



**CSDVRS, LLC**  
**600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755**  
**VideoPhone: 727-431-9692 Voice: 727-254-5600 Fax: 727-443-1537**

April 24, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Ex Parte Notice: CG Docket No. 10-51**

Dear Ms. Dortch:

On April 24, 2013, Chris Wagner, Senior Vice President, Business Operations and Marketing, and the undersigned of CSDVRS, LLC (“ZVRS”) met with Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau, Gregory Hlibok, Chief, Elaine Gardner and Eliot Greenwald, Attorney Advisors, Disability Rights Office.

ZVRS discussed the experiences of relay customers with Sorenson in porting and slamming. The record is replete with the complaints about Sorenson’s improper tactics including their videophone numbers ported to Sorenson without their consent. Included in the attached power point presentations were photographs of Sorenson’s defeatured videophone screens once they learn that the customer has elected to port. Sorenson’s VP provides misleading and insufficient information to enable consent to a port. Sorenson refuses to provide a new number to activate their defeatured VPs, requiring that the former customer port the number back to them. The record also establishes that Sorenson ports customers solely based on a “verbal” agreement with no follow up documentation of the so-called agreement. ZVRS never ports without a written Letter of Agency.

Consistent with its prior comments filed with the Commission, ZVRS recommends: a) prohibiting providers from defeaturing their VP until the iTRS number port to the new default provider was fully accomplished; b) a time period following the port where no marketing by the former default provider is permitted; c) require clear documentation of consumer consent to

effectuate a port of an iTRS number; d) monetary penalties for any slamming; e) the extension of CPNI rules to TRS; f) mandating the prioritization of iTRS number ports in a manner equivalent to landline voice numbers so they can be effectuated within hours not days; and g) requiring the provision of consumer education about slamming and how to file a slamming complaint.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Karen Peltz Strauss  
Gregory Hlibok  
Elaine Gardner  
Eliot Greenwald

Attachment