

**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 Video Relay	)	CG Docket No. 10-51
Services Program	)	

**JOINT PETITION OF VRS PROVIDERS FOR A WAIVER**

In this Joint Petition, five providers of telecommunications relay services (“TRS”)—ASL Services Holdings, LLC, d/b/a Global VRS; Convo Communications, LLC; Purple Communications, Inc.; Sorenson Communications, LLC; and CSDVRS, LLC, d/b/a ZVRS (“VRS Providers”)—request a limited waiver expressly permitting them to provide service to a new user or one ported from another provider while that user’s verification through the telecommunications relay services User Registration Database (“TRS-URD”) is pending. The VRS Providers seek this waiver out of concern that denying service until a new user has been verified through the TRS-URD would have adverse effects, including denying the user the ability to place non-compensable point-to-point calls, delaying VRS access to health care, community and social services, and denying the ability to make 911 calls to the extent that no videophone may be provided until after verification. For porting users, this denial or loss of service could occur without any change in the deaf users’ identifying information, but due to variances in the Lexis/Nexis database.

To eliminate such adverse effects, the VRS Providers seek a waiver authorizing service to new or porting users for a period of up to two weeks while verification is pending—but would

only seek compensation for VRS calls during that period once validation is, in fact, obtained. More specifically, the VRS Providers seek a waiver of Section 64.615(a)(5)(ii)'s prohibition on "register[ing] individuals"<sup>1</sup> who "do not pass the identification verification check" to allow up to two weeks of service *prior* to completing verification. Section 64.615(a)(5)(iii)'s prohibition on "seek[ing] compensation" for calls placed by individuals who "do not pass the identification verification check" would remain in place because, as noted above, VRS Providers would not seek such compensation until the individuals *do* pass the identification check.<sup>2</sup>

In short, the VRS Providers believe that a waiver here would service the public interest by allowing them to provide more functionally equivalent service by treating VRS users more like hearing users who initiate or port service.

## **I. BACKGROUND**

As the Commission is aware, the *2013 VRS Reform Order*<sup>3</sup> directed the establishment of the TRS-URD, and envisioned that VRS providers would eventually need to take three steps related to the database: (1) submit registration data to the TRS-URD for each of their registered VRS users;<sup>4</sup> (2) have data related to each VRS user's identity submitted and verified through the

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<sup>1</sup> 47 C.F.R. § 64.615(a)(5)(iii). In seeking a limited waiver of this provision, the VRS Providers also seek the ability to place numbers in the TRS Numbering Directory during the period while verification is pending.

<sup>2</sup> Significantly, the VRS Providers' experience is that the overwhelming majority of individuals seeking verification *do* eventually obtain it, even if doing so requires multiple submissions of supporting information.

<sup>3</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd. 8618, 8647-56 ¶¶ 62-86 (2013) ("*2013 VRS Reform Order*").

<sup>4</sup> 47 C.F.R. § 64.611(a)(4).

TRS-URD;<sup>5</sup> and (3) before completing a VRS call, query the TRS-URD to confirm that the party on the video side of the call is a registered VRS user.<sup>6</sup>

On December 29, 2017 the Commission issued a public notice announcing that the database was ready to accept user registration data submitted by VRS providers.<sup>7</sup> This announcement triggered both the 60-day period within which VRS providers were required to complete the submission of registration data for all currently registered users,<sup>8</sup> and the rule that VRS providers shall not “register individuals” or “seek compensation” for calls placed by individuals “that do not pass the identification verification check conducted through the [TRS-URD].”<sup>9</sup> The third step, requiring VRS providers to query the database to validate a user’s registered status before *each* call—known as the “all call query” (ACQ) function of the database—has not yet been triggered because the FCC has not yet created registration procedures for institutional and public videophones. Accordingly, VRS providers cannot yet reliably utilize such queries to determine whether a VRS user is registered, and therefore are not yet required to send such queries, pending further notice from the Commission.<sup>10</sup>

On February 28, 2018, CGB and OMD released an order addressing concerns that had arisen with the implementation of the TRS-URD in connection with VRS Providers’ then-currently registered users.<sup>11</sup> That *Order* began by clarifying the meaning and timeframe for

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<sup>5</sup> *Id.* § 64.615(a)(5).

