatment with respect to the Confidential Information—which has been redacted from the public version of this filing.

**2. Description of the Circumstances Giving Rise to the Submission (Section 0.459(b)(2))**

Sorenson is submitting this filing to provide additional justification to the TRS Fund Administrator and the FCC pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(L)(2).

**3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))**

The ten-digit number associated with the Emergency Contact Routing Center operated by Sorenson's E911 provider merits confidential treatment because undue publication could lead to call volumes that impact emergency call routing and emergency response times. The email addresses that are not publicly available merit confidential treatment because they constitute personally identifiable information that could, if disclosed, jeopardize the safety of Sorenson employees. Disclosure of this information would result in an unwarranted privacy breach.

**4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))**

The TRS market is highly competitive throughout the United States.

**5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))**

Disclosure would result in potential degradation to emergency services and privacy breaches that impact Sorenson employees. Sorenson call center employees have been subjected to threats and, as a result, Sorenson generally treats employee contact information as confidential information.

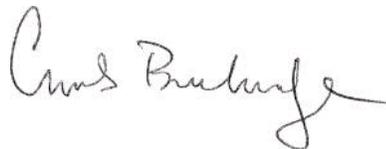
**6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))**

Sorenson does not make this information publicly available.

**7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))**

Sorenson does not make this information publicly available.

Sincerely,



John Nakahata  
Chris Wright  
Charles Breckinridge

*Counsel to Sorenson Communications, Inc.*

# Exhibit A

## Chad Breckinridge

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**From:** Matt Saltzer <msaltzer@r-l-s-a.com>  
**Sent:** Wednesday, November 07, 2012 10:35 AM  
**To:** Chad Breckinridge; [REDACTED] mmaddix@sorenson.com  
**Cc:** Dave Rolka  
**Subject:** RE: TRS Compensation Clarification

Here is clarification:

Emergency calls routed to numbers other than 911. Sorenson needs to separately supply a list of the emergency numbers that it dials in place of '911'. The CDR asks for the outbound phone number. It is not specific to the number dialed by the caller or the number dialed by the CA. If the caller dials 911 but Sorenson dials some other number instead of 911, then that number needs to be disclosed because RLSA would not compensate Sorenson for the call in one odd situation: when it's an IP Relay call that provides no inbound TDN. This should never happen and should therefore not be an issue.

Misdialed numbers. RLSA will continue to withhold compensation for conversation time that involves an outbound phone number that is obviously not valid, including 4, 5, 6, 7, 8, 9 digits and a series of digits that cannot complete a call such as "1" or "123" or "5555555555".

Missing Data. I don't know anything about phantom traffic but your examples appear to agree with our position on withholding support for conversations between someone who's phone number cannot be determined to be domestic and a phone number which appears to be outside of the USA. IP Relay support is more restrictive than VRS because both sides of the call must be domestic to be eligible for support. If either side of an IP Relay call is not presented with data that can be identified as domestic, we will withhold support for such a call.

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**From:** Chad Breckinridge [<mailto:CBreckinridge@wiltshiregrannis.com>]  
**Sent:** Thursday, November 01, 2012 4:52 PM  
**To:** Matt Saltzer; Dave Rolka  
**Cc:** John Nakahata; Michael Maddix ([mmaddix@sorenson.com](mailto:mmaddix@sorenson.com)); Christopher Wright; Reed Steiner  
**Subject:** RE: TRS Compensation Clarification

Dear Matt:

Many thanks for your reply. I'm writing to make sure we're understanding your response so that we can consider next steps.

- Emergency calls routed to numbers other than 911. Your response indicates that RLSA will provide compensation for these calls as long as Sorenson first identifies the telephone numbers that are used in place of 911 in this situation. Is that correct?
- Misdialed numbers. Your response indicates that RLSA will not provide compensation for misdialed calls resulting in a failed dialing sequence. For example, the caller dials 8 digits and is therefore routed to a "call cannot be completed as dialed" recording or something similar. Is that correct?
- Missing data -- VRS. You note in your response that RLSA will not provide compensation "for VRS calls that have no inbound TDN and where the outbound number is not domestic." I want to make sure I'm understanding that scenario. Since a VRS provider should always have an inbound TDN for calls that originate with a deaf party, your description seems to refer to hearing-to-deaf calls where (a) the deaf party is overseas and (b) the VRS provider does not receive data from the hearing party indicating whether that party is in the U.S.

