

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	
Structure and Practices of the Video Relay Services Program)	CG Docket No. 10-51
)	
Sorenson Communications, LLC Petition for Expedited Waiver)	

ORDER

Adopted: September 29, 2023

Released: September 29, 2023

By the Chief, Consumer and Governmental Affairs Bureau:

I. INTRODUCTION

1. The Consumer and Governmental Affairs Bureau (CGB or Bureau) of the Federal Communications Commission (FCC or Commission) hereby grants to Sorenson Communications, LLC (Sorenson), limited waivers, as described below, of the Commission’s rules to the extent that they require a Video Relay Service (VRS) provider to: (1) send a notice to a second VRS provider’s users when the first provider is acquiring, by sale or transfer, part or all of the second provider’s user base;¹ (2) re-register newly-acquired users in the Telecommunications Relay Services (TRS) User Registration Database (URD or User Database) before initiating service to those users;² (3) answer calls from users on a first-come, first-served basis;³ and (4) answer 80 percent of all calls within 120 seconds, measured on a monthly basis.⁴ Sorenson requested waiver of these rules in two recently filed petitions.⁵ We find good cause to

¹ 47 CFR § 64.631(f)(1). This 30-days advance notice requirement is part of a streamlined procedure whereby users may be ported to a new default VRS provider, pursuant to a sale or transfer, without obtaining each user’s authorization and verification. *See id.* § 64.631(f).

² *Id.* §§ 64.611(a)(4), 64.615(a)(6)(i)-(vi).

³ *See id.* § 64.604(b)(2); *see also FCC Clarifies That Telecommunications Relay Services (TRS) Marketing And Call Handling Practices Are Improper*, Public Notice, CC Docket No. 98-67, CG Docket No. 03-123, 20 FCC Rcd 1471, 1473 (CGB 2005) (2005 Call Handling PN) (“[TRS] providers must handle incoming calls in the order that they are received.”).

⁴ 47 CFR § 64.604(b)(2)(iii).

⁵ Sorenson Communications, LLC Petition for Expedited Waiver, CG Docket Nos. 03-123, 10-51 (filed July 24, 2023) (July Petition), <https://www.fcc.gov/ecfs/document/10724052107965/1>; Sorenson Communications, LLC Second Petition for Waiver, CG Docket Nos. 03-123, 10-51 (filed Aug. 8, 2023) (August Petition), <https://www.fcc.gov/ecfs/document/108080022406561/1>. Sorenson also provided additional information in response to questions from Commission staff. Letter from John T. Nakahata, Counsel to Sorenson Communications, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123, 10-51 (filed Sept. 19, 2023) (Sorenson *Ex Parte*), <https://www.fcc.gov/ecfs/search/search-filings/filing/1091926935548>.

grant these limited waivers because adherence to these rules could prevent Sorenson from quickly establishing a fully functioning, robust VRS service for consumers who are deafblind. Granting these waivers will ensure the continuous availability of service to consumers who are deafblind during a transition period after their current provider, ASL Services Holdings LLC d/b/a GlobalVRS (GlobalVRS), exits the VRS market.

II. BACKGROUND

2. VRS is a relay service,⁶ supported by the TRS Fund, that “allows people with hearing or speech disabilities who use sign language to communicate with voice telephone users through video equipment.”⁷ In a typical VRS call, a deaf or hard of hearing person communicates in American Sign Language (ASL), by video over a broadband link, to a communications assistant (CA), who then voices the message to a hearing person using ordinary telephone service. The same process then occurs in reverse: the CA receives the hearing party’s voice response over the telephone and signs that response, by video, to the ASL user.⁸

3. *Video-Text Service.* Some VRS users, who are deafblind, are able to sign *to* a CA but are unable to see the signs received *from* the CA well enough to understand them. For such users, since 2016, GlobalVRS has provided a special variant of VRS (referred to in this Order as Video-Text Service), which has been available only from GlobalVRS. In this service, the ASL user continues to use a video link to sign to the CA. However, the other party’s contributions to the conversation are converted to text (instead of ASL video), which the deafblind party can read using a refreshable braille display.⁹ For persons who are deafblind and whose primary language is ASL, this Video-Text Service offers an alternative to text-to-voice relay services, such as Internet Protocol Relay Service, allowing such users the opportunity to send messages in their first language, ASL, while receiving a text response.

