



ANDREW O. ISAR

4304 92ND AVENUE NW
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 866.474.3630
WWW.MILLERISAR.COM

Via ECFS

August 7, 2017

Ms. Marlene H. Dortch
Office of the 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, Comments of ASL Services Holdings, LLC dba GlobalVRS on Petition Filed by Sorenson Communications, LLC for Partial Reconsideration of the 2017 VRS Interoperability Order

Dear Secretary Dortch:

In its Petition, Sorenson Communications, LLC (“Sorenson”) makes a number of arguments underscoring numerous unresolved issues associated with the Interoperability Profile for Relay User Equipment (“RUE Profile”).¹ ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS”) maintains that these issues should be addressed by the Commission before any further action on implementing RUE Profile requirements is even considered.

On June 12, 2017, GlobalVRS submitted comments in response to the Commission’s January 17, 2017 *Further Notice of Proposed Rulemaking* (“Comments”)² regarding user experience with provider-supplied video relay service (“VRS”) equipment and software, the potential represented by equipment and software innovation, and on the appropriate scope of the RUE Profile. In its

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, *Sorenson Communications, LLC Petition for Partial Reconsideration, or in the Alternative, Suspension of the RUE Implementation Deadline* (May 30, 2017).

² *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, *Comments of ASL Services Holdings, LLC dba GlobalVRS in Response to Further Notice of Proposed Rulemaking* (June 12, 2017).

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Comments, GlobalVRS maintained, among other things, that “with the advent of ever developing advancements in off-the shelf consumer-oriented mobile device technology, a primary Telecommunications Relay Service Program (“Program”) focus should be on promoting relay service software applications for those devices rather than on a historic reliance on proprietary provider-supplied equipment to achieve interoperability. To that end, and moreover in light of the existing interoperability regulations and effective inter-provider interoperability coordination currently in place, the RUE Profile should remain a guideline.”

As the Commission addresses Sorenson’s petition, it should maintain the RUE Profile as a guideline consistent with recommendations that have been made by all providers, or to the extent that the Commission imposes RUE Profile as a requirement once the pending issues are resolved, that the requirement be imposed exclusively on those video relay service providers that make proprietary equipment available to their subscribers.³

Respectfully submitted,

MILLER ISAR, INC.

/s/ Andrew O. Isar

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Regulatory Consultants to
ASL Services Holdings, LLC dba
GlobalVRS

³ See *Comments* at page 4.