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September 1, 2017

VIA E-MAIL TO TRSREPORTS@FCC.GOV

Patrick Webre
Acting Bureau Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

> **Re: Notification of Intent to Participate in Voluntary At-Home VRS Call Handling Pilot Program, CG Docket Nos. 10-51 & 03-123**

Dear Mr. Webre,

Pursuant to Section 64.604(b)(8)(i) of the Commission's rules,[1] CSDVRS, LLC, d/b/a ZVRS ("ZVRS") is pleased to notify the Commission of its intent to participate in the voluntary at-home Video Relay Service ("VRS") call handling pilot program ("Pilot Program"). Per the Commission's requirements, this notification also includes a detailed plan demonstrating that ZVRS intends to achieve compliance with the mandatory minimum standards applicable to VRS and with the safeguards enumerated in Section 64.604(b)(8).

The attached exhibits correspond to each of the required specifications set forth in Section 64.604(b)(8)(i)(A) through (I), as follows:

Exhibit A. A description of the screening process used to select Communications Assistants ("CAs") for the Pilot Program.

Exhibit B. A description of specific training to be provided for CAs selected to participate in the Pilot Program ("At-Home CAs").

Exhibit C. A description of the protocols and At-Home CA expectations developed for the Pilot Program.

Exhibit D. A description of the grounds for dismissing an At-Home CA from the Pilot Program and the process for such termination in the event that the At-Home CA fails to adhere to applicable requirements.

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[1] 47 C.F.R. § 64.604(b)(8)(i).

Exhibit E. A description of all steps that will be taken to install a workstation in an At-Home CA's home, including evaluations that will be performed to ensure all workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions.

Exhibit F. A description of the monitoring technology to be used by ZVRS to ensure that off-site supervision approximates the level of supervision at the ZVRS call center.

Exhibit G. An explanation of how ZVRS's workstations will connect to its network, including how they will be integrated into the call center routing, distribution, tracking, and support systems, and how ZVRS will ensure system redundancy in the event of service disruptions in at-home workstations.

Exhibit H. A signed certification by officers of ZVRS that it will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the Pilot Program.

Exhibit I. A commitment to comply with all other safeguards enumerated in Section 64.604(b)(8) of the Commission's rules and the applicable rules governing TRS.

Although ZVRS understands that the Pilot Program will be in effect for one year, beginning November 1, 2017, and ending October 31, 2018, ZVRS aims to convert this program into a permanent part of its service offering upon approval from the Commission.

ZVRS looks forward to participating in the Pilot Program. Please contact me if you have any questions or require any additional information.

Sincerely,

/s/_____

Gregory Hlibok
Chief Legal Officer
ZVRS Holding Company
Parent company of CSDVRS, LLC d/b/a
ZVRS and Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765

Attachment

cc: Karen Peltz Strauss
        Eliot Greenwald

Exhibit A

ZVRS Screening Process for Selecting At-Home Communications Assistants

Both internal and external candidates will be eligible to apply for positions as At-Home CAs in the Pilot Program. Before selecting CAs to handle VRS calls from at-home workstations, ZVRS will use the following screening process to ensure that call center CAs who apply for the Pilot Program have the required experience, skills, and knowledge necessary to effectively interpret from at-home workstations:

1. For external Applicants, ZVRS will use the same evaluation criteria and hiring processes that it uses for prospective call center CAs.

2. For all internal and external Applicants, a designated Evaluator will review the CA's application to determine whether the Applicant has:
   a. At least three years of experience as a call center CA;
   b. A clean record of work performance; and
   c. An available room at his or her home that meets the environmental requirements for the Pilot Program set forth in Exhibit C.

3. If the Applicant meets these three criteria, the Evaluator and either the Call Center Manager ("CCM") or the Regional Manager ("RM") will interview the Applicant and decide whether to invite the Applicant to participate in the Pilot Program as an At-Home CA. Applicants who are not selected will be notified via email by the Evaluator.

In addition to the above-listed criteria, every ZVRS CA is required to satisfactorily complete the company's required screening and training programs, including compliance training. Applicants selected to participate in the Pilot Program will be also required complete additional training that is specifically tailored to the Pilot Program, as described in Exhibit B.

Exhibit B

Description of ZVRS At-Home Interpreting Specific Training

At-Home CAs will receive training tailored for at-home interpreting. This training will be in addition to the company's required training received by all CAs working at a ZVRS call center, as well as all other applicable company policies and procedures (e.g., the new hire training program, annual compliance training, annual CPNI training, and annual training refresher).

