

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

To: Consumer and Governmental Affairs Bureau

**PETITION OF CONVO COMMUNICATIONS, LLC FOR AN EXPEDITED LIMITED
WAIVER TO OFFER AT-HOME INTERPRETING SUBJECT TO THE CONDITIONS
OF THE PILOT PROGRAM**

Convo Communications, LLC (“Convo”) pursuant to Sections 1.3 and 64.604(b)(8) of the Commission’s rules hereby requests an expedited limited waiver of 47 C.F.R. 64.604(b)(8) to allow Convo to begin offering at-home interpreting under the conditions set forth in the at-home video relay services (VRS) call handling program.

1. BACKGROUND AND SUMMARY

With the *VRS Improvements Report and Order*¹ released in 2017, the Commission authorized the adoption of a pilot program for at-home interpreting by VRS providers subject to providers demonstrating compliance with the requirements set out in Section 64.604(b)(8). In order to participate, providers who hold either conditional or full certification receive compensation from the TRS Fund were to notify the Commission of its intent to participate in

¹ Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436, 2455-64 (¶¶46-60) (2017) (“2017 VRS Improvements Report and Order”)

the pilot program by September 1, 2017². The pilot program was to commence from November 1, 2017 and last until October 31, 2018.

The pilot program's termination date was then extended by the Commission to April 30, 2019; with the instructions that "[i]f any VRS provider wishes to begin offering at home interpreting under the conditions of the pilot program, [it] should submit a particularized showing of special circumstances demonstrating good cause for granting a rule waiver to that VRS provider."³ Convo now requests a limited waiver of the program period to allow Convo to participate in the pilot program.

II. DISCUSSION

A. Waiver Standard

The Commission's rules establish that a waiver may be appropriate where good cause can be shown in Section 1.37⁴. The Commission may exercise its discretion to waive a rule when strict compliance can be demonstrated to be inconsistent with the public interest⁵. The Commission may further take into account the equity considerations of an overall policy or consider its overall effective implementation⁶. The U.S. Court of Appeals for the District of Columbia Circuit has found that good cause exists if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest⁷.

² 47 C.F.R. § 64.604(b)(8)(i).

³ See Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Order, CG Docket Nos. 10-51 and 03-123, DA 18-1119, n.54 (rel. Oct. 31, 2018).

⁴ 47 C.F.R. §1.3.

⁵ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), cert. denied, 409 U.S. 1027 (1972); *Northeast Cellular*, 897 F.2d at 1166

⁷ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

B. Special Circumstances and Equitable Considerations Justify Grant of this Request

In the Consumer and Governmental Affairs Bureau's ("Bureau") extension of the pilot program's expiration date, the Bureau pointed to the numerous benefits of at-home interpreting to the VRS industry in efficiency, redundancy, reliability, and effectiveness of service⁸.

Among the benefits of at-home interpreting highlighted by the Bureau in its decision to extend the termination date were the following: Working from home had a positive impact on the performance of video interpreters ("VI")⁹; providers were able to handle higher call volumes, improving wait times for consumers¹⁰; the redundancy of provider networks improved making providers better capable of managing unexpected occurrences¹¹; and the pool of qualified interpreters to select from expanded with the option of at-home interpreting¹². The Bureau authorized the extension of the pilot program under the reasoning that all of these benefits would be lost if the at-home interpreting program were to cease¹³. These same reasons for extending the pilot program constitute special circumstances and equitable considerations justifying grant of this request for a waiver.

Grant of this waiver will allow also benefit the program's need for data with the inclusion of Convo as another VRS provider in the at-home interpreting program; such data from Convo will help inform the Bureau as to the impact of the at-home program on VRS and VRS users¹⁴.

⁸ Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Order, CG Docket Nos. 10-51 and 03-123, DA 18-1119, n.54 (rel. Oct. 31, 2018)

⁹ Id at ¶ 6.

¹⁰ Id at ¶ 6.

¹¹ Id at ¶ 6.

¹² Id at ¶ 6.

¹³ Id at ¶ 7 and 8.

