



# PUBLIC NOTICE

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

News Media Information 202-418-0500  
Internet: [www.fcc.gov](http://www.fcc.gov)

DA 25-541

Released: June 24, 2025

## GRANT OF CERTIFICATION FOR SORENSEN COMMUNICATIONS, LLC, TO PROVIDE VIDEO RELAY SERVICE UNDER OWNERSHIP OF ARIEL GP HOLDCO, LLC

CG Docket Nos. 03-123 and 10-51

By the Acting Chief, Consumer and Governmental Affairs Bureau:

Certification is granted to Sorenson Communications, LLC (Sorenson), to provide video relay service (VRS)<sup>1</sup> supported by the Interstate Telecommunications Relay Service Fund (TRS Fund)<sup>2</sup> under majority ownership by Ariel GP Holdco, LLC (Ariel). By this action, Sorenson, which currently holds a conditional certification to provide VRS,<sup>3</sup> is eligible for compensation from the TRS Fund for a period of five years, through June 24, 2030.

### **Background**

On March 23, 2022, the Bureau granted conditional certification to Sorenson for the provision of VRS, following the acquisition of majority ownership of Sorenson by Ariel.<sup>4</sup> Conditional certification was granted for a period of two years, until March 22, 2024, and subsequently was extended through June 30, 2025.<sup>5</sup> On April 19, 2022, Ariel filed an application for full certification of Sorenson as a provider of VRS, eligible for compensation from the TRS Fund under the new ownership.<sup>6</sup> On October 29, 2024, the

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<sup>1</sup> VRS is “[a] telecommunications relay service that allows people with hearing or speech disabilities who use sign language to communicate with voice telephone users through video equipment. The video link allows the [Communications Assistant] to view and interpret the party’s signed conversations and relay the conversation back and forth with a voice caller.” 47 CFR § 64.601(a)(57).

<sup>2</sup> The TRS Fund compensates eligible providers of Internet-based and interstate TRS for their reasonable costs of providing these services. *See id.* § 64.604(c)(5)(iii).

<sup>3</sup> *Grant of Conditional Certification for Sorenson Communications, LLC, to Provide Video Relay Service After Its Acquisition by Ariel GP Holdco, LLC*, CG Docket Nos. 03-123 and 10-51, Public Notice, 37 FCC Rcd 3990 (CGB 2022) (2022 Conditional Certification Notice).

<sup>4</sup> *See id.*

<sup>5</sup> *See Extension of Conditional Certifications of CaptionCall, LLC, and Sorenson Communications, LLC, to Provide Telecommunications Relay Services*, CG Docket Nos. 03-123 and 10-51, Public Notice, 39 FCC Rcd 2927 (CGB 2024) (extending through December 31, 2024); *Extension of Conditional Certifications of CaptionCall, LLC, and Sorenson Communications, LLC, to Provide Telecommunications Relay Services*, CG Docket Nos. 03-123 and 10-51, Public Notice, DA 24-1264 (CGB Dec. 17, 2024) (extending through June 30, 2025).

<sup>6</sup> *See Application of Sorenson Communications, LLC, as Majority-Owned and Controlled by Ariel GP Holdco, LLC, for Certification to Provide Video Relay Service*, CG Docket Nos. 10-51 and 03-123 (filed Apr. 19, 2022) (redacted) (2022 Sorenson Application); Supplemental Update to Sorenson Communications, LLC’s Internet-Based TRS Certification Application for Video Relay Service, CG Docket Nos. 10-51 and 03-123 (filed Sept. 17, 2024) (September 2024 Sorenson Supplement) (disclosing certain previously redacted information); Supplemental Update

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Bureau released a Public Notice seeking comment on Sorenson's application for full certification.<sup>7</sup> The Private Equity Stakeholder Project (PESP) filed comments,<sup>8</sup> and Sorenson filed reply comments.<sup>9</sup>

## **Discussion**

Internet-based TRS providers must obtain certification from the Commission to be eligible for TRS Fund support.<sup>10</sup> Certification shall be granted upon a determination that the provider will meet all applicable minimum TRS standards and has adequate procedures and remedies for ensuring compliance with Commission rules.<sup>11</sup> After certification, Internet-based TRS providers must file annual reports updating the information in their application to demonstrate continuing compliance with the Commission's mandatory minimum TRS standards.<sup>12</sup>

