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June 13, 2013

By ECFS

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

Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; and Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Secretary Dortch:

Pursuant to Section 1.1206 of the Commission's rules, the undersigned counsel hereby provides notice that on June 12, 2013, NobelTel, LLC ("NobelTel") met via telephone with Kris A. Monteith, Bureau Chief, and Robert F. Aldrich, Attorney-Advisor, of the Consumer and Governmental Affairs Bureau in connection with the Telecommunications Relay Services ("TRS") proposed contribution factor and projected Fund requirements. Attending on behalf of NobelTel were Richard L. Mahfouz, President, and Micaiah D. Poleate, Senior Financial Analyst, of NobelTel, and Steven A. Augustino and H. David Darwin of Kelley Drye & Warren LLP.

Consistent with its comments in this proceeding, NobelTel stated that the proposed TRS contribution factor is excessive and would cause substantial harm to telecommunications carriers and their customers, particularly to customers of prepaid calling cards. The proposed factor is by far the highest in the Fund's history, and implementation of any significant increase with essentially no advance notice would cause significant disruption in the telecommunications industry and further burden consumers already facing economic difficulties.

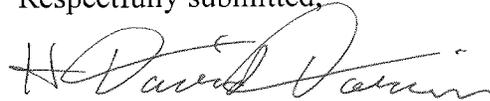
All commenters in the docket agreed that the demand estimates presented by the administrator are unreliable, particularly those for Internet Protocol ("IP") Captioned Telephone

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Service ("CTS"). Moreover, the Commission is in the process of making significant changes to bring the TRS programs under greater control, including rules aimed at the inflated IP CTS demand and laudable enforcement efforts to eliminate waste, fraud and abuse. NobelTel submits that the Commission does not yet have enough reliable information to implement any changes in the rates effective on July 1. Instead, the Commission should freeze the contribution factor at the present level on an interim basis. It should then reassess the TRS contribution factor for the Fund year only after it obtains reliable information on the projected demand for TRS programs based on the effects of its recent reforms to the various services supported by the Fund.

In accordance with Section 1.1206(b)(2)(iii), this notice is timely filed. Please contact the undersigned at (202) 342-8601 if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "H. David Darwin". The signature is fluid and cursive, with a large initial "H" and "D".

H. David Darwin

Counsel to NobelTel, LLC

cc: Kris A. Monteith, FCC (via e-mail)
Robert F. Aldrich, FCC (via e-mail)