

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

In the Matter of)	
)	
Telecommunications Relay Services)	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
Service Program)	
)	

REPLY COMMENTS

**Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)
National Association of the Deaf (NAD)
Deaf Seniors of America (DSA)
Cerebral Palsy and Deaf Organization (CPADO)**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), National Association of the Deaf (“NAD”), Deaf Seniors of America (“DSA”) and Cerebral Palsy and Deaf Organization (“CPADO”) (collectively, “Commenters”) submit these reply comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice seeking comments on the Petition for Rulemaking and Interim Waiver (“Petition”) filed by Convo Communications, LLC (“Convo”), proposing changes to certain Video Relay Service (“VRS”) service rules.¹ Commenters respond to comments by Sorenson Communications, LLC urging the

¹ Convo Communications, LLC, Petition for Rulemaking and Interim Waiver, CG Docket Nos. 03-123 and 10-51 (filed June 4, 2021) (“*Petition*”).

Commission not to implement a cap on the percentage of VRS minutes relayed through remote workstations on a monthly basis.²

As previously explained, the Commenters do not oppose an increase in the percentage of VRS minutes relayed through remote workstations on a monthly basis to 80 percent so long as any such relaxation is accompanied with certain requirements including that VRS providers routinely audit such workstations to ensure that caller privacy and call performance is not adversely affected and taking appropriate measures to ensure a call-back option and connectivity to the next available VRS Communications Assistants (“CA”) if a disruption in Internet connectivity to the remote workstation occurs.³ Consumers have experienced the benefits of having increased at-home CAs during the COVID-19 pandemic, and subject to appropriate policies and procedures, such service should remain available.

However, Commenters are opposed to having no cap on VRS minutes relayed through at-home workstations until there are clear policies and procedures in place. It is imperative that the FCC takes measures to ensure that at-home networks are secure, reliable and redundant. Privacy is paramount and additional oversight must be exercised to ensure that CAs take appropriate steps to ensure the privacy of calls relayed through their remote workstations. For example, consideration should be given for an initial at-home set-up as well as ongoing audit measures including how the working environment is secured and what support is provided for using home square footage to make it a work environment.

Moreover, the Commission should require VRS providers to implement appropriate measures to provide a call-back option and connectivity to the next available CA in the event of a

² Comments of Sorenson Communications, LLC re Convo Petition for Rulemaking and Interim Waiver, CG Docket Nos. 03-123 and 10-51 (filed July 19, 2021).

³ Comments of TDI et al. (filed July 19, 2021).

problem that disables the CA that initially relayed the call. Attention should be given to what happens when the CA's home loses electricity or broadband connectivity, particularly with increased percentages of minutes relayed remotely. VRS providers must ensure remote workstations have the same reliability and redundancy that dedicated call centers enjoy including measures to reroute a call or reconnect for any dropped call.

Until the FCC has considered and developed appropriate policies and procedures for increasing VRS minutes relayed through remote workstations, it should not move away from having a cap on the monthly percentage.

The Commenters appreciate the opportunity to submit reply comments in this important proceeding. We look forward to continuing our work with the Commission to improve the integrity and performance of next generation VRS services.

Respectfully submitted,

/s/ *Eric Kaika*

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