- Is our understanding correct?
  - If so, this means that VRS calls with missing hearing-party data are compensable in other scenarios, correct? (For example, when the deaf party is located in the U.S. and hearing party's data is incomplete.)
  - Also, does this mean that RLSA will not provide compensation for these calls even though this scenario occurs most commonly when the hearing party is located in the U.S. but has blocked caller ID or is using a form of phantom traffic?
- Missing data – IP Relay. You note in your response that RLSA will not provide compensation for IP Relay calls whenever the inbound phone number is missing. Since the provider should always have data for the inbound leg on deaf-initiated calls, this seems to refer to hearing-to-deaf calls where the provider does not receive data from the hearing party indicating whether that party is in the U.S.
    - Is our understanding correct?
    - If so, does that mean that RLSA will not provide compensation even though this scenario occurs most commonly when the hearing party is located in the U.S. but has blocked caller ID or is using a form of phantom traffic?

Thanks again, Matt. Please feel free to call to discuss if that would be easier.

Chad

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**From:** Matt Saltzer [mailto:msaltzer@r-l-s-a.com]  
**Sent:** Tuesday, October 30, 2012 11:31 AM  
**To:** Chad Breckinridge; Dave Rolka  
**Cc:** 'Mike Maddix'; John Nakahata; Christopher Wright; Reed Steiner  
**Subject:** RE: TRS Compensation Clarification

Chad,

RLSA would like a list of all of the emergency numbers that Sorenson reports in place of 911 so that we can add them to our filter.

RLSA maintains that support for misdialed phone numbers (such as one with 8 digits or 5 digits) will continue to be withheld.

RLSA will continue to withhold support for VRS calls that have no inbound TDN and where the outbound number is not domestic. We will also continue to withhold IP Relay support for calls where either or both ends of a call are not domestic. This means that if the inbound phone number is missing, we cannot verify that it was domestic and will withhold support.

Should Sorenson desire to appeal any of the support withheld by RLSA, please prepare and submit an appeal for consideration.

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**From:** Chad Breckinridge [mailto:CBreckinridge@wiltshiregrannis.com]  
**Sent:** Monday, October 22, 2012 10:15 AM  
**To:** 'Gregory Hlibok'; Dave Rolka; Matt Saltzer  
**Cc:** 'Mike Maddix'; John Nakahata; Christopher Wright; 'Diane Mason'; 'Robert Aldrich'; 'Karen Peltz Strauss'; 'Andrew Mulitz'  
**Subject:** RE: TRS Compensation Clarification

Dave and Matt:

I'm writing to follow up on the three compensation-related questions we raised below. Can you let us know the approach on these?

Thank you.

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**From:** Chad Breckinridge  
**Sent:** Thursday, October 11, 2012 9:03 PM  
**To:** 'Gregory Hlibok'; 'Dave Rolka'; 'Matt Saltzer'  
**Cc:** 'Mike Maddix'; John Nakahata; Christopher Wright; 'Diane Mason'; 'Robert Aldrich'; 'Karen Peltz Strauss'; 'Andrew Mulitz'  
**Subject:** RE: TRS Compensation Clarification

Thank you, Greg.

Dave and Matt: Can you let us know the approach to the three types of calls listed below?

Many thanks.

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**From:** Gregory Hlibok [<mailto:Gregory.Hlibok@fcc.gov>]  
**Sent:** Thursday, October 11, 2012 5:45 PM  
**To:** Chad Breckinridge; Diane Mason; Robert Aldrich; Karen Peltz Strauss; Andrew Mulitz  
**Cc:** 'Mike Maddix'; 'Dave Rolka'; John Nakahata; Christopher Wright; 'Matt Saltzer'  
**Subject:** RE: TRS Compensation Clarification

Chad,

We have consulted with RLSA on the issues you raised below. Please check with RLSA.

Thanks.

Greg

Gregory Hlibok  
Chief, Disability Rights Office  
Consumer & Governmental Affairs  
Voice/VP: (202) 559-5158

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**From:** Chad Breckinridge [<mailto:CBreckinridge@wiltshiregrannis.com>]  
**Sent:** Tuesday, October 09, 2012 2:20 PM  
**To:** Gregory Hlibok; Diane Mason; Robert Aldrich; Karen Peltz Strauss; Andrew Mulitz  
**Cc:** 'Mike Maddix'; 'Dave Rolka'; John Nakahata; Christopher Wright; 'Matt Saltzer'  
**Subject:** RE: TRS Compensation Clarification

Greg, Diane, Bob, Karen and Andy:

Have you had an opportunity to discuss these compensation-related questions? We'd be grateful for clarification from you on whether these calls are compensable.

Many thanks.