<sup>6</sup> *Id.* § 64.615(a)(1).

<sup>7</sup> *Video Relay Service Providers May Begin Submitting Data to the TRS User Registration Database*, Public Notice, 32 FCC Rcd. 10467 (OMD CGB 2017) (*TRS-URD Public Notice*).

<sup>8</sup> *See* 47 C.F.R. § 64.611(a)(4)(ii).

<sup>9</sup> *Id.* § 64.615(a)(5)(ii)-(iii).

<sup>10</sup> *See TRS-URD Public Notice*, 32 FCC Rcd. at 10468-69.

<sup>11</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*,

“verification check[s]” under Section 64.615(a)(5).<sup>12</sup> The *Order* described the “verification check” process as follows:

Under the TRS-URD verification process, as currently administered by the TRS-URD Administrator, Rolka Loube LLC, several steps may be required before a VRS user ultimately passes or fails verification. This process begins when the provider submits the user’s data to the database, and an automated query is launched, using LexisNexis’s “FlexID” service, to verify this data. Based on results reported to date, while failure rates for this initial, automated verification step have varied from provider to provider, sometimes they have exceeded 20 percent. After the provider corrects formatting errors, if this initial automated check does not establish a user’s identity, the TRS-URD Administrator allows the provider to submit additional information, including, at times, supplemental documentation provided by the user or the results of the provider’s own identity verification check on that user. These supplemental submissions are subject to automated processing by the TRS-URD, which often results in successful verification of the user. If not, a provider may submit up to two “appeals” to the TRS-URD Administrator, requesting individual review of the user’s data and documentation. If such Administrator appeals are unsuccessful, any further appeal must be filed with the Commission.<sup>13</sup>

The *Order* found that, “based on the TRS-URD Administrator’s experience to date,” a “reasonable period for completing this process, from beginning to end” is not “longer than 60 days.”<sup>14</sup>

Against this backdrop, the *Order* made some adjustments to the TRS-URD deadlines set forth in the *TRS-URD Public Notice*. First, the *Order* “grant[ed] all VRS providers a temporary, 31-day waiver of the rule requiring the submission of registration data for all existing users within 60 days of the *TRS-URD Public Notice*,” thereby extending that deadline “through March

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Order, DA 18-196, OMD CGB CG Docket Nos. 10-51, 03-123 (rel. Feb. 28, 2018) (“*February TRS-URD Deadline Extension Order*”).

<sup>12</sup> 47 C.F.R. § 64.615(a)(5).

<sup>13</sup> *February TRS-URD Deadline Extension Order*, ¶ 7.

<sup>14</sup> *Id.* ¶ 9.

31, 2018.”<sup>15</sup> The *Order* also clarified that—given the 60-day estimate for the verification process—providers would be allowed “to receive payment (if the call is otherwise compensable) for VRS calls placed after the March 31<sup>st</sup> data submission deadline by users whose data ha[d] been submitted on or before this deadline, so long as they are verified within 60 days after such deadline, i.e., by May 30, 2018.”<sup>16</sup> Finally, in addition to these clarifications relating to *existing* users, the *Order* waived—also for 31 days—Section 64.611(a)(4)(iii)’s requirement of the submission of registration information for *new* users.<sup>17</sup>

On March 30, 2018, CGB and OMD released a follow-up order extending for an additional “30 days, through April 30, 2018, the deadline for video relay service (VRS) providers to submit registration data for their registered users” to the TRS-URD.<sup>18</sup> Like the earlier order, the *March TRS-URD Deadline Extension Order* also extended the waiver period for Section 64.611(a)(4)(iii). Because no further waiver of these requirements has been issued, however, they went fully into effect on that date. Section 64.611(a)(4)(iii) therefore now requires all of the information required by Section 64.611(a)(4) to be submitted “upon initiation of service.”<sup>19</sup>

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<sup>15</sup> *Id.* ¶¶ 13, 16.

