



Federal Communications Commission
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**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

Comments Due: November 13, 2024

Reply Comments Due: November 25, 2024

The Consumer and Governmental Affairs Bureau (Bureau) of the Federal Communications Commission (Commission) seeks comment on two applications for certification to provide Internet-based telecommunications relay service (TRS) supported by the Interstate Telecommunications Relay Services (TRS) Fund: (1) the application of Sorenson Communications, LLC (Sorenson), for certification to provide Video Relay Service (VRS) supported by the Interstate Telecommunications Relay Services (TRS) Fund;¹ and (2) the application filed by CaptionCall, LLC, (CaptionCall), for certification to provide Internet Protocol Captioned Telephone Service (IP CTS) supported by the Interstate TRS Fund.² In 2022, the Bureau granted Sorenson and CaptionCall conditional certification to provide VRS and IP CTS, respectively, after the acquisition of majority ownership and control of these entities by Ariel GP Holdco, LLC (“Ariel”).³ The Bureau conditioned those grants on Sorenson and CaptionCall filing these applications for full certification under their new ownership.⁴

¹ 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. 18, 2022) (redacted), <https://files.fcc.gov/ecfs/download/c8feb725-5343-4bc8-923d-ceaa3b454536.pdf?orig=true&pk=cb77b2ec-1a58-dbc6-139b-ad192cfd5d9b>; Supplemental Update to Sorenson Communications, LLC’s Internet-Based TRS Certification Application for Video Relay Service, CG Docket No. 03-123 (filed Sept. 17, 2024) (disclosing certain previously redacted information), <https://www.fcc.gov/ecfs/document/10917001465262/1>.

² Application of CaptionCall, LLC, as Majority-Owned and Controlled by Ariel GP Holdco, LLC, for Certification to Provide Internet Protocol Captioned Telephone Service, CG Docket No. 03-123 (filed Apr. 18, 2022) (redacted), <https://files.fcc.gov/ecfs/download/c9bd9c7e-d2f3-4f85-95b4-572fd6dfd852.pdf?orig=true&pk=cb77b2ec-1a58-dbc6-139b-ad192cfd5d9b>; Supplemental Update to CaptionCall LLC’s Internet-Based TRS Certification Application for Internet Protocol Captioned Telephone Service, CG Docket No. 03-123 (filed Sept. 17, 2024) (disclosing certain previously redacted information), <https://www.fcc.gov/ecfs/document/1091790168240/1>.

³ See *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, DA 22-310 (CGB Mar. 23, 2022); *Grant of Conditional Certification for CaptionCall, LLC, to Provide Internet Protocol Captioned Telephone Service After Its Acquisition by Ariel GP Holdco, LLC*, CG Docket No. 03-123, Public Notice, DA 22-311 (CGB Mar. 23, 2022).

⁴ The conditional certifications for Sorenson and CaptionCall were initially set to expire on March 23, 2024. The Bureau has extended the conditional certifications through December 31, 2024. See *Extension of Conditional*

(continued...)

Both Sorenson and CaptionCall have redacted portions of their applications for which they request confidential treatment.⁵ Access to the redacted material is governed by the Third Protective Order in this docket.⁶

Filing Requirements. Interested parties may file comments on or before the dates indicated above. 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).⁷

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs/filings>.
- Paper Filers:
 - Parties who choose to file by paper must file an original and one copy of each filing.
 - Filings can be sent, 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.
 - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. 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 courier deliveries (any deliveries not by the U.S. Postal Service Express) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
 - U.S. Postal Service first-class, Express, and Priority mail must be sent to 45 L Street, NE, 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.⁸ 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 (Continued from previous page) _____

Certifications of CaptionCall, LLC, and Sorenson Communications, LLC, to Provide Telecommunications Relay Services, CG Docket Nos. 03-123 and 10-51, Public Notice, DA 24-281 (Mar. 20, 2024).

⁵ In the Supplemental Updates to their applications, Sorenson and CaptionCall have disclosed certain previously redacted information. See *supra* notes 1 & 2.

⁶ See *Misuse of Internet Protocol (IP) Captioned Telephone Service; 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. 13-24, 10-51, and 03-123, Order and Third Protective Order, 33 FCC Rcd 6802, 6803, para. 4 (CGB 2018).

⁷ *Electronic Filing of Documents in Rulemaking Proceedings*, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

⁸ 47 CFR §§ 1.1200 *et seq.*

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).

Additional Information. For further information regarding this Notice, please contact William Wallace, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-2716 or by e-mail to William.Wallace@fcc.gov.

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