*Sorenson's VRS Qualifications.* Sorenson's application and supplemental filings provide the information and documentation required by the Commission's certification rules, including: (1) a description of the service to be provided;<sup>13</sup> (2) a detailed description of how Sorenson will meet all mandatory minimum standards applicable to VRS;<sup>14</sup> (3) all required documentary and other evidence showing that Sorenson leases, licenses, or has acquired its own call center facilities and operates such call centers;<sup>15</sup> (4) a description of Sorenson's organizational structure, including the names of its 10 percent or more equity interest holders, the names of persons with the power to vote 10 percent or more the securities of Sorenson, and the names of its executives, officers and members of its board;<sup>16</sup> (5) a confidential list, by position, of the number of full-time and part-time employees involved in Sorenson's

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to Sorenson Communications, LLC's Internet-Based TRS Certification Application for Video Relay Service, CG Docket Nos. 10-51 and 03-123 (filed Dec. 5, 2024) (December 2024 Sorenson Supplement).

<sup>7</sup> See *Comment Sought on Application of Sorenson Communications, LLC, for Certification as a Provider of Video Relay Service; Comment Sought on Application of CaptionCall, LLC, for Certification as a Provider of Internet Protocol Captioned Telephone Service*, CG Docket Nos. 10-51 and 03-123, Public Notice, DA 24-1113 (CGB Oct. 29, 2024).

<sup>8</sup> See Private Equity Stakeholder Project, FCC Comment re Sorenson, CG Docket Nos. 10-51 and 03-123 (filed Nov. 12, 2024) (PESP Comment). PESP is "a financial watchdog organization that researches and reports on private equity investments and their impacts on various communities." PESP Comment at 1.

<sup>9</sup> See Reply Comments of Sorenson Communications, LLC, CG Docket Nos. 10-51 and 03-123 (filed Nov. 25, 2024) (Sorenson Reply Comment).

<sup>10</sup> *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Second Report and Order, 26 FCC Rcd 10898, 10902, para. 8 (2011) (*2011 Internet-based TRS Certification Order*); see also 47 CFR § 64.606.

<sup>11</sup> See *2011 Internet-based TRS Certification Order*, 26 FCC Rcd at 10909-13, paras. 23-34; 47 CFR § 64.606(b)(2); see also *Structure and Practices of the Video Relay Service Program et al.*, CG Docket Nos. 10-51 et al., Memorandum Opinion and Order, Order, and Further Notice of Proposed Rulemaking, 26 FCC Rcd 14895 (2011) (clarifying and modifying the certification requirements adopted in the *2011 Internet-based TRS Certification Order*).

<sup>12</sup> 47 CFR § 64.606(g).

<sup>13</sup> 2022 Sorenson Application at 6-7; see 47 CFR § 64.606(a)(2)(i).

<sup>14</sup> 2022 Sorenson Application at 7-20, Add. 2 (regulatory compliance plan), Add. 3 (CPNI operating procedures); see 47 CFR § 64.606(a)(2)(ii).

<sup>15</sup> 2022 Sorenson Application at 20-25, Exhs. 1 (list of call center leases) (redacted), 5 (call center technology) (redacted), and 6 (call center leases) (redacted); see 47 CFR § 64.606(a)(2)(ii)(A).

<sup>16</sup> 2022 Sorenson Application at 25-29, Exhs. 2 (redacted) and 3; September 2024 Sorenson Supplement at 1-4 (unredacted ownership interests), Exh. 1 (updated officers and directors); December 2024 Sorenson Supplement, Ex. 1 (updated officers and directors); see 47 CFR § 64.606(a)(2)(ii)(B). Sorenson also updated its contact information. September 2024 Sorenson Supplement at 4-5.

VRS operations;<sup>17</sup> (6) a confidential list of all sponsorship arrangements relating to the provision of Internet-based TRS;<sup>18</sup> (7) a description of Sorenson's complaint procedures;<sup>19</sup> (8) a statement that Sorenson will file annual compliance reports demonstrating continued compliance with the rules;<sup>20</sup> (9) a description of its at-home call handling program;<sup>21</sup> and (10) a certification by Sorenson's CEO confirming the accuracy and completeness of the information contained in the application.<sup>22</sup>

Further, our review of annual audits of Sorenson's compliance with the Commission's TRS rules does not reveal any patterns of noncompliance warranting denial of recertification.