<sup>16</sup> *Id.* ¶ 9.

<sup>17</sup> *See id.* ¶ 16, 47 C.F.R. § 64.611(a)(4)(iii).

<sup>18</sup> *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, DA 18-324, OMD CGB CG Docket Nos. 10-51, 03-123, ¶1 (rel. Mar. 30, 2018) (“*March TRS-URD Deadline Extension Order*”).

<sup>19</sup> That information includes “full name; full residential address; ten-digit telephone number assigned in the TRS numbering directory; last four digits of the social security number or Tribal Identification number . . .; date of birth; Registered Location; VRS provider name and dates of service initiation and termination; a digital copy of the user’s self-certification of eligibility for VRS and the date obtained by the provider; [and] the date on which the user’s identification was verified.” 47 C.F.R. § 64.611(a)(4).

## II. DISCUSSION

### A. The Waiver Standard

Under 47 C.F.R. § 1.3, “[a]ny provision of the rules may be waived by the Commission . . . on petition if good cause therefor is shown.” In *Northeast Cellular Telephone Co., L.P. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990), the D.C. Circuit explained that good cause exists when circumstances warrant a deviation from the general rule. For the reasons set forth below, that standard is met here.

### B. VRS Providers Should be Granted a Waiver to Provide Service to New Users While Verification is Pending so long as their Registration Information has been Submitted.

Section 64.615(a)(5)(ii) prohibits “register[ing]” new users “that do not pass the identification check conducted through” the TRS-URD.<sup>20</sup> On its face, this provision does not prohibit providing service to a user whose verification is *pending*—but the VRS Providers here nonetheless seek a waiver expressly permitting such service for a period of up to two weeks. As noted above, the VRS Providers would only seek compensation for calls during that period (assuming, of course, that the calls are otherwise compensable) once verification is obtained.

As set forth *supra* at 3, the Commission has recognized that the verification process can be complex and time-consuming. As also discussed there, the Commission accordingly allowed a window of time during which providers could supply service to *existing* users prior to verification—for a period of 60 days after the data submission deadline—“so long as they are verified within 60 days after such deadline.”<sup>21</sup> The waiver that the VRS Providers seek here is

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<sup>20</sup> 47 C.F.R. § 64.615(a)(5)(ii).

<sup>21</sup> *February TRS-URD Deadline Extension Order*, ¶ 9.

analogous; it would prevent unfair disparate treatment of new and porting users by also permitting them to obtain service—albeit for a shorter time—while verification remains pending.

The VRS Providers believe that two weeks is a sufficient waiver period because, as a practical matter, the verification process does not typically take 60 days. The VRS Providers indicate that the vast majority of all verifications are approved within two weeks.

Indeed, as the as the *February TRS-URD Deadline Extension Order* discussed above recognized, most verifications—generally over 70%—occur within hours of submission of the user’s information.<sup>22</sup> Still, that means that “failure rates for th[e] initial, automated verification step” may “exceed[] 20 percent.”<sup>23</sup> When that occurs, the provider may need to “submit additional information, including, at times, supplemental documentation provided by the user or the results of the provider’s own identity verification check on that user.”<sup>24</sup>

For new VRS users, even the “over 70%” representing the fastest verifications—those performed within hours—can cause inconvenience and disruption. Significantly, hearing individuals do not experience similar disruptions in obtaining phone service. When a hearing person obtains a cell phone or a landline (*e.g.*, VoIP service), for example, service typically begins immediately. VRS Providers’ inability to likewise provide service immediately accordingly would create tension with the statutory mandate of “functionally equivalent” relay services.<sup>25</sup> As Congress found in adopting the requirement of functionally equivalency,

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<sup>22</sup> Notably, however, even when the verification process itself is rapid, submissions late in a given day can still be delayed overnight because verifications are not performed after business hours.

