

ANDREW O. ISAR



Via ECFS

August 5, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *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 Secretary Dortch:

ASL Services Holdings, LLC dba GlobalVRS submits *Comments of ASL Services Holdings, LLC dba GlobalVRS* in response to the Commission's *Further Notice of Proposed Rulemaking* section of the Commission's May 15, 2019 *Report and Order and Further Notice of Proposed Rulemaking* in the above-referenced proceeding.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar
Andrew O. Isar

Consultants to
ASL Services Holdings, LLC dba GlobalVRS

Attachment

cc: Eliot Greenwald (via Email)
Robert Aldrich (via Email)
Michael Scott (via Email)

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

COMMENTS OF ASL SERVICES HOLDINGS, LLC dba GLOBALVRS

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August 5, 2019

SUMMARY

ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS”) addresses the proposed permanent adoption of the at-home interpreting pilot program, and enterprise and public videophone log-in mechanisms proposed by the Commission. GlobalVRS supports the Commission’s proposed conversion of the pilot at-home call-handling program (“Program”) to a permanent program. GlobalVRS urges the Commission to retain current Program safeguards subject to further Commission consideration of data from all providers and additional program experience. GlobalVRS also addresses certain Program safeguards that may be broadly interpreted and will benefit from additional Commission clarification to ensure compliance as intended. And GlobalVRS addresses the Commission’s proposed enterprise and public videophone log-in procedures, which GlobalVRS maintains offers limited safeguards because of the challenges associated with active monitoring and enforcement, in favor of other less costly proposals. Ultimately, GlobalVRS recommends visual user verification as the most effective method for precluding fraud, waste and abuse.

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In the Matter of)	
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Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	

COMMENTS OF ASL SERVICES HOLDINGS, LLC dba GLOBALVRS

ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS”) submits the following comments in response to the *Further Notice of Proposed Rulemaking* section of the Commission’s May 15, 2019 *Report and Order and Further Notice of Proposed Rulemaking*.¹ GlobalVRS specifically addresses the proposed permanent adoption of the at-home interpreting pilot program, and enterprise and public videophone log-in mechanisms.

I. INTRODUCTION

The Commission proposes permanent adoption of the Program based in part on the results of pilot Program data submitted from two providers who effectively operate as a single provider, and the Commission’s stated anticipated advantages of at-home interpreting. Indeed, the Program offers many desirable advantages. GlobalVRS supports the pilot Program’s permanent adoption. Nevertheless, GlobalVRS maintains that the Commission should consider additional data from all providers, including those who have not yet participated in the Program, to enable the Commission

¹ *In the Matter of 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 and Further Notice of Proposed Rulemaking* (May 15, 2019) [FNPRM].

and providers to gain experience with at-home interpreting before making major changes to current safeguards. Such data may reveal the need for potential further amendment of current or new safeguards.

GlobalVRS also maintains that certain Program safeguards may be subject to interpretation and should now be clarified and/or defined to ensure full compliance consistent with the Commission's intent.

GlobalVRS acknowledges the Commission's desire to create additional safeguards for enterprise and public videophones through a log-in mechanism in concept. In practice, GlobalVRS believes that the proposed log-in process will not preclude abuses as the Commission envisions, and become effectively unenforceable.

Unless the true identity of the registered user can be verified through *both* validation of the individual being a registered VRS user *and visual* verification of the public videophone user, the potential for registered users to facilitate fraudulent calling remains. GlobalVRS proposes that enterprise and public videophone users provide identification that enables verification of their eligibility to place VRS calls as TRS-URD registrants prior to placing calls. In the absence of visual verification procedures being implemented, GlobalVRS supports initial adoption of Sorenson's log-in alternative to the proposed log-in mechanism.

II. THE COMMISSION SHOULD RETAIN CURRENT SAFEGUARDS PENDING ADDITIONAL DATA FROM ALL PROVIDERS AND ADDITIONAL PROGRAM EXPERIENCE.

The Commission bases its intent to convert the pilot at-home call handling program to a permanent program in part on the results of report data from participating “VRS providers.”² These VRS providers – CSDVRS, LLC d/b/a ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”), effectively operate as a single company. Though the ZVRS/Purple trial Program results may underscore the benefits of making the Program permanent, their results do not necessarily apply to all providers. As other providers are now providing, or plan to provide at-home interpreting, the Commission should be prepared to make further amendments to the Program regulations, based on other provider results. Once additional data and Program experience have been gained, should further amendments to current safeguards be considered.

