



April 28, 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 behalf of Sorenson Communications, Inc. (“Sorenson”), I write to respond to the letter of CSDVRS LLC (“ZVRS”) regarding one-line VCO and one-line HCO. In the letter, ZVRS wrongly asserts that Sorenson engages in “skills-based” routing because it routes one-line VCO and one-line HCO calls to hardware interpreting stations that are capable of supporting these features. This is incorrect. The FCC has defined skill-based routing as allowing a VRS caller “to select preferred VRS CAs according to the CAs’ skill sets—in particular their interpreting, transliteration, and signing styles, and/or areas of knowledge (*e.g.*, medicine, law, or technology).”¹ Although Sorenson believes the FCC should permit skill-based routing, it does not engage in this practice.

ZVRS also criticizes Sorenson for allowing users who request to continue using the VP-200 to do so even though the VP-200 does not support one-line HCO and one-line VCO. This is a surprising about-face because less than four months ago ZVRS submitted a filing that asserted just the opposite. In that filing, ZVRS and the other iTRS providers explained that some users wish to continue using the VP-200 and strongly object to upgrading to the latest videophone. As ZVRS explained, “ordering universal provision of one-line VCO would actually harm consumers rather than help them.”² ZVRS apparently now wants to force a small number of users to give up their equipment because that legacy equipment does not support a feature that only a small fraction of VRS users want. That is simply anti-consumer and not in the public interest.

ZVRS suggests that there are no interoperability issues for one-line VCO and HCO, aside from those involving legacy equipment, that do not support those features. If ZVRS is certain that it can support one-line VCO and HCO calls from all equipment on the market today, Sorenson has no objection to the Commission requiring ZVRS to do so. For providers who are not certain about their ability to do so, however, the Commission should recognize that there is a potential for interoperability issues. The SIP Forum is currently working on standards to improve

¹ *Structure & Practices of the Video Relay Serv. Program*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd. 8618, 8691 ¶180 (2013).

² Collective Providers’ Comments at 8 (filed Dec. 23, 2013).

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future interoperability, including signaling VCO and HCO user preferences. As a result, the Commission should not require providers to resolve any VCO or HCO interoperability issues until after the standards have been completed and providers have made the transition to SIP.³

Sincerely,

/s/ Mark D. Davis

Mark D. Davis

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

cc: Karen Peltz Strauss
Gregory Hlibok
Eliot Greenwald
Caitlin Vogus

³ ZVRS also asserts that the Commission should require consumers to use only off-the-shelf equipment. Although this is plainly outside the scope of this rulemaking proceeding, Sorenson notes that this argument is meritless for the reasons addressed in its numerous prior filings on the issue. *See, e.g.*, Comments of Sorenson Communications, Inc. at 59, CG Docket Nos. 10-51 and 03-123 (filed Nov. 14, 2012); Reply Comments of Sorenson Communications, Inc., at 44-50, CG Docket Nos. 10-51 & 03-123 (filed Nov. 29, 2012); Letter from John Nakahata, Counsel for Sorenson Communications, Inc., to Marlene H. Dortch, Secretary, FCC, at 2, CG Docket Nos. 10-51 & 03-123 (filed May 8, 2013).