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April 10, 2014

Via Electronic Filing

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

Re: Notice of Ex Parte Meeting; CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On April 8, 2014, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”); Sheri A. Farinha, Vice Chair, California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”); Andrew S. Phillips, National Association of the Deaf (“NAD”); Randall Pope, President, American Association of the Deaf-Blind (“AADB”); Mark Hill, President, Cerebral Palsy and Deaf Organization (“CPADO”); Lise Hamlin, Director of Public Policy, Hearing Loss Association of America (“HLAA”) and the undersigned participated in a meeting (either in person or by phone) with:

- Kris Monteith, Karen Strauss, Robert Aldrich, Gregory Hlibok, Elaine Gardner, Eliot Greenwald, and Caitlin Vogus of the Consumer & Governmental Affairs Bureau (“CGB”);
- David Schmidt, Diane Mason, and Andrew Mulitz of the Office of Managing Director (“OMD”); and
- Jonathan Chambers and Henning Schulzrinne of the Office of Strategic Planning & Policy Analysis (“OSP”).

During the meeting, there was a discussion about the letter submitted by the Consumer Groups in qualified support of the Collective Providers’ Letter requesting a temporary, one-year waiver of the daily measurement of speed-of-answer (“SoA”) requirement and associated penalties for noncompliance.¹ The Consumer Group representatives emphasized their support for moving SoA to a daily measurement and continuing to progress towards functional equivalency but acknowledged that the daily SoA requirement may not be feasible for providers in certain instances and a waiver

¹ See Letter from Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. *et al.* to Marlene Dortch, Commission Secretary, CG Docket No. 03-123 and CG Docket No. 10-51 (filed Dec. 30, 2013).

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period may help ensure that the quality of Video Relay Service (“VRS”) is not sacrificed. They encouraged FCC staff to provide any data that may be available to demonstrate that providers are already able to meet the daily SoA requirement without a general temporary waiver period (*e.g.*, 1 year) as contrasted with an individual waiver request for a provider not meeting the SoA requirement on a particular day.

The Consumer Group representatives spoke about recent complaints they have received from individuals about issues with verification of eligibility. For example, a certain IP Relay provider has required copies of social security cards for registration. The Consumer Group representatives suggested the FCC might want to examine the verification requirements being imposed and the impact on use of certain types of TRS.

The participants generally discussed the need for involvement by the user community in the design, development, and implementation phases of the Neutral Video Communications Platform (“NCP”) and Neutral Access Reference Platform (“NAP”). The Consumer Group representatives stressed the need for user input throughout the process, including the design and testing phases, to ensure the platforms work effectively and efficiently. They emphasized that the platforms are for individual consumers who are deaf and hard of hearing, dead-blind, or deaf and mobile-disabled and such individuals should be involved with the FCC for internal and external, ongoing input. They strongly encouraged thorough and robust testing of the platforms before market introduction so that consumers’ VRS communications are not jeopardized in any way. They also stressed that the FCC’s rules need to clearly support VRS providers who choose to keep or develop their own platforms and not financially pressure them into adopting the NAP. The Consumer Group representatives recommended that the NAP be compatible with NG911 to allow Public Safety Answering Points to accept direct video phone calls. They suggested that certain FCC policies about skills-based routing of VRS calls be examined as the NAP development progresses to consider the particular needs of certain users such as deaf and mobile-disabled individuals.

Finally, the participants talked about the role of the Interstate TRS Fund Advisory Council. The Consumer Group representatives suggested that the discussion should focus on determining the purposes and goals of the council or a new advisory committee or subcommittee. They initially suggested that the committee have frequent meetings to ensure that both it and the FCC can be responsive to TRS matters, and they will contemplate other possible recommendations for consideration.

Respectfully submitted,

/s/ Danielle Burt

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Counsel for TDI

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cc (by e-mail):

Kris Monteith
Karen Strauss
Robert Aldrich
Gregory Hlibok
Elaine Gardner
Eliot Greenwald
Caitlin Vogus
David Schmidt
Diane Mason
Andrew Multz
Jonathan Chambers
Henning Schulzrinne

Claude Stout
Sheri A. Farinha
Andrew S. Phillips
Randall Pope
Mark Hill
Lise Hamlin