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VIA ELECTRONIC FILING

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

Re: *Ex Parte Letter – 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*

Dear Ms. Dortch:

CSDVRS, LLC d/b/a ZVRS (“ZVRS”) hereby responds to an ex parte letter filed by Sorenson Communications, LLC (“Sorenson”) on May 2, 2019.¹ In this letter, submitted just before commencement of the sunshine period, Sorenson advances several new rule modifications related to service-related equipment for the Video Relay Service (“VRS”).² Sorenson’s new proposals related to service-related equipment were not previously proposed or discussed in this docket, and VRS stakeholders have had no opportunity to consider and evaluate them. Sorenson’s proposals could have severe negative impacts on VRS users and VRS providers and cannot be adequately considered at this time.

The rules under consideration by the Commission in the Draft Order³ are limited to impermissible *non-service related equipment*, not service-related equipment. Indeed, the

¹ See Letter from John T. Nakahata, Counsel to Sorenson Communications, LLC to Marlene H. Dortch, Secretary, Federal Communications Commission CG Docket Nos. 10-51 and 03-123 (filed May 2, 2019) (“Sorenson Letter”).

² Sorenson Letter at 3 (“A VRS provider that offers or provides service-related equipment at no or reduced charge may do so provided that it complies with the following: (A) The offer or possession of no or reduced charge equipment shall not be tied to the user maintaining any level of VRS usage, or to placing any amount of additional VRS calls. (B) The offer or possession of no or reduced charge equipment shall not be tied to the user remaining a default user of the VRS provider offering or providing that equipment, or having been a default user of the VRS provider for a specified period. (C) A VRS provider shall not require the return of no or reduced charge equipment if the user ceases to be a default user. (D) A VRS provider shall not condition the offer or possession of no or reduced charge equipment on a user porting specific numbers specified by the VRS provider. (E) A VRS provider shall not request proof or documentation of a user’s VRS call history as a condition of offering or providing no or reduced charge equipment. (F) When a VRS provider offers a user no or reduced charge equipment, that equipment must be reasonably related to the user’s need for and ability to communicate using VRS, or, in the case of product testing, the provider’s need to evaluate the features or functions being tested.”).

³ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Draft Report and Order and Further Notice of Proposed Rulemaking*, FCC-CIRC1905-07, CG Docket Nos. 10-51 and 03-123 (rel. Apr. 18, 2019) (“Draft Order”).

Commission explicitly stated that it “will not, at this time, prohibit the distribution of service-related equipment.”⁴ The provision of service-related equipment to VRS users is integral to the functioning of VRS service today. Sorenson’s proposed rules would negatively impact users and severely prejudice other VRS providers. With no opportunity for VRS providers and the user community to comment on Sorenson’s proposals due to the imminent sunshine period, the Commission must disregard Sorenson’s new proposals related to service-related equipment.

Respectfully submitted,

/s/Gregory Hlibok

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⁴ Draft Order at para. 34, Note 122.