¹⁴ Id at ¶ 9

There are also present equitable considerations justifying grant of this waiver. With this waiver, Convo will be allowed to keep up with the ever-increasing demand for video interpreting while likewise supporting the availability of in-person interpreting for deaf and hard of hearing people in their jobs, educational institutions, health care facilities, and beyond. The pool of interpreters has never been large, and is constantly challenged by the pull from VRS providers causing interpreters to migrate closer to call centers (frequently seen as more stable and predictable than “freelance work”). Even interpreters who do not opt to move out of their communities to be closer to a call center have seen their ability to perform community work diminish as their long commutes eat up any available time in their schedules. Expanding Convo VI opportunities to include at-home interpreting will aid in preserving community interpreting, giving deaf and hard-of-hearing people greater access to interpreters for their workplaces, medical appointments, academic needs, and similar situations that call for interpreters.

Grant of this waiver will also benefit VIs and Convo users alike during times of inclement weather. Currently, a constant concern at Convo is the safety of VIs in an occupation that must run twenty-four hours, seven days a week. VIs who travel in inclement weather take risks in doing so; risks that also translate into stress that may impact job performance. In times where VIs opt to stay home during inclement weather, or where Convo has to make the difficult decision to temporarily close a call center, Convo risks increasing the wait time for users who call to use VRS services. Those VIs who do show are potentially overloaded on the queue, having to make up for those VIs who had to stay home. The ability for Convo to have at-home VRS call handling will allow Convo greater flexibility in managing those days and nights where the weather poses a real hazard for commuters, by allowing calls to be handled by at-home VIs.

The impact of at-home call handling will be felt by both VIs and users, and thus poses equitable justification for allowing Convo's participation in the at-home interpreting program.

While Convo previously chose not to participate in the at-home interpreting program at its initial onset, Convo now is prepared to participate in the program if it is extended further. Convo's initial concerns included questions as to the efficiency of investing in the changes to the homes of interpreters; the technological changes required; and the risk to its relationship with VIs if it had to close the program after just one year. Based on the Commission's strict parameters for the pilot program and publicly available anecdotal experience, it appears that VRS consumers have generally accepted the use of at-home interpreters. Accordingly, the anticipated benefits of the program for Convo's users and VIs outweigh prior concerns about at-home interpreting.

With both special circumstances and equitable considerations present, a grant of a limited waiver to allow Convo to engage in at-home call handling is in the public interest.

III. Convo's Notification of Intent to Participate in the Voluntary At-Home Video Relay Service and Detailed Plan for Ensuring Compliance with Rules Governing At-Home Compliance Program

With its request for a limited waiver, Convo includes its' notification of intent to participate in the pilot program for at-home interpreting for video relay services, provided the waiver is granted. This notification is provided as required under the *VRS Improvements Report and Order* and Section 64.604(b)(8)(i); and includes the requisite detailed plan explaining how Convo's management of at-home work stations will satisfy the TRS mandatory minimum standards, guarantee call confidentiality, and protect against waste, fraud, and abuse¹⁵. Convo currently is in its third year of maintaining full certification to receive funds from the TRS Fund.

¹⁵ VRS Improvements Report and Order at ¶ 55-58; 47 C.F.R. § 64.604(b)(8)(i).

Convo will bring its already proven dedication to compliance with the TRS Rules to the at-home program if granted the limited waiver.

The attached exhibits constitute Convo's compliance plan for at-home interpreting services to ensure compliance with the mandatory minimum standards applicable to VRS and ensure compliance with the safeguards required by the TRS Rules specifically for the at-home VRS call handling pilot program¹⁶.

- Exhibit A. Description of the screening process used to select VIs for the at-home call handling program.
- Exhibit B. Description of specific training to be provided for at-home VIs.
- Exhibit C. Description of the protocols and VI expectations developed for the at-home call handling program.
- Exhibit D. Description of the grounds for dismissing a VI from the at-home program and the process for such termination if the at-home VI fails to adhere to applicable requirements.
- Exhibit E. Description of all steps that will be taken to install a workstation in an at-home VI's home, including evaluations that will be performed to ensure all workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions.
- Exhibit F. Description of the monitoring technology to be used by Convo to ensure that off-site supervision approximates the level of supervision at the Convo call center.
- Exhibit G. Explanation of how Convo's at-home workstations will connect to its network, including how the workstations will be integrated into the call center routing, distribution,

¹⁶ 47 C.F.R. § 64.604(b)(8)(i).

tracking, and support systems, and how Convo will ensure system redundancy in the event of service disruptions in at-home workstations.