4. On April 28, 2023, GlobalVRS filed a letter with the Commission notifying it of a “potential service interruption on or about June 30, 2023,” absent affirmative Commission action on a petition filed by GlobalVRS requesting additional compensation.¹⁰ One month later, in a notice dated May 26, 2023, GlobalVRS informed its users that absent such action, GlobalVRS “will have no choice but to cease operations effective June 30, 2023,” and suggested that its users begin registering for service with other VRS providers.¹¹ On June 8, GlobalVRS sent a more definitive notice of its intention to cease providing VRS after June 30, 2023. GlobalVRS suggested that Video-Text Service users register for a text-based service until their “MyMMX-db software has a new [VRS] provider connected to it.”¹² On June 30, 2023, GlobalVRS sent a third notice to its users. In this notice, GlobalVRS informed users that

⁶ Section 225 of the Communications Act of 1934, as amended (the Act), requires the Commission to ensure the availability of TRS to persons who are deaf, hard of hearing, or deafblind or have speech disabilities, “to the extent possible and in the most efficient manner.” 47 U.S.C. § 225(b)(1). TRS are defined as “telephone transmission services” enabling such persons to communicate by wire or radio “in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services.” *Id.* § 225(a)(3).

⁷ 47 CFR § 64.601(a)(51).

⁸ *See Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 5545, 5548-49, para. 2 (2011).

⁹ Users of GlobalVRS’s service may use MyMMX-db software, an application for smartphones developed by nWise AB to allow users to read Real-Time Text (RTT) messages on Braille displays. *See* nWise, Our Products, <https://mymmx.com/our-products/> (last visited Aug. 1, 2023).

¹⁰ Letter from Gabrielle Joseph, GlobalVRS, to Marlene H. Dortch, FCC, CG Docket Nos. 03-123 and 10-51 (filed Apr. 28, 2023) (April 28 Termination Notice).

¹¹ *See* July Petition, Attach. A.

¹² *See id.*, Attach. B; *see also supra* note 9 (describing MyMMX software).

it was continuing to provide VRS temporarily while it works with the Commission and Sorenson to develop a “seamless transition” for their service.¹³ On August 3, 2023, GlobalVRS filed a letter with the Commission confirming its plan to continue providing Video-Text Service pending its availability from a new provider, and seeking reimbursement of expenses incurred to maintain the service after June 30, 2023.¹⁴ On August 17, 2023, the Bureau adopted an order authorizing an accelerated schedule for reimbursement of exogenous costs incurred by GlobalVRS in providing Video-Text Service after June 30, 2023, and granting conditional waivers of certain Commission rules.¹⁵

5. In a petition filed July 24, 2023, Sorenson explained that it is currently preparing to offer a form of Video-Text service, which it expects to make available in the near future, and that it is negotiating with GlobalVRS for the transfer to Sorenson of GlobalVRS’s deafblind users and any other remaining GlobalVRS users.¹⁶ In the July 24, 2023, petition and a second petition filed August 8, 2023, Sorenson requests limited waivers of several Commission rules to facilitate a smooth and prompt transition of GlobalVRS’s remaining users and prevent interruption or degradation of service to those users.¹⁷ Further, with respect to its second petition, Sorenson explains that it needs time to train CAs to handle Video-Text calls in order to provide a better experience for deafblind users as Sorenson introduces this service for the first time and ramps up its capabilities to provide the Video-Text Service.¹⁸

6. Sorenson maintains that GlobalVRS has provided notices to users that meet certain key elements of the Commission’s sale or transfer notice requirements, and that providing another 30 days’ notice at this point could cause a delay in the transition or potentially a gap in service for users of GlobalVRS’s services – and could deprive ASL users who are deafblind of a vital means of communication.¹⁹ In light of the potential harm to GlobalVRS’s remaining users, Sorenson requests a waiver of the requirement to provide its own 30-days’ notice to users of the upcoming transfer.²⁰

