



PUBLIC NOTICE

Federal Communications Commission
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DA 19-1139

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**CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU SEEKS COMMENT ON REQUEST
BY SORENSON COMMUNICATIONS, LLC FOR CLARIFICATION OR, IN THE
ALTERNATIVE, FOR WAIVER OF CERTAIN VIDEO RELAY SERVICE AND DIRECT
VIDEO CALLING RULES**

CG Docket Nos. 10-51 and 03-123

Comments Date: December 4, 2019

Reply Comments Date: December 19, 2019

The Consumer and Governmental Affairs Bureau (Bureau) of the Federal Communications Commission (Commission) seeks comment on a request for clarification or waiver filed by Sorenson Communications, LLC (Sorenson).¹ Sorenson seeks clarification that enterprise and public videophones used to access video relay service (VRS) are not subject to the rule requiring the administrator of the Telecommunications Relay Service User Registration Database (Database) to remove the data of any user who has neither placed nor received a VRS or point-to-point call in a one-year period.² In the alternative, Sorenson seeks waiver of this requirement.³ Sorenson also seeks clarification that in instances where the all-call query (ACQ) function of the TRS Numbering Directory fails to validate a VRS user who is registered in the Database, a VRS provider may complete the VRS call and seek a waiver for compensation of such calls in certain circumstances.⁴ In addition, Sorenson requests clarification that point-to-point video calls are not subject to the ACQ rule.⁵ Finally, Sorenson seeks guidance on how a direct video calling (DVC) provider is to effectuate a transfer of a DVC call to VRS and on the form of on-screen menu option for DVC or VRS that may be provided to customers who call a single, unified DVC customer support number.⁶

¹ Sorenson Communications, LLC, Request for Clarification or, in the Alternative, for Waiver, CG Docket Nos. 10-51 and 03-123 (filed Oct. 23, 2019), <https://ecfsapi.fcc.gov/file/10230358829190/2019-10-23%20Request%20for%20Clarification.pdf> (Sorenson Request for Clarification).

² *Id.* at 1 (citing 47 CFR § 64.615(a)(3)(ii)(A)); see also *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396, 3410-12, paras. 27-30 (2019) (*VRS and DVC Improvements Order*) (adopting registration and certification requirements for enterprise and public videophones).

³ Sorenson Request for Clarification at 1.

⁴ *Id.* at 1-2 (citing 47 CFR § 64.615(a)(1)).

⁵ *Id.* at 2.

⁶ *Id.* (citing *VRS and DVC Improvements Order*, 34 FCC Rcd at 3407, para. 19).

Filing Requirements. Interested parties may file comments on or before the date indicated on the first page of this document.⁷ All filings must reference CG Docket Nos. 10-51 and 03-123. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).⁸

- Electronic Filers: Comments may be filed electronically using the Internet by accessing ECFS: <https://www.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
- Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.
 - All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
 - Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
 - U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

Ex Parte Rules. The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.⁹ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

People with Disabilities. To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Bureau at 202-418-0530 (voice) or 202-418-0432 (TTY).

⁷ See 47 CFR §§ 1.1, 1.45, 1.49.

⁸ *Electronic Filing of Documents in Rulemaking Proceedings*, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

⁹ 47 CFR §§ 1.1200 *et seq.*

Additional Information. For further information regarding this Notice, please contact Michael Scott, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-1264 or by e-mail to Michael.Scott@fcc.gov.

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