The Commission poses a series of questions regarding the effectiveness of current trial Program’s safeguards against fraud, waste and abuse, what “issue have been encountered” in the Program, and what modifications are necessary.³ GlobalVRS has long maintained that there are unique considerations associated with providing VRS to the Spanish speaking Deaf and DeafBlind Communities, which the Company serves. Yet until recently,⁴ GlobalVRS and other providers have not participated in the program, and been unable to address how these and other potential considerations apply in their own at-home interpreting environments. As the GlobalVRS now anticipates deploying at-home interpreters, it is unclear what potential issues or considerations *will*

² FNPRM at 40.

³ See, e.g. FNPRM at 44.

⁴ See *In the Matter of 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, Order, DA 19-360 (April 30, 2019) authorizing Sorenson Communications, LLC, ASL Services Holdings, LLC dba GlobalVRS and Convo Communications, LLC to participate in the pilot program as extended.

be encountered that could temper the current safeguards.⁵ By extension, other providers who have not previously participated in the Program may also raise additional issues that require consideration and ultimately could require amendment of the Program rules based on what *they* encounter. It would otherwise appear highly unusual for the Commission to amend current safeguards based on the trial results of a single provider who required extensions to complete its own trial.

GlobalVRS does not oppose – and indeed supports - converting the at-home interpreting trial to a permanent program. However, GlobalVRS does not support amendment of current program safeguards until all providers have had ample time to participate. In light of the trial data that the Commission has received from essentially a single provider, the unique considerations that data from other newly participating providers may raise, and the Program’s limited history generally, GlobalVRS urges the Commission to consider further amendments and further clarification of safeguards as needed, beyond those addressed below, as additional operating data and experience from all providers and the Commission are gained.

III. ADDITIONAL RULE AMENDMENTS OR EXPLICIT CLARIFICATION ARE NEEDED TO ENSURE THAT ALL PROVIDERS COMPLY WITH PROGRAM SAFEGUARDS AND UNDERLYING RULES AS INTENDED.

The Commission seeks comment regarding the proposed Program safeguards established under the pilot Program. GlobalVRS generally maintains that conceptually those safeguards are sufficient to protect against fraud, waste and abuse, subject to potential further amendment based on longer-term and broader experience, as noted. Some of the Program safeguards would

⁵ 47 C.F.R. § 64.604(b)(8).

nevertheless benefit from further clarification to more clearly establish provider requirements and ensure that providers are able to fully comply in accordance with Commission intent:

Technical and Environmental Safeguards – The Word “Secure” Should be Defined.

The rules include the word “secure” in reference to secure work stations,⁶ locations,⁷ and networks.⁸ “Secure” is generally understood in concept, but more open to interpretation as a technical term, *e.g.* what level of technical security is appropriate for an at-home broadband Internet access service (“BIAS”) line? How will the Commission establish that a line was secure if an at-home interpreter’s computer is hacked? Does the word “secure” include a direct connection to a work computer that is inaccessible through wi-fi (see below)? Would the Commission consider a “safe harbor” such as a BIAS provided by a major cable, wireless or wireline telecommunications service provider as being “secure?”

Technical and Environmental Safeguards – Does the Entity or Individual Assume Responsibility for BIAS? Does the Commission expect providers or interpreters to control the provision of BIAS? GlobalVRS presumes that the provider assumes responsibility for BIAS when used by the interpreter on behalf of the provider and that provider BIAS should be entirely separate from the interpreter’s personal BIAS, and not be connected through an interpreter’s home wi-fi (thus available to others and not “secure” from personal use). If an interpreter is found to have tampered with equipment to bypass safeguards, would the provider nevertheless be held responsible and risk being terminated from the program?⁹ GlobalVRS urges the Commission to explicitly address these issues.

⁶ *Id.* at 64.604(b)(8)(i)(E)

⁷ *Id.* at 64.604(b)(8)(v)(A)

⁸ *Id.* at 64.604(b)(8)(v)(E)

⁹ Though the interpreter would certainly be removed from the program and likely terminated, the provider should not face program termination if it can demonstrate that it took all reasonable steps to enforce safeguards.