7. Sorenson also asserts that the process of re-registering GlobalVRS’s remaining users could cause additional delay in the transition. Sorenson contends that users “routinely fail the URD Administrator’s identity verification” for a variety of reasons, and as a result their re-registration can be delayed for some period of time.²¹ Ordinarily, in such situations, these users would revert to their porting-out provider. In this situation, however, porting back would be impractical since GlobalVRS would no longer be available, and these users would be unable to register with any VRS provider pending resolution of the identity verification.²² Sorenson notes that this again could delay the transition or lead to a gap in service for the remaining users. Sorenson requests a waiver of this rule, asserting that GlobalVRS’s users are already registered in the User Database, their identities have already been verified,

¹³ See July Petition, Attach. C.

¹⁴ Letter from Gabrielle Joseph, GlobalVRS, to Marlene H. Dortch, FCC, CG Docket Nos. 03-123 and 10-51 (filed Aug. 3, 2023), <https://www.fcc.gov/ecfs/document/10803170679210/1>.

¹⁵ *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, Order, DA 23-718 (CGB Aug. 17, 2023) (*GlobalVRS Reimbursement Order*).

¹⁶ See July Petition at 4.

¹⁷ See *id.* at 4; August Petition at 2-3; Sorenson *Ex Parte* at 2.

¹⁸ See August Petition at 4-5.

¹⁹ July Petition at 4-6; 47 CFR § 64.631(f)(1). Sorenson states that additional information required by the rule could be provided at a later time, either in response to a specific inquiry by a user or in a subsequent notice to all the GlobalVRS users acquired by Sorenson. July Petition at 5; Sorenson *Ex Parte* at 2.

²⁰ July Petition at 4-5.

²¹ *Id.* at 7-8.

²² *Id.* at 8.

and they have already been determined to be eligible for VRS.²³

8. In its August Petition and *Ex Parte*, Sorenson explains that a separate queue for Video-Text Service calls may be necessary so that these calls can be routed to CAs who are trained and experienced in providing this unique service.²⁴ Otherwise, it would be “very inefficient” for Sorenson to train and equip all of its CAs to handle deafblind calls because “[d]eaf[b]lind minutes will make up a fraction of a percent of Sorenson’s overall VRS minutes.”²⁵ In addition, Sorenson states that a separate queue for deafblind VRS users could potentially provide a much better experience for deafblind users.²⁶ Consequently, Sorenson requests a waiver of the first-come, first-served rule to permit routing of Video-Text Service calls to the next available CA who is specially trained in both interpreting from ASL to English and transcribing from voice to text.²⁷

9. Sorenson further explains that it expects a period of adjustment while developing its version of Video-Text Service and onboarding, training, and equipping CAs to provide the service.²⁸ Sorenson states it is moving as quickly as possible and expects to comply with the “speed of answer” rule requiring it to answer at least 80 percent of all calls within 120 seconds, as measured on a monthly basis.²⁹ Yet, Sorenson also recognizes that it is in the early stages of developing the service and that the transfer of users is on a short timeframe.³⁰ Under these circumstances, if it determines to implement a separate queue for deafblind users, Sorenson requests a temporary waiver of the speed of answer rule for the deafblind users’ queue for a period of four months after the transfer of GlobalVRS’s deafblind users to Sorenson.³¹

Sorenson and GlobalVRS are currently negotiating an agreement for the transfer of GlobalVRS's remaining registered users, from GlobalVRS to Sorenson.³⁶

12. We agree with Sorenson that GlobalVRS's notices to its users of its plans to terminate the provision of VRS³⁷ and to transfer its remaining VRS users to Sorenson³⁸ have already provided users with key information required by the notice rule. As Sorenson explains, GlobalVRS's customers have received three notices of the upcoming change in service and have had several months to select a new provider.³⁹ It is likely that those users still receiving service from GlobalVRS are remaining with GlobalVRS because they need a service (i.e., Video-Text Service) that is not yet available from Sorenson, the only other provider preparing to offer it. We also agree that requiring another, more detailed 30 days' notice before a transfer agreement is implemented could delay or interrupt the provision of service to GlobalVRS's users—and potentially deprive ASL users who are deafblind of a vital means of communication.⁴⁰ For these reasons, we find that a partial waiver of the notice requirement is justified.