<sup>23</sup> *February TRS-URD Deadline Extension Order*, ¶ 7.

<sup>24</sup> *Id.* As further discussed *infra* at 8, providing these documents can present a variety of logistical challenges, as well as raise potential privacy concerns for the user.

<sup>25</sup> 47 U.S.C. § 225(a)(3).

“individuals with disabilities continually encounter” the “discriminatory effects of ... communication barriers”—and the statute was intended to eliminate such discrimination.<sup>26</sup> Leaving new users without service for a period of time perpetuates rather than eliminates this discrimination.

But these inconveniences become far more serious for those users who encounter delays in the verification process. Such delays may occur even if there is no failure of validation. Sometimes, for example, the entities involved in the verification process may be the source of delay. In May, delay for much of a business day occurred because Lexis’s processing was down.<sup>27</sup> A more recent source of delay was that the TRS-URD Administrator’s Internet service provider was experiencing an outage.<sup>28</sup> Plainly, however, these kinds of issues are not the fault of users, and they should not experience service delays as a result.

Of course, far longer delays result when a user does initially fail a verification check and must therefore provide additional information. This can occur even when the customer has not had a name change or moved, but the Lexis/Nexis data on which the Administrator relies receives bad data calling the person’s name or address into question. Such delays are exacerbated when the user lacks the ability to make point-to-point calls. After all, a VRS Provider obviously does not know what additional information might be required for verification until a user initially fails verification. But the user then needs the ability to place calls in order to obtain additional information for resubmission in a timely manner. Moreover, in some cases, even after a first round of additional information has been collected and submitted, the user may

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<sup>26</sup> 42 U.S.C. § 12101(a)(5).

<sup>27</sup> See Attachment 1.

<sup>28</sup> See Attachment 2.

fail for new a reason—for example, because of changes in the data available to Lexis. Again, it is then difficult to go back and get another round of documentation from a user who cannot readily make calls. And some failure codes—for example, if Lexis incorrectly indicates that the user is deceased—are particularly difficult to clear, often requiring multiple submissions or use of appeals processes.<sup>29</sup>

Specific populations may also pose unique problems when it comes to verification. Students, for example, will likely be at entirely new addresses, with little documentation at that address to help verify their identity. Foreign nationals living in the United States—whether students or not—may lack traditional identifying information, such as Social Security numbers. And even individuals with such information may have privacy concerns about sharing more and more of it when additional rounds of documentation are required.

Notwithstanding occasional longer delays, the VRS Providers believe that the great majority of service disruptions resulting from verification delays would be addressed by permitting them to provide service for a period up to two weeks from the time the user's verification information is submitted, pending verification. So, for example, if a provider installs VRS equipment at a new user's location, the provider would assign a number at that time and immediately begin providing service, once the information required by Section 64.611(a)(4) has been collected and transmitted. Calls made during the period before the user was verified would not be eligible for compensation until verification is completed. Similarly, if a user obtains a new VRS application enabling service on a mobile device, the provider would assign a number

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<sup>29</sup> In the most difficult cases, appeals processes can add further substantial delay to the verification process—delay that may last even beyond the two weeks for which the VRS Providers seek a waiver here. An appeal to the Fund Administrator frequently takes about a week—although that period has been longer at times due to vacations or other staffing issues—while FCC appeals may take several times as long.

and begin providing service once the required data is submitted. Again, however, under this waiver request, the default provider would not seek compensation for calls placed during this period until verification is ultimately obtained.