Technical and Environmental Safeguards - System Redundancy Should be Scaled, Though Defined by the Commission. Regarding system redundancy requirements for at-home work stations,¹⁰ GlobalVRS agrees that system redundancy should be scaled for at-home workstations. Backup generators that are critical to call centers housing interpreter teams. Generators are costly and moreover unnecessary in at-home work stations because of the ability of provider automatic call distribution platforms to immediately re-route calls to working call centers in the event of a power outage. Alternatively, at-home backup power requirements should be no more than adequate off the shelf computer backup power units that will retain sufficient power to complete a call that an interpreter may be interpreting at the time of an unexpected outage, back up data, and inform provider management of a power outage to enable rerouting of calls. Nevertheless, GlobalVRS ultimately urges the Commission to establish the specific level of system redundancy that deemed acceptable for at-home interpreting rather than leaving such a determination left to the provider's discretion to ensure compliance.

Monitoring and Oversight Requirements – Provider Reimbursement of Exogenous Cost. Commission safeguards include at-home work location inspections by the provider and the Commission.¹¹ How such inspections are to be conducted by providers remains unclear. Must such inspections be conducted physically or may inspections be conducted virtually via a video call? What level of provider management would be required to conduct an inspection? Could inspections be outsourced to third parties local to the at-home interpreter prospect – presuming that the third party would have no professional or personal relationship or otherwise be conflicted in performing an inspection? If an in-person inspection is required, will inspection costs be

¹⁰ FNPRM at 45.

¹¹ *Id.* at 46.

deemed an allowable expense or otherwise be subject to reimbursement as an exogenous cost?¹² These issues should be clarified rather than left open to interpretation and potential provider expense.

Proposed Safeguards Should be Retained. GlobalVRS otherwise agrees with the Commission's proposed Program safeguards and supports their adoption: As *de facto* call centers, it is entirely appropriate for at-home interpreter work locations to retain records available for review, audit, and unannounced inspections by the Commission and TRS Fund Administrator and otherwise maintain the same level of information, certification, and commitment¹³ and the safeguards for authorizing interpreter participation in the Program are reasonable to ensure that only qualified interpreters and locations may be considered for at-home interpreting.¹⁴

GlobalVRS agrees that the Commission should retain authority to cancel participation. Cancellation should first be considered for non-complaint individual at-home interpreting locations if the basis for non-compliance is egregious and for lessor violations, if the provider does not or cannot immediately bring the at-home interpreting location into compliance. Only if there is established evidence of program non-compliance should the provider be precluded from

¹² GlobalVRS recognizes that the Program is voluntary. Nevertheless, to the extent that physical inspections are required, GlobalVRS urges the Commission to allow direct inspection costs to be reimbursable as an exogenous cost or at a minimum allowable costs for annual cost reimbursement determination by the TRS Fund administrator. A broader related issue is what, if any, costs of deploying an at-home call center may be considered exogenous and subject to reimbursement. Some deployment costs will be a function of specific safeguards that the Commission has or will implement, including requiring physical rather than virtual site inspections, or the level of detailed reporting GlobalVRS urges the Commission to provide guidance on what at-home interpreting deployment costs it will consider reimbursable either as direct exogenous costs or as allowable costs for annual relay service rate determinations, if any.

¹³ FNPRM at 48 and 50. To the extent that continued experience with permanent at-home interpreting reveals the need for an increase or reduction in the current safeguards, GlobalVRS urges the Commission to consider further amendments based on requests for amendment and public comment.

¹⁴ *Id.* at 49.

participation.¹⁵ These safeguards should be retained unless - or until - no longer deemed necessary by the Commission.

Data Collection Requirements Should be Retained. GlobalVRS supports retaining current reporting requirements, including retention of the six-month reporting requirements, again if or until the Commission no longer deems certain reports or reporting frequency sufficient or necessary in accordance with experience gained over time. GlobalVRS maintains that reports should remain confidential and proprietary, whether individually or in aggregated form. It is unclear what public benefit would be gained by mandating that reports be made public and how the public would use such reports. Providers should be allowed to determine if they wish to make related information available to the public.¹⁶

Limitation on Service – Current Limitations Should be Retained Pending Additional Program Experience. Before removing any limitation on the percentage of at-home interpreting call center usage, GlobalVRS urges the Commission to maintain current limitations until providers and the Commission gain further experience with the Program and the possibility of unlimited at-home call center deployment is supported by data.¹⁷ Removal of at-home call center limitations now would otherwise be premature, as noted.