13. However, GlobalVRS's users have not received certain information required by section 64.631(f), i.e.: (1) the date on which Sorenson will become the users' new default provider;⁴¹ (2) whether Sorenson will be responsible for handling any complaints filed, or otherwise raised, against GlobalVRS prior to or during the transfer;⁴² and (3) Sorenson's toll-free customer service telephone number.⁴³ Sorenson states that, once a transfer agreement is executed, it can provide a supplemental notice prior to the transfer which would include this information.⁴⁴ Therefore, we condition grant of this limited waiver on (i) Sorenson filing with the Commission a copy of the transfer agreement between Sorenson and Global no later than five business days after the agreement is executed; and (ii) Sorenson providing notice to GlobalVRS's users of the information referenced above as soon as practicable after the agreement is executed, and in any event, no later than the date of transfer. This notice shall also be provided as a pre-recorded video message in ASL.⁴⁵

14. *Waiver of User Re-Registration and Verification.* We also find good cause to grant a limited waiver of sections 64.611(a)(4) and 64.615(a)(6)(i)-(vi) of the Commission's rules. Under these rules, when a registered VRS user changes its default provider, the new default VRS provider must resubmit the user's information (such as name, address, date of birth, and the last four digits of the user's social security number) to the User Database for reverification of the user's identity before initiating service to the porting customer.⁴⁶

³⁶ Sorenson *Ex Parte* at 1. As explained earlier, GlobalVRS is terminating its provision of VRS. Under an agreement to transfer GlobalVRS's remaining registered users to Sorenson, Sorenson would become the "default" provider to which VRS calls to and from such users are routed unless the user affirmative chooses to use a different provider. *See* 47 CFR § 64.611(a)(1), (2).

³⁷ *See* July Petition, Attachs. B, C.

³⁸ *See id.*, Attach. C.

³⁹ *Id.* at 4-6.

⁴⁰ *Id.* at 4-6.

⁴¹ 47 CFR § 631(f)(1)(i).

⁴² *Id.* § 631(f)(1)(iii).

⁴³ *Id.* § 631(f)(1)(iv).

⁴⁴ Sorenson *Ex Parte* at 2.

⁴⁵ 47 CFR § 64.631(f)(1)(i).

⁴⁶ *Id.* §§ 64.611(a)(4), 64.615(a)(6)(i)-(vi). In 2022, the Commission adopted changes to this rule that allow the user to receive service for two weeks while identity verification is completed. The user must be ported back to the

(continued....)

15. In the unusual circumstances present here, requiring compliance with re-registration and verification requirements during the transition period could result in interruption of service to the affected users.⁴⁷ As Sorenson explains, VRS users “routinely fail the URD Administrator’s identity verification” for a variety of reasons, and the provider must then submit additional documentation to establish the user’s identity.⁴⁸ This can be a challenging and time-consuming process, as it involves individually contacting each customer and working with them to securely upload their documentation to Sorenson, which must then submit that documentation for the URD Administrator’s review and approval.⁴⁹ It is likely to be especially challenging for users who are deafblind.⁵⁰ Further, additional delays are possible if there are discrepancies in the information provided, or if the required documentation is not immediately available.⁵¹

16. It is especially significant that, unlike the typical case where a user is porting from one default provider to another, the users involved here have no alternative to porting. As GlobalVRS’s notices to its users make clear, it needs to terminate the provision of VRS as soon as possible, for economic reasons.⁵² Having initially planned to terminate service June 30, GlobalVRS has extended its termination date for a brief period, as an accommodation to its customers who are deafblind, solely because no service alternative for its Video-Text Service customers was immediately available.⁵³ Thus, for any users whose identities cannot be reverified quickly, the service they need will no longer be available from their current provider.⁵⁴ Without waivers of these registration rules, GlobalVRS’s remaining users may suffer harm, face unnecessary hurdles or delays, and potentially lose access to vital communication services during this transition. Further, the identities of these users have been verified previously, when their registration data was submitted to the Database by GlobalVRS. In these unusual circumstances, to avoid inflicting such hardship and to maintain uninterrupted service to a small group of customers for whom an alternative service provider is not yet available, and for whom a service cutoff could have especially harmful effects, we find good cause to waive the requirement to reregister and reverify GlobalVRS’s users.⁵⁵

