



PUBLIC NOTICE

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AUTHORIZATIONS GRANTED TO CSDVRS, LLC, AND PURPLE COMMUNICATIONS, INC., TO PARTICIPATE IN THE VRS AT-HOME CALL HANDLING PILOT PROGRAM

CG Docket Nos. 10-51 & 03-123

The Consumer and Governmental Affairs Bureau (Bureau) of the Federal Communications Commission (Commission) grants CSDVRS, LLC, d/b/a ZVRS (ZVRS) and Purple Communications, Inc. (Purple), authorization to participate in the Video Relay Service (VRS) at-home call handling pilot program from November 1, 2017, through October 31, 2018.¹ ZVRS and Purple have each provided detailed plans to ensure that their communications assistants (CA), while working from their homes, will handle VRS calls in compliance with the VRS mandatory minimum standards and in accordance with the at-home safeguards that the Commission adopted on March 23, 2017.²

Background. In the *VRS Improvements Report and Order*, the Commission authorized a voluntary pilot program, permitting VRS providers to hire qualified CAs to handle VRS calls from at-home work stations, subject to specified safeguards, for a twelve-month period, beginning November 1, 2017, and ending October 31, 2018.³ For any month of the program, a participating VRS provider may be compensated for minutes served by at-home CA workstations up to a maximum of *either* 30 percent of a VRS provider's total minutes for which compensation is paid in that month *or* 30 percent of the provider's average monthly minutes for the 12 months ending October 31, 2017, whichever is greater.⁴ The Commission will gather data as the pilot proceeds to inform a final determination on whether to make this program permanent.⁵

Under the *VRS Improvements Report and Order*, each VRS provider interested in participating in the at-home call handling pilot program is required to notify the Commission in advance, and must submit a detailed plan explaining how the provider's management of at-home work stations will satisfy the TRS mandatory minimum standards, guarantee call confidentiality, and protect against waste, fraud, and abuse.⁶

¹ See Notification of CSDVRS, LLC, d/b/a ZVRS (ZVRS), Intent to Participate in Voluntary At-Home VRS Call Handling Pilot Program, CG Docket Nos. 10-51 and 03-123 (filed Sept. 1, 2017) (ZVRS Notification); Notification of Purple Communications, Inc. (Purple), Intent to Participate in Voluntary At-Home VRS Call Handling Pilot Program, CG Docket Nos. 10-51 and 03-123 (filed Sept. 1, 2017) (Purple Notification); 47 CFR § 64.604(b)(8)(ii).

² See 47 CFR § 64.604(b)(8)(i) (setting forth what information must be included in these plans); *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, Order, 32 FCC Rcd 2436 (2017) (*VRS Improvements Report and Order*); see generally 47 CFR § 64.604(b)(8) (rules governing the at-home call handling pilot program).

³ 47 CFR § 64.604(b)(8).

⁴ 47 CFR § 64.604(b)(8)(iii).

⁵ *VRS Improvements Report and Order*, 32 FCC Rcd at 2455-56, para. 46; 47 CFR § 64.604(b)(8)(viii), (ix).

⁶ 47 CFR § 64.604(b)(8)(i).

The plans submitted by ZVRS and Purple contain the following nine elements required by section 64.604(b)(8)(i) of the rules:

- (A) A description of the screening process used to select CAs for the at-home call handling program;
- (B) A description of specific training to be provided for at-home CAs;
- (C) A description of the protocols and CA expectations developed for the at-home call handling program;
- (D) A description of the grounds for dismissing a CA from the at-home program and the process for such termination in the event that the CA fails to adhere to applicable requirements;
- (E) A description of all steps that will be taken to install a workstation in a CA's home, including evaluations that will be performed to ensure all workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions;
- (F) A description of the monitoring technology to be used by the provider to ensure that off-site supervision approximates the level of supervision at the provider's call center;
- (G) An explanation of how the provider's workstations will connect to the provider's network, including how they will be integrated into the call center routing, distribution, tracking, and support systems, and how the provider will ensure system redundancy in the event of service disruptions in at-home workstations;
- (H) A signed certification by an officer of the provider that the provider will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program; and
- (I) A commitment to comply with all other safeguards enumerated in section 64.604(b)(8) of the Commission's rules and the Commission's other rules governing TRS, as applicable.⁷

After reviewing these plans, we find that ZVRS and Purple have sufficiently demonstrated that their use of at-home work stations will comply with the Commission's standards and safeguards.⁸ Therefore, we grant each of these providers authorization to participate in the VRS at-home call handling pilot program.⁹

We emphasize that ZVRS and Purple must continue to operate in compliance with all personnel, technical, and environmental safeguards, as well as all monitoring and oversight obligations for operating at home work stations, as set forth in section 64.604(b)(8) of the rules,¹⁰ and all other applicable mandatory minimum standards.¹¹ In addition, ZVRS and Purple must each file monthly reports and one

⁷ See 47 CFR § 64.604(b)(8)(i); ZVRS Notification, Exhs. A-I; Purple Notification, Exhs. A-I.

⁸ See *VRS Improvements Report and Order*, 32 FCC Rcd at 2462, para. 56.

⁹ ASL Services Holdings, LLC dba GlobalVRS (GlobalVRS) also filed a notification of intent to participate in the at-home call handling pilot program. Notification of GlobalVRS, Intent to Participate in Voluntary At-Home VRS Call Handling Pilot Program, CG Docket Nos. 10-51 and 03-123 (filed Sept. 1, 2017) (GlobalVRS Notification). We are still in the process of reviewing the GlobalVRS Notification for compliance with all Commission requirements set forth in the *VRS Improvements Report and Order* and 47 CFR § 64.604(b)(8).

¹⁰ 47 CFR § 64.604(b)(8); *VRS Improvements Report and Order*, 32 FCC Rcd at 2458-61, paras. 52-54.

¹¹ See 47 CFR § 64.604(b)(8)(ii) (granting Commission authority to cancel the authorization for failure to comply with section 64.604(b)(8) of the rules or other applicable mandatory minimum standards).

six-month report providing updated information about their implementation of this program, as required by sections 64.604(b)(8)(viii) and (ix) of the Commission's rules.¹²

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Additional Information. For additional information, please contact Eliot Greenwald, Disability Rights Office, Consumer and Governmental Affairs Bureau, at (202) 418-2235, or email at Eliot.Greenwald@fcc.gov.

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¹² 47 CFR § 64.604(b)(8)(viii), (ix); *VRS Improvements Report and Order*, 32 FCC Rcd at 2462-63, paras. 57-58.