- Exhibit H. Signed certification by an officer of Convo that Convo will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program.
- Exhibit I. Convo's commitment to comply with all other safeguards enumerated in Section 64.604(b)(8) of the rules and the applicable rules governing TRS.

IV. CONCLUSION

For the reasons stated herein, Convo requests the Commission to find that a grant of this a limited waiver would be in the public interest and in furtherance of the benefits the Commission sought to establish in its adoption of the VRS Improvements Report and Order. A grant of this waiver would promote equity and fairness, and serve the public interest.

Respectfully submitted,

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April 11, 2019

Exhibit A

Convo's Screening Process to Select VIs for the At-Home Call Handling Program

Prospective at-home interpreting applicants will first be screened to ensure that they meet several basic criteria before going further in the selection process. Call Center VIs who apply will have to have the experience, skills, and training necessary to effectively interpret from their at-home work stations. The application and hiring process will be as such:

1. External applicants will have to first go through the same evaluation criteria and hiring process as prospective call center VIs experience.
2. All applicants will then be screened to ensure that each VI seeking to participate in the program meets the minimum experience and professional standards required for at-home interpreting. The screening will consider the following:
 - professional experience, skills, and knowledge to effectively interpret from a workstations;
 - thorough understanding of the TRS mandatory minimum standards;
 - minimum of three years of experience as a call center interpreter; and
 - ability to work independently.
3. Applicants that successfully pass the initial minimum experience and professional standards screening will then be screened to determine whether the applicant's prospective work environment will satisfy the physical requirements of the program; including whether there is a designated area with secure access; sufficient space, proper lighting, proper air flow, and temperature and ability to have dedicated internet. If an otherwise qualified candidate cannot assure a physical location that would satisfy the requirements, they will be disqualified. As part of ensuring Convo that the applicant has a satisfactory proposed work room, the candidate will be required to submit a video of the proposed space as well as required to demonstrate proof of possession of the premises.
4. If the applicant meets these four criteria, the applicant will be screened further by a hiring panel led by the program manager who will interview the applicant and decide whether to invite the applicant to participate in the at-home program as an At-Home VI.
5. Upon hiring, every VI is required to satisfactorily complete the company's required screening and training programs, including compliance training. At-Home VIs will have additional training specifically tailored to the at-home program¹⁷.

¹⁷ See Exhibit B.

Exhibit B
Description of specific training to be provided for at-home VIs

All At-Home VIs at Convo will receive the same training provided to all incoming VIs that work at Convo Call Centers including VI specific training, compliance training, and the same on-boarding training provided to all employees. In addition, At-Home VIs will receive training specific to the compliance requirements for at-home interpreting. At-Home VIs will receive training on the following:

- A thorough training covering the TRS mandatory minimum standards, as required by Section 64.604(b)(8)(iv)(A) of the FCC's rules.
- Training specific to handling calls from at-home workstations pursuant to Section 64.604(b)(8).
- Training on how to effectively work with management; how to communicate with other Convo employees; how to team with an interpreter when needed; and how to resolve various problems that may arise including the need for support during emergency calls, or if a VI becomes ill or is otherwise unexpectedly impaired.)
- Training on how to approach an emergency or network outage at the VI's home workstation.
- Thorough onboarding training specific to operational and human resource policies including the grounds for dismissal from the at-home program; and instruction that failure to adhere to compliance requirements are grounds for immediate dismissal¹⁸.
- Each VI will receive the grounds for dismissal and process of dismissal in writing.
- Receive training to ensure that the at home VIs know how to work with Convo's technology team to ensure that their at home work environment for VRS call handling enables confidential and uninterrupted services to the same extent as Convo's Call Centers, and is seamlessly integrated into Convo's call routing, distribution, tracking, and support systems.

At the conclusion of each new at-home VI training, the new VI will provide certification in writing confirming that they:

- Understand and commit to complying with the FCC's rules governing TRS, including rules governing caller confidentiality and fraud prevention. They will also certify their understanding of the reasons and process for dismissal from the at-home program.
- Reside in a separate, secure location in the VI's home, where access is restricted solely to the VI;
- Understand that the call-handling technology at home will be used to the same extent as other VIs at a call center, with no differences in types of calls handled or ability to handle emergency calls; options for teaming; and communication with management.

