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Governor



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May 22, 2012

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

**Re: Notice of Ex Parte Conference**

Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; and Misuse of Internet Protocol (IP) Captioned Telephone Service, CG Docket No. 13-24.

Dear Ms. Dortch:

On July 11, Curtis Humphries of the Arizona Commission for the Deaf and the Hard of Hearing, Kelby Brick of Brick Advantage, LLC, and the undersigned met with Greg Hlibok, Elaine Gardner, Eliot Greenwald and Caitlin Vogus of the Disability Rights Office, David Schmidt of the Office of the Managing Director, and Robert Aldrich of the Consumer and Governmental Affairs Bureau. Karen Peltz Strauss of the Consumer and Governmental Affairs Bureau, along with Andy Multz and Diane Mason of the Office of the Managing Director participate in the conference via telephone.

We discuss Internet Protocol Captioned Telephone Services consistent with the attached document.

Very truly yours,

Sherri L. Collins, Executive Director  
Arizona Commission for the Deaf and the Hard of Hearing

## **FCC PROPOSAL**

### **Pilot program for State management of IP-CTS**

#### **Background of Arizona Commission for the Deaf and Hard of Hearing**

The Arizona Commission for the Deaf and the Hard of Hearing (ACDHH) was established in 1977 to improve the quality of life for Deaf and Hard of Hearing residents. ACDHH serves as a statewide information referral center for issues related to people with hearing loss.

ACDHH aspires to be a national leader in communication access, support services and community empowerment throughout the state. Our mission is to ensure, in partnership with the public and private sectors, accessibility for the Deaf, Hard of Hearing, Deaf-Blind and persons with speech difficulties to improve their quality of life.

ACDHH provides valuable services to the citizens of Arizona including a statewide 24-hour telephone relay service, providing telephone equipment for qualified residents who are Deaf, Hard of Hearing, Speech Impaired, or Deaf-Blind, overseeing standards and licensing for sign language interpreters and providing outreach and educational opportunities in local communities.

**Objective:** ACDHH is interested in exploring the opportunity to manage IP-CTS.

**Why the FCC would be interested in a pilot program:** ACDHH could provide a ground level review and verification process for IP CTS utilizing its existing staff. The FCC and RLSA could require that all Arizona IP CTS users undergo evaluation and verification by ACDHH staff to ensure that IP CTS is an appropriate telecommunication access service for them (as opposed to other forms of relay services or the utilization of various assistive technology such as amplified phones). This will address alleged fraud, waste and abuse within the IP-CTS marketplace while gaining regulators valuable data for future oversight of IP-CTS.

#### **Scope of possible Arizona IP-CTS program:**

1. Evaluation and verification of potential IP CTS users
2. Distribution of equipment, software and IP CTS authorization credentials
3. Singular registration with access to multi-vendor services
4. Review and analysis of provider-submitted data and reports to Fund Administrators
5. Review and analysis of consumer data and evaluations.

#### **Questions to discuss with the FCC:**

1. Would the FCC be interested in developing such a pilot program?
2. What is the possible scope and framework of such a program?
3. Will ACDHH be allowed to identify preferred providers or help users identify appropriate provider(s) for their specific needs?
4. What are the regulation obstacles, if any, in enacting such a pilot program?
5. Can the pilot program require providers to register with ACDHH before providing services to Arizona residents? Can ACDHH develop further criteria for state certification as a relay provider beyond what the FCC already provide?
6. Will the FCC consider singular registration through the pilot program with access to various vendors?
7. Will the FCC authorize RLSA to share provider data and reports with ACDHH
8. Will the FCC consider requiring providers to register through ACDHH before serving Arizona phone numbers?