



August 27, 2013

Ex Parte

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

Re: Misuse of Internet Protocol (IP) Captioned Telephone Service, CG Docket No. 13-24; Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities CG Docket No. 03-123

Dear Ms. Dortch:

On August 23, 2013, on behalf of the CaptionCall, LLC subsidiary of Sorenson Communications, Inc. ("CaptionCall"), I spoke with Eliot Greenwald, Attorney Advisor in the Disability Rights Office of the Consumer and Government Affairs Bureau, and left a voice mail for Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel, concerning the pending order in these dockets. On August 26, I left a voice mail for Deputy General Counsel Suzanne Tetrault. On August 23, 2013, John Nakahata, also representing CaptionCall, spoke with David Grimaldi, Chief Counsel and Senior Legal Advisor to Chairwoman Clyburn, on the same topic.

In these communications, we reiterated the proposal CaptionCall made in meetings on August 20, 2013, and in its filing in these dockets on August 22, 2013, suggesting that:

"the Commission could require that all IP CTS users

(1) have at least one hearing aid or a cochlear implant, and

(2) either

(i) have an independent third party medical professional certification that, even with a hearing aid or

cochlear implant, they need captions to use the telephone in a functionally-equivalent manner to a person without hearing disabilities, or

(ii) pay at least \$75 for the necessary equipment."

As we explained, it would be arbitrary and capricious in the extreme for the Commission to ignore this proposal and instead require users to pay \$75 for equipment even if, for example, a user had a cochlear implant and a physician's statement that the user needed captions to obtain functionally equivalent telephone service.

Sincerely,

Christopher J. Wright
Counsel to CaptionCall, LLC

cc: Commissioner Ajit Pai
David Grimaldi
Priscilla Argeris
Nicholas Degani
Karen Peltz Strauss
Gregory Hlibok
Eliot Greenwald
Robert Aldrich
Elaine Gardner
David Schmidt
Andrew Multz
Henning Schulzrinne
Nicholas Alexander
Sean Lev
Suzanne Tetrault
Diane Holland Griffin
Marcus Maher