

January 14, 2013

VIA ELECTRONIC FILING

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

Re: **Ex Parte Presentation, Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123**

Dear Ms. Dortch:

On January 11, 2013, Commission staff asked Consumer Groups<sup>1</sup> to comment on Hamilton Relay, Inc.'s proposal that was filed with the Commission on January 10, 2013.<sup>2</sup>

Hearing Loss Association of America supports Hamilton Relay's proposal.

We further emphasize our agreement with Consumer Group's request<sup>3</sup> that in the notice of proposed rulemaking the Commission issues with the emergency order, the Commission, at a minimum, seek comment on whether the interim third-party certification eligibility requirement should be included in any permanent rules and whether any evidence exists to make this requirement permanent.

We also agree with the request that the emergency order direct the TRS Fund administrator to collect and analyze data to determine the source of growth in IP CTS; to share aggregate, redacted data about the growth in IP CTS with the Consumer Groups; and to incorporate IP CTS growth projections in the next TRS contribution factor, which will be issued prior to expiration of the 180-day interim rule.

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<sup>1</sup> "Consumer Groups" include the Telecommunications for the Deaf and Hard of Hearing, Inc. ("TDI"), Association of Late-Deafened Adults, Inc. ("ALDA"), Hearing Loss Association of America ("HLAA"), National Association of the Deaf ("NAD") and Deaf and Hard of Hearing Consumer Advocacy Network ("DHHCAN").

<sup>2</sup> See Letter from Dave A. O'Connor, counsel for Hamilton Relay, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket No. 03-123 (filed Jan. 10, 2013).

<sup>3</sup> See Letter from Philip J. Macres, counsel for TDI, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 03-123, at 2 (filed Jan. 14, 2013).



Sincerely,

*Brenda Battat*

Brenda Battat  
Executive Director

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