¹⁵ *Id.* at 51.

¹⁶ It is unclear whether instant messaging sent between call centers including at-home call centers should be considered part of the data to be retained and if retained, for how long. GlobalVRS' utilizes "SLACK," an instant messaging system which has inherent technical limitations on how long and how many instant messages are retained. Does the Commission consider such instant messages to constitute "records" as used in the at-home interpreting rules, and if so, what would the Commission consider reasonable and technically feasible retention policies?

¹⁷ FNPRM at 54. The need for additional data generally to support a reduction or elimination of in at-home interpreting limitations is underscored by the Commission's observation regarding videophone usage at FNPRM para. 61: "Although some commenters claim that public videophones are relatively infrequently used, Rolka Loube reports that total usage of enterprise and public videophones averages more than one million minutes per month." Perception does not necessarily equate to the facts. There is no evidence supporting removal of all limitations at this time and removal of all limitation could have unintended consequences, *e.g.*, a provider seeking to immediately move to an all at-home

Despite the Commission's well-considered Program safeguards, the potential for fraud, waste and abuse remains to be fully tested and enforced. There is already a growing demand from interpreters to be approved to work from home. If there are no restrictions on the program, that the number of remote locations is anticipated to skyrocket. A proliferation of at-home call centers will impose a further burden on the Commission to ensure compliance and pursue timely enforcement once a violation has been established. It is unclear that the Commission or providers have the resources to perform these functions with an ever-growing number of call centers and unique at-home interpreting anomalies, at least not presently. This situation could open a Pandora's Box to potential abuses that could be perpetrated to the detriment of other providers until enforcement action would be initiated, potentially long after the damage to competitors would be done.¹⁸ GlobalVRS urges the Commission to first gather historical data from all participants, monitor the impact to consumers and then determine if changes to restrictions should be made. The Commission should first gain a complete understanding of dynamics of making at-home interpreting generally available by all providers, and reduce at-home call center limitations on a gradual basis in accordance with the benefit of further experience and data.

IV. A DISTINCTION SHOULD BE MADE BETWEEN PUBLICLY ACCESSIBLE AND EMPLOYEE-ASSIGNED ENTERPRISE VIDEO PHONES WHEN IMPLEMENTING SAFEGUARDS.

Enterprise videophones may either be publicly accessible, located in reception areas or conference rooms, or available only to designated employees. The proposed safeguards do not acknowledge this distinction. If log-in procedures are adopted, an employee will have to log-in to

interpreting network of call centers could have harmful consequences that could adversely impact other providers and undermine the Commission's ability to enforce its rules.

¹⁸ Providers may, for example, offer at-home interpreting as a recruitment tool to unqualified or marginally qualified interpreters or interpreters residing in remote areas that may not have reliable BIAS, despite the Commission's qualification safeguards, in a strategic effort to undermine competitors' access to interpreters and ability to expand operations.

use his/her designated videophone for every placed call. This would impose an unnecessary burden on Deaf employees, and undermine functional equivalency. GlobalVRS urges the Commission to make the distinction between publicly available and private enterprise videophones and allow employees to place calls as they would from their personally assigned numbers, or consider log-in alternatives, as discussed below.

V. RESPONSIBLE INDIVIDUALS AND END-USERS SHOULD BE HELD ACCOUNTABLE FOR MISREPRESENTING CERTIFICATIONS.

GlobalVRS supports the proposed requirement that VRS providers “submit to the User Registration Database a certification by the responsible individual for an enterprise videophone that the organization, business, or agency will make reasonable efforts to ensure that only registered VRS users are permitted to use the phone for VRS.”¹⁹ In practice, however, such certifications will ring hollow in the absence of enforcement action against those who do not safeguard access to the enterprise’s videophone(s) - as well as individuals who misrepresent their eligibility to place VRS calls generally.

