

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)	CG Docket No. 10-51
Video Relay Service Program)	
_____)	

REPLY COMMENTS OF CONVO COMMUNICATIONS, LLC

Convo Communications, LLC (“Convo”) hereby files these reply comments regarding the petition (“Petition”) filed by Sorenson Communications, LLC (“Sorenson”) requesting the Federal Communications Commission (“FCC” or “Commission”) pause with its mandate for Video Relay Service (“VRS”) providers to comply with the Relay User Equipment (“RUE”) Profile in conjunction with the Accessible Communication for Everyone (“ACE”) App.¹ Previously, the Commission’s Consumer and Governmental Affairs Bureau issued a Public Notice regarding the use of the RUE Profile.²

In September 2016, Convo and other VRS providers jointly commented that the Commission should not require the RUE Profile because doing so would disrupt or even impair VRS provider-distributed endpoints.³ The same concerns expressed in these joint comments continue today, thus Convo’s position remains that the Commission should refrain from requiring

¹ Sorenson Communications, LLC, Petition for Partial Reconsideration, or in the Alternative, Suspension of the RUE Implementation Deadline, CG Docket Nos. 10-51 & 03-123 (filed May 30, 2017) (“Petition”); see also Consumer & Governmental Affairs Bureau Announces Comment Dates for Sorenson’s Petition for Partial Reconsideration of the 2017 VRS Interoperability Order, Public Notice, DA 17-718, CG Docket Nos. 10-51 & 03-123 (July 26, 2017).

² *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, DA 17-76, 32 FCC Rcd. 687 (Consumer & Gov’tl Affs. Bur. 2017).

³ Comments of Convo Communications, CSDVRS, Purple Communications, and Sorenson Communications, CG Docket Nos. 10-51 & 03-123 (filed Sept. 14, 2016) (“Joint Comments”).

compliance with the RUE profile at this time.

I. The RUE Profile Has Significant Technical Issues

As discussed in the Joint Comments, the RUE Profile was developed without an adequate level of involvement by VRS providers and stakeholders, and cannot be said to represent a standard benchmark compared to, for example, the US VRS SIP Profile.⁴ The technical concerns providers expressed about the RUE Profile remain unaddressed. Incorporating the RUE Profile would potentially require providers to remove endpoint features which are not specified in the RUE Profile, even if those features do not affect interoperability among different provider endpoints.⁵ Implementing the RUE Profile would also subject provider networks to lower security than currently operative.⁶ Another critical gap in the RUE Profile is the inability for users to update Registered Locations for 911 purposes.⁷ Finally, the lack of a client certificate to authenticate the ACE App is a critical technical gap which risks the protection of the privacy of consumers' information on connecting providers' networks.⁸ Convo agrees with all other VRS providers that the RUE Profile and the accompanying ACE App are not ready to be mandated due to the significant technical gaps.

2. Interoperability Does Not Require a Mandated RUE Profile

To succeed in promoting competition and choice in the VRS program in an efficient and cost-effective manner, it is essential for the Commission to continue pushing the implementation of the US VRS SIP Profile. Indeed, the ACE App has been shown to have the potential to

⁴ Id.

⁵ See Id, at pp. 2-4.

⁶ See Id, at p. 1; Letter from ASL Services Holdings, LLC and Convo, CSDVRS, Purple, and Sorenson, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 & 03-123, at p. 3 ("the security provisions of the RUE Profile, and critical operational detail with respect to security, maintenance, support, and centralized services, have not yet been defined.") (Nov. 8, 2016) ("Joint Letter").

⁷ See Petition, at pp. 16-17.

⁸ See, Id at p. 18.

function on SIP and interoperate with VRS providers' service and endpoints.⁹ Not only is the RUE Profile unnecessary for interoperability, but Convo sees requiring its implementation as potentially creating a drag on interoperability since providers would have to divert large amounts of staff time, resources and funds in support of an ACE App with the RUE Profile.¹⁰ Convo has a limited number of engineers, far beneath those of larger providers, and taking them off task to work uncompensated on the RUE Profile would without doubt impair Convo's capacity to competitively expand its technology offerings so that it can grow to scale before the expiration of the Commission's four-year VRS rate plan.

Accordingly, Convo joins all other VRS providers in urging the Commission to pause with requiring the RUE Profile. If the Commission wishes to continue with the RUE Profile, it should work with providers and other stakeholders in developing the standard, and strictly consider it as a guideline in the interim.

Respectfully submitted,

Jeff Rosen
General Counsel
Convo Communications, LLC
2028 E Ben White Blvd #240
Austin, TX 78741
(240) 560-4396
jeff@convorelay.com

August 17, 2017

⁹ See, Id. However it must be noted that the ACE App (Windows version) experienced significant challenges in the most recent SIP interoperability testing among VRS providers.

¹⁰ See, Joint Letter at p. 3.