



10 January 2014

The Honorable Thomas E. Wheeler, Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: CG Docket Nos. 10-51 and 03-123

Dear Chairman Wheeler,

On December 16, 2013, Lydia Runnels, Vice President of Engineering of CSDVRS, met with several parties at the FCC including Henning Schulzrinne, Chief Technology Officer; Greg Hlibok, Chief; and Elaine Gardner and Caitlin Vogus, Attorney Advisors, Disability Rights Office. Lydia Runnels brings years of experience in standards bodies and work experience including years at Bell Labs, AT&T, AT&T Paradyne and CSDVRS.

In these meetings, as in all our recent meetings with FCC personnel, there is agreement that interoperability of Video Mail for both VRS and point to point calls and portability of Address Books are in the best interest of Deaf and Hard of Hearing consumers. It is further agreed that provider support for these features does not need to be attached to a standards agreement. In fact, in the VRS SIP forum working group over the past week, there has been consensus that portability of the Address Book is not related to SIP interoperability, and therefore not in the initial goals of the VRS SIP working group. In fact, the standard protocols that allow interoperability that all providers have in place today, such as point to point support from SIP and H.323 videophones, are all that is needed for all providers to support Video Mail and transfer of the address book at time of a port.

Today, Sorenson only supports video mail from Sorenson devices. Sorenson has 80+ percent of all videophones in the market today. Sorenson chooses not to support video mail when the communication comes from a competitive provider's product. The result of this is exemplified by a government agency's deaf employees that today believe ZVRS does not support Video Mail. These deaf employees believe this because when they place a call to a Sorenson phone at home, from a work Z phone, they cannot leave Video Mail. The truth is; Z supports video mail from Z to Z and from Sorenson to Z and from any call, just the same as hearing people have voice mail support; regardless of the provider or device that originated the call. We are hearing equivalent.

The only video phone product provider in VRS that does not support video calls from other products is Sorenson, the provider with the most money. Sorenson again is using a proprietary product to create a closed network. The message is; if you want video mail you need a Sorenson Video Phone. Imagine if AT&T had 80% of the hearing world phone products and

chose to do the same. Would the FCC sit back and let this happen to the hearing community? One more time, would the FCC sit back and let this happen to the hearing community?

It is time for the FCC to act and act fast. When everyone knows this is wrong, PLEASE make it right. Please order all providers that support Video Mail on their devices to support Video Mail calls from any device within 90 days. Please order when a consumer ports his telephone number to another provider, that the provider losing the telephone number transfers the address book to the new provider. In both cases, 90 days is all that is needed to comply.

The time to take these simple easy actions is now. The FCC must standup to the Sorenson lobby which combats these actions that provide equivalency and better communication for deaf consumers.

Finally, we have asked deaf consumers to do "dial around" to any provider, not just ZVRS, as a protest to what we believe are Sorenson's monopolistic practices.

We have also asked consumers and consumer organizations to write the FCC and their elected officials. On this particular issue the solution is lost by Sorenson positioning technology over simplicity and logic.

Finally, I would like to take this opportunity to acknowledge the tremendous job that the FCC has done through the years in supporting the deaf community. The dedicated team of people who work in these areas are remarkable, and have effected significant change. Video Relay Service continues to be a life changer, and ZVRS appreciates the support we have seen for us and the community.

Thank you.

Respectfully,



Sean Belanger, CEO
CSDVRS

cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Ruth Milkman
Priscilla Delgado Argeris
Nicholas Degani
Karen Peltz Strauss
Henning Schulzrinne

Jonathan Chambers
Kris Monteith
Robert Aldrich
Gregory Hlibok
Elaine Gardner
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Claude Stout, TDI
Sheri Farinha, NorCal Services
Howard Rosenblum, NAD