Chad

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**From:** Chad Breckinridge  
**Sent:** Friday, September 21, 2012 11:48 AM  
**To:** 'Matt Saltzer'; 'Gregory Hlibok'; 'Diane Mason'  
**Cc:** 'Mike Maddix'; 'Dave Rolka'; John Nakahata; Christopher Wright; 'Robert Aldrich ([Robert.Aldrich@fcc.gov](mailto:Robert.Aldrich@fcc.gov))'; 'Karen Peltz Strauss ([Karen.Strauss@fcc.gov](mailto:Karen.Strauss@fcc.gov))'; 'Andrew Muiltz'  
**Subject:** RE: TRS Compensation Clarification

Hi Matt:

Many thanks for your quick response. Responses to your points are in red below. Please let us know if we can provide any additional information on these issues.

Chad

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**From:** Matt Saltzer [<mailto:MSaltzer@r-l-s-a.com>]  
**Sent:** Thursday, September 20, 2012 12:34 PM  
**To:** Chad Breckinridge; 'Gregory Hlibok'; 'Diane Mason'  
**Cc:** 'Mike Maddix'; Dave Rolka; John Nakahata; Christopher Wright; Robert Aldrich ([Robert.Aldrich@fcc.gov](mailto:Robert.Aldrich@fcc.gov)); Karen Peltz Strauss ([Karen.Strauss@fcc.gov](mailto:Karen.Strauss@fcc.gov))  
**Subject:** RE: TRS Compensation Clarification

Chad,

I believe that your points 1 and 3 are related only to IP Relay and that point 2 is related to IP Relay, VRS and perhaps even IP CTS. Please clarify.

Sorenson's first point (911 calls for unregistered users and users without validated addresses) applies to IP Relay and VRS. The second point (misdialed numbers) applies to all three services that Sorenson provides – VRS, IP Relay, and IP CTS. The third point (incomplete hearing party data) applies to VRS and IP Relay.

On point 1: Within your description here, you suggest that the deaf caller is wanting, intending and requesting to dial 911 but that the record of that call, will rather show [REDACTED] because your CA or system is changing the desired '911' to another non-911 TDN. I was not aware of this until now but await Commission's position on this as it relates to the rule and even perhaps the altering of the dialed number. RLSA can easily adjust our system to include any list of acceptable emergency numbers in addition to the '911' that is specified within rule 12-71.

Yes – you have described the situation accurately. This can occur with VRS and IP Relay. Sorenson can insert "911" into the field for the hearing party if that would help, but additional call data will show that the calls were routed to the Emergency Call Routing Center.

On point 2: RLSA believes that such a call doesn't establish a conversation and therefore contains only session time.

As noted in my email, Sorenson has the opposite view. On these calls, CAs and VIs are actually relaying information, just as occurs with a hearing call.

On point 3: IP Relay has a rule that prohibits support for international calls. Without a domestic TDN, it is impossible for RLSA to determine whether or not the hearing party is domestic or foreign. RLSA is not withholding VRS support for lack of an 'inbound' TDN.

Sorenson notes that RLSA has been withholding some compensation for this reason for both VRS and IP Relay calls. And, as a practical matter, the analysis should be the same for both services. Considering that providers are required to handle these calls (hearing-originated calls with incomplete data received from the hearing party), they are entitled to compensation for them, just as occurs with a call in the hearing world.

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**From:** Chad Breckinridge [mailto:CBreckinridge@wiltshiregrannis.com]  
**Sent:** Thursday, September 20, 2012 12:03 PM  
**To:** 'Gregory Hlibok'; 'Diane Mason'  
**Cc:** 'Mike Maddix'; Matt Saltzer; Dave Rolka; John Nakahata; Christopher Wright  
**Subject:** TRS Compensation Clarification

Dear Greg and Diane,

I'm writing on behalf of Sorenson Communications to clear up three TRS Fund compensation issues. In each case, Sorenson believes that it is entitled to compensation, but RLSA has either withheld payment or suggested that it intends to withhold. (Dave Rolka and Matt Saltzer from RLSA are copied on this email; so is Mike Maddix from Sorenson.) We would appreciate clarification from you.

1. As noted in the email chain below, RLSA has indicated that it will withhold compensation on certain emergency calls, suggesting that Sorenson turn to the Commission for resolution. The issue relates to emergency calls from TRS users who have not registered with Sorenson or from users whose addresses have not yet been validated by Sorenson's E911 provider. For all of these users, Sorenson either has no address on file (for non-registered callers) or the address it has on file won't allow for traditional 911 routing because the E911 provider hasn't validated it. Based on guidance from its E911 provider, Sorenson routes these calls to a 10-digit number [REDACTED] that serves the E911 provider's Emergency Contact Routing Center. In every case, the TRS end user has dialed 911, tapped the "call 911" button on his or her endpoint, or signed to the Communications Assistant that it's an emergency call (which is equivalent to "finger dialing" 911).