¹⁸ See Exhibit D.

Exhibit C
Description of the protocols and VI expectations developed for the
at-home call handling program.

In addition to all of the already existing protocols and requirements of VIs attested to in Convo's annual compliance report, Convo has established the following protocols and VI expectations for the at-home interpreting program:

- Workstations of At-Home VIs must be in a separate, secure location in the VI's home, where access is restricted solely to the At-Home VI. Doors to at-home workstations must remain locked at all times to prevent access by unauthorized persons.
- The room of the workstation must be a physically secured and enclosed area specifically designated for call handling; and may not be used for household functions.
- Each at-home workstation will be equipped with white noise emitters or soundproofing to prevent eavesdropping and to ensure that interruptions from noises outside the room do not adversely affect the At-Home VI's ability to interpret a call accurately and effectively.
- No personal electronic devices with the capability to record will be allowed in the room of the workstation at any time.
- Each at-home workstation will be connected to Convo's secure network connection to ensure caller privacy and confidentiality.
- Each at-home workstation will be equipped with a background similar to a call center workstation; At-Home stations will be indistinguishable from call center stations.
- At-home workstations will be equipped with the same technology features as at a call center such as the ability to transfer, communicate with teammates, and reach out to IT.
- At-home workstations will be equipped with an external camera and tracking software in efforts to provide equivalent supervision as that of the call center environment.
- Convo will have the ability to produce reports that can be analyzed to address technological issues or for data analysis regarding at-home workstations.
- Convo will regularly analyze at-home workstation data and proactively address any concerns.
- All at-home workstations will be inspected and approved prior to activation to ensure compliance with the TRS Rules for VRS and for the at-home program.
- At-Home VIs will each be assigned a unique at-home call center identification number, which will be used to identify all minutes handled from each work station in the call detail records submitted monthly by Convo to the TRS Fund administrator.
- At-Home VIs must comply with unannounced on-site inspections completed by Convo management and/or the FCC.
- At-Home VIs will be subject to the company policies and procedures applicable to call center VIs.
- At-Home VIs will be required to participate in regular company provided trainings; both compliance related and otherwise.
- The At-Home VI will not begin handling calls at home until trained and until their at-home workstation installation and evaluation has been completed.

Exhibit D

Description of the grounds for dismissing a VI from the at-home program and the process for such termination if the at-home VI fails to adhere to applicable requirements.

Convo will immediately dismiss an at-home interpreter from the trial for any reason that the interpreter would otherwise be dismissed from employment including egregious violation of mandatory minimum standards and company policy. Additionally, Convo will dismiss at-home VIs from the trial if they demonstrate an inability to meet established expectations associated with the trial as laid out in Exhibit C. The grounds and process for dismissing an At-Home VI from the at-home program will be provided in writing to the At-Home VI, as required by Section 64.604(b)(8)(iv)(D) of the FCC's rules. Each At-Home CA will be required to certify in writing as to his or her understanding of the reasons and process for a dismissal from the at-home program, as required by Section 64.604(b)(8)(iv)(E) of the FCC's rules.

Examples of causes for dismissal of an at-home VI from the at-home call handling program will include the following:

- **Interference with Background or Visual Clarity of Call:** An At-Home VI that engages in any activity that interferes with the background appearance needed to provide clarity during the call process will receive a written warning for a first violation. Any subsequent violation will result in the VI's dismissal from the at-home program and/or dismissal from Convo.
- **Automatic Dismissals from the at-home program and from Convo will occur for an at-home VI who engages in any of the following:**
 - Any activity that interferes with the operation of the at-home workstation, including white noise emitters or soundproofing to prevent eavesdropping and to ensure that interruptions from noises outside the room do not adversely affect a VI's ability to interpret a call accurately and effectively.
 - Use of personal electronic devices with the capability to record in the room of the workstation.
 - Any activity that interferes with the installation and/or disrupts the maintenance of a secure network connection.
 - Any activity that interferes with the installation and/or disrupts the maintenance of an external camera and the tracking software.
 - Any activity that compromises the security and privacy of his or her at-home workstation.
 - Any activity that allows access by unauthorized person (friends/family members and others) to a room where his or her workstation is located.
 - Any personal use of any company provided equipment and internet access.
 - Refusal to allow access to the workstation for an authorized manager or FCC representation during an unannounced on-site inspection.
 - Use of the dedicated broadband Internet connection by anyone other than the VI and for any purpose other than to access Convo's call distribution will be grounds for immediate termination from the At-Home program.