*Consent Decrees.* Within the last five years, Sorenson and its wholly-owned subsidiary CaptionCall, LLC, entered into two consent decrees with the FCC's Enforcement Bureau, settling investigations into violations of the TRS rules by CaptionCall, a provider of TRS Fund-supported Internet Protocol Captioned Telephone Service.<sup>23</sup> As the parent company, Sorenson is a party to the Consent Decrees and responsible for aspects of the remedial efforts and financial penalties,<sup>24</sup> as well as its corporate oversight of CaptionCall. The actions addressed in the *2021 Consent Decree* predated Ariel's acquisition of Sorenson and CaptionCall. We also find it significant that CaptionCall's initial reporting of the matters addressed in the *2024 Consent Decree* predated its acquisition by Ariel and that additional reporting of these matters under Ariel's management began immediately after completion of the acquisition and was completed within a year after the acquisition.<sup>25</sup> Further, the *2024 Consent Decree*, as noted above, provides that Sorenson and CaptionCall shall take additional steps to prevent future rule violations. Therefore, notwithstanding the continuing parent-subsiary relationship between Sorenson and CaptionCall, we conclude that these consent decrees and the circumstances associated with them do not raise substantial obstacles to finding that Sorenson, under Ariel's ownership, will meet the applicable minimum TRS standards and has adequate procedures and remedies for ensuring compliance with Commission rules.

Based on our review of the Application, supplements, annual reports,<sup>26</sup> and other relevant information, we find that Sorenson will provide VRS in compliance with the applicable mandatory minimum TRS standards and that it makes available adequate procedures and remedies for compliance with such minimum standards and the requirements of section 64.606. Further, our review of annual audits of Sorenson's compliance does not reveal any patterns of noncompliance warranting denial of recertification.

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<sup>17</sup> 2022 Sorenson Application at 29-30; *see* 47 CFR § 64.606(a)(2)(ii)(C).

<sup>18</sup> 2022 Sorenson Application at 30, Ex. 4 (redacted); *see* 47 CFR § 64.606(a)(2)(ii)(E).

<sup>19</sup> 2022 Sorenson Application at 30-31; *see* 47 CFR § 64.606(a)(2)(iii).

<sup>20</sup> 2022 Sorenson Application at 31; *see* 47 CFR § 64.606(a)(2)(iv).

<sup>21</sup> 2022 Sorenson Application at 31-32; *see* 47 CFR § 64.606(g)(5).

<sup>22</sup> 2022 Sorenson Application at 32, Add. 1; *see* 47 CFR § 64.606(a)(2)(v).

<sup>23</sup> *See Sorenson Communications, LLC and CaptionCall, LLC*, EB-TCD-17-00024119, et al., Order and Consent Decree, 36 FCC Rcd 16545 (EB 2021) (*2021 Consent Decree*); *CaptionCall LLC; MachineGenius, Inc.*, EB-TCD-22-00034166, et al., Order and Consent Decree, 39 FCC Rcd 6981 (EB 2024) (*2024 Consent Decree*).

<sup>24</sup> *See 2024 Consent Decree*, 39 FCC Rcd at 6981, Order, para. 1; *id.* at 6996-98, Consent Decree, paras. 20-24; *2021 Consent Decree*, 36 FCC Rcd at 16545, Order, para. 1; *id.* at 16563-64, Consent Decree, paras. 27-30.

<sup>25</sup> *See 2024 Consent Decree*, 39 FCC Rcd at 6987-88, para. 6 n.15.

<sup>26</sup> *See, e.g.*, Update and Verification of Internet-Based Certification Application of Sorenson Communications, LLC for Video Relay Service, CG Docket Nos. 10-51 and 03-123 (filed Mar. 24, 2025); Update and Verification of Internet-Based Certification Application of Sorenson Communications, LLC for Video Relay Service, CG Docket Nos. 10-51 and 03-123 (filed Dec. 18, 2023); Update and Verification of Internet-Based Certification Application of Sorenson Communications, LLC for Video Relay Service, CG Docket Nos. 10-51 and 03-123 (filed Dec. 28, 2022).