GlobalVRS recognizes that the Commission’s jurisdiction does not extend beyond the providers. Nevertheless, those enterprises who misrepresent their ability to limit videophone access to eligible users and those individuals who misrepresent their eligibility to place calls using publicly available video phones must be held accountable. VRS providers are limited in their ability to pursue those who seek to engage in fraudulent calling beyond terminating service or blocking calls. Whether in the context of enterprise and public videophone usage or broader end-user fraud, the Commission must take affirmative action to prosecute those individuals, if not under its jurisdiction, then by engaging the Department of Justice to pursue prosecution. Further,

¹⁹ FNPRM at 60.

all certifications should make the consequences of perjury and engaging in fraudulent acts clear to those certifying compliance. Otherwise the proposed certifications do little to preclude fraud.

VI. VISUAL VERIFICATION OF ENTERPRISE AND PUBLIC VIDEOPHONE USER'S IDENTITY IS THE MOST EFFECTIVE APPROACH TO PRECLUDE UNAUTHORIZED USAGE.

The Commission seeks comment regarding implementation of a log-in mechanism for enterprise and public videophone users such as the “OAuth 2.0” process proposed by Neustar.²⁰ Notwithstanding the additional costs and additional technical complexities Neustar’s proposed log-in process or any other log-in mechanism poses, however limited²¹ there is no evidence to support that a log-in process will ultimately be effective. Indeed, as the Commission notes, only Neustar has proposed a log-in solution.²²

The TRS-URD was implemented to “*verify the identity of VRS users, call validation requirements to ensure that VRS calls involve properly registered users, and call detail reporting requirements to confirm the identity of VRS callers and that the provider is in fact entitled to compensation for the call.*”²³ The TRS-URD identifies the registrant as eligible to place Fund-

²⁰ FNPRM at 63 to 69.

²¹ Without detailed analysis, GlobalVRS cannot begin to meaningfully estimate the added cost of implementing a log-in process, let alone whether the cost of such a log-in process and related diversion of resources to implement a log-in process would be justified in the absence of data on the number of enterprise and public videophone subscribers the Company would have and specific technical requirements. GlobalVRS has initially estimated some 400 person-hours in programming costs to incorporate a log-in mechanism and associated numbering directory and TRS-URD interfaces. Further, direct implementation costs would not factor in the added administrative costs of responding to callers who lost or forgot log-in information, and verifying those calls that might be exempted from log-in requirements. Whatever the implementation of costs, smaller providers would be disproportionately impacted by having to assume implementation costs for a far smaller universe of videophone clients than the dominant providers. And implementation costs would not be materially reduced by exempting certain types of calls, as the Commission suggests since log-in capabilities and procedures would still have to be designed and implemented generally. (Emergency calls should be exempt from any form of log-in or other means of caller verification as a matter of public safety and not a means to reduce implementation costs – FNPRM at 73). As discussed, GlobalVRS maintains that a log-in process will not eliminate unauthorized usage. If the Commission ultimately imposes a log-in requirement, it will be appropriate to treat any associated costs assumed by providers as exogenous subject to TRS Fund reimbursement. Regardless of implementation costs, in GlobalVRS’ view that it is premature to consider adoption of a log-in process in the absence of evidence that a log-in process can be implemented effectively as proposed.

²² FNPRM at 69.

²³ *Id.* at 58 emphasis supplied.

eligible calls. If a registrant enables an unregistered individual to bypass safeguards and place unauthorized VRS calls from an enterprise or public videophone, a log-in procedure will not be effective in precluding this type of fraud. Lost or stolen log-in information will also enable ineligible users to place, regardless of a log-in process. As the TRS-URD will only verify that the registered user is authorized to place the call and not the person actually placing the call, the visual verification by the CA of the user's identity prior to placing a call is needed.

Visual verification that the individual placing the call is the same individual who is registered in the TRS-URD, such as a screenshot of the caller's face and/or caller's driver's license photo or other form of approved picture of the registrant will be ultimately effective in precluding unauthorized calling from enterprise and public video phones.²⁴ Unless the Commission requires some form of visual verification that the person placing the call matches the photo on file for the registrant when using an enterprise or public videophone caller is a TRS-URD registered user, no log-in process is failsafe, let alone will the process be capable of being effectively monitored or enforced. The Commission will otherwise have to accept that a log-in mechanism is a "blind" process, and inherent unable to effectively block all unauthorized calls placed from enterprise and public videophones. GlobalVRS urges the Commission to explore adoption of a visual verification mechanism through the TRS-URD.