Specifically, each selected At-Home CA will:

- Receive a refresher training to ensure that they have a thorough understanding of the TRS mandatory minimum standards, as required by Section 64.604(b)(8)(iv)(A) of the Commission's rules.
- Receive specific training for handling calls from at-home workstations pursuant to Section 64.604(b)(8).
- Receive training to effectively work with a call center supervisor, to communicate with a supervisor in the event a team interpreting is needed, and to communicate with a supervisor to resolve problems that may arise during a relay call (e.g., difficulty understanding a VRS user's signs, the need for added support for emergency calls, and relieving a CA in the event of the CA's sudden illness).
- Receive training on steps that must be taken in the event of emergency or network outage at the CA's home workstation (e.g., communicating with a supervisor to coordinate relief for a CA in such an event).
- Receive guidance on the grounds for dismissing a CA from the at-home call handling program, including a process for such termination in the event that the CA fails to adhere to these requirements, as set forth in Exhibit D. The company will provide such grounds and process in writing to each CA participating in the pilot program.
- Provide an executed certification in writing of the CA's understanding of and commitment to complying with the Commission's rules governing TRS, including rules governing caller confidentiality and fraud prevention, and the CA's understanding of the reasons and process for dismissal from the pilot program.
- Receive training to ensure that the CA's home environment used for at-home VRS call handling enables the provision of confidential and uninterrupted services to the same extent as ZVRS call centers and is seamlessly integrated into ZVRS's call routing, distribution, tracking, and support systems.

As part of the training protocol, each At-Home CA will confirm in writing that he or she:

- Resides in a separate, secure location in the CA's home, where access is restricted solely to the CA;

- Understands that the call-handling technology at home will be used to the same extent as other CAs at a ZVRS call center, including the ability to transition a non-emergency call to an emergency call, engage in virtual teaming with another CA, and allow supervisors to communicate with and oversee calls;
- Acknowledges that the at-home environment at the workstation is equipped with an effective means to prevent eavesdropping, such as white noise emitters or soundproofing, and to ensure that interruptions from noises outside the room do not adversely affect an At-Home CA's ability to interpret a call accurately and effectively;
- Acknowledges that the at-home workstation is connected to the provider's network over a secure connection to ensure caller privacy;
- Acknowledges that ZVRS will inspect and approve each at-home workstation before activating the At-Home CA's workstation for use;
- Acknowledges that ZVRS will equip each at-home workstation with monitoring technology sufficient to ensure that off-site supervision approximates the level of supervision at ZVRS call centers, including the ability to monitor both ends of a call (i.e., video and audio) to the same extent as is possible in a call center, and regularly analyze the records and data produced by such monitoring to proactively address possible waste, fraud, and abuse; and
- Acknowledges that ZVRS will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program.

Successful completion of the at-home VRS call handling training and at-home installation and evaluation processes must occur within the first sixty days of the selection of the At-Home CA, and the At-Home CA will not begin handling calls at home until such training and at-home workstation installation and evaluation has been completed.

Exhibit C

Description of ZVRS Protocols and CA Expectations Developed for the At-Home Call Handling Pilot Program

ZVRS has established the following protocols and CA expectations for the Pilot Program:

- At-Home CAs must have their at-home workstation in a separate, secure location in their home, where access is restricted solely to the At-Home CA. Absolutely no friends, family, or others are allowed in the workstation for any reason. Doors to at-home workstations must remain locked at all times to prevent access by unauthorized persons.
- Each at-home workstation will be equipped with white noise emitters or soundproofing to prevent eavesdropping and to ensure that interruptions from noises outside the room do not adversely affect the At-Home CA's ability to interpret a call accurately and effectively.
- No cellular phones or other personal electronic devices are allowed in the workstation at any time.
- Each at-home workstation will be connected to our secure network connection to ensure caller privacy and confidentiality.
- Each at-home workstation will be equipped with a grey background similar to a call center workstation to provide clarity during the call process.
- At-home workstations will be equipped with the same technology as a call center workstation (i.e. ability to transfer, instant message colleagues/supervisor, etc.).
- At-home workstations will be equipped with an external camera and tracking software in efforts to provide equivalent supervision as that of the call center environment.
- Ability to record actions and produce reports that can be analyzed for anomalies
- ZVRS will regularly analyze such data to proactively address possible waste, fraud and abuse.
- All at-home workstations will be inspected and approved prior to activation and use to ensure the workstation is in compliance with all FCC regulations.
- At-Home CAs will be assigned a unique call center identification number, which will be used to identify all minutes handled from each work station in the call detail records submitted monthly by ZVRS to the TRS Fund administrator.
- At-Home CAs must comply with unannounced on-site inspections completed by supervisors and/or FCC.
- At-Home CAs will also be subject to the company policies and procedures generally applicable to call center CAs.