17. To implement this waiver, we direct the TRS Fund administrator to reclassify all current registered users of GlobalVRS as registered users of Sorenson. To the extent that any GlobalVRS users are involved in a Database registration appeal process, such appeal process shall now be treated as an

original VRS provider if verification is not completed within two weeks. This rule change is not effective until approved by the Office of Management and Budget under the Paperwork Reduction Act. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program; Misuse of Internet Protocol (IP) Captioned Telephone Service; Petition for Rulemaking and Interim Waiver of Convo Communications, LLC*, CG Docket Nos. 03-123, 10-51, and 13-24, Report and Order, Notice of Proposed Rulemaking, Order, and Declaratory Ruling, 37 FCC Rcd 8107 (2022); *Sorenson Communications, LLC, Petition for Partial Reconsideration*, CG Docket Nos. 03-123, 10-51, & 13-24 (filed Oct. 21, 2022).

⁴⁷ See July Petition at 7-8.

⁴⁸ *Id.* at 7.

⁴⁹ *Id.* at 7-8.

⁵⁰ *Id.* at 8.

⁵¹ *Id.* at 8.

⁵² *Id.* at 6.

⁵³ See *GlobalVRS Reimbursement Order*, para. 13. As noted earlier, GlobalVRS’s customers have received three notices of the upcoming change in service and have had five months to select a new provider. Thus, those who remain are likely Video-Text Service customers, for whom a service alternative has not yet been available.

⁵⁴ See July Petition at 8.

⁵⁵ See *id.* at 8.

appeal relating to registration with Sorenson. However, we emphasize that these users, like all VRS users, are free to register with a different VRS provider at any time.

18. *Waiver of First-Come First-Serve and Speed-of-Answer.* Part 64 of the Commission’s rules does not include a codified rule providing that VRS calls must be answered in the order in which they are received. However, a public notice stating such a requirement was issued by CGB in 2005, and a Commission-level Report and Order refers to the first-come, first-served principle as a binding obligation of VRS providers.⁵⁶ Thus, absent a waiver, Sorenson may be prohibited from using a separate call “queue” to handle Video-Text Service calls. Sorenson has stated that a separate queue for Video-Text calls may be needed so that it can efficiently and timely route those calls to specially trained and equipped CAs.⁵⁷

19. To the extent that VRS providers are required to use a single queue to handle all calls, so that they are answered in the order in which they are received,⁵⁸ we find good cause to grant a limited waiver of that requirement in the current circumstances. Video-Text Service requires that CAs have more advanced typing skills than those needed to handle ordinary VRS calls. Although Sorenson is preparing to offer Video-Text Service for the first time, and has yet to decide all the details of how it will be configured,⁵⁹ it is likely that a provider of Sorenson’s size may need to place Video-Text calls in a separate queue, at least until a sufficient number of CAs are trained to handle such calls. Otherwise, when a Video-Text call is received, the limited number of CAs initially able to handle Video-Text calls could all be busy handling other calls, resulting in unnecessary and undue delay for the Video-Text user. Further, service to Sorenson’s other customers is unlikely to be affected by the use of a separate queue for the very limited number of Video-Text customers.⁶⁰ The grant of this waiver is contingent on Sorenson’s compliance with the first-come, first-served rule within each of the two separate queues.⁶¹

20. We also find good cause to grant a temporary waiver of the speed-of-answer rule, section 64.604(b)(2)(iii) of the Commission’s rules, for a period of four months, beginning on the effective date of the transfer of the GlobalVRS deafblind users, if Sorenson implements a separate queue for deafblind users.⁶² Sorenson states it is taking over the Video-Text Service on an accelerated timeline due to GlobalVRS exiting the market and that it has not previously offered a similar service.⁶³ We agree that a four-month waiver will allow Sorenson time to equip and train CAs specifically to work with deafblind