To the extent that the Commission nevertheless seeks to proceed with some form of log-in mechanism, GlobalVRS vehemently opposes any waiver or limitation of log-in requirements for providers who claim an inability to integrate their equipment with a log-in mechanism.²⁵

²⁴ GlobalVRS is mindful that verification of identity may be considered by some inconsistent with functional equivalency. As the TRS Fund is a regulatory program that accords benefits to end-users, user eligibility is a necessary safeguard against fraud, waste and abuse, as the Commission has established. By extension, verification of eligibility for use of enterprise or public videophones is reasonable and necessary to protect the integrity of the Fund and keep relay services readily accessible to responsible users.

²⁵ FNPRM at 66.

Dominant providers have long relied on the provision of proprietary equipment to protect their market base. Providers who have developed and distributed proprietary equipment and competitively benefited from such equipment should be expected to assume development costs of incorporating log-in requirements into their equipment if a log-in mechanism is adopted. It should not be enough for those providers to simply claim an inability of their equipment to technically comply to be exempt from a log-in requirement.

GlobalVRS agrees that interpreters' authority to refuse or terminate calls they believe to be suspicious and/or fraudulent should apply to enterprise and public videophone calls as well, as an added protection against fraud, as the Commission acknowledges.²⁶ Interpreters should be able to exercise their professional judgment when they believe that any suspicious and/or fraudulent call is being placed and to notify the caller.

VII. SORENSON'S LOG-IN ALTERNATIVE IS MORE EFFECTIVE AT PREVENTING FRAUD AND SHOULD BE TRIED BEFORE A LOG-IN MECHANISM IS CONSIDERED.

GlobalVRS agrees that Sorenson's proposed log-in alternative to require enterprise and public videophone users to enter their registered VRS telephone number without a PIN before completing a call, is more effective and less expensive to implement.²⁷ From a practical perspective, registered users are more inclined to remember their registered number than an assigned PIN, thus reducing the burden on legitimate users. To the extent that a registered user has aided in enabling fraudulent calls to be placed, the provider and TRS Fund administrator will be able to establish the identity of the user through active monitoring, as the Commission notes. Identification of potential fraudulent usage through monitoring usage attributed to the user's VRS

²⁶ See FNPRM footnote 196, "In addition, as is true for all VRS calls, VRS providers may decline to handle a call from an enterprise or public videophone if it has reason to believe that someone other than those users who have been preauthorized to use the phone without a per-use log-in is utilizing the device."

²⁷ FNPRM at 75.

assigned number will enable providers to take immediate action. And the requirement for users placing calls over enterprise and public videophones to provide their registered telephone number should serve as an inherent safeguard if the user recognizes that calls placed from videophones will ultimately be traced back to the user. GlobalVRS urges the Commission to consider adoption of Sorenson's proposed log-in alternative,²⁸ even if on an interim basis, to test the efficacy of this approach before – or if – considering a log-in mechanism or evaluating a visual verification process.

VIII. CONCLUSION.

GlobalVRS supports permanent adoption of the Program without further amendments, pending additional data from all providers and general program experience. To the extent that certain rules may be open to interpretation, GlobalVRS urges the Commission to define or clarify those rules to ensure that the rules are implemented in the manner in which the Commission intends. Any reduction in the limitation on at-home interpreting call center usage should be based on additional Program data and experience rather than removal of all limitations at this time. GlobalVRS urges the Commission to explore visual verification procedures through the TRS-URD, and enterprise and public videophone user attestations. Alternatively, GlobalVRS supports initial trial adoption of Sorenson's log-in alternative. If the Commission pursues a log-in mechanism, GlobalVRS urges the Commission to do so only with evidence supporting the efficacy a log-in mechanism, and allow providers to treat implementation costs as exogenous, and not grant compliance exemptions or waivers to provider equipment.

[Signature on following page.]

²⁸ Sorenson proposes a user attestation in addition to providing the user's assigned ten digit number. Such an attestation should include acknowledgement of eligibility to use the services and criminal consequences to the individual if they are found to be abusing the service, as GlobalVRS proposes.

Respectfully submitted this 5th day of August, 2019,

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