

May 6, 2013

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

Re: **Notice of Ex Parte – CG Docket Nos. 03-123 and 10-51**  
**NorCal Services for Deaf & Hard of Hearing**

Dear Ms. Dortch:

NorCal Services for Deaf and Hard of Hearing (“NorCal”) is a non-profit, community-based organization serving deaf and hard of hearing individuals, their families, and the general public in 24 northeastern counties of California. NorCal’s mission is to support and promote equal access and opportunities to education, employment, and public services by individuals who are deaf or hard of hearing. The organization provides a wide range of services, including assistance for employment, advocacy, peer counseling, independent living and communication, and specialized services for deaf and hard of hearing individuals with developmental disabilities.

On May 3, 2013, the undersigned, NorCal’s Chief Executive Officer, sent an e-mail to Gregory Hlibok, Chief of the Disability Rights Division, Consumer and Governmental Affairs Bureau, alerting him to Sorenson Communications, Inc.’s (“Sorenson”) practice of configuring its Video Relay Service (“VRS”) and equipment to block consumers from leaving video mail messages through point-to-point calls using a competing service. This was the second of two complaints I have submitted to the Commission regarding Sorenson’s lack of interoperability with competing devices. My e-mail emphasized that this is a critical public safety issue for the deaf and hard of hearing community, and provided the following example to demonstrate how crucial it is for the Commission to address this issue immediately.

In April 2013, I dealt with an emergency situation with a survivor of domestic and sexual violence. In the course of trying to reach her via videophone, I was exasperated and frustrated to discover that I could not leave her a message on her Sorenson sign mail. She returned my calls and left several frantic messages. I know this because she was able to leave messages on my P3 videophone. I could see that she was upset, scared, and living in fear for her life and the lives of her children. Not only was it important for me to be able to reach her using the videophone as a point-to-point call, but it was also crucial for me to be able to use VRS to contact shelters, HUD, and the county office for information while contacting the individual in between calls to provide updated instructions. I was not able to do this because Sorenson was blocking my P3 videophone from leaving a message. I recognized that Sorenson was blocking my messages because I had to physically go to another office to call the individual using a Sorenson device. Indeed, I was only able to leave a message on her Sorenson videophone when using another Sorenson device.

This experience presented clear evidence that Sorenson was preventing me from making a critical, confidential call in an emergency situation simply because I was using a P3 for videophone purposes and not a Sorenson device. In this type of emergency situation, every second counts, and confidentiality is essential. Sorenson’s lack of interoperability presents a

clear public safety danger for the consumer by imposing a barrier between providers, such as NorCal, and deaf and hard of hearing consumers requesting essential social services and advocacy.

I wanted to alert the Commission to this vital issue given that VRS reforms are under active consideration. Because this is a critical public safety issue for the deaf and hard of hearing community, I strongly encourage the Commission to address this issue immediately – even if it must be addressed separately from the other VRS reforms currently under consideration to allow more immediate action.

Respectfully submitted,

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