Exhibit E

Description of all steps that will be taken to install a workstation in an at-home VI's home, including evaluations that will be performed to ensure all workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions.

In order to ensure that workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions, Convo will take the following steps as part of its installation of at-home workstations:

- Convo's Information Technology Team (IT) will oversee installation of a secure, private connection on a dedicated high-speed internet connection which connects to a router installed within the home office of the At-Home VI.
- IT will confirm that capacity and speed of the internet connection is sufficiently robust and reliable to support the at-home workstation. IT will oversee the high-speed internet connection and monitor it. IT will also install all needed software on the at-home workstation; and engage in extensive testing to ensure the at-home workstations mirror the Convo Call Center stations.
- The At-Home VI's home office will be evaluated to determine that it is exclusively designated as a VI workstation used for interpreting a VRS call for Convo and is sufficiently secure to ensure the workspace can be accessed only by the At-Home VI. The workstation cannot be used for any other purpose.
- The VI at-home workstation, including computer, monitors, webcam, software, and headset will be identical to the workstations installed at Convo call centers. The agent station will only have the ability to connect to the platform.
- The VI at-home workstation equipment will all be provided, owned, and maintained by Convo.
- IT will be responsible for pre-configuring the computer for the at-home workstation and shipping it to the At-Home VI's location.
- At-Home VIs will be required to login and provide a password on the workstation prior to taking calls. They will also be required to log onto the shared communication platforms that call center VIs use to communicate with each other.
- A white noise machine will be installed to provide a reduction from outside interruptions.
- A surveillance video camera will be installed in the home office for remote monitoring.
- Evaluations of all at-home workstations to ensure they are sufficiently secure and equipped to prevent eavesdropping and outside interruptions.
- No calls will be handled by an At-home VI until the VI has satisfactorily completed training, had their work station installed and tested, and an evaluation of the workstation and VI's readiness¹⁹ have been completed.
- At-home Call Center IDs will be created by IT and added to the CDR scripts and monthly RL Submissions.
- Convo will inform the TRS Fund Administrator and the Commission of the at-home call center IDs.

¹⁹ See Exhibit B

Exhibit F

A description of the monitoring technology to be used by the provider to ensure that offsite supervision approximates the level of supervision at the provider's call center

- At-Home VI workstations will be integrated into the call center's routing, distribution, tracking, and support systems which will assist in monitoring At-Home VIs in an identical manner to how Call Center VIs are monitored.
- Monitoring will be additionally conducted as a team effort by Call Center Managers, Call Center Leads, and the Workforce Management Team in the same way Call Center VIs are monitored, including through the use of records and data regarding log in times, start and end times, and scheduled time.
- At-Home VIs will have access to their management team and the Workforce Management Team via internal channels of communication already utilized by Convo.
- A surveillance video camera will be installed in the home office for remote monitoring by Convo.

Exhibit G

Explanation of how Convo's at-home workstations will connect to its network, including how the workstations will be integrated into the call center routing,

Each at-home VI work station will be connected to a Convo provided, dedicated, secure broadband internet access line for connection to Convo's automatic call distribution system. The following points highlight how these at-home workstations will connect to Convo's network, and how they will be integrated into Convo's call center routing.

- IT will confirm that the At-Home VI has a robust and reliable high-speed broadband capacity sufficient to support a high quality video connection.
- The internet connection will be managed and monitored by Convo.
- The At-Home VIs will be set up for a secure connection to Convo's automatic call distribution system.
- Convo's software will be installed on the workstation computer. The computer will only be able to connect to Convo's platform. Like VIs in call centers, each At-Home VI will be required to login and provide a password on the agent station prior to taking calls.
- The workstation will have the same computer, monitors, webcams, software, and headsets as are used by Convo VIs at Convo Call Centers.
- Extensive testing will be done, by Convo's technology team to ensure all is working identical to call center stations.
- Each at-home VI will be assigned their own ID number just like VIs in a call center allowing for tracking and reporting to be done using the VI's ID number.
- An uninterrupted power supply (UPS) for redundant power that is equivalent to the UPS used at Convo Call Centers will be utilized at the workstation of the At-Home VI.
- Every VRS call can be routed to all VIs on the platform.
- The same Engineering and IT teams which support Convo's call centers will support at-home VIs.
- The computer for the workstation will be shipped directly from Convo to the At-Home VI's home for installation. It will be pre-configured by the technology team and tested prior to shipment.
- The at-home interpreting call routing route into the same call distribution as the call centers; maintaining the first-come first-served basis of the queue. Calls will not be directed to a specific VI or location.