### Response to Comments on the Application

PESP recommends that the Commission extend Sorenson's conditional certification pending Sorenson's submission of additional information regarding: (1) Sorenson's level of debt; and (2) wages and working conditions for Sorenson's communications assistants (CAs).<sup>27</sup>

*Debt.* In the *2022 Conditional Certification Notice*, the Bureau noted that Moody's Investors Service had announced it downgraded Sorenson's Corporate Family Rating (CFR) from B2 to B3, in response to the company's plans "to issue approximately \$589 million Holdco [payment-in-kind] notes (unrated) to help fund the sale of majority ownership of the company."<sup>28</sup> Based on review of additional information provided by Sorenson and Ariel regarding those new financial obligations, the Bureau stated that it was unable "to find that, at this time, there is a substantial risk of Sorenson becoming unable to meet the Commission's minimum standards."<sup>29</sup>

PESP contends that, since receiving conditional certification, Sorenson "has taken on additional debt but has not specifically addressed the issue in its application nor made assurances that the VRS reimbursements will not be improperly used for interest or other debt related payments."<sup>30</sup>

In response, Sorenson claims that nothing has changed in its debt structure since the Bureau reviewed the information used to grant conditional certification.<sup>31</sup> Further, Sorenson notes that the Commission annually receives detailed financial reports, including with respect to Sorenson's capital structure, which are audited by the TRS Fund administrator.<sup>32</sup>

The Bureau finds that the record does not warrant withholding full certification due to concerns about Sorenson's debt structure. The record does not indicate that the current debt structure raises a substantial risk of Sorenson becoming unable to meet the Commission's minimum standards.<sup>33</sup> The Commission receives annual reports of financial information for all Internet-based TRS providers, including Sorenson, and monitors provider performance. Should evidence emerge that Sorenson's debt

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<sup>27</sup> PESP Comment at 1. PESP recently published a report on the VRS industry entitled "Lost in Interpretation: Private Equity's Capture of a Vital Sign Language Translation Tool" (Aug. 7, 2024), <https://pestakeholder.org/reports/lost-in-interpretation-private-equitys-capture-of-a-vital-sign-language-translation-tool/>. In this report, PESP claims that the private equity model of ownership featuring high levels of debt and rapid increases in profitability contributes to poor wages and working conditions for VRS interpreters and quality of service issues for VRS users that rely on companies, including Sorenson, following that model. *Id.*

<sup>28</sup> See *2022 Conditional Certification Notice*, 37 FCC Rcd at 3993-94; Moody's Investors Service, *Rating Action: Moody's downgrades Sorenson's CFR to B3, affirms credit facility at B2; outlook stable* (Jan. 13, 2022), [https://www.moodys.com/research/Moodys-downgrades-Sorensons-CFR-to-B3-affirms-credit-facility-at-PR\\_461292](https://www.moodys.com/research/Moodys-downgrades-Sorensons-CFR-to-B3-affirms-credit-facility-at-PR_461292). CFRs are "long-term ratings that reflect the relative likelihood of a default on a corporate family's debt and debt-like obligations and the expected financial loss suffered in the event of default. A CFR is assigned to a corporate family as if it had a single class of debt and a single consolidated legal entity structure." Moody's Investors Service, *Rating Symbols and Definitions* at 8 (Nov. 2, 2021), [https://www.moodys.com/researchdocumentcontentpage.aspx?docid=PBC\\_79004](https://www.moodys.com/researchdocumentcontentpage.aspx?docid=PBC_79004). "Obligations rated B are considered speculative and are subject to high credit risk," and a B3 rating "indicates a ranking in the lower end of that generic rating category." *Id.* at 6.

<sup>29</sup> *2022 Conditional Certification Notice*, 37 FCC Rcd at 3993.

<sup>30</sup> PESP Comment at 2.

<sup>31</sup> Sorenson Reply Comment at 3-4.

<sup>32</sup> *Id.*, citing 47 CFR § 64.604(c)(5)(iii)(D).

