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December 22, 2021

VIA www.reginfo.gov Comment Portal

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Re: OMB Control No. 3060-0463; FCC CG Docket Nos. 03-123, 10-51, 13-24

COMMENTS OF SORENSON COMMUNICATIONS, LLC

Sorenson Communications, LLC, hereby submits comments on the request of the Federal Communications Commission (“FCC” or “Commission”) for Office of Management and Budget (“OMB”) approval of an information collection¹ under the Paperwork Reduction Act (“PRA”).² The Commission seeks a renewal of various information collections involving providers of Telecommunications Relay Services (“TRS”), including its collection of cost and demand data pursuant to the Relay Services Data Request (“RSDR”). Sorenson disagrees with the FCC’s estimate that TRS providers require only approximately ten hours to complete the RSDR.³ In

¹ See Information Collection Being Submitted for Review and Approval to the Office of Management and Budget, 86 Fed. Reg. 68,493 (Dec. 2, 2021).

² 44 U.S.C. § 3501 *et seq.*

³ Rolka Loube Associates LLC, Interstate TRS Fund Annual Provider Data Request Filing Instructions at 2 (2021), <https://omb.report/icr/202112-3060-001/doc/116941900.pdf>.

Sorenson's experience, the number of hours necessary to complete this data request substantially exceeds the FCC's estimate.

Sorenson is the industry-leading provider of communications services and products designed to enable Deaf and Hard-of-hearing individuals to communicate with the hearing world. Sorenson offers TRS to Deaf and Hard-of-hearing consumers under the FCC's Video Relay Service ("VRS") and Internet Protocol Captioned Telephone Services programs. As a service provider in the FCC's programs for over a decade, Sorenson has extensive experience with the annual requirement to submit cost data consistent with the requirements of the RSDR.

Based on Sorenson's experience, the FCC's ten-hour burden estimate for the RSDR is patently low. Sorenson estimates that it spends 200 to 300 hours annually on the RSDR. It is not a simple matter of transferring cost data from general books of account to the RSDR form. The RSDR requires a separate system of accounting entirely, for which TRS providers must implement special processes they would not otherwise need. For example, to fulfill its cost reporting requirements, Sorenson has to develop and maintain a special cost tracking system. It must track whether costs are "allowable" costs of providing a relay service or not. Costs associated with consumer hardware are currently not "allowable" costs of VRS. To ensure that only allowable costs are reported as such, providers must identify costs associated with consumer hardware and report them separately. This may require allocating the costs of departments such as engineering that work on consumer hardware as well as "allowable" service-related issues. Providers must also develop and maintain reasonable methods for allocating costs, such as rent and executive salaries, that relate to multiple relay services or that relate to relay as well as non-relay services.

In addition, Sorenson must prepare a reconciliation of its GAAP financial statements to its RSDR. It also creates and maintains a cost allocation manual, and compiles and completes detailed explanatory appendices. Each of these processes is time consuming. The FCC's ten-hour annual estimate completely misses the mark.

Sorenson recommends that the Office of Information and Regulatory Affairs recognize this burden estimate as unreasonable. The FCC should critically review its burden estimate and replace it with a more realistic estimate that reflects the numerous hours that are required to prepare for and submit the RSDR.

Respectfully submitted,



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