

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals)	
With Hearing and Speech Disabilities)	
)	
Structure and Practices of the)	CG Docket No. 10-51
Video Relay Service Program)	

To: Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program

**APPLICATION OF ASL SERVICES HOLDINGS, LLC DBA GLOBALVRS,
FOR FULL CERTIFICATION TO PROVIDE VIDEO RELAY SERVICE**

Angela Roth, President and CEO
Gabrielle Joseph, Vice President and COO
ASL Services Holdings, LLC dba GlobalVRS
3700 Commerce Blvd., Suite 216
Kissimmee, Florida 34741
Telephone: (407) 518-7900 ext. 201

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SUMMARY

ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS”) submits its Application for full certification as a provider of Video Relay Service (“VRS”) eligible for compensation from the Interstate Telecommunications Relay Service Fund (“TRS Fund”) on a non-conditional basis. GlobalVRS has responsibly provided VRS as a TRS Fund eligible provider on a conditional basis for nearly eight years. As demonstrated herein, GlobalVRS fully meets the Commission’s requirements, including applicable mandatory minimum standards, for TRS Fund eligibility. GlobalVRS has welcomed the Enforcement Bureau’s findings, and fully embraced them to ensure that the Company remains fully compliant and provides the best calling experience possible.

A grant of GlobalVRS’s Application is in the public interest and will ensure that the Company remains an ethical, responsible, and compliant provider to the Deaf, Hispanic Deaf, and Deafblind communities. GlobalVRS respectfully requests that the Commission grant its Application on an expedited basis.

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I. INTRODUCTION

ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS” or “Company”), pursuant to Section 64.606(a)(2) of the Commission’s rules¹ and paragraph 21(a) of the Commission’s February 1, 2019 Consent Decree in File EB-TCD-15-00020482 (“Consent Decree”),² hereby submits its Application to the Commission for full, non-conditional certification as a provider of Video Relay Service (“VRS”) eligible for compensation from the Interstate Telecommunications Relay Service Fund (“TRS Fund”) on a non-conditional basis.

GlobalVRS is a privately-owned, woman and minority-owned, Florida limited-liability company with its permanent headquarters located at 3700 Commerce Blvd., Suite 216, Kissimmee, Florida 34741. GlobalVRS is a subsidiary of American Sign Language Enterprises, LLC.³

GlobalVRS has provided VRS since 2008 throughout the U.S., including Puerto Rico, initially through a partnership agreement with TRS Fund eligible providers Hands on - VRS/Purple, and then with CSDVRS, LLC d/b/a ZVRS. In November 2011, GlobalVRS was granted conditional eligibility for compensation from the interstate TRS Fund., and continues to provide VRS under this conditional certification.⁴ GlobalVRS provides English and Spanish VRS, with a primary focus and expertise in providing VRS to underserved Spanish language VRS users whose options for professional, native Spanish language VRS are exceptionally limited. GlobalVRS employs bi-lingual (English and American Sign Language and Spanish and American

¹ 47 C.F.R. §64.606(a)(2).

² *In the Matter of ASL Services Holdings, LLC dba GlobalVRS*, File No. EB-TCD-15-00020482, *Order*, DA 19-28 adopting *Consent Decree* [*Consent Decree*].

³ GlobalVRS’s operations are entirely independent from those of its previous affiliates. *See* discussion at Section V, *infra*.

⁴ *See, Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, *Public Notice* DA 1902 (November 15, 2011). The Company initiated the provision of TRS Fund-compensable VRS in December 2011.

Sign Language) and tri-lingual (English, Spanish and American Sign Language) Communications Assistants (“CAs”)⁵ with strong ties to the Deaf and Hard-of-Hearing community. The Company is also the only Company specializing in serving the Deafblind Community.

All of GlobalVRS’s CAs are qualified and experienced. interpreters who maintain qualifications including, but not limited to, Registry of Interpreters for the Deaf (“RID”), National Association of the Deaf (“NAD”), Educational Interpreter Performance Assessment (“EIPA”), Board for Evaluation of Interpreters Quality Assurance Screening from the Florida Registry of Interpreters for the Deaf (“FRID”), and other similar state organization qualifications throughout the U.S. All CAs have completed, and remain subject to, additional evaluations through GlobalVRS’ internal testing/screening standards. In addition to an experienced and diverse workforce, GlobalVRS has also developed innovative software to support both fixed and mobile VRS through commercially available devices, as well as through other provider proprietary devices. The Company currently serves subscribers through three national call centers.

On February 1, 2019, GlobalVRS entered into a Consent Decree with the Commission’s Enforcement Bureau (“Bureau”) to resolve the Bureau’s investigation into GlobalVRS’s compliance processes and interoperability. The Bureau’s investigation did not find willful misconduct, but did identify weaknesses in GlobalVRS’ procedures that contributed to findings of non-compliance in those areas.

GlobalVRS has taken its compliance obligations seriously as an Internet-based VRS provider. With the benefit of the Bureau’s review, GlobalVRS has developed a detailed compliance plan to document its specific policies, practices, and procedures to resolve the

⁵ For purposes of the instant Application, GlobalVRS adopts the general term “Communications Assistant” in accordance with the Commission’s rules. GlobalVRS otherwise uses the term “Video Interpreter” when referring to its interpreters as more accurately reflecting the functions performed with VRS interpreting.

deficiencies identified by the Bureau and ensure its full compliance with Commission rules. Further, GlobalVRS is documenting its processes through additional operating procedures for employees, an operations compliance manual, and employee training in conjunction with periodic reporting and Bureau review, ensuring that the Company's processes are deemed compliant with applicable Commission rules, orders, and policy, consistent with the Consent Decree's directives.

This Application is submitted in accordance with the Consent Decree directives and to refresh the record regarding GlobalVRS compliance. GlobalVRS will continue working diligently with the Commission Enforcement Bureau, the Consumer and Government Affairs Bureau and its designees, Office of Managing Director, and with the Fund Administrator to ensure ongoing compliance. Since its inception, GlobalVRS has endeavored to fully comply with applicable Telecommunications Relay Service program Commission regulations and policies. Resolution of the issues identified through the Bureau's investigation now ensures GlobalVRS' full compliance and enhanced processes and systems to support ongoing compliance on a non-conditional basis.

The public interest is served by granting GlobalVRS' Application. As described below, GlobalVRS meets the Commission's Mandatory Minimum Standards and additional requirements for certification as a Fund eligible VRS provider, as may be further confirmed by Commission through the Company's compliance with the Consent Decree and in conjunction with its coordination with the Enforcement Bureau. Further, GlobalVRS has demonstrated its effectiveness in serving the needs of the Deaf, Hard-of-Hearing, and special needs of the Deafblind, and Spanish language Deaf communities through the provision of professional, bi-lingual and tri-lingual skill sets within VRS for more than ten years. In light of its long-standing provision of VRS, its compliance with Commission rules – now with the benefit of the Bureau's findings and ongoing oversight, and an established compliance plan, GlobalVRS respectfully

requests that the Commission grant its request for full certification as a VRS provider eligible for TRS Fund reimbursement on a non-conditional basis.

In support of its Application, GlobalVRS provides the following information in accordance with Section 64.606(a)(2) of the Commission’s rules.

II. DESCRIPTION OF THE FORMS OF TRS TO BE PROVIDED (47 C.F.R. §64.606(a)(2)(i)).

GlobalVRS currently provides, and seeks to continue providing, TRS Fund-eligible Internet-based VRS.⁶ GlobalVRS currently provides VRS to English and Spanish speaking Deaf, Hard-of-Hearing, and Deafblind subscribers and is prepared to service qualified Hearing point-to-point subscribers. The Company specializes in the provision of Spanish VRS through native Spanish language bi-lingual and tri-lingual interpreters, who are inherently attuned to the nuances of Spanish language interpretation and service to the Deafblind Community

GlobalVRS provides VRS on a perpetual basis via wireline or wireless high-speed broadband Internet access services through any fixed or mobile commercial or proprietary VRS provider device. GlobalVRS’ free “MyMMX” VRS software application enables users to easily access GlobalVRS’s skilled CAs to complete VRS calls, Registered Users’ own account information through secure password protected access, and to access to GlobalVRS’ customer care representatives.

GlobalVRS [REDACTED]

[REDACTED] to support continual service. GlobalVRS maintains

⁶ GlobalVRS does not propose providing IP CTS and does not address the requirements set forth in Section 64.606(a)(2)(ii)(F) of the Commission’s rules, 47 C.F.R. §64.606(a)(2)(ii)(F), accordingly. GlobalVRS does not furnish related customer premises equipment. The requirements set forth in Section 64.607, 47 C.F.R. §64.607, do not apply.

automated systems to report usage, support customer service inquiries, and enhance service quality, while ensuring that calls are answered within Commission-established speed of answer requirements, as set forth in Section 64.604(b)(2) of the Commission’s rules, and detailed below.⁷

III. DETAILED DESCRIPTION OF HOW THE PROVIDER WILL MEET ALL NON-WAIVED MANDATORY MINIMUM STANDARDS (47 C.F.R. §64.606(a)(2)(ii)).

GlobalVRS currently meets or exceeds all non-waived VRS mandatory minimum standards (“MMS”) as set forth in Section 64.604 of the Commission’s rules⁸ and other applicable regulations, as detailed below. Through the course of its more than seven years of service as an Internet-based TRS Fund eligible (“iTRS”) VRS provider and interaction with the TRS Fund Administrator, the Enforcement Bureau and Consumer and Government Affairs Bureau, Consumer Groups, and other providers, GlobalVRS’ compliance is well documented and established as a matter of record with the Commission.⁹

A. Operational Standards - 47 C.F.R. §64.604(a)

1. Communications Assistants - 47 C.F.R. §64.604(a)(1).

CA competency is paramount to the provision of exceptional VRS to individuals with hearing, Deafblind, and speech impairments. To that end, GlobalVRS is committed to maintaining rigorous proficiency standards that the Company’s CAs are expected to meet. Well-skilled and well-trained CAs and support staff are critical to the provision of exceptional service, call accuracy, and ultimately to an enhanced caller experience. GlobalVRS continues to employ an intensive screening process to select only well-qualified interpreters that exceed minimum typing, grammar, and interpretation skills and provide ongoing training to ensure interpreters' skills are effective and constantly improving.

GlobalVRS’s bi-lingual (English-American Sign Language (“ASL”) and Spanish-ASL) and tri-lingual (English-ASL-Spanish) CAs hold qualifications including, but not limited to, Registry of Interpreters for the Deaf (“RID”), National Association of the Deaf, Education

⁷ 47 C.F.R. §64.604(b)(2).

⁸ 47 C.F.R. §64.604.

⁹ GlobalVRS’s compliance will be detailed further through its compliance plan and compliance and operations manuals to be presented to the Enforcement Bureau and made available to the Consumer and Government Affairs Bureau.

Interpreter Performance Assessment, Board for Evaluation of Interpreters (“BEI”),¹⁰ and Quality Assurance Screening from the Florida Registry of Interpreters for the Deaf (“FRID”), as well as other similar state organizations throughout the country. Bi-Lingual CAs who have Spanish-ASL skill sets are subject to additional internal screening and testing standards developed by GlobalVRS over the course of its history of employing Spanish language interpreters. As there currently are no nationally recognized testing standards or certifications applicable to Spanish-to-ASL translation, GlobalVRS utilizes its own internal screening standards to ensure Spanish-ASL bi-lingual proficiency. These screening standards were developed by the Company’s Chief Executive Officer and President, Angela Roth, based on her more than 30 years of experience in the Sign Language industry.¹¹

A majority of GlobalVRS CAs have extensive VRS interpreting experience, and have worked with GlobalVRS for several years, many since GlobalVRS began providing VRS. All CAs are subject to periodic evaluations and quality assurance reviews by Deaf and hearing supervisors to verify skills and approach. Personality screening is also performed on supervisors to better understand and match management styles needed to maintain a productive work environment, thus enhancing CA interaction with Deaf and Hard-of-Hearing clients. GlobalVRS also frequently requests customer feedback regarding the CAs’ demeanor and skill.

These measures are intended to ensure that all CAs are capable of meeting specialized communication needs of Deaf, Hard-of-Hearing, and Deafblind individuals by interpreting effectively, accurately and impartially, both receptively and expressively using any required specialized vocabulary.¹² Consistent with the Commission’s MMS, all GlobalVRS CAs have competent grammar and spelling, have a strong, native, understanding of the cultures, languages and etiquette of individuals who are Deaf, Hard-of-Hearing or have speech disabilities, and possess

¹⁰ Developed by the Department of Assistive and Rehabilitative Services, Office for the Deaf and Hard of Hearing (Texas).

¹¹ Ms. Roth has served two terms as the RID National Certification Board Chair, served as the Chair for the RID Diversity Council and also as the National Hispanic Team Leader and consultant for the 5-year long Federal National Multicultural Interpreting Project. Ms. Roth served as a consultant for the BEI Trilingual test development and has also served on the Florida Licensure task force. Her experiences, particularly her involvement in developing certification standards, make her uniquely qualified to develop a screening standard by which to evaluate the skills and proficiency of CAs delivering ASL and Spanish VRS services.

¹² 47 C.F.R. §64.604(a)(1)(iv).

clear and articulate voice communication.¹³ CAs must also be sensitive to customer needs and be able to work well under pressure. Failure to meet these skill levels will result in an interpreter being deemed unqualified for GlobalVRS.

Newly hired CAs are trained on subjects including basic information about GlobalVRS, VRS history, specific training on regulatory requirements including, but not limited to, speed of answer, minimum call interpretation time, emergency calling procedures, and an overview of Company technology, compliance processes, and data confidentiality, among other topics, prior to being assigned to interpret calls. Following classroom instruction, all new interpreters receive extensive hands-on training under an approved training syllabus, provided by a GlobalVRS trainer. GlobalVRS's training environment provides trainees with the identical platform and tools used when serving callers. This ensures a safe learning environment that does not jeopardize or degrade customers' GlobalVRS experience, yet enhances the CA's skills. Only when the trainer has determined that the CA is ready to interpret live calls, will the CA be allowed to begin interpreting calls, and then under the initial supervision of an experienced supervisor or senior interpreter.

Post training, the CAs are fully supported by the experienced interpreting team. Experienced CAs will readily make themselves available for team interpreting, observation, case conferencing and overall support. All newly hired CAs are subject to a mandatory 90-day probationary period. During this period, the CA is evaluated in three areas: Technical skill, overall professional demeanor, and quality of service to clients. If necessary, extended probation will be given to the CA until they are completely proficient in all three evaluated areas.

GlobalVRS ensures that all CAs are routinely trained and knowledgeable about service requirements including, but not limited to, confidentiality, staying with calls for a minimum of ten minutes, and other requirements set forth in Section 64.604(a)(1) of the regulations. Initial training and regular updates on Commission rules are provided to CAs on a scheduled and *ad hoc* basis as needed. GlobalVRS further enhanced its regulatory compliance training as part of its initial and ongoing training program in conjunction with the draft Consent Decree obligations in the fourth quarter of 2018.

¹³ 47 C.F.R. §64.604(a)(1)(ii).

GlobalVRS uses its best efforts to accommodate users' requests for specific CA gender both at call initiation and at transfer, if necessary. GlobalVRS meets all other applicable Section 64.604(a)(1) obligations.

2. Confidentiality and Conversation Content -- 47 C.F.R. §64.604(a)(2).

CAs are expressly prohibited from disclosing the contents of any relayed conversation, of keeping records of the content of calls beyond their duration, and/or intentionally altering a relayed conversation. GlobalVRS instructs all CAs to ensure that all conversations are translated verbatim unless directed otherwise by the callers, as is required by the Commission's rules and engages in periodic spot check monitoring of CA calls by supervisors or senior CAs to verify compliance.

All CA work stations are located in physically segregated areas that do not allow anyone other than the CA(s) engaged in the call to see or hear the caller or called party. GlobalVRS, through its comprehensive training modules and supervision, ensures that its CAs strictly adhere to call confidentiality requirements. Further, GlobalVRS also requires all CAs to sign and abide by the RID Code of Professional Conduct, which includes call confidentiality obligations. CAs also receive initial and annual training on the Commission's Customer Proprietary Network Information regulations addressed below, as part of the Company's regulatory training.

3. Types of Calls -- 47 C.F.R. §64.604(a)(3).

Notwithstanding the Commission's Types of Calls Requirement waiver,¹⁴ GlobalVRS interpreters do not refuse single or sequential calls or otherwise limit the length of calls. All calls, including long distance calls, are, and will continue to be, completed without charge to the User. GlobalVRS has demonstrated its ability to interpret all non-waived call types and has the established experience to continue interpreting non-waived call types.

¹⁴ See *Telecommunications Relay Services And Speech to Speech Services for Individuals with Hearing and Speech Disabilities; Waivers of Mandatory Minimum Standards*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, [29 FCC Rcd. 10697](#), 10703-04; 10705 (2014)(*iTRS Exemption Order*).

4. Types of Calls - Voice Mail and Interactive Menus; Three way calling, Speed dialing and Video Mail features -- 47 C.F.R. §64.604(a)(3)(vii).

GlobalVRS offers three-way calling, speed dialing functionality, and video mail to its Registered Users.¹⁵

Three-way calling: GlobalVRS provides three-way calling capabilities for all callers. At the instruction of the inbound caller, GlobalVRS can connect up to two additional parties to any call (audio or video) and perform a three-way call.

Speed dialing functionality: GlobalVRS's VRS software application allows speed dialing. GlobalVRS's Registered Users are able to access their GX-Pro application address book and select added/saved contacts. The Registered User then has the option of selecting a contact in their address book or manually adding a telephone number into GlobalVRS's MyMMX® automatic call distribution platform and make an outbound call that will connect to a GlobalVRS CA. Under either scenario, the Registered User's desired telephone number will then auto populate the CAs outbound call screen. The CA can simply connect the call without having to ask what number the caller has dialed. GlobalVRS also offers "Quick Dial" through its software applications. This feature allows Registered Users to assign their favorite contacts a number between 1 and 9. Instead of having to go to their address book and locate the contact, they can simply dial the number assigned to that contact and the telephone information will automatically appear on the CAs screen to complete the call.

Video Mail: GlobalVRS provides video mail to all Registered Users. Video mail is automatically available by default. Yet Registered Users have the option to disable voice mail using the settings in the GlobalVRS "MyMMX" application. If a Registered User receives video mail, the Registered User will receive a notification when accessing the GlobalVRS application and can easily select to open/view their messages.

Interactive Menus: GlobalVRS provides a dual tone multi-frequency feature for the Registered User to press "hot keys" when interactive menus (phone trees) are present in lieu of the CA having to select the numbers for the caller.

¹⁵ As used herein, a "Registered User" is an individual who has selected GlobalVRS as its default provider, has completed the Company's registration process pursuant to 47 C.F.R. §64.611, and whose registration has been accepted by the Telecommunications Relay Services – User Registration Database Administrator as eligible to place TRS-Fund reimbursable calls. "Users" as used herein, refers to GlobalVRS Registered Users and those who are registered users of other Internet-based VRS providers but use GlobalVRS's VRS service on a "dial around" basis.

X-Card: X-Card allows Registered Users to port their address books from one provider to another. GlobalVRS has worked collaboratively with providers to ensure X-Card compliance within its platform and software application.

Importing X-Card/V-Card: Using GlobalVRS’s personal computer software application, the Registered User access contacts, selects the “myContacts” button, the “import” button, and the selected X-Card/V-Card is saved on their device. Once selected, Registered Users has access to their address book on the GlobalVRS software application. The Company has also adopted the standard “X-Card” export interface to enable Registered Users to import their contact lists in X-Card XML format.¹⁶

Exporting X-Card: Registered Users have two options:

1. X-Card: Registered Users direct their web browsers to <https://globalvrs.tv/contact/export/xcard> website, login to their account using a user name and passcode and the X-Card file is automatically downloaded.

2. V-Card: Registered Users login on to their account via a personal computer or mobile device, go to contacts, select “myContacts,” select the export button, type a name to save the file, and select “Save.” V-Cards are then saved on the Registered User’s device.

GlobalVRS ensures that CAs immediately inform VRS users of the presence of any recorded messages and relay information conveyed by the recording when the caller places a call. Similarly, GlobalVRS ensures that CAs inform callers of any interactive menus that may be encountered in placing a call and assist callers with working through the menu to route their call to the preferred location or retrieve the information they want. GlobalVRS CAs are also trained and directed to assist VRS users in leaving voice messages on voice mail systems.

5. Emergency Call Handling for TTY-Based TRS Providers 47 C.F.R. §64.604(a)(4).

GlobalVRS partners with Bandwidth.com, <https://www.bandwidth.com/>, a nationally-recognized emergency 911 platform provider, to provide compliant emergency VRS access to the Public Safety Answering Point serving the registered location of each Registered User.

¹⁶ 47 C.F.R. §64.621((b)(2).

GlobalVRS' compliance with this requirement and the Commission's emergency calling requirements pursuant to section 64.605 are addressed in detailed below.

6. STS Called Numbers -- 47 C.F.R. §§64.604(a)(5); 64.604(b)(7).

The Commission has waived for VRS providers, the requirement under this provision of the regulations that CAs maintain a list of names and telephone numbers speech-to-speech ("STS") users call.¹⁷ Should this waiver end, GlobalVRS will comply with any established requirement.

7. Visual privacy screens/idle calls. -- 47 C.F.R. §64.604(a)(6).

CAs are strictly prohibited from using privacy screens. In the event that callers enable a privacy screen or feature that obfuscates the caller, or in instances where a caller is unresponsive or unengaged for more than five minutes, CAs are instructed to terminate such calls immediately. The only exception to immediate termination is if the call has been established to be of an emergency nature or if the caller is legitimately on hold and the Registered User is present and awaiting call initiation. When terminating a call when a caller is unresponsive or unengaged for more than five minutes, the CA must announce his/her intent to disconnect a call unless a party indicates the desire to continue the call. When terminating such calls CAs must document the date, time, and reason for termination using an GlobalVRS form available from each work station via the Company's intranet.

8. International Calls. -- 47 C.F.R. §64.604(a)(7).¹⁸

Registered Users are informed of the requirements associated with placing VRS calls using GlobalVRS when traveling outside of the U.S. when contacting a Customer Care representative or

¹⁷ *iTRS Exemption Order*, para. 53.

¹⁸The Enforcement Bureau's investigation revealed that additional verification would enhance compliance, though did not find that GlobalVRS had violated Commission requirements governing international travel. GlobalVRS has enhanced its international travel verification process accordingly.

a CA. Registered Users must pre-register for international calling by completing a *Permission to Travel-Call/ Extension Form* no less than two days prior to travel with GlobalVRS Customer Care. The International travel request asks the Registered User to indicate the dates of travel and reason for making the request. Requests are limited to a three week period. Upon receipt of the *Permission to Travel-Call Form*, Customer Care verifies that the Registered User is a U.S. resident. No *Permission to Travel-Call Form* is approved unless fully completed and verified by GlobalVRS. International travel *Permission to Travel-Call Form* is documented in GlobalVRS's "At A Glance" ("AAG") intranet for access by CAs and also as a printed document provided to each CA.

The AAG intranet is available to all CA's in all centers. It is used to post pertinent information that a CA might need while on a call. CAs can easily reference at any time to verify which users are currently under a Traveler's Permit.

The information is also posted as a hard copy notification of CAs and placed in every station in all centers. The GlobalVRS Lead trainer is responsible to add the Traveler's Permission to the AAG for Interpreter reference.

On the designated departure date, Customer Care is then responsible to whitelist the Traveler's assigned ten-digit number ("TDN") from GlobalVRS's automatic call distribution platform. A calendar reminder for each traveler's return date/time is created to ensure that the international whitelist designation is removed upon the Registered User's return date.

Should a user attempt to place international calls without being whitelisted on the platform, the platform will automatically detect the Internet Protocol ("IP") address as an international IP address and prohibit the user from placing a call. GlobalVRS CAs are also trained to reject any VRS call originating from an international Internet Protocol address unless the call is initiated by a

Registered User who has pre-registered with GlobalVRS to place international calls during specified time periods and within specified regions. GlobalVRS CAs are trained to identify and report potentially fraudulent calls to senior management, who coordinate with the Commission. Per collaboration with the Enforcement Bureau further automation enhancements are also underway in 2019.

B. Technical Standards - 47 C.F.R. §64.604(b)

1. ASCII and Baudot - 47 C.F.R. §64.604(b)(1).

The ASCII and Baudot communication requirement contained in this rule is waived for VRS.¹⁹

2. Speed of Answer-- 47 C.F.R. §64.604(b)(2).

GlobalVRS has, and will continue to, ensure that it meets or exceeds the 80 percent within 120 seconds response time for VRS, measured monthly pursuant to 47 C.F.R. §64.604(b)(2)(iii). GlobalVRS submits speed of answer (“SoA”) statistics in its monthly filing with the Fund Administrator that demonstrates ongoing compliance. GlobalVRS’ internal SoA goal is to personally answer all calls within thirty seconds, far exceeding the current standard applicable to VRS. GlobalVRS has not only exceeded the current SoA requirement of 120 seconds, but set the bar even higher to ensure fast response time.

GlobalVRS consistently meets a [REDACTED], measured monthly. GlobalVRS’s exceptional SoA is based on staffing procedures that ensure ample coverage, even during peak usage periods.

- GlobalVRS has developed a SoA report that reflects SoA within 10 seconds, 30 seconds, 60 seconds and 120 seconds intervals Reports are reviewed daily and summarized in a Daily Administration Report (“DAR”). The DAR reflects the daily SoA average for all calls answered under 60 seconds, under 30 seconds and under 10 seconds. The DAR also evaluates the CA’s SoA performance and reflects a per CA average for each que. Example:

¹⁹ *iTRS Exemption Order*, para. 54.

[REDACTED]

- GlobalVRS conducts weekly forecasting meetings to closely monitor workforce scheduling. In these meetings, managers monitor call volume, number of CAs scheduled, length of calls, abandoned calls on an hour by hour basis. Adjustments are made to ensure the proper staffing is available for the upcoming week as needed.
- In instances of un-anticipated spikes in call volume, GlobalVRS designates a Scheduling Team available during and after business hours who can coordinate “on Call” Staff Interpreters to be called in and support as needed.

GlobalVRS’s automatic call distribution platform uses an automated monitoring system which continually measures SoA with regular reports provided to GlobalVRS. GlobalVRS continually monitors calling trends to schedule sufficient operators to ensure ongoing compliance.

3. Equal Access to Interexchange Carriers -- 47 C.F.R. §64.604(b)(3).

Equal access to interexchange requirements has been waived for VRS providers, so long as they do not charge for long distance calls. GlobalVRS does not charge users for long distance service or placing VRS calls.²⁰ Further, the Commission’s ten-digit number assignment requirements necessarily make GlobalVRS its Registered Users’ “presubscribed” – default VRS provider.

²⁰ *iTRS Exemption Order*, para. 16.

4. TRS Facilities -- Continuous Operations -- 47 C.F.R. §64.604(b)(4).

GlobalVRS operates on a perpetual basis, accepting calls twenty-four hours a day, seven days a week through its call centers. The Company's call centers rely on equipment, system, and facility redundancy to ensure continual operation. Call centers are supported by uninterruptable emergency power backup generators and batteries, and redundant broadband Internet access to secure cloud-based data storage to ensure continuous operations.

GlobalVRS' call centers utilize commercial-sized power generators with battery back-up power available in the event of a power outage. Each generator is capable of powering the call center for at least three hours in the event of an outage. GlobalVRS' primary [REDACTED] call center is located in a building with two separate power grid systems to minimize the likelihood of power interruptions. Additionally, GlobalVRS has a built-in redundancy to ensure that, in the event of an interruption at a call center, calls may be immediately routed to a non-affected call center. Managers are on-call 24 hours a day 7 days a week to ensure services remain operational.

GlobalVRS's automatic call distribution platform resides on secure, redundant, and fully accessible [REDACTED] cloud-based servers to ensure uninterrupted operation under virtually any circumstance.²¹

The platform is supported by technical staff that is intimately knowledgeable with the platform and its operations and has the capability of ensuring that the platform remains fully operational at all times.²²

²¹ See, GlobalVRS Substantive Change Notice (March 22, 2018).

²² Pursuant to 47 C.F.R. §64.604(b)(4)(iv), a copy of GlobalVRS's lease of its automatic call distribution platform is attached here to at Attachment 3.

Since its inception, GlobalVRS has maintained continual operations, even in the face of two catastrophic hurricanes that affected its Puerto Rico call centers.

5. Technology -- 47 C.F.R. §64.604(b)(5).

GlobalVRS leases an advanced, comprehensive automatic call distribution platform,²³ functionality robust, scalable, and adaptable to ongoing requirements and user needs. GlobalVRS’s “MMX®” automatic call distribution platform maximizes current video, voice, and transmission processing technology to improve the calling experience. GlobalVRS has worked with nWise to further enhance system capabilities with applications enabling use of the Company’s VRS with commercial and proprietary VRS provider mobile and fixed devices, and continues to make service enhancements based on Registered User recommendations and the Company’s own innovative approach to provide the best possible calling experience. Commensurate with industry goals, GlobalVRS has discontinued use of H323 technology and fully implemented Session Initiation Protocol (SIP) Standards in accordance with the SIP Protocol created through provider cooperation.^{24 25} GlobalVRS is currently the only known provider with Braille display compatibility.

6. Caller ID - 47 C.F.R. §64.604(b)(6).

GlobalVRS transmits Caller ID on all calls. This is accomplished by transmitting the Registered User’s assigned ten-digit number when placing an outbound call. In the rare instance

²³ Developed by nWise AB, a Swedish technology company that provides relay service platforms throughout Europe, Asia, and the U.S. nWise has partnered with GlobalVRS since GlobalVRS inception to design secure, compliant, versatile and scalable VRS that complies with Program regulations.

²⁴ 47 C.F.R. §64.621(c).

²⁵ GlobalVRS utilizes SIP for call signaling and does not directly utilize SS7 technology. GlobalVRS's platform is capable of supporting SS7 technology (*i.e.* calls come in with Blocked Caller ID, not showing the respective ten-digit telephone number to the agent or the hearing party, but keeping the necessary data for reporting to the Commission).

where a Registered User enables the ability to block caller ID on other provider technology, GlobalVRS’s automatic call distribution platform can still successfully negotiate the call signaling and capture the corresponding ten-digit number and required information for reporting, even though the caller ID will appear as anonymous to the outbound caller.

7. Voluntary at-home VRS call handling pilot program - 47 C.F.R. §64.604(b)(8).

GlobalVRS has identified experienced interpreters who are qualified to participate in the at-home VRS call handling program. GlobalVRS is prepared to designate qualified interpreters to engage in the Commission’s voluntary at-home call handling pilot program (“Program”) as set forth in Section.64.604(b)(8) of the Commission’s rules, to the extent that the Program period is extended and GlobalVRS is authorized to participate in the Program.²⁶

C. Functional Standards - 47 C.F.R. §64.604(c)

1. Complaint Log - 47 C.F.R. §64.604(c)(1).

GlobalVRS maintains a log of all consumer complaints received. The consumer complaint log lists the date the complaint was filed, the nature of the complaint, an explanation of how the complaint was resolved, the date resolved, and employee responsible for resolution. The Company has further instituted a senior management review of all complaints to ensure that the complaint has been resolved and to understand the basis for the complaint and whether system amendments or improvements are needed. GlobalVRS will continue to submit to the Commission a report of the number of complaints received annually on or before July 1 of each year. These reports have been submitted to the Commission since the Company was first granted conditional eligibility. Additionally, GlobalVRS will include a complete statement of the facts and supporting data, where available, in response to any informal or formal complaints received by the Commission and

²⁶ See, *Structure and Practices of the Video Relay Service program*, CG Docket No. 10-51: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *Petition of ASL Services Holdings, LLC dba GlobalVRS on an Expedited Limited Waiver to Offer At-Home Interpreting Subject to the Conditions of the Pilot Program* (March 19, 2019).

directed to the Company. GlobalVRS provides information on the complaint process to its users, including providing links to the Commission's complaint web site.

2. Contact Person - 47 C.F.R. §64.604(c)(2).

The designated GlobalVRS contact person to coordinate with the Commission, its designees and the TRS Fund Administrator is:

**Gabrielle Joseph
3700 Commerce Blvd.,
Kissimmee, Florida 34741
Phone: 407-518-7900 x 321
E-Mail: gabrielle@aslservices.com**

Ms. Joseph serves as Chief Operations Officer and has been designated Company Compliance Officer.

3. Public Access to Information and Consumer Outreach 47 C.F.R. §64.604(c)(3).

GlobalVRS continues to engage in an active consumer information campaign to educate the public with significant effort made in outreach to underserved Spanish language Deaf and Hard-of-Hearing and Deafblind communities.

GlobalVRS communicates with its stakeholders through direct contact – in community interpreting environments, through private and governmental agencies that support the Deaf and Hard-of-Hearing and Deafblind communities.

Further, GlobalVRS engages in the following consumer outreach initiatives:

- Senior managers represent the Company in Deaf community trade shows and are frequent speakers on Deaf issues;
- GlobalVRS' founder, Angela Roth, writes periodic articles and makes presentations regarding the VRS industry and multi-culturalism;
- GlobalVRS has also created and frequently hosts workshops, open to the public, which focus on educating the public on the Americans with Disabilities Act and related industry topics;
- GlobalVRS' Website (<https://globalvrs.com/>) includes information regarding the relay service programs and requirements;

- Expo Education: GlobalVRS supports various Deaf expositions and tradeshow throughout the country. Its sponsorship assists in supporting each venue to showcase various products and services within the Deaf and Hard-of-Hearing community. In addition, GlobalVRS sends teams of interpreters to work at its booth and talk one-on-one with the Deaf and Hard-of-Hearing attendees in order to answer their questions regarding VRS. GlobalVRS also provides products, such as educational handouts, that clearly address common questions about VRS raised within the Deaf and Hard-of-Hearing community. GlobalVRS has also participated in live stage presentations where the GlobalVRS team has taught the audience on a variety of subjects including CPR survival skills, VRS vs. VRI Interpreting, ADA Laws, VRS Services and many other topics;
- Email Blasts: GlobalVRS sends periodic “email blasts” to Registered Users who authorize GlobalVRS to do so, describing GlobalVRS’ services and ways to access VRS.
- Meetings/Workshops: GlobalVRS sends representatives to a variety of locations to give in-services and workshops to interpreters, and the Deaf, Hard-of-Hearing, and business communities, explaining the differences between VRS and video relay interpreting services to promote compliance with FCC rules;
- Remote Area Education: GlobalVRS recognizes that there are many remote areas where Deaf (and Hard-of-Hearing) and Spanish Deaf (and Hard-of-Hearing) individuals live. GlobalVRS strives to reach out to Deaf and Hard-of-Hearing persons residing in rural areas, as it recognizes that other VRS providers may focus their educational efforts and resources to attract current (and potential) VRS users living in larger metropolitan areas;
- Direct Customer Service Follow-Up: GlobalVRS utilizes its Deaf and Hard-of-Hearing customer service representatives to make direct contact with VRS clients to ensure that they understand the services offered; and
- English-Spanish Translation: Indicative of its commitment to public education about the availability of tri-lingual VRS services, GlobalVRS invests considerable time and financial resources translating its educational materials, maintaining both Spanish and English versions of the GlobalVRS website, and engaging in the above community outreach activities both in English and in Spanish. GlobalVRS is also increasing video instructions in ASL.

4. Rates -- 47 C.F.R. §64.604(c)(4).

GlobalVRS does not charge, nor has it charged, to place VRS calls. GlobalVRS remains compliant with the Commission’s rule prohibiting relay service providers from charging rates that are any greater than rates paid for functionally equivalent voice communications services with respect to the duration of the call, the time of day, and the distance from the point of origination and point of termination, accordingly.

5. Jurisdictional Separation of Costs 47 C.F.R. §64.604(c)(5) (As Applicable).

Data collection and audits. 47 C.F.R. §64.604(c)(5)(iii)(D)(1). GlobalVRS has provided, and will continue to provide “true and adequate data and other historical, projected,” and rate-related information requested by the Fund Administrator necessary to determine TRS fund revenue requirements, subject to Fund Administrator Audits. Further, GlobalVRS has separately provided additional cost data to the Commission. GlobalVRS has successfully completed annual Fund Administrator audits and implemented all recommendations, most recently an audit of its user registration process in mid-October 2018.

GlobalVRS acknowledges that the Enforcement Bureau raised questions regarding certain aspects of the Company’s accounting and reporting practices. Through the efforts of the Company’s current chief financial officer, a qualified senior tax attorney hired in 2016, Global has adopted and is fully documenting enhanced practices to further ensure accurate, compliant cost reporting.

All direct expenses associated with the provision of VRS are accurately segregated and documented. All shared expenses and indirect costs are subject to detailed analysis by the Company’s Chief Financial Officer and executive management team, and allocations performed to only capture VRS related expenses, again in consultation with the TRS Fund Administrator. Payroll allocations have also been enhanced to be recorded through coding within Paycom (payroll administrator for GlobalVRS) in lieu of other previous payroll allocation methods, consistent with the Enforcement Bureau’s inquiry. Specific operating procedures have been documented to ensure consistent interpretation throughout GlobalVRS’s accounting team for proper accounting and annual Relay Services Data Request completion.

Call data required from all TRS providers 64.604(c)(5)(iii)(D)(2) to (5).

Pursuant to Section 64.604(c)(5)(iii)(D)(2), GlobalVRS's automatic call distribution platform automatically generates call detail records including all required data. These data are formatted by use of scripts according to the TRS Fund Administrator's detailed guidelines guidelines in the Interstate TRS Fund Monthly Filing Instructions. Scripts are automated and cannot be manipulated. Required monthly reports are compiled, reviewed, approved and then uploaded into the Fund Administrator's online "extranet" portal.

Current monthly reporting includes:

CDRV:	Call Data Reports
DEVS:	Listing of current devices registered with GlobalVRS.
HRUS:	Listing of current Hearing Users registered with GlobalVRS.
IPAS:	Listing of current IP addresses used by GlobalVRS operations
NUMS:	Listing of current TDN's blacklisted by GlobalVRS. Assigned ten-digit telephone numbers used to place calls that are not reimbursable including numbers assigned to affiliates and used for testing purposes, are "blacklisted" from any reimbursement.
SOAV:	Listing of speed of answering statistics for corresponding month
SIGN:	An attestation form with signature from a company officer
RLOG:	Listing of Registered Users Login Report
ILOG:	Listing of GlobalVRS Internal Login Report
CNTR:	A list of all active call centers being used to provide services

All reports are reviewed by the Company's senior engineer on a daily basis using company DAR and also on a monthly basis using company MVR- Monthly Verification Report where all data is audited. Once data auditing is completed, the submissions are certified by the Company's Chief Operations Officer who has first-hand knowledge of the data and its accuracy

All call detail records and SoA data are retained for a minimum of five years and are available for review by the Commission, the Fund Administrator, and their designees.

Audits 64.604(c)(5)(iii)(D)(6).

Since its inception, GlobalVRS has actively participated in annual TRS Fund Administrator audits and provided detailed information responsive to the auditors' requests.

GlobalVRS has enhanced its documentation procedures based on Enforcement Bureau findings to further ensure full documentation is available to auditors at the time that audits are conducted to obviate the need for post-audit requests.

Call Data Retention 64.604(c)(5)(iii)(D)(7). Pursuant to Section 64.604(c)(5)(iii)(D)(7), GlobalVRS retains all supporting documentation for a minimum of five years in secure, password-protected servers with backup copies that are available to the Commission and Fund Administrator upon request. The Company has an established data retention policy that clearly delineates data retention requirements.

Information Filed With the Administrator 64.604(c)(5)(iii)(I).

GlobalVRS's President and Chief Executive Officer or Chief Operations Officer will continue to certify under penalty of perjury that conversation minutes submitted to the Fund for reimbursement are accurate in compliance with Section 225 of the Communications Act of 1996, as amended and Commission rules, including user registration rules and rules that prohibit against financial incentives or calls intended to generate usage.

GlobalVRS maintains that it has complied with applicable statute and regulation since its inception and that its submission of reimbursable usage to the Fund Administrator has been accurate, as understood by the Company. The Enforcement Bureau's investigation revealed in principal part that GlobalVRS processes for user registrations was not reasonable under Commission rules, however unintentional. Well before the conclusion of the Commission's investigation, GlobalVRS had already amended its registration process through additional verification steps and conversion of verified data into stand-alone documents for all Registered Users. Further, GlobalVRS changed its policies to cease employee wireless service reimbursements and "blacklisted" all affiliated company VRS usage as non-reimbursable, to

ensure compliance, through procedures provided to the Enforcement Bureau. And the Company is fully documenting all procedures to ensure full compliance by all employees. The certification of accuracy by a company officer is now made with the benefit of a clear understanding of related issues raised during the Enforcement Bureau’s investigation and their resolution, as has been addressed with the Bureau.

Whistleblower Protections - 47 C.F.R. § 64.604(c)(5)(iii)(M)

GlobalVRS has an established Whistleblower Policy incorporated into the Company’s Operations Manual. This policy encourages immediate reporting of any non-compliant activity directly to the Commission and senior management. Employees receive training on Commission regulation generally and on applicable regulations. GlobalVRS periodically briefs employees regarding regulatory developments and employee compliance and whistleblower obligations. A copy of the Commission’s Mandatory Minimum Standards and other attendant regulations are available to all CAs and Customer Care representatives as a reference on the company’s intranet. These steps not only ensure that video interpreters are familiar with Commission requirements, but underscore the Company’s compliance commitment.

Eligibility for Reimbursement from the TRS Fund - 47 C.F.R. §64.604(c)(5)(iii)(N)

64.604(c)(5)(iii)(N)(1)(ii). GlobalVRS has since its inception clearly identified itself as an eligible VRS provider in all communications with the public. The Company does not currently engage with any other entity in the provision of VRS interpretation. GlobalVRS uses a single URL address for English (eng.globalvrs.tv) and a single URL address for Spanish users (globalvrs.tv) to access to its VRS.

64.604(c)(5)(iii)(N)(1)(iii), (iv), and (v).

GlobalVRS does not contract with, or otherwise authorize any third party to provide interpretation services or call center functions.

64.604(c)(5)(iii)(N)(2). GlobalVRS has faithfully submitted call center reports and submitted substantive change notices in instances where its call centers have been impacted by natural events and provided substantive change notices on thirty days' notice, when call center reorganizations have necessitate submission, as is a matter of record with the Commission. The Company will continue maintaining compliance with all call center reporting obligations.

64.604(c)(5)(iii)(N)(3). GlobalVRS CAs are compensated in accordance with each interpreter's experience, work history, shift, and the time available to interpret calls. Under no circumstance is interpreter compensation tied to the number of calls or length of calls interpreted.

64.604(c)(5)(iii)(N)(4). GlobalVRS clearly recognizes that no business-related calls including remote training session calls are reimbursable from the Fund and has blacklisted all Company numbers to ensure that no call placed from those numbers is reimbursable. All employees are advised and warned of disciplinary repercussions associated with the prohibition against placing compensable business-related calls. GlobalVRS otherwise does not conduct, host, or promote use of remote training sessions. See Information Filed With the Administrator 64.604(c)(5)(iii)(I) discussion, *supra*.

6. Complaints -- 47 C.F.R. §64.604(c)(6).

GlobalVRS' Registered User complaint procedures are described in detail at Section VIII, *infra*. GlobalVRS maintains a log of all consumer complaints received. GlobalVRS submits an annual complaint log to the Commission on or before July 1 applicable to the 12-month period ending May 31 of each year. GlobalVRS reiterates its commitment to cooperate fully in any investigation or other procedure the Commission may undertake to resolve complaints it may receive regarding GlobalVRS services.

GlobalVRS may be contacted at via telephone, Email, or in writing to the Company's address:

Address: 3700 Commerce Blvd.,
Kissimmee, Florida 34741
Phone: 888-472-6768 (Spanish VRS)
888-472-6778 (English VRS)
E-Mail: gabrielle@aslservices.com
help@globalvrs.com
Website: www.GlobalVRS.com
Facsimile: 407.518.7903
Voice Telephone: 1.877.326.3877
English and Spanish VP Users: Globalvrs.tv

7. Confidential Treatment of TRS Customer Information –47 C.F.R. §64.604(c)(7).

Consistent with this provision and the Company's Customer Proprietary Network Information ("CPNI") obligations, all customer information, however generated, is treated as confidentially and is not sold, distributed, shared, or revealed in any way by GlobalVRS or any of its staff or automatic call distribution platform provider, unless compelled to do so by lawful order. GlobalVRS has and will continue to comply with the provisions governing protection of CPNI as set forth in Sections 64.5101 *et seq.* of the Commission's rules²⁷ as discussed in detail in Section III.D.7. *infra*.

8. Discrimination and preferences –47 C.F.R. §64.604(c)(12).

GlobalVRS has not, nor will it, discriminate directly or indirectly, by any means or device, or engage in any unjust or unreasonable discrimination related to practices, facilities, or services for or in connection with like relay service, engage in or give any undue or unreasonable preference

²⁷ 47 C.F.R. §§64.5101 through 64.5111.

or advantage to any particular person, class of persons, or locality, or subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.

GlobalVRS has not, nor will it, engage in any practice that GlobalVRS knows or has reason to know will cause or encourage false or unverified claims for TRS Fund compensation; Unauthorized use of VRS; the making of VRS calls that would not otherwise be made; or use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner.

GlobalVRS ensures that only eligible Registered Users and users registered with other providers may place calls that are reimbursable from the Fund in strict compliance with Section 64.611 of the Commission’s rules,²⁸ and now with further benefit of review of its enhanced registration procedures by the Enforcement Bureau. All GlobalVRS Registered Users are uploaded into the Telecommunications Relay Service - User Registration Database (“TRS-URD”) as further evidence that the processes undertaken by the Company complies with Commission requirements to ensure only authorized provision of VRS. Detailed discussion regarding GlobalVRS’ compliance with the Internet-based TRS registration requirements as set forth in Section 64.611 of the Commission’s rules is addressed *infra*. No caller may complete a VRS call unless GlobalVRS has verified that the caller is duly registered in the TRS-URD.

9. Unauthorized and Unnecessary Use of VRS – 47 C.F.R. §64.604(c)(13).

GlobalVRS has not knowingly, nor will it, engage in any practice resulting in false or unverified claims for TRS Fund compensation, unauthorized use of VRS, the making of calls that would not otherwise be made or the use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner.

²⁸ 47 C.F.R. §64.611.

GlobalVRS acknowledges that the Enforcement Bureau’s investigation revealed that the Company did not implement a “reasonable verification process”²⁹ pursuant to Section 64.611 of the Commission’s rules governing Registered User verification. The investigation also revealed practices that were deemed to constitute placement of VRS calls by affiliates operating as a single entity and VRS calls placed using Internal Numbers that were considered by the Enforcement Bureau in violation of the unauthorized and unnecessary use of VRS.³⁰

GlobalVRS practices that contributed to these findings had been understood compliant, and had not constituted engaging, “in any practice that [GlobalVRS knew or had] reason to *know* [would] cause or encourage...[emphasis supplied]” unauthorized VRS usage.³¹ As detailed below, GlobalVRS is now in full compliance with the Internet-based TRS registration rules in Section 64.611, has successfully added Registered Users to the TRS-URD, and implemented additional processes, as presented to the Enforcement Bureau, to ensure that the Company maintains a reasonable verification process and never knowingly engages in any practice that could result in unauthorized and unnecessary use of VRS. Further, GlobalVRS continues to train its CAs to be vigilant of potential forms of unauthorized usage by users and encouraged to report unauthorized usage of any kind through its whistleblower process.

D. Compliance with Other Standards –47 C.F.R. §64.604(d).

Section 64.604(d) incorporates the applicable requirements of Sections 64.605, Emergency Calling Requirements; 64.611, Internet-based TRS registration; 64.615, TRS User Registration Database and administrator; 64.621, Interoperability and portability; 64.631, Verification of orders

²⁹ Consent Decree at para. 9.

³⁰ *Id.*

³¹ GlobalVRS had maintained that its procedures were compliant and therefore “known” – to be compliant as opposed to claiming ignorance of any applicable requirement.

for change of default TRS providers; 64.632, Letter of authorization form and content; 64.5105, 64.5107, 64.5108, 64.5109, and 64.5110 governing TRS customer proprietary network information, of the Commission’s rules,³² as mandatory minimum standards. GlobalVRS complies with each of these rules as specifically discussed below.

1. Compliance With Emergency Calling Requirements – 47 C.F.R. §64.605

47 C.F.R. §64.605(a).³³ GlobalVRS has since its inception complied with emergency calling requirements in conjunction with its emergency calling partner, Bandwidth.com addressed above. Bandwidth.com’s emergency call platform is integrated with GlobalVRS automatic call distribution platform to seamlessly connect Registered Users who place emergency 911 calls to the caller’s serving public safety answering point (“PSAP”). Automatic number identification (“ANI”), the caller’s registered location, information indicating that the call is being placed by GlobalVRS and the CA’s identification number, and call back number are all passed through to the serving PSAP following confirmation of the caller’s information. All 911 calls are routed through the use of ANI and, if necessary pseudo-ANI, via Bandwidth.com’s dedicated wireline E911 network.³⁴

GlobalVRS’s automatic call distribution platform (“ACD”) implements an automated system to prioritize emergency calls so that they are answered before non-emergency calls. This is done through the configuration of the 911 queue on in GlobalVRS automatic call distribution platform. Emergency 911 calls are automatically recognized by GlobalVRS’s ACD platform

³² 47 C.F.R. §§64.611, 64.615, 64.621, 64.631, 64.632, 64.5105, 64.5107, 64.5108, 64.5109, and 64.5110. 47 C.F.R. §64.617, Neutral Video Communications Service Platform has been repealed and no longer applies.

³³ Excluding 47 C.F.R. §64.605(a)(1)(i) and (iv) inapplicable to iTRS providers.

³⁴ See, Bandwidth.com 911 FAQ: <https://www.bandwidth.com/wp-content/uploads/9-1-1-Lo-down.pdf>

software and given the highest priority in the call queue system ahead of any other non-emergency calls. In the unlikely event a 911 call comes in while all CAs are in active calls, the system will also notify all CAs that there is a 911 call waiting using a bright red frame on their screen. CAs are then encouraged to answer the call as fast as possible without willfully terminating the existing call without reason.

When an emergency caller connects to a GlobalVRS CA, the CA is trained to request and document the caller's name and location at the beginning of any emergency call, even if the caller's registered location information is already on file with GlobalVRS. In the event one or both legs of an emergency call are disconnected, GlobalVRS does and will ensure that the CAs are trained to re-establish the call by contacting the calling party, the PSAP, or both.

GlobalVRS recognizes that information obtained by GlobalVRS as a result of assisting with an emergency call will be used only for emergency or law enforcement purposes. Protection of all proprietary information is underscored in GlobalVRS's CPNI privacy and confidentiality training.

47 C.F.R. §64.605(b) E911 Service for VRS. As noted, when a Registered User places an emergency 911 call through GlobalVRS, the Registered User's ANI, Registered Location, GlobalVRS's name and the CA's identification number are transmitted to the serving PSAP through Bandwidth.com's E911 platform in accordance with Sections 64.3000 *et seq.* of the Commission's rules, the universal emergency telephone number rules.³⁵

Regarding Section 64.605(b)(4) specifically governing Registered Locations, as part of the registration process described below, GlobalVRS obtains each prospective Registered User's physical location, which is added to the User Registration Database (URD) for approval. Should

³⁵ 47 C.F.R. §§64.3000 to 64.3004.

there be an error code specific to the User’s address. GlobalVRS verifies the physical location by requiring independent documentation that correlates the prospective Registered User to the address to be registered such as a utility bill, driver’s license, or other documents authorized by the TRS-URD Administrator, at the time of registration. Registered Users are informed of the importance of updating their registered location and may update their information by updating their customer profile at will. GlobalVRS has established a means by which Registered Users can easily update their Registered Location information through the GlobalVRS' Personal Online Profile.³⁶ Registered Users are also able to update their registered location information by contacting GlobalVRS Customer Care. When a Registered User contacts Customer Care, the representative will ask pre-established Registered User security questions to verify identity, confirm existing information, and then manually update the new/updated information in GlobalVRS’s WordPress Registered User account application and in the MMX platform. All CAs will then see the Registered User’s new address when the Registered User places a call.

GlobalVRS interpreted five emergency calls in 2018.

The Commission’s September 26, 2018 *Notice of Proposed Rulemaking* regarding Kari’s Law and Section 506 of RAY BAUM’S Act and inquiry concerning 911 access, routing, and systems location in enterprise communications systems³⁷ proposes *inter alia* to “allow TRS providers flexibility in implementing dispatchable location solutions, and to fall back to Registered Location options when real-time location is not feasible.”³⁸ Pending adoption of corresponding

³⁶ See 47 C.F.R. §64.605(b)(4)(ii); <https://secure.globalvrs.com/v2/en/login/>

³⁷ *In the Matter of Implementing Kari’s Law and Section 506 of RAY BAUM’s Act, Inquiry Concerning 911 Access, Routing and Systems Location in Enterprise Communications Systems*, PS Docket Nos. 18-261 and 17-239, *Notice of Proposed Rulemaking*, FCC 18-132 (September 26, 2018).

³⁸ *Id.* at para. 81.

regulation and/or policy regarding VRS provided to corporate Registered Users with multi-location telephone systems (“MTLS”), GlobalVRS is reviewing methods to identify and establish specific locations for Deaf callers from MTLS locations as organizational entity Registered Locations, e.g. “second floor third cubical on right” that can be transmitted to Public Safety Answering Points on 911 calls made from MTLS locations to the extent possible.

2. Compliance With Internet-based TRS registration – 47 C.F.R. §64.611.

A primary focus of the Enforcement Bureau’s investigation concerned GlobalVRS’s compliance with the Commission’s Internet-based TRS registration rule, wherein the Bureau concluded in pertinent part that GlobalVRS had failed “to implement a reasonable process” to verify users” and “to collect self-certifications attesting to eligibility... for each Registered User...”³⁹ GlobalVRS acknowledges the early circumstances leading to the Enforcement Bureau’s conclusions. GlobalVRS had implemented additional enhancements to its registration process well before the conclusion of the Bureau’s investigation. Its registration process now constitutes a “reasonable process” for Registered User registration as reviewed with the Enforcement Bureau and as evident in its successful registration of Registered Users in the TRS-URD.

Among the enhancements to its registration process, GlobalVRS has trained its customer care representatives to independently verify new registrants’ eligibility self-certifications, identity, Registered Locations, and consent to transmit registration data to the TRS-URD. For those who change their default provider to GlobalVRS, GlobalVRS’s Systems Administrator is trained to access the TRS-URD to verify all information provided, consistent with the registration process for new registrants. Customer Care continues to collect and verify documentation for submission

³⁹ *Consent Decree* at para. 9.

to the TRS-URD prior to submission to ensure timely uploading of data and completion of the registration process. All required eligibility attestations and acknowledgements, and information sharing consents with the TRS-URD for new Registered Users are currently completed during online registration and signed using Electronic Signature Disclosures guidelines. Forms are then automatically generated and stored in WordPress account software, downloaded, and saved as a stand alone Adobe Acrobat electronic files in the Company's secured internal network. An independent management review of all new registrations including separate, stand-alone supporting documentation using a required item checklist is now also performed.

Ten-digit numbers are assigned based on area codes local to the Registered Location. When assigning ten-digit numbers to new Registered Users, GlobalVRS coordinates with its numbering partner Bandwidth.com to ensure numbers are geographically relevant to the registrant's registered location under the North American Numbering Plan. No ten-digit number can be used by a registrant to place a call until the registrant has been successfully entered into the TRS-URD. Pursuant to Section 64.611(e), GlobalVRS does not provide toll-free numbers. The Company has established a process to serve qualifying hearing individuals to place non-compensable point-to-point calls to Registered Users, although has yet to receive requests from qualifying hearing individuals.

The confidentiality of all collected data is strictly maintained pursuant to the Company's compliance with Customer Proprietary Network Information ("CPNI") rules, addressed below, and CAs and customer care representatives are subject to recurring CPNI compliance reviews, as noted.

GlobalVRS has worked closely with the Fund Administrator to successfully integrate its registration process with the TRS-URD. GlobalVRS has now ensured that its registration

procedures meet the “reasonable process” for Registered User registration established by the Commission.

Regarding compliance with the User Notification and Acknowledgement requirement, 47 C.F.R. §64.611(g) regarding numbering and E911 services for VRS, the Company notifies registrants regarding placement of emergency 911 calls during the registration and maintains emergency 911 calling information on the company website.⁴⁰ GlobalVRS’s notification process continues to comply with the Electronic Signatures in Global and National Commerce Act. . See also discussion regarding GlobalVRS’s compliance with Section 64.631, Verification of Orders for Change of Default TRS Providers, 47 C.F.R. §64.631, below.

3. Compliance With TRS User Registration Database and Administrator Requirements – 47 C.F.R. §64.615

On January 1, 2018, the Fund Administrator released its initial *Internet Telecommunications Relay Services Video Relay Service Registration Database Filing Instructions* (“Instructions”). These initial Instructions present detailed requirements for provider TRS-URD interfaces. Senior GlobalVRS information technology managers have closely coordinated with the Fund Administrator to deploy seamless, automated interfacing system that meets Instructions requirements and attendant Commission rules, as evident through GlobalVRS successful uploading of all Registered Users and Subsequent amendments to Registered User records. Registered Users who do not place calls over a one-year period are removed from the TRS-URD following coordination with the Fund Administrator.

4. Compliance With the VRS Access Technology Reference Platform – 47 C.F.R. §64.619

Global VRS has closely coordinated with the Commission and other providers to ensure that its platform is capable of interfacing with the VRS Access Technology Reference Platform in its current state of development GlobvalVRS has and will continue to readily participate in all bi-

⁴⁰ See, e.g. <https://globalvrs.com/>

annual SIP Conferences and ensured scheduling of time with MITRE to initiate interoperability testing.

5. Compliance With Interoperability and Portability – 47 C.F.R. §64.621

GlobalVRS does not, nor has it, restricted any user’s unfettered access to another provider’s service or otherwise degraded service quality with another provider’s service. GlobalVRS has incorporated the Session Initiated Protocol (SIP) profile, planning for RUE implementation once final requirements are established, and X-Card capability on its automatic call distribution platform in conjunction with technical amendments coordinated with its automatic call distribution platform provider.

Through its active involvement in provider SIP implementation conferences and development calls, GlobalVRS has adopted technical enhancements to its automatic call distribution platform to comply with the Commission’s SIP profile adoption requirements. GlobalVRS is actively involved with MITRE and all providers in ensuring full interoperability, as further discussed below. Regarding SIP implementation, GlobalVRS has continued to participate in the weekly SIP Profile development meetings. All required SIP protocols have been implemented.

As RUE specifications continue to evolve and GlobalVRS is closely monitoring the rules that will soon be finalized and is working with the VRS Access Technology Reference Platform (“VATRP”) Team on testing.⁴¹

And, as noted above, GlobalVRS has implemented the X-Card requirements to ensure address book portability among providers.

The Enforcement Bureau notified GlobalVRS in June 2017 there have been certain issues raised with GlobalVRS’s overall interoperability. Through the assignment of a senior technology engineer working in conjunction with the Company’s automatic call distribution platform provider, root technical issues that significantly contributed to interoperability trial failures were

⁴¹ Though GlobalVRS has joined other providers in requesting an immediate pause and further development of the VATRP. *See* Letter from ASL Services Holdings, LLC dba GlobalVRS, CSDVRS, LLC, Convo Communications, LLC, Purple Communications, Inc., and Sorenson Communications, LLC to Mr. Eliot Greenwald, Deputy Chief Disability Rights Office, Consumer and Governmental Affairs Bureau (October 17, 2018).

identified and resolved. Current interoperability test results by the contracted interoperability testing entity, MITRE, have demonstrated that GlobalVRS's VRS is fully interoperable with other providers' services.⁴²

[REDACTED]

6. Verification of Orders for Change of Default TRS Providers – 47 C.F.R. §64.631

As part of GlobalVRS's compliance with Commission registration rules, GlobalVRS strictly complies with related Section 64.631 requirements governing verification of default provider changes. GlobalVRS relies on an electronically signed letter of authorizations ("LoA") form that complies with Section 64.632, addressed below. GlobalVRS retains all documentation, including LOAs for no less than five (5) years, and indefinitely for Registered Users who remain GlobalVRS Registered Users.

7. Compliance With Letter of Authorization Form and Content – 47 C.F.R. §64.632

GlobalVRS's registration process is automated on line.⁴³ LOAs are generated upon completion of the registration process and contain the language set forth in Section 64.632(d) of

⁴² See MITRE's most recent January 2019 interoperability results matrix reflecting interoperability.

⁴³ GlobalVRS may initially rely on electronic mail registrations for entities, device registration, and point-to-point registrations at such time as the Company initiates such registrations.

the Commission’s rules.⁴⁴ GlobalVRS maintains standalone electronic copies of the LOA that are available upon Commission request as set forth in Section 64.631.

8. Compliance Customer Proprietary Network Information Regulations – 47 C.F.R. §§64.5105, 64.5107, 64.5108, 64.5109, and 64.5110

GlobalVRS has always strictly complied with Commission Compliance Customer Proprietary Network Information (“CPNI”) rules and maintained strict privacy of all user data since its inception. All GlobalVRS employees receive initial and recurring training regarding CPNI protection and attendant Commission rules, as required per Section 64.5109(b). The Company strictly limits those individuals who may access user data to a need to know basis – customer care, CAs, and information technology/operations individuals, the latter including GlobalVRS’s contracted automatic call distribution platform vendor who is bound to comply with CPNI under its agreement with GlobalVRS. As noted, CPNI is transmitted with emergency 911 calls exclusively to PSAPs via Bandwidth.com, as authorized pursuant to Section 64.5105(c)(4). Protection for the confidentiality of transmitted CPNI associated with emergency 911 calling is established in GlobalVRS’s agreement with Bandwidth.com.⁴⁵ GlobalVRS provides CPNI to the Fund Administrator for use in the TRS-URD with the affirmative Registered User’s approval as set forth in Section 64.611 and otherwise pursuant to Section 64.5107, and when requested by the Fund Administrator for oversight of the Fund pursuant to Section 64.5105(c)(5).

GlobalVRS uses CPNI exclusively to support its provision of VRS. The Company neither sells CPNI to others nor does it provide such information to – nor seek to obtain confidential information from – competitors.

⁴⁴ See, <https://secure.globalvrs.com/v2/en/register/>

⁴⁵ See, GlobalVRS Agreement with Bandwidth.com, at Attachment 2.

Access to CPNI is password protected, either by designated Company representatives or by Registered Users. If a Registered User seeks to access the Registered User's own CPNI, the individual may only do so through a password protected online logon that requires further authentication through the correct response to the Registered User's pre-established security questions. In instances of forgotten passwords, the Registered User must contact customer care and independently verify his or her identity. GlobalVRS has not been the victim of hacking. Yet pursuant to Section 64.5111, GlobalVRS has established a SOP for notification of information security breaches in the event that confidential records may be compromised for any reason.

GlobalVRS has submitted its annual CPNI compliance certification pursuant to Section 64.5109(e) as evidence of its compliance. The Company's compliance officer assumes responsibility for ensure strict and ongoing compliance with CPNI rules.

IV. DEMONSTRATION THAT APPLICANT LEASES FACILITIES AND OPERATES SUCH FACILITIES ASSOCIATED WITH TRS CALL CENTERS (47 C.F.R. §64.606(a)(2)(ii)(A)).

GlobalVRS VRS operations are supported by long-standing call centers and leased automatic call distribution platform that has been customized for GlobalVRS' compliant provision of VRS as discussed under each applicable regulatory requirement, below.

A. Call Center Leases - 47 C.F.R. §64.606(a)(2)(ii)(A)(1).

GlobalVRS operates [REDACTED]

[REDACTED] GlobalVRS does not operate call centers outside of the U.S. Pursuant to Section 64.606(a)(2)(ii)(A)(1) of the Commission's rules⁴⁶ copies of leases for each call center operated by GlobalVRS are attached hereto at confidential **Attachment 1**.

⁴⁶ 47 C.F.R. §64.606(a)(2)(ii)(A)(1).

B. Non-U.S. Call Centers - 47 C.F.R. §64.606(a)(2)(ii)(A)(3).

GlobalVRS does not operate call centers outside of the U.S.

C. Description of the Technology and Equipment Used to Support Call Center Functions - 47 C.F.R. §64.606(a)(2)(ii)(A)(4).

GlobalVRS automatic call distribution (“ACD”) “MMX®” platform is designed by, and operated under a third-party agreement⁴⁷ with nWise AB. GlobalVRS retains control of the platform while providing direction for platform customization to ensure compliance with Commission regulations including interoperability standards. The platform is session-initiated protocol (“SIP”)-based and allows GlobalVRS to establish and maintain distinct queues based on the default language and gender desired by Registered Users when making and receiving calls.

The MMX® platform contains four key functional elements:⁴⁸

MMX® Core. The core of the system comprises all the central functions needed for a call to be correctly controlled in a secure manner. It is all based on MMX® Call Control, which handles call control. MMX® Call Control has components that guarantee security, such as MMX® Encryption and MMX® High Availability. MMX® is designed to be able to perform tasks that are crucial to society, even in difficult scenarios.

MMX® End Points. Registered Users download apps to their smartphone, tablet or computer. The apps are expressly developed for people with different functional impairments and are available in different designs: total conversation (TC), text and for the DeafBlind. The apps have a common basic structure, preserving consistency across graphics and functions. That makes it easy for a user to switch from iPhone to Android, or to a web application on a computer.

MMX® Management. This element also contains all tools for managing data related to call flows, and for user and system administration. It is possible to obtain customized reports.. MMX® can be linked to external databases.

MMX® Gateways. The Gateways element enables MMX® to work alongside existing technical communication solutions including interoperation with text telephony (TTY) and SMS.

⁴⁷ Attached hereto at **Attachment 3**.

⁴⁸ A complete description of the MMX® ACD platform is also included at **Attachment 3**.

GlobalVRS' ACD platform utilizes five distinct queues:

- English Queue: Enables callers to make/receive calls using English speaking interpreters;
- Spanish Queue: Enables callers to make/receive calls using Spanish speaking interpreters;
- 911 Queue: Ensures calls where the Registered User dials “911” are prioritized over all other queues in the event of an emergency call;
- Deafblind Queue: Enables callers to make/receive calls using software that is customized for Deafblind Registered Users. Deafblind Registered Users retain the option to place and receive calls interpreted by English or Spanish speaking interpreters; and
- Customer Care: Enables callers to make/receive calls directly with the Customer Care Team.

Interpreters are assigned to specific queues by the Systems Administrator according to their language skill. Registered Users may then select their desired default queue - the queue they would like to make/receive calls through - during the registration process. Should a Registered User wish to place a single call using a different queue, the Registered User simply requests a transfer for that call to another queue. Otherwise when a Registered User places a call, the call is then automatically routed to the appropriate queue.

D. Copy of Each Proof of Purchase, Lease or License Agreement for all Technology and Equipment used to Support Call Center Functions for each Call Center Operated by the Applicant within the United States - 47 C.F.R. §64.606(a)(2)(ii)(A)(5).

GlobalVRS provides all direction to technology partners to ensure compliance of the program. Copies of all leases and license agreements used to support call center functions for each call center operated by GlobalVRS are attached hereto at confidential **Attachment 2**, and include:





E. Complete Copy of Each Lease or License Agreement for Automatic Call Distribution - 47 C.F.R. §64.606(a)(2)(ii)(A)(8).

Copies of the leases and license agreement for ACD platform are attached hereto at confidential **Attachment 3**. GlobalVRS has successfully used nWise’s MMX® ACD platform since its inception. The ACD platform has been designed specifically for GlobalVRS’s use and has been demonstrated compliant with Commission rules and the TRS Fund Administrator’s database and reporting requirements.

V. APPLICANT’S ORGANIZATIONAL STRUCTURE AND MANAGEMENT (47 C.F.R. §64.606(a)(2)(ii)(B)).

GlobalVRS operates as a separate wholly owned subsidiary of American Sign Language Enterprises, LLC.⁴⁹ American Sign Language Enterprises, LLC’s organizational structure, the names of the Companies’ executives, officers, members of its board of directors, and managing members maintaining at least a ten (10) percent equity interest in American Sign Language Enterprises, LLC are attached hereto at confidential **Attachment 4**.

⁴⁹ American Sign Language Enterprises, LLC - is a holding company with controlling interest in ASL Services Holdings, LLC d/b/a GlobalVRS, American Sign Language Services Corporation- an entity providing Community and Video Remote Interpreting (“VRI”) services, and ASL Services Latino Inc. (PR), which provides Community and VRI services in Puerto Rico. The Enforcement Bureau’s “... Investigation also found that VRS minutes were generated through calls made to and on behalf of Global and other American Sign Language Enterprises, LLC affiliates (collectively, ASL Companies) through Global’s VRS. While the ASL Companies are structured as separate entities and maintain separate bank accounts, the record reflects that in key respects, the companies in certain aspects operated as a single entity---sharing management teams and employees , and expenses-- without distinguishing or tracking shared administrative employee work time using the same time reporting codes. The reporting codes for administrative employees did not record time spent working on all costs attributable to the provision of VRS. Thus, calls made to the ASL Companies and calls made by personnel of the ASL Companies when using Global Numbers are non-reimbursable from the TRS Fund. (Consent Decree, para. 10. As a result of the Bureau’s findings, the Companies’ Chief Financial Officer has incorporated additional processes to more accurately account for employee time and cost allocations to GlobalVRS, “blacklisted” all of the Companies’ telephone numbers to ensure that no reimbursement is sought for calls placed to or from those numbers, and explicitly trained all employees regarding the treatment of calls from Company numbers as non-reimbursable costs of doing business.

VI. APPLICANT’S EMPLOYEES (47 C.F.R. §64.606(a)(2)(ii)(C) and (D)).

A listing of employees involved in VRS operations, by position, is attached hereto at confidential **Attachment 5**. **Attachment 5** also includes management agreements between GlobalVRS and its parent corporation. GlobalVRS retains copies of employment agreements for all individuals engaged in the provision of VRS for a minimum of five years.

VII. SPONSORSHIP ARRANGEMENTS RELATING TO INTERNET-BASED TRS (47 C.F.R. §64.606(a)(2)(ii)(E)).

GlobalVRS sponsors events on an *ad hoc* basis and has no ongoing sponsorship arrangements, accordingly.

VIII. DESCRIPTION OF COMPLAINT PROCEDURES (47 C.F.R. §64.606(a)(2)(iii)).

Consumer complaints and inquiries may be made to GlobalVRS through several means. Registered Users may submit a complaint to the interpreter who is interpreting a call. A caller may also submit a complaint via videophone⁵⁰, telephone⁵¹, or by e-mail⁵². The complaint is then forwarded to GlobalVRS’ Customer Care department for resolution. All complaints are logged. The information documented in the complaint log includes the date/time of the call, the interpreter’s name and identification number, the caller’s name, videophone number or e-mail address, and an explanation of the complaint its resolution and individual ultimately responsible for complaint resolution. GlobalVRS’ Customer Care team is bi-lingual so that both English and Spanish speaking callers can be helped whenever they call.

Upon receiving a complaint, GlobalVRS’ Customer Care team contacts the caller in an attempt to resolve the complaint. If the customer is satisfied with Customer Care’s response, then the complaint log is documented that the problem has been resolved. If the customer is not satisfied, then the complaint is escalated to the Workforce Manager, then to the Director of Operations and then ultimately to GlobalVRS’ President until the complaint is resolved. If a

⁵⁰ Using a videophone, customers may submit complaints by contacting help@graciasvrs.tv or ayuda@graciasvrs.tv.

⁵¹ To submit a complaint by hearing telephone, a customer may call 1-877-472-2420.

⁵² To submit a complaint via e-mail, a customer may contact help@graciasvrs.com or ayuda@graciasvrs.com.

complaint pertains to an interpreter, then the Customer Care supervisor reviews and determines if corrective action or disciplinary measures involving the interpreter is appropriate. Complainants are also informed that they may contact a designated higher level company official or the FCC if dissatisfied with a response, as part of the response.

Complaint documentation is consolidated into a complaint log which is reviewed monthly by the Director of Operations Chief Operations Officer to ensure timely resolution of complaints. The complaint log is submitted annually to the Commission pursuant to 47 C.F.R. §64.604(c)(1), as addressed in Section III.C.1, *supra*.

Many technical questions that might otherwise result in a consumer complaint, can be resolved by provision of timely information. GlobalVRS provides a variety of on-line support resources, including a comprehensive "frequently asked questions" page, to provide consumers with immediate guidance on many questions or problems.

GlobalVRS has access to the Commission's "Zendesk" customer complaint online application in the event that a formal or informal complaint against GlobalVRS is made with the Commission.

IX. STATEMENT REGARDING SUBMISSION OF ANNUAL COMPLIANCE REPORTS DEMONSTRATING COMPLIANCE WITH APPLICABLE RULES (47 C.F.R. §§64.606(a)(2)(iv) and 64.606(g)).

A. Statement Regarding Submission of Annual Compliance Reports Demonstrating Continued Compliance with Commission Rules (47 C.F.R. §64.606(a)(2)(iv)).

Since its inception as a TRS Fund eligible provider, GlobalVRS has submitted annual compliance reports with the Commission demonstrating continued compliance with applicable Commission rules governing the Company's provision of Fund-eligible VRS, certified as accurate and complete by a GlobalVRS officer pursuant to 47 C.F.R. §64.606(a)(2)(v). The Company avers that it will continue to submit accurate and complete annual compliance.

GlobalVRS has submitted annual compliance reports to the Commission that the Company has held to be an accurate and complete representation of its compliance with Commission regulations, orders, and policies applicable to the provision of Fund-eligible VRS. Over the course of the Enforcement Bureau's investigation, GlobalVRS has come to understand how certain former registration and affiliate allocation procedures, among others, believed to have been compliant with Commission rules were deemed non-compliant. GlobalVRS has revised those procedures

consistent with its gained understanding. The Company's understanding of how certain former procedures were found non-compliant does not equate to the Company's having intentionally submitted inaccurate or incomplete compliance reports or claim of ignorance. But rather that its understanding had been misplaced. This is now resolved through its work with the Enforcement Bureau. To that end, GlobalVRS reiterates that its ongoing annual compliance reports will be accurate and complete.

B. Submission of Annual Reports Demonstrating Compliance with Section 64.606 of the Commission's Rules. (47 C.F.R. §64.606(g)).

GlobalVRS avers to submit annual compliance reports in accordance with the requirements set forth in Sections 64.606(a)(2)(iv) and 64.606(g), as noted, and periodic compliance reports to the Enforcement Bureau pursuant to Consent Decree paragraphs 22 through 25. The Company's annual reports will include updates to information and documentation submitted herein applicable to Section 64.606(a)(2) or otherwise affirm that there are no changes since the Company's previous submission. Annual reports will continue to be certified by a GlobalVRS officer with first-hand knowledge of the accuracy and completeness of the information provided in accordance with the certification statement set forth in Section 64.606(g)(2).

Under the terms of GlobalVRS's Consent Decree with the Enforcement Bureau, GlobalVRS is completing a new Compliance Plan, Compliance Manual, and Operations Manual describing its operations to include the requirements established under Section 64.606(g)(3). The Company's Compliance Plan and subsequent updates will be provided to the Commission annual in accordance with this section.

X. STATEMENT REGARDING NOTIFICATION OF SUBSTANTIVE CHANGE (47 C.F.R. §64.606(f)(2)).

GlobalVRS acknowledges its obligation to inform the Commission of changes in its provision of VRS to include, but not limited to use of new equipment or technologies to facilitate the manner in which relay services are provided; providing services from a new facility not previously identified to the Commission or the Fund administrator; and discontinuation of service from any facility, within sixty days of occurrence. Further, GlobalVRS acknowledges that when submitting substantive change notices, a Company officer must certify that it continues to meet the Commission's minimum standards following implementation of the change.

Global has complied with its substantive change notification requirements since being granted conditional certification, most recently notifying the Commission of a change to cloud-based servers.⁵³ GlobalVRS avers to its continued compliance with requirements to submit substantive change notices.

XI. STATEMENT REGARDING UNAUTHORIZED SERVICE INTERRUPTIONS (47 C.F.R. §64.606(h)).

GlobalVRS acknowledges its obligation to inform the Commission of unauthorized service interruptions, whether voluntary when the planned interruption exceeds thirty minutes or more in duration on 60 days' notice, or involuntary, unforeseen service interruption beyond GlobalVRS' control or a voluntary service interruption of less than thirty minutes of duration within two business days. In the event that GlobalVRS submits a notice of unauthorized service interruption, the Company will provide such information with its notice to the Commission as set forth in Sections 64.606(h)(2) and (3). Should unforeseen service interruptions occur beyond GlobalVRS' control, GlobalVRS will also provide notification of service outages on the Company's website and update status. GlobalVRS has not experienced a service outage since early 2013.⁵⁴

XII. THE PUBLIC INTEREST IS SERVED IN GRANTING THE INSTANT APPLICATION

Although a public interest showing is not required under the Section 64.606 application requirements, GlobalVRS addresses why its Application is in the public interest and should be granted. GlobalVRS is the only VRS provider to specialize in Spanish language and Deafblind interpretation. Its efforts to serve these communities have significantly contributed to enhancing their quality of life and promoting functional equivalency for these communities, in addition to the Deaf Community generally. The company has introduced new applications to facilitate VRS calling from any mobile device for all Registered Users. GlobalVRS has sought to strictly comply with Commission regulations and has benefited from working with the Enforcement Bureau to bring itself into compliance in instances where certain procedures were deemed non-compliant. With the benefit of the resolution of these issues, GlobalVRS is now well-positioned for continued

⁵³ See, e.g. GlobalVRS Substantive Change Notice March 22, 2018. This notice was submitted in an abundance of caution as it was unclear whether the noted change qualified as a substantive change.

⁵⁴ See ASL Services Holdings, LLC [dba GlobalVRS] Notice of Involuntary, Unforeseen Service Interruption (February 13, 2013).

growth and expansion of its services to the Deaf and Deafblind Communities as an ethical, responsible VRS provider.

XIII. CONCLUSION

As demonstrated above, GlobalVRS meets the requirements for certification to receive reimbursement from the Fund for provision of VRS. . Grant Fund eligibility certification to GlobalVRS will serve the public interest as established herein. GlobalVRS respectfully requests the Commission's expeditious grant of such certification.

Respectfully Submitted this 29th day of March, 2019,

ASL Services Holdings, LLC dba GlobalVRS

By: _____


Angela Roth
President and CEO
3700 Commerce Blvd., Suite 216
Kissimmee, Florida 34741
E-Mail: Angela@aslservices.com
Phone: (407) 518-7900 ext. 201
Fax: (407) 518-7903

Andrew O. Isar
Miller Isar, Inc.
4304 92nd Avenue NW
Gig Harbor, WA 98335

Consultants to
ASL Services Holdings, LLC dba GlobalVRS

ATTACHMENT 1

**ASL SERVICES HOLDINGS, LLC DBA GLOBALVRS
CALL CENTER LEASES**

(47 C.F.R. §64.606(a)(2)(ii)(A)(1))

(CONFIDENTIAL)

Attached

ATTACHMENT 2

**PROOF OF PURCHASE, LEASE, LICENSE AGREEMENT
FOR ALL TECHNOLOGY AND EQUIPMENT
USED TO SUPPORT CALL CENTER FUNCTIONS**
(47 C.F.R. §64.606(a)(2)(ii)(A)(5))

(CONFIDENTIAL)
Attached

ATTACHMENT 3

**COPY OF EACH LEASE OR LICENSE AGREEMENT
FOR AUTOMATIC CALL DISTRIBUTION AND SERVER
MMX® ACD PLATFORM SYSTEM DESCRIPTION**

(47 C.F.R. §64.606(a)(2)(ii)(A)(8))

(CONFIDENTIAL)

Attached

ATTACHMENT 4

**CORPORATE EXECUTIVES, OFFICERS, BOARD OF DIRECTORS AND
MANAGING MEMBERS**

(47 C.F.R. §64.606(a)(2)(ii)(B))

(CONFIDENTIAL)

Attached

ATTACHMENT 5

**LISTING OF FULL-TIME AND PART-TIME EMPLOYEES INVOLVED IN TRS
OPERATIONS BY CATEGORY**

(47 C.F.R. §64.606(a)(2)(ii)(C) and (D))

(CONFIDENTIAL)

Attached

I, Angela Roth swear under penalty of perjury that I am President and Chief Executive Officer of ASL Services Holdings, LLC dba GlobalVRS, an applicant for Telecommunications Relay Service Fund eligibility, and that I have personally examined the foregoing submissions, and that all information required under the Commission's rules and orders have been provided and that all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

By:

Subscribed and Sworn to me this 29th day of March, 2019.

Notary Public

My Commission expires

SEAL