RLSA appears to have concerns about providing compensation for these calls because they are routed through a 10-digit number to reach the E911 provider's emergency routing center, rather than simply routing them to "911". (Of course, in light of the address problems described above, simply routing these calls to "911" would fail to get them to the appropriate PSAP.) These are all clearly "911 calls" as contemplated in rule 64.605, and they are therefore compensable. Sorenson handles all of the emergency calls it receives, even for unregistered users or users without validated addresses. We request that you clarify that Sorenson is entitled to receive compensation for them.

2. RLSA has withheld compensation for calls to "1411" (instead of "411"), to "1211" (instead of "211"), and to other misdialed numbers. The conversation time on these calls should be compensable. The misdialed numbers often lead to recorded messages that provide the caller with important information – including, for instance, that the caller has the wrong number, or that the caller needs to re-dial without a "1", etc. Sorenson handles all of these calls (as we understand the company is required to do), and Sorenson's CAs relay these messages. In fact, even if Sorenson weren't required to handle these calls, the company typically has no way of determining in real time when an end user has misdialed. Finally, functional equivalence requires that RLSA compensate these calls. In the hearing world, if a cell phone user misdials a number, that person's wireless carrier will legitimately treat as billable all of the time that the call is connected to the wrong party or the recording on the other end. There is no reason to treat TRS providers any differently, and nothing in the rules or the statute suggests that TRS providers should be treated differently.

3. RLSA has also been withholding compensation for calls that we've discussed with you before: hearing-to-deaf calls where the hearing party's call data (telephone number, etc.) is not transmitted to Sorenson. (We discussed this issue with you in May and June 2011, and you directed NECA and then RLSA to release funds for calls that fall into this

category.) There may be a variety of explanations for this situation – the hearing party has blocked caller ID, the originating carrier somehow dropped the data, or an intermediary transmission provider dropped the data, etc. – but in every case, Sorenson never received the data from the incoming caller. Again, Sorenson handles all of these calls, as we understand the company is required to do, and we therefore believe that the company should be compensated for them. Moreover, as with the misdialed calls, functional equivalence dictates that these calls are compensable. In the hearing world, calls are treated as billable even if the originating party's call data is not transmitted to the terminating party's carrier. Again, there is no reason to treat TRS providers differently, and nothing in the rules or the statute suggests that TRS providers should be treated differently.

\* \* \*

We look forward to your clarification on these three points. We believe it is clear that each is compensable and always has been. Please let us know if you would like to discuss further.

Many thanks.

Chad

CHAD BRECKINRIDGE  
WILTSHIRE & GRANNIS LLP  
1200 18TH STREET NW, SUITE 1200  
WASHINGTON, DC 20036  
202-730-1349 TEL 202-730-1301 FAX



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**From:** Matt Saltzer [mailto:MSaltzer@r-l-s-a.com]  
**Sent:** Tuesday, September 18, 2012 10:05 AM  
**To:** Reed Steiner  
**Cc:** Dave Rolka; Mike Maddix  
**Subject:** RE: Sorenson August 2012 minutes submission

Thank you for writing about this, especially early in the process. It will hopefully give us time to work out the issue however, I think this may be an argument that will need to be taken to the FCC as the wording within the rule indicates that providers "will be prohibited from: (1) handling the user's IP Relay calls other than 911 emergency calls". See FCC 12-71 paragraph 13. Even if this turns out to be semantics, the number [REDACTED] is not 911 and thus is going to fail our test that is based on the rule.

Are unregistered IP Relay users dialing [REDACTED] or is the CA changing the dialed 911 to that number?

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**From:** Reed Steiner [mailto:[REDACTED]]  
**Sent:** Tuesday, September 18, 2012 11:25 AM  
**To:** Matt Saltzer  
**Cc:** Mike Maddix  
**Subject:** Sorenson August 2012 minutes submission

Matt,

With regards to Sorenson's August 2012 minutes submission, please note that the number [REDACTED] is the Emergency Contact Routine Center for our E911 provider. This is the number we call when a deaf party contacts us from

an unregistered phone or from an address that is not yet validated by our E911 provider. Given that we are required to process emergency calls from unregistered users, we submit them even when there is no user information.

Thanks,  
**Reed E. Steiner**  
Vice President of Finance

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**Sorenson Communications**  
4192 S. Riverboat Road  
Salt Lake City, Utah 84123

  
W [www.sorenson.com](http://www.sorenson.com)

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