



February 13, 2018

VIA ECFS

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

Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; CG Docket No. 10-51

Dear Ms. Dortch:

Amanda Montgomery and the undersigned of Convo Communications, LLC (“Convo”) met on February 8, 2018 with Karen Peltz Strauss, Robert Aldrich, Eliot Greenwald, and Michael Scott of the Consumer and Governmental Affairs Bureau, and David Schmidt and Andrew Mulitz of the Office of Managing Director.

Convo discussed the data related to its yet to be verified customers and those customers uploaded to the TRS User Registration Database (“URD”), showing that although its results so far appear to be consistent or slightly better than other VRS providers, far too many users risk losing their access to VRS at the close of the 60 day window for their registration in URD. Scores of Convo verified customers have failed registration in URD due to procedural, rule interpretation or technical issues or because a different version of LexisNexis was used by the URD Administrator for verification. Scores of active Convo customers remain yet to be verified and submitted for URD registration due to their confusion about needing to register for each provider and their resistance to providing their social security number information.

Convo urged that transition to URD should be treated similar to the transition to ten digit numbering. After many months of careful preparation, the Commission handled the actual process of switching from proxy numbers to ten digit numbering very patiently, providing a five month extension of the deadline so customers were not left behind in their right to access telecommunications through relay. The transition to ten digit numbering transition was a shared responsibility among the Commission, consumers and relay providers.

The transition to URD is much more complicated due to the multi-steps required to successfully register customers. Several steps involve issues that often require a labor-intensive effort to accomplish or at times are outside the providers’ control. The risks to consumers are tremendous if they cannot make calls including emergency calls or receive important calls such as from prospective employers, educational personnel or medical providers because the numbers listed in their records have become deactivated as a result of a premature deadline.

We appreciated the Commission’s recent reminder to consumers about the deadline and the consequences of failing to provide information to accomplish their registration in URD, and more time is needed to circulate the FCC communication to affected consumers. However

Convo is concerned that the Commission did not include in that communication notice about a possible inability to make emergency/911 calls for numbers which were terminated due to the URD deadline.

Convo explained that it does not have an army of customer support personnel such as Sorenson, who has said that they make more than 4,000 household visits each month. Nor does Convo desire to have such a substantial workforce, we believe that type of intensive person to person engagement has led to many problems in VRS, especially the manipulation of customers and their equipment. Rather, Convo has adopted an autonomous approach, where customers are supported by technology in independently using VRS. Convo was the first provider to implement the use of LexisNexis as third party verification of users, which greatly reduced the need for a large workforce to verify customers; this verification method has been adopted by the URD Administrator and has become the industry standard. To provide customer support without a large workforce, Convo has implemented a widely used customer self-service technology platform. These and other similar actions support the Americans with Disabilities Act's mandate and the Commission's efforts in achieving efficiency in the provision of VRS. However Convo's efficiently-sized workforce means that we do not readily have the personnel to accomplish the labor-intensive requirements of getting the remaining customers registered in URD in a short time.

Accordingly, Convo requests a 90 day extension of the deadline for those customers who have been uploaded to URD, but failed registration and are currently pending additional information to become registered in URD. A 90 day extension is a reasonable amount of time for consumers, providers and the URD Administrator to remediate issues that have arisen in the 60 day window which did not occur or were not prominent problems during the testing period. A 90 day extension would provide Convo a reasonable timeframe to complete URD registration commensurate with a company of its size and resources.

Moreover, Convo requests a 30 day extension of the deadline for those customers who have yet to be verified by the providers and/or provided their consent to the provision of their information to URD and therefore have not been uploaded to URD for registration. At this time, Convo plans to terminate and flush ten digit numbers assigned to customers who do not complete their verification within the FCC deadline. We have put into place a system of progressive warnings to this pool of customers but cannot be responsible for continuing servicing them past the FCC deadline. Thus a 30 day extension is vital to ensure that these customers are provided a reasonable opportunity to be advised a final time about the consequences of their failure to provide URD required information such as missed calls regarding their health, education or economic opportunities and most importantly, be provided a brief grace period to be able to make emergency or 911 calls. We are of the view that insufficient time has transpired following the Commission's February 9, 2018 ASL video providing notice to consumers to help reinforce the providers' frequent attempts to communicate with customers at risk of losing their service. If the Commission does not grant an extension of time for those unverified customers, then Convo requests that the Commission publicly communicate to consumers that their ability to make emergency/911 calls may be potentially affected if they do not provide the URD required information by February 28, 2018. Convo will continue communicate to URD related information to customers, but it would be

much more impactful if the Commission undertakes its own public communication about potentially affected emergency communication capabilities consistent with its long-standing practice.

Sincerely,

/s/

Jeff Rosen
General Counsel

cc: Karen Peltz Strauss
Robert Aldrich
Eliot Greenwald
Michael Scott
David Schmidt
Andrew Mulitz