Exhibit H

Signed certification by an officer of Convo that Convo will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program.

I, Jeff Rosen, General Counsel of Convo Communications, LLC, hereby certify that Convo will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the At-Home Call Handling Program.

Printed name: Jeff Rosen

Signature:

Dated: April 11, 2019

Exhibit I

A commitment to comply with all other safeguards enumerated in this paragraph (b)(8) and the applicable rules in this chapter governing TRS (47 C.F.R. §64.604(b)(8)(i)(I).

Convo submits this commitment to comply with the safeguards set forth in 64.604(b)(8) of the FCC's rules and other requirements as may apply. Convo recognizes the importance of strict compliance, maintaining full certification since December 2016, as a company, and will carry that strict implementation of compliance to its at-home interpreting program. Convo's compliance plan for the at-home interpreting program is as follows:

Authorization for at-home VRS call handling, 47 C.F.R. §64.604(b)(8)(ii)

Upon approval of participation in the at-home interpreting program and once at-home workstations are established, Convo will conduct at-home VRS call handling inspections during the period of the Program. Convo acknowledges that the Commission may cancel approval of the Plan and Program participation if Convo fails to comply with any of the safeguards enumerated below or other applicable mandatory minimum TRS standards. Convo understands and acknowledges that it may be subject to withholding, forfeitures, and penalties for noncompliant minutes handled by at-home workstations.

Limit on Minutes Handled

In any month of the program, a VRS provider may be compensated for minutes served by at-home VI workstations up to a maximum of *either* thirty percent (30%) of a VRS provider's total minutes for which compensation is paid in that month *or* thirty percent (30%) of the provider's average monthly minutes for the 12 months ending October 31, 2017, whichever is greater.

Personnel Safeguards

Before permitting VRS calls to be handled by VIs from at-home workstations, Convo shall comply with the following requirements and safeguards enumerated in §64.604(b)(8).

- 1) Ensure that each VI handling calls from an at-home workstation has the experience, skills, and knowledge necessary to effectively interpret from these workstations, including a thorough understanding of the TRS mandatory minimum standards and at least three years of experience as a call center VI²⁰.
- 2) Establish protocols for the handling of calls from at-home workstations and provide training to at-home VIs on such protocols, in addition to all applicable training that is required of VIs working from call centers²¹.
- 3) Provide each VI working from an at-home workstation equivalent support to that provided to VIs working from call centers, as needed to effectively handle calls, including, where appropriate, the opportunity to team interpret and consult with management, and ensure that a member of the management team is readily available to a VI working from home to resolve problems that may arise during a relay call, such as difficulty in understanding a VRS user's signs, the need for added support for emergency

²⁰ See exhibits A and B.

²¹ See exhibit C.

- calls, and relieving a VI in the event of the VI's sudden illness²².
- 4) Establish grounds for dismissing a VI from the at-home VRS call handling program (i.e., for noncompliance with the standards and safeguards enumerated in this paragraph (b)(8) and the rules governing TRS), including a process for such termination in the event that the VI fails to adhere to these requirements, and provide such grounds and process in writing to each VI participating in the pilot program²³.
 - 5) Obtain from each VI handling calls from an at-home workstation a certification in writing of the VI's understanding of and commitment to complying with the rules in this chapter governing TRS, including rules governing caller confidentiality and fraud prevention, and the VI's understanding of the reasons and process for dismissal from the at-home VRS call handling program²⁴.

Technology & Environment Safeguards

Convo will ensure that each home environment used for at-home VRS call handling enables the provision of confidential and uninterrupted services to the same extent as Convo's call centers and is seamlessly integrated into Convo's call routing, distribution, tracking, and support systems²⁵.

