



# PUBLIC NOTICE

**Federal Communications Commission**  
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DA 21-1651

Released: December 29, 2021

**COMMENT SOUGHT ON PETITION FOR DECLARATORY RULING  
FILED BY SORENSON COMMUNICATIONS, LLC, ON  
VIDEO RELAY SERVICE COST ALLOCATION METHODOLOGIES**

**CG Docket Nos. 10-51 and 03-123**

**Comments Due: January 10, 2022**

**Reply Comments Due: January 18, 2022**

The Consumer and Governmental Affairs Bureau (Bureau) of the Federal Communications Commission (Commission) seeks comment on a petition filed by Sorenson Communications, LLC (Sorenson), requesting a declaratory ruling on the Commission's cost allocation methodologies for video relay service (VRS).<sup>1</sup> Sorenson seeks (1) a ruling that the Commission's rules treat as allowable the costs associated with a VRS provider's field staff to the extent they are performing tasks that are service-related and not customer premises equipment related; and (2) confirmation that field staff time is an allowable cost of providing VRS even when it is part of a longer visit during which staff may perform equipment installation and maintenance.<sup>2</sup>

The petition contains information (redacted from the public version) for which confidential treatment is requested. Access to the redacted material is governed by the Third Protective Order in these dockets.<sup>3</sup>

*Filing Requirements.* Interested parties may file comments on or before the dates indicated above.<sup>4</sup> All filings must reference CG Docket Nos. 03-123 and 10-51. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).<sup>5</sup>

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs/filings>.
- Paper Filers:

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<sup>1</sup> Petition of Sorenson Communications, LLC for Declaratory Ruling, CG Docket Nos. 10-51 and 03-123 (filed Dec. 23, 2021), [https://ecfsapi.fcc.gov/file/122330636542/2021.12.23%20Sorenson%20PDR%20re%20Cost%20Allocation%20\(public\).pdf](https://ecfsapi.fcc.gov/file/122330636542/2021.12.23%20Sorenson%20PDR%20re%20Cost%20Allocation%20(public).pdf) (Sorenson Petition) (redacted).

<sup>2</sup> Sorenson Petition at 1-2.

<sup>3</sup> 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).

<sup>4</sup> See 47 CFR §§ 1.1, 1.2(b), 1.45.

<sup>5</sup> See FCC, Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24121 (May 1, 1998).

- 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.
- 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 45 L Street NE Washington, DC 20554.
- Currently, the Commission does not accept any hand delivered or messenger delivered filings as a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19. In the event that the Commission announces the lifting of COVID-19 restrictions, a filing window will be opened at the Commission's office located at 9050 Junction Drive, Annapolis Junction, MD 20701.<sup>6</sup>

*Ex Parte Rules.* The proceeding this Public Notice initiates shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission's ex parte rules.<sup>7</sup> 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 section 1.1206(b). In proceedings governed by section 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](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 Michael Scott, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-1264, or [Michael.Scott@fcc.gov](mailto:Michael.Scott@fcc.gov).

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<sup>6</sup> See *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy*, Public Notice, 35 FCC Rcd 2788 (OMD 2020), <https://www.fcc.gov/document/fcc-closesheadquarters-open-window-and-changes-hand-delivery-policy>.

<sup>7</sup> 47 CFR § 1.1200 *et seq.*