One possible concern with this waiver request is that new users might, during the proposed two-week waiver period, place “dial-around” calls to providers other than their new provider if service were permitted. Other providers would presumably have no way to know that a user placing such a call was a new, unverified user. These calls might then be reported to the Fund Administrator as compensable. But refusing to grant the waiver sought here for this reason would amount to letting the tail wag the dog—particularly since VRS *requires* that users be able to converse with the Video Interpreter in ASL. In any event, this would be a problem of extremely limited duration—when the “all call query” function of the database becomes available (expected in the fall), providers receiving such dial-around calls *will* be able to tell whether the user has been verified.

A second possible objection is that users might repeatedly seek to obtain new service so as to benefit from service during the two-week waiver period sought here without ever actually being verified. As noted above, however, the VRS Providers seek the ability to provide service for up to two weeks only *after* the registration information has been submitted for validation. That submission requires a substantial amount of detailed information from the user *before* the verification may be requested. As a result, users are extremely unlikely to seek to “game” the waiver period. Additionally, since VRS Providers will not seek compensation for calls during the two-week period unless the user ultimately *does* receive verification, there would be no cost to the Fund in the unlikely event of such “gaming.” This would, in turn, provide VRS Providers incentive to prevent such abuses.

**C. VRS Providers Should be Granted a Waiver to Provide Service to Users Porting from Other Providers While Re-Verification is Pending.**

Like new users, VRS users seeking to port their service from one provider to another do not expressly fall within the ban on “register[ing] individuals that do not pass the identification verification check conducted” through the TRS-URD.<sup>30</sup> Indeed, such users by definition have *already* “pass[ed] the identification verification check” or they would not have been eligible for VRS service from their existing provider. Nonetheless, the VRS Providers understand that the Commission may interpret this provision to require that a user seeking to move to a new provider must be re-verified.

The VRS Providers accordingly seek a waiver of Section 64.615(a)(5)(ii) to expressly permit issuing a temporary number to users seeking to change providers. That temporary number would allow porting users to begin making and receiving VRS calls via the new provider right away, even before receiving verification approval. Of course, once such users receive verification, VRS Providers could permissibly issue them temporary numbers without needing a waiver. But if users become aware that there will be a period when service is not available from their chosen new provider while they await re-verification, that may present a substantial disincentive to changing providers.

The Commission has consistently emphasized that being able to change providers or look to more than one provider for service is a policy priority for the TRS Program. It is well established, for example, that a “TRS provider has an affirmative legal obligation to take all steps necessary to initiate or allow a port-in or port-out.”<sup>31</sup> According to the Commission, such

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<sup>30</sup> 47 C.F.R. § 64.615(a)(5)(ii).

<sup>31</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Report

portability “is indeed critical to effective competition and the provision of consumer choice in VRS.”<sup>32</sup> Denying a waiver here would frustrate that policy.

But granting a waiver in the context of users seeking to port would again advance the statutory goal of “functionally equivalent” relay services.<sup>33</sup> For hearing users, porting a number from one service to another is straightforward and nearly instantaneous—and the Commission has mandated that this must occur within one business day from submission of a simple port.<sup>34</sup> Even though technical differences between VRS and hearing services render porting a lengthier process for VRS,<sup>35</sup> the waiver sought here would make the experience far more equivalent for the VRS user.

To be clear, however, even though porting a TDN between carriers generally takes about a week in the VRS context, the VRS Providers here seek a waiver only for a period up to two weeks from the time the new provider seeks validation of the porting user. As noted above, VRS Providers do not need a waiver to provide a temporary number once verification is obtained, and the verification process is the same for new and existing users. Again, then, the waiver would simply permit the VRS Provider to provide service for a period of up to two weeks pending

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and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd. 11591, 11607 ¶ 35 (2008) (“*E911 Requirements Order*”).

<sup>32</sup> 2013 VRS Reform Order, 28 FCC Rcd. at 8643 ¶ 50; *E911 Requirements Order*, 23 FCC Rcd. at 11606, ¶ 34 (“The record is clear that the ability to port numbers (1) from one Internet-based TRS provider to another, and (2) between Internet-based TRS providers and other entities subject to LNP (such as carriers and interconnected VoIP providers) is a priority in any numbering plan for Internet-based TRS.”).