Exhibit D

Description of ZVRS Grounds for Dismissing a CA from the At-Home Program and the Process for Such Termination in the Event that the CA Fails to Adhere to Applicable Requirements

At-Home CAs are subject to all ZVRS company policies and procedures, including those governing employee conduct and disciplinary actions. At-Home CAs are not exempt from any of the responsibilities, duties, and expectations of call center CAs. In addition to these company policies and procedures, all At-Home CAs must adhere to the protocols and CA expectations developed specifically for the Pilot Program, as set forth in Exhibit C.

Below are examples of grounds for which an At-Home CA will be dismissed from the Pilot Program. This is not an exhaustive list of conduct that can result in discipline, and the examples below do not replace sound judgment or common-sense behavior.

- An At-Home CA that engages in any activity that interferes with the background appearance needed to provide clarity during the call process will receive a written warning for a first violation. Any subsequent violation will result in the CA's dismissal from the Pilot Program.

- An At-Home CA that engages in any of the following activities will be automatically dismissed from the Pilot Program:

    - Engaging in an activity that interferes with the operation of the at-home workstation, including white noise emitters or soundproofing to prevent eavesdropping and to ensure that interruptions from noises outside the room do not adversely affect a CA's ability to interpret a call accurately and effectively.

    - Bringing cellular phones or other personal electronic devices into the at-home workstation at any time.

    - Engaging in an activity that interferes with the installation and/or disrupts the maintenance of a secure network connection to ensure caller privacy and confidentiality at the CA workstation.

    - Engaging in an activity that interferes with the installation and/or disrupts the maintenance of an external camera and tracking software intended to provide equivalent supervision as that of the call center environment.

- An At-Home CA that engages in any of the following activities will be terminated from employment at ZVRS:

    - Engaging in an activity that compromises the security and privacy of his or her at-home workstation.

    - Engaging in an activity that allows access by unauthorized person (friends/family members and others) to a room where his or her workstation is located.

- o Refusing to allow access to a room where his or her workstation is located by an authorized supervisor or FCC representative for an unannounced on-site inspection.

As noted above, in addition to these grounds for dismissal from the Pilot Program, At-Home CAs will remain subject to all of the same disciplinary policies and procedures that apply to ZVRS's call center CAs.

The grounds and process for dismissing an At-Home CA from the Pilot Program will be provided in writing to the At-Home CA, as required by Section 64.604(b)(8)(iv)(D) of the Commission's rules.

Each At-Home CA will be required to certify in writing as to his or her understanding of the reasons and process for a dismissal from the Pilot Program, as required by Section 64.604(b)(8)(iv)(E) of the Commission's rules.

Exhibit E

ZVRS At-Home Installation Process and Checklist

The following is a description of all steps that ZVRS will take to install a workstation in an At-Home CA's home, including evaluations that will be performed to ensure all at-home workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions.

- A secure, private connection will be installed by the company's Information Technology department ("IT") on a dedicated high-speed internet connection which connects to a router installed within the home office of the At-Home CA.
- IT will confirm that capacity and speed of the internet connection is sufficiently robust and reliable to support the at-home workstation.
- Supervisor will confirm that the At-Home CA's home office is exclusively designated as a CA workstation used for interpreting a VRS call for ZVRS and is sufficiently secure to ensure the workspace can be accessed only by the At-Home CA. The workstation cannot be used for any other purpose.
- The high-speed internet connection at an At-Home CA's home will be managed and monitored by IT. The software will be installed on the at-home workstation by IT.
- Extensive testing will be done by IT to ensure all is working identical to workstations in ZVRS call centers.
- The CA at-home workstation, including PC, monitors, webcam, software, and headset will be identical workstations installed at ZVRS's call centers. The agent station will only have the ability to connect to the platform.
- The PC will be shipped directly from ZVRS to the At-Home CA's home for installation. The PC will be pre-configured by the engineering team and tested prior to shipment to the At-Home CA's home for installation by a ZVