November 12, 2015

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of Ex Parte Meeting; CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On November 9, 2014, Sheri A. Farinha, Vice Chair, California Coalition of
Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”); Claude Stout,
Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc.
(“TDI”) and TDI’s counsel, Danielle Burt of Morgan, Lewis & Bockius LLP;
Zainab Alkebsi, Policy Counsel, National Association of the Deaf (“NAD”); and
Lise Hamlin, Director of Public Policy, Hearing Loss Association of America
(“HLAA”) participated in a meeting (either in person or by phone) with:

- Karen Strauss, Gregory Hlibok, Eliot Greenwald, and Darryl Cooper of the
  Consumer & Governmental Affairs Bureau (“CGB”); and
- David Schmidt and Andrew Mulitz of the Office of Managing Director
  ("OMD")

The Consumer Group representatives discussed their Joint Petition for
Waiver and Rulemaking of the Eligibility Rule Regarding Social Security Number
(SSN). They talked about consumers’ privacy and security concerns with being
required to provide the last four digits of their SSNs to register for VRS and their
request for the Commission to consider allowing consumers to choose to provide an
alternative form of verification (e.g., driver’s license, utility bill) to register. They
emphasized that the SSN requirement results in unequal treatment since it applies
only to the deaf or hard of hearing persons registering to use VRS and does not
apply to hearing users that may place or receive a VRS call.

Based on the discussion, the Consumer Group representatives understand that
the TRS User Registration Database (“TRS-URD”) will maintain first name,
last name, address, and date of birth of registrants and will not maintain SSNs of

1 See Joint Petition, CG Docket Nos. 10-51 and 03-123 (filed Oct. 1, 2015).
registrants. It is their understanding that the SSNs of registrants will be provided only “one-way,” meaning to the TRS Fund Administrator to verify a registrant’s identification. If a registration is not accepted requiring an individual to resubmit, such individual will need to provide the required information again, including the SSN, because such information is not being maintained.

The Consumer Groups suggest the Commission should, at a minimum, provide information to consumers about how their SSN information will be used and might provide a simple demonstration of the TRS-URD registration process from collection to successful registration. The Commission should also consider providing additional messaging to assure consumers that SSN information will be protected when it is required to be produced.

Respectfully submitted,

/s/

Sheri A. Farinha

cc (by e-mail):

Karen Strauss
Gregory Hlibok
Eliot Greenwald
Darryl Cooper
David Schmidt
Andrew Mulitz

Claude Stout
Zainab Alkebsi
Lise Hamlin
Danielle Burt