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February 14, 2014

*via electronic filing*

Marlene H. Dortch  
Secretary, Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation**

***Wireless E911 Location Accuracy Requirements – PS Docket No. 07-114***

***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 February 11, 2014, Claude Stout of Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), Andrew Phillips of the National Association of the Deaf (NAD), and Lise Hamlin of Hearing Loss Association of America (HLAA) (collectively, “Consumer Groups”), and Blake Reid of the Samuelson-Glushko Technology Law & Policy Clinic at Colorado Law (TLPC) discussed pending Commission action in the above-referenced matters with Adonis Hoffman, Chief of Staff and Senior Legal Advisor, and Stefanie Frank, law intern with Commissioner Mignon Clyburn’s office, and then with Commissioner Jessica Rosenworcel and her policy director, Clint Odom.

Consumer Groups understand that the FCC is considering Miracom's application to offer its InnoCaption mobile captioned telephone relay service (TRS). Consumer Groups believe it’s time for competition in mobile captioned telephone market, which at the moment has only one provider. Consumers and industry alike benefit from the kinds of innovation that occur when more than one provider is in the market. In this case, Miracom is offering a technology that is different from those of other vendors in the market and provide significantly improvements in the provision of captioned telephone services. We urged the Commission to carefully consider this application.

Consumer Groups are aware that the Commission has an item in circulation pertaining to indoor location accuracy technologies. We strongly recommend that the Commission takes action affirmatively on this item. It will be a tremendous boost for us as it will more effectively address our life, health, and security needs. First responders will be in a better position to come to our rescue when we call and ask for help. They will have the capacity to locate our whereabouts down to the floor and room/suite where we are in.

Consumer Groups have been concerned that some offices within the Commission were not coordinating their efforts closely with each other on TRS issues. We have asked for a meeting which will take place on March 4 with CGB and Office of Managing Director, FCC. We hope this will be the first of many meetings we have

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with them on TRS issues, and among the first items we plan to review with them are the definition, principles, and applications of functional equivalency for TRS.

Please don't hesitate to contact me if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in black ink that reads "Claude L. Stout". The signature is written in a cursive, flowing style.

Claude L. Stout

Executive Director

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

**Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)**

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cc: Commissioner Mignon Clyburn, FCC

Commissioner Jessica Rosenworcel

Adonis Hoffman, Chief of Staff & Senior Legal Advisor, Office of Commissioner Mignon Clyburn

Stefanie Frank, law intern, Office of Commissioner Mignon Clyburn, FCC

Clint Odom, Policy Director, Office of Commissioner Jessica Rosenworcel, FCC



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