

August 22, 2013

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**
*Misuse of Internet Protocol (IP) Captioned Telephone Service;
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities*
CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On August 20, 2013, Hamilton Relay, Inc. (“Hamilton”) provided a demonstration of its Internet Protocol Captioned Telephone Service (“IP CTS”) for Commissioner Pai, his Legal Advisor Nicholas Degani, and Eliot Greenwald of the Consumer & Governmental Affairs Bureau (“CGB”) in the FCC’s Technology Room. In a follow-up meeting, Hamilton demonstrated the service to David Schmidt and Andrew Multz of the Office of the Managing Director, Henning Schulzrinne and Nicholas Alexander of the Office of Strategic Planning & Policy Analysis, Sharon Lee and Richard Hindman of the Enforcement Bureau, and Karen Peltz Strauss, Elaine Gardner, and Mr. Greenwald of CGB. In attendance for Hamilton was Dixie Ziegler, Anne Girard, and the undersigned counsel on behalf of Hamilton. Jamie Machotka of Captioned Telephone, Inc. (“CTI”) also participated in the meetings on behalf of Hamilton.

During each meeting, Hamilton explained how the current interim rule requiring captions to be defaulted to “off” is burdensome to consumers, particularly those with mobility issues, and is unnecessary for those who live alone.

In the follow-up meeting, Hamilton noted that its IP CTS equipment can be engineered to override the “default captions off” setting for emergency 911 calls. The override feature could permit such calls to be automatically captioned, even if the user inadvertently presses the captions button.

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This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor

Counsel for Hamilton Relay, Inc.

cc (via e-mail): Participants