Convo will further ensure, as described in Exhibit E, that each at-home workstation:

- 1) Resides in a separate, secure location in the At-Home VI's home, where access is restricted solely to the At-Home VI;
- 2) Allows an At-Home VI to use all call-handling technology to the same extent as other VIs, including the ability to transition a non-emergency call to an emergency call, engage in virtual teaming with another VI, and allow supervisors to communicate with and oversee calls;
- 3) Is capable of supporting VRS in compliance with the applicable mandatory minimum technical and emergency call handling standards to the same degree as these are available at call centers, including the ability to route VRS calls around individual VI workstations in the event the At-Home VI experiences a network outage or other service interruption;
- 4) Is equipped with an effective means to prevent eavesdropping, such as white noise emitters or soundproofing, and to ensure that interruptions from noises outside the room do not adversely affect an At-Home VI's ability to interpret a call accurately and effectively; and
- 5) Is connected to Convo's network over a secure connection to ensure caller privacy.

Monitoring and Oversight Obligations

Before permitting VIs to handle VRS calls from at-home workstations, Convo will:

- 1) Inspect and approve each at-home workstation before permitting call handling;
- 2) Assign a unique call center ID number to each VRS at-home workstation and use this call center ID to identify all minutes handled from each such workstation in

²² See Exhibits B and C.

²³ See Exhibit D.

²⁴ See Exhibit E.

²⁵ See Exhibit E.

- its call detail records submitted monthly to the TRS Fund administrator;
- 3) Equip each at-home workstation with monitoring technology sufficient to ensure that off-site supervision approximates the level of supervision at Convo call centers, including the ability to monitor both ends of a call (i.e., video and audio) to the same extent as is possible in a call center, and regularly analyze the records and data produced by such monitoring to proactively address possible waste, fraud, and abuse;
 - 4) Keep all records pertaining to at-home workstations, including the data produced by any at-home workstation monitoring technology, except for any data that records the content of an interpreted conversation, for a minimum of five years; and
 - 5) Conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the at-home program²⁶.

FCC Audits and Inspections

Convo shall make all of its at-home workstations and workstation records accessible and available for review, audit, and inspection by the FCC and the Fund administrator and unannounced on-site inspections by the FCC to the same extent as other call centers and call center records subject to the TRS rules. Selected At-Home trial interpreters must affirmatively agree in writing to ad hoc, unannounced Commission, Fund administrator and Company onsite location reviews, audits, and inspections as a pre-condition for participate in the At-Home interpreting trial.

Monthly Reports

Convo's monthly requests for compensation shall include in its report the following information to the TRS Fund Administrator:

- 1) The call center ID and full street address (number, street, city, state, and zip code) for each at-home workstation and the VI ID number for each individual handling VRS calls from that workstation; and
- 2) The location and call center IDs of call centers providing supervision for at-home workstations, plus the names of persons at such call centers responsible for oversight of such workstations.

Six-month Reporting

Convo shall submit, no later than seven months after the start of its program, a report covering the first six months of its program, containing the following information:

- a. A description of the actual screening process used to select VIs for the at-home call handling program;
- b. Copies of training materials provided to At-Home VIs;
- c. Copies of written protocols used for VIs working from home;
- d. The total number of VIs handling VRS calls from at-home workstations over the first six months of the program;
- e. The number of 911 calls handled by Convo's at-home workstations;
- f. A description and copies of any surveys or evaluations taken of VIs concerning their experience using at-home workstations and participating in an at-home call handling

²⁶ See exhibits C, E, and F

program;

g. The total number of VIs terminated from the program;

h. The total number of complaints, if any, submitted to Convo regarding its at home call handling program or calls handled by At-Home VIs;

i. The total number of on-site inspections conducted of at-home workstations and the date and location of each inspection;

j. A description of the monitoring technology used to monitor VIs working at home and an analysis of the experience of supervisors overseeing At-Home VIs compared to overseeing VIs in a call center;

k. Copies of any reports produced by tracking software and a description explaining how Convo analyzed the reports for anomalies; and

l. Detailed documentation of costs incurred in the use of at-home workstations, including any costs associated with VI recruitment, training, and compensation, engineering and technical set-up (including workstation set-up), and administrative and management support (including oversight, evaluation, and recording.)