⁵⁶ *2005 Call Handling PN*, 20 FCC Rcd at 1473 (stating that the practice of “selectively answer[ing] calls from preferred consumers or locations, rather than answer[ing] the calls in the order they are received . . . is inconsistent with the notion of functional equivalency”); see also *Structure and Practices of the Video Relay Service Program et al.*, Report & Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618, 8691, para. 180 n.470 (2013) (declining to authorize the routing of calls to interpreters with particular skills and “remind[ing] providers that they must handle incoming calls in the order that they are received, with the exception of 911 calls”).

⁵⁷ See August Petition at 3-5; Sorenson *Ex Parte* at 2-3.

⁵⁸ Emergency calls are not included in such a requirement and must be given priority over all other calls. See 47 CFR §§ 9.14(b)(2)(ii) (requiring Internet-based TRS providers to “implement a system that ensures that the provider answers an incoming emergency call before other non-emergency calls (*i.e.*, prioritize emergency calls and move them to the top of the queue)”).

⁵⁹ Sorenson *Ex Parte* at 2.

⁶⁰ According to GlobalVRS, there are 112 active users of Video-Text Service. *GlobalVRS Reimbursement Order*, para. 9 n.26.

⁶¹ See Sorenson *Ex Parte* at 3 (stating that company will comply with the first-come, first-served rule within each service queue, except for 911 calls).

⁶² Sorenson states it will coordinate the specific date of transfer with the Commission and GlobalVRS. July Petition at 8.

⁶³ See Sorenson *Ex Parte* at 3.

users, assess Video-Text Service traffic, and make any necessary long-term adjustments as it takes over this service from GlobalVRS.⁶⁴ Accordingly, a temporary waiver of the VRS speed of answer rules is necessary to allow Sorenson a reasonable time to train and equip its CAs and determine the optimal configuration of this new service.

21. The waiver of the speed of answer requirement is applicable to calls handled by a separate Video-Text Service queue, if Sorenson determines to implement a separate queue that service. The VRS speed of answer requirement shall continue to apply to calls to and from Sorenson's other VRS users who are not within the affected population of deafblind users.⁶⁵

IV. PROCEDURAL MATTERS

22. *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 Consumer & Governmental Affairs Bureau at 202-418-0530.

23. *Additional Information.* For further information regarding this item, please contact Joshua Mendelsohn, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-559-7304 (voice or videophone) or by email to Joshua.Mendelsohn@fcc.gov.

V. ORDERING CLAUSES

24. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, 4(i), 4(j), and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 225, and sections 0.141, 0.361, and 1.3 of the Commission's rules, 47 CFR §§ 0.141, 0.361, and 1.3, this Order IS ADOPTED.

25. IT IS FURTHER ORDERED that the petitions for limited waiver of Sorenson Communications, LLC, filed July 24, 2023, and August 8, 2023, are GRANTED to the extent described and subject to the conditions stated herein.

26. IT IS FURTHER ORDERED that sections 9.14(b)(2)(ii), 64.604(b)(2)(iii), 64.615(a)(6)(i)-(iv), and 64.631(f)(1) of the Commission's rules, 47 CFR §§ 9.14(b)(2)(ii), 64.604(b)(2)(iii), 64.615(a)(6)(i)-(iv), 47 CFR § 64.631(f)(1), are WAIVED to the extent described and subject to the conditions stated herein.

27. IT IS FURTHER ORDERED that, pursuant to section 1.102(b)(1) of the Commission rules, 47 CFR § 1.102(b)(1), this Order SHALL BE EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION

Alejandro Roark, Chief
Consumer and Governmental Affairs Bureau

⁶⁴ See August Petition at 5-6; Sorenson *Ex Parte* at 3.

⁶⁵ Sorenson emphasizes that it will continue to meet the first-come, first-served and speed-of-answer requirements for users of its standard VRS offering. See Sorenson *Ex Parte* at 3.