November 14, 2013

Ex Parte

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

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

Dear Ms. Dortch:

On November 12, 2013, Grant Beckmann, Scot Brooksby, Paul Kershisnik, and Mike Maddix of Sorenson Communications, Inc. ("Sorenson"), and Mark Davis, Chris Wright, and I, on behalf of Sorenson, met with Henning Schulzrinne, Jonathan Chambers, and Nicholas Alexander of the Office of Strategic Planning and Policy Analysis and Gregory Hlibok, Karen Peltz Strauss, Eliot Greenwald, and Elaine Gardner of the Consumer and Governmental Affairs Bureau. In the meeting, we discussed the points which are summarized below.

The VRS industry has made great progress toward interoperability in the past few years. Dial-around and point-to-point functionalities currently work very well—in fact, Sorenson's ntouch VP and VP-200 videophones can dial around to every other provider and can place and receive point-to-point calls to and from every other provider. The remaining issues surrounding interoperability for basic VRS and point-to-point calls are not categorical, but are episodic as providers (not just Sorenson) implement changes to their networks, systems and endpoint hardware and/or software.

The industry has made significant improvements since the 2012 Gallaudet University interoperability study—through both formal and informal cooperation among providers. On the formal side, providers have held three interoperability conferences since January of 2012—the second of which was organized and hosted by Sorenson and the third of which was hosted by CSDVRS ("ZVRS") and occurred just last week. The most recent conference was attended by all six VRS providers, and providers intend to continue holding two conferences per year. Sorenson has volunteered to host one per year. Sorenson also holds monthly interoperability telephone calls separately with Purple and ZVRS to identify and resolve interoperability issues. These calls have been highly successful, and frequently lead to informal engineer-to-engineer follow-up. Although Sorenson has volunteered to hold similar calls with other providers, the other providers have not expressed interest to date. In addition to these calls, Sorenson's engineering team interacts with its counterparts on an ad hoc basis when, and if, significant issues arise.

Providers are also cooperating through the SIP Forum to develop interoperability standards to facilitate interoperability as providers switch from the older H.323 standard to Session Initiation Protocol (SIP) both between one provider's equipment and a second VRS provider (such as for dial-around or a ported customer), and also for point-to-point calls. Sorenson has consistently provided manpower for this effort. The standards resulting from this process include both contact-list portability and the ability for any endpoint to leave a video message for any third-party device.

Regarding videomail interoperability, it bears emphasis that there is currently no agreed-upon H.323 standard for the exchange of video messages across VRS providers, and neither of the largest commercial telepresence providers—Polycom and Tandberg, which is now part of Cisco—offer solutions. Providers therefore designed their own solutions from scratch. Sorenson introduced its videomail system in 2004 to enable a hearing caller to leave videomail for a Deaf VRS user. Its current point-to-point videomail system uses that same basic implementation. At the time Sorenson was developing point-to-point videomail, there was significant regulatory uncertainty over the permissibility of server-based routing—which the Commission still has not yet definitively resolved, although it now, in 2013, appears to have acquiesced to the implementation of server-based routing, at least in part, by all or nearly all providers. As a result, Sorenson designed its system not to require or use server-based routing. Other providers implemented videomail reliant upon server-based routing.

Sorenson also designed its system to provide high-quality videomail even in low-bandwidth conditions. Sorenson's ntouch VP records video messages on the *calling party*'s videophone and uploads the message to Sorenson's servers as bandwidth allows. This innovation greatly improves the quality of video messages in low-bandwidth environments common in many users' homes (and which were much more common in 2005). Other providers—and older Sorenson videophones—do not support this innovation.

This current incompatibility of videomail systems is not permanent; videomail can become compatible as part of the SIP standardization process. To facilitate this, providers are already actively working to develop a videomail interoperability standard through the SIP Forum, and once adopted and implemented, that would ultimately address most of the videomail interoperability issues that consumers experience today. The Commission should allow this standards-development process to run its course. Nevertheless, in order to facilitate the process, the FCC does need to resolve two existing regulatory issues related to server-based routing. First, the Commission should clarify once and for all that server-based routing is permissible.[1] Second, the Commission needs to fix the flaw in the iTRS database that makes the customer lists

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[1] Petition for Clarification or Waiver of Purple Communications, Inc., CG Docket No. 10-51 (filed June 2, 2010); Letter from Christopher Wright, Counsel to Sorenson Communications, Inc., to Marlene H. Dortch, FCC Secretary, at 1, CG Docket Nos. 03-123 and 10-51, WC Docket No. 05-196 (filed Jan. 7, 2011).

of providers who adopt server-based routing vulnerable to theft by anyone who can access the database (which, in the absence of hacking, is limited to other providers).[2]

The Commission should not, however, order providers retroactively to ensure videomail interoperability for H.323. Doing so would cost millions of dollars and would require at least a year of intensive engineering work to transition two-thirds of Sorenson's customer basis to server-based routing. During this work, Sorenson would be forced to shift its engineering teams away from work on the SIP transition in order to design and implement a videomail solution for H.323—a standard that is in the process of being phased out. By contrast, if the Commission allows providers to invest their resources in the SIP transition rather than H.323 videomail development, it is quite possible that by the end of 2014, Sorenson would be ready to switch to the new SIP standard—which is expected to address point-to-point interoperability, videomail interoperability, contact-list portability, and more.

Finally, the Commission also must understand that the SIP-standardization process requires provider resources, and after the impending rate cuts, there will be few if any resources left. If the Commission wants to ensure interoperability, it needs to adopt rates that are sufficient to keep providers in business—and that means implementing auctions sooner than contemplated by the June 2013 VRS rate order.

Respectfully submitted,

John T. Nakahata
Counsel to Sorenson Communications, Inc.

cc: Henning Schulzrinne,
        Jonathan Chambers
        Nicholas Alexander
        Gregory Hlibok
        Karen Peltz Strauss
        Eliot Greenwald
        Elaine Gardner

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[2]   *See* Sorenson's Petition to Limit Access to Data in the iTRS Numbering Directory, CG Docket Nos. 03-123, 10-51 (filed Feb. 16, 2012).