



April 18, 2014

**Ex Parte**

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

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Waiver of iTRS Mandatory Minimum Standards*, CG Docket No. 03-123

Dear Ms. Dortch:

On April 18, 2014, I spoke by telephone with Eliot Greenwald of the Disability Rights Office to discuss Video Relay Service (“VRS”) providers’ current ability to support single-line Hearing Carry Over (“single-line HCO”). During the call I confirmed that Sorenson Communications, Inc., (“Sorenson”) currently offers users the ability to place a single-line HCO call on the latest software and equipment it distributes to users (*i.e.* the ntouch products) but not on legacy equipment or software.

In addition we discussed some additional technical limitations regarding both one-line HCO and one-line VCO. Specifically, there is no H.323 standard for signaling user one-line VCO or HCO preferences, and providers have not included that feature in past interoperability testing. Therefore, it may not be possible for users to place a dial-around call using one-line VCO or one-line HCO, and it may not be possible for providers to handle dial-around single-line VCO and HCO calls involving other providers’ equipment or software. The same may be true for point-to-point calls if one party is using equipment or software distributed by a different provider.

The SIP Forum is in the process of developing Session Initiation Protocol (“SIP”) standards for TRS calls, and one of the topics is signaling for one-line HCO and VCO. In the meantime, however, the Commission should not require providers to support one-line VCO and HCO calls through equipment distributed by a different provider (for example, for dial-around calls or point-to-point calls).

We also discussed Sorenson’s specific implementation of single-line VCO and HCO. Sorenson users activate single-line VCO or HCO by selecting “one-line VCO,” which enables audio in both directions. For outgoing (deaf-to-hearing) calls, users enable these features on a contact-by-contact basis because most users prefer to use the feature only with family or other people with whom they are familiar. Because not all interpreter stations are capable of supporting one-line VCO and HCO, deaf-to-hearing single-line VCO and HCO calls are routed to interpreting stations capable of handling those calls, which means that wait times may sometimes be longer for single-line VCO or HCO calls. For incoming (hearing-to-deaf) calls,

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the deaf user must request one-line VCO or HCO, at which point the interpreter will re-queue the call to an interpreter at a VCO- and HCO-capable station.

In short, Sorenson does not object to the Commission allowing the waivers for one-line HCO and one-line VCO to expire so long as the Commission makes clear that: (1) providers are not required to replace legacy iTRS access technology that is not capable of providing one-line VCO and one-line HCO unless a consumer requests upgraded iTRS access technology capable of providing one-line VCO and one-line HCO; (2) providers can satisfy the minimum standard by offering at least one option that supports one-line VCO and one-line HCO; in other words, providers need not support these features with every iTRS access technology platform they distribute; (3) providers do not need to support one-line VCO and HCO on equipment distributed by a different provider until the SIP standards-development process is complete and then only for software or equipment that implements the new SIP standards; and (4) the specific implementation described above meets the mandatory minimum standard.

I have spoken with counsel for Purple Communications, Inc., who has authorized me to represent that Purple currently offers at least one hardware or software option that supports one-line HCO and also does not object to allowing the one-line-HCO waiver to expire provided that the Commission makes the four clarifications requested above.

Sincerely,

/s/ Mark D. Davis

Mark D. Davis

*Counsel for Sorenson Communications, Inc.,  
Debtor-in-Possession*

cc: Karen Peltz Strauss  
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