<sup>33</sup> *Cf.* *2022 Conditional Certification Notice*, 37 FCC Rcd at 3993.

structure is adversely affecting its ability to meet the mandatory minimum TRS standards, the Commission has the ability to take appropriate action to ensure that minimum TRS standards are met.<sup>34</sup>

*Communications Assistants (CAs)*. PESP also claims that Sorenson’s application “does not address any of the well documented issues in the VRS industry, which are highlighted in the PESP report, including high turnover, lack of training, low wages and benefits, and lack of mental health support to deal with the vicarious trauma that many interpreters deal with.”<sup>35</sup> Based on the discussion of Sorenson’s comments about CA wages in the *2023 VRS Compensation Order*,<sup>36</sup> PESP contends that the Commission should request additional information about wages and working conditions at the company “to ensure that high [CA] turnover does not put the company at risk of failing to meet the Commission’s minimum requirements.”<sup>37</sup>

Sorenson responds that it “expends significant resources providing its [Video Interpreters (VIs)] with best-in-class processes, procedures, and technology that Sorenson has developed to make it easier for VIs to perform their essential functions,” and that PESP’s claims are “baseless.”<sup>38</sup>

According to the 2025-26 TRS Fund Report, the weighted average, across all VRS providers, of CA wages and benefits per service minute has increased substantially since 2023.<sup>39</sup> While the cumulative increase to date has not reached the level projected by the Commission in the *2023 VRS Compensation Order*,<sup>40</sup> the record evidence does not show that current wages—or other working conditions—for Sorenson’s CAs are so inadequate as to cast doubt on Sorenson’s ability to provide a quality of service meeting the Commission’s mandatory minimum standards for VRS. Should such evidence emerge during the course of the new certification period, the Commission has the ability to take appropriate action to ensure that minimum service standards are met.<sup>41</sup>

### **Certification**

For the foregoing reasons, we find that the public interest and the objectives of section 225 are served by authorizing Sorenson to provide VRS under its Ariel ownership. We certify Sorenson as

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<sup>34</sup> See 47 CFR § 64.604(c)(5)(iii)(E)(4) (“The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in this section”); *id.* § 64.604(c)(5)(iii)(L) (procedures for suspension/withholding of payment); *id.* § 64.606(e)(2) (“The Commission may, on its own motion, require a certified Internet-based TRS provider to submit documentation demonstrating ongoing compliance with the Commission’s minimum standards if, for example, the Commission receives evidence that a certified Internet-based TRS provider may not be in compliance with the minimum standards.”).

<sup>35</sup> PESP Comment at 3.

<sup>36</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, CG Docket Nos. 03-123 and 10-51, Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 9157, 9182-83, paras. 59-63 (2023) (*2023 VRS Compensation Order*). In the *2023 VRS Compensation Order*, the Commission increased the compensation levels for VRS, in part, based on Sorenson’s contention that increased compensation was necessary to boost CA wages to ensure that it could hire qualified interpreters. *Id.* at 9182-83, para. 61.

<sup>37</sup> PESP Comment at 2-3.

<sup>38</sup> Sorenson Reply Comment at 3.

<sup>39</sup> *2023 VRS Compensation Order*, 38 FCC Rcd at 9182-83, para. 61.

<sup>40</sup> See Rolka Loube Saltzer Associates, LLC, Interstate Telecommunications Relay Services Fund: Payment Formula and Fund Size Estimate, CG Docket Nos. 03-123 and 10-51, Ex. 1-4 (filed Apr. 30, 2025), <https://www.fcc.gov/ecfs/document/10506166960326/1> (2025 TRS Report).

<sup>41</sup> See *supra* note 34.

eligible to receive compensation from the Fund for the provision of VRS. This certification shall remain in effect for a period of five years.<sup>42</sup>

We emphasize that Sorenson must continue to operate in compliance with all relevant Commission rules and orders, including any applicable Consent Decrees. The Commission may investigate compliance by Sorenson with the Commission's rules and orders, and take enforcement action, including suspension or revocation of this certification.<sup>43</sup> This may include unannounced on-site visits to Sorenson's headquarters, offices, or call centers for the purpose of ensuring continued compliance with the certification requirements and the Commission's rules.<sup>44</sup> This Public Notice shall be effective immediately upon release.

*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](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at 202-418-0530.

*Additional Information:* For additional information on this proceeding, contact William Wallace at 202-418-2716, or [William.Wallace@fcc.gov](mailto:William.Wallace@fcc.gov), of the Consumer and Governmental Affairs Bureau, Disability Rights Office.

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<sup>42</sup> See 47 CFR § 64.606(c)(2).

<sup>43</sup> See *id.* § 64.606(e)(2).

<sup>44</sup> See *2011 Internet-based TRS Certification Order*, 26 FCC Rcd at 10914, para. 36.