<sup>33</sup> 47 U.S.C. § 225(a)(3).

<sup>34</sup> 47 C.F.R. § 52.35.

<sup>35</sup> VRS providers are treated as resellers under the porting procedures, and thus ports between VRS providers are complex ports, not simple ports.

verification, and to seek compensation for calls during that period only once verification has been obtained.

## CONCLUSION

The Commission may waive rules if it has good cause to do so and “particular facts would make strict compliance inconsistent with the public interest.”<sup>36</sup> Here, strict compliance with the Commission’s user verification rules would unduly inconvenience new and porting VRS users, and would be inconsistent with the Commission’s goal of furthering functional equivalence. The Commission should accordingly permit VRS Providers to place numbers in the TRS Numbering Directory for and provide service—for a period of two weeks after their verification information is submitted to the TRS-URD, pending verification—to both new VRS users and those seeking to port from a different provider.

Date: June 20, 2018

Respectfully submitted,

/s/ Gabrielle Joseph

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<sup>36</sup> *Ne. Cellular*, 897 F.2d at 1166 (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

# **Attachment 1:**

E-Mail re Lexis Processing

**From:** URDAdministrator  
**To:** [Jessica Roque](#); [Douglas Kerr](#); [Lydia Yomogida](#); [Jose Pereira](#); [Lori Koch](#); [kelley.duran@convorelay.com](#); [Greg Hlibok](#); [james.rydstrom@convorelay.com](#); [Dave Rolka](#); [Darcy Howard](#); [Grant Beckmann](#); [Gabrielle Joseph](#); [Allan Jacks](#); [Amanda Coby](#); [Jesse Parent](#); [Rosen, Brian](#); [David Schmidt](#); [Caryn Bain](#); [Brian Showalter](#); [Jeff Rosen](#); [jaime@convorelay.com](#); [Brian Robinson](#); [Staff Interpreters](#); [Craig Barnes](#); [Susan Hurst](#)  
**Cc:** [Gary Hansen](#); [Mary Beth Osborne](#); [Isaac Roach](#); [Rosen, Brian](#)  
**Subject:** RE: Lexis Nexis: URD Processing Restored  
**Importance:** High

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Confirmation has been given by Lexis Nexis that their batch processing has been restored.

URD has resumed processing of registrations as of 4pm and we are now generating result files to providers on BOX.

Please email [urd@rolkaloue.com](mailto:urd@rolkaloue.com) if you have any questions or experience any resolution issues regarding this outage.

Thank you for your patience.

**Kelly Kearn**, *CISSP*  
**Chief Information and Security Officer (CIO/CISO)**

**RolkaLoube**  
4423 North Front Street  
Harrisburg, PA 17110-1788  
(w) 717-303-3619  
[kkearn@rolkaloue.com](mailto:kkearn@rolkaloue.com)



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**From:** Kelly Kearn

**Sent:** Thursday, May 31, 2018 11:52 AM

**To:** 'Jessica Roque' <jessica.roque@purple.us>; Douglas Kerr <DKerr@Sorenson.com>; 'Lydia Yomogida' <lydia.yomogida@purple.us>; Jose Pereira <Joey@ASLServices.com>; 'Lori Koch' <lkoche@zvr.com>; 'kelley.duran@convorelay.com' <kelley.duran@convorelay.com>; 'Greg Hlibok' <ghlibok@zvr.com>; 'james.rydstrom@convorelay.com' <james.rydstrom@convorelay.com>; Dave Rolka <drolka@rolkaloue.com>; 'Darcy Howard' <darcy.howard@purple.us>; 'Grant Beckmann' <GBeckmann@sorenson.com>; 'Gabrielle Joseph' <Gabrielle@aslservices.com>; Allan Jacks <ajacks@rolkaloue.com>; Amanda Coby <acoby@rolkaloue.com>; Jesse Parent <JPParent@sorenson.com>; Rosen, Brian <Brian.Rosen@neustar.biz>; 'David Schmidt' <David.Schmidt@fcc.gov>; Caryn Bain <cbain@zvr.com>; Brian Showalter <brian.showalter@convorelay.com>; 'Jeff Rosen' <jeff@convorelay.com>; 'jaime@convorelay.com' <jaime@convorelay.com>; Brian Robinson <brobins@rolkaloue.com>; Staff Interpreters <staff.terp@purple.us>; Craig Barnes <CBarnes@Sorenson.com>; Susan Hurst <shurst@rolkaloue.com>

