



April 5, 2019

Ex Parte

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

Re: VRS Access Technology Reference Platform and RUE Profile (CG Docket Nos. 10-51 & 03-123)

Dear Ms. Dortch,

The undersigned VRS Providers urge the Commission to suspend the April 29, 2019 implementation deadline for the RUE Profile and VATRP interoperability as soon as possible. The Consumer Groups, the Rehabilitation Engineering Research Center (“RERC”), and the National Technical Institute for the Deaf all concur that suspending the deadline is appropriate.¹ Indeed, the Commission *must* suspend the deadline, because there is no longer sufficient time to take all steps necessary to update the standard and to require implementation. Suspending the deadline also allows all stakeholders to revisit VRS standards within a broad-based consensus process.

As the Providers have detailed on the record, the RUE Profile and VATRP deadline is no longer a possibility. The RUE Profile and VATRP are not finished, and the three-and-a-half weeks remaining until the implementation deadline provides too little time to complete the procedural steps necessary to incorporate them into the rules, much less implement them. In any event, as currently envisioned they pose security risks to users and VRS providers alike.²

¹ See Letter from Dr. Gerard Buckley, President, National Technical Institute for the Deaf and Vice President and Dean, Rochester Institute of Technology and Gary Behm, Associate Vice President of Academic Affairs, National Technical Institute for the Deaf and Director, Center on Access Technology, to Marlene H. Dortch, Secretary, FCC, at 1, CG Docket Nos. 10-51 & 03-123 (filed Mar. 20, 2019); Letter from Tamar Finn and Danielle Burt, Counsel to Telecommunications for the Deaf and Hard of Hearing, Inc., to Marlene H. Dortch, Secretary, FCC, at 1, CG Docket Nos. 03-123 & 10-51 (filed Oct. 31, 2018).

² See generally Petition of ASL Services Holdings, LLC dba Global VRS, CSDVRS, LLC dba ZVRS, Convo Communications, LLC, Purple Communications, Inc., and Sorenson

These problems should not surprise anyone. The Consumer Groups and RERC agree with the VRS Providers that it was not appropriate to develop the draft RUE Profile in a closed environment.³ The Consumer Groups have been excluded from development of the RUE Profile and VATRP—no doubt at least one reason why the current RUE Profile does not reflect their priorities.⁴ As the VRS Providers have been advocating for the last two years, any VRS standards development should be done within a voluntary, consensus standard organization. The Consumer Groups should be at the table to help set priorities and participate fully in the work of the group. In the meantime, however, the Commission must suspend the implementation deadline.

Respectfully submitted,

/s/

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/s/

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/s/

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/s/

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cc: Patrick Webre, FCC
Eric Burger, FCC
Robert Aldrich, FCC
Eliot Greenwald, FCC
Michael Scott, FCC

Andrew Mulitz, FCC
David Schmidt, FCC
Claude Stout, Telecommunications for
the Deaf and Hard of Hearing, Inc.

Communications, LLC for Suspension of the RUE Profile and Video Access Technology Reference Platform Implementation Deadline, CG Docket Nos. 10-51 & 03-123 (filed Feb. 8, 2019).

³ Letter from Claude L. Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. et al., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 & 10-51 (filed Mar. 22, 2019).

⁴ *See id.* at 2.

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