**Cc:** Gary Hansen <GHansen@Sorenson.com>; Mary Beth Osborne <MOSBORNE@rolkaloue.com>; Isaac Roach <IRoach@sorenson.com>; Rosen, Brian <Brian.Rosen@team.neustar>

**Subject:** Lexis Nexis: Processing Down

**Importance:** High

FYI...

We have been alerted by Lexis Nexis that their processing is currently down. As such, we are **pausing URD registration processing** until further notice.

You will continue to be able to upload your registration submission files to BOX, but RL will not be processing the registrations or be able to provide result files until LexisNexis notifies us that they are back up and running for the identity validation and risk code result file processing.

As soon as they have restored their availability RL will restart URD processing and alert everyone accordingly.

**Kelly Kearn**, *CISSP*

**Chief Information and Security Officer (CIO/CISO)**

**RolkaLoubé**

4423 North Front Street

Harrisburg, PA 17110-1788

(w) 717-303-3619

[kkearn@rolkaloubé.com](mailto:kkearn@rolkaloubé.com)



## **Attachment 2:**

E-mail re Internet Outage

**From:** Kelly Kearn  
**To:** [Jessica Roque](#); [Douglas Kerr](#); [Lydia Yomogida](#); [Jose Pereira](#); [Lori Koch](#); [kelley.duran@convorelay.com](#); [Greg Hlibok](#); [james.rydstrom@convorelay.com](#); [Dave Rolka](#); [Darcy Howard](#); [Grant Beckmann](#); [Gabrielle Joseph](#); [Allan Jacks](#); [Amanda Coby](#); [Jesse Parent](#); [Caryn Bain](#); [Brian Showalter](#); [Jeff Rosen](#); [jaime@convorelay.com](#); [Brian Robinson](#); [Staff Interpreters](#); [Craig Barnes](#); [Susan Hurst](#)  
**Cc:** [Gary Hansen](#); [Mary Beth Osborne](#); [Isaac Roach](#)  
**Subject:** RE: VRS URD - Comcast Internet Outage  
**Date:** Tuesday, June 12, 2018 11:18:45 AM

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**[EXTERNAL]**

All processing has been completed and result files should be posted by/before noon eastern time.

If any provider believes that there are any outstanding result files from processing that they still don't see after noon eastern time today, please email [urd@rolkaloube.com](mailto:urd@rolkaloube.com) and we will look into your matter individually.

Thank you for your patience,

**Kelly Kearn**, *CISSP*  
**Chief Information and Security Officer (CIO/CISO)**  
**RolkaLoube**  
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Harrisburg, PA 17110-1788  
(w) 717-303-3619  
[kkearn@rolkaloube.com](mailto:kkearn@rolkaloube.com)



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**From:** Kelly Kearn  
**Sent:** Tuesday, June 12, 2018 11:14 AM  
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**Subject:** VRS URD - Comcast Internet Outage

This email is to notify all VRS providers that the URD had a Comcast internet system outage for a few hours this morning and just recently confirmed that our connection is back up. We are currently

processing any/all files that were sent to us and will send out another email once all result files have been processed and in line with hourly processing of submission files.

Thank you for your patience.

**Kelly Kearn**, *CISSP*

***Chief Information and Security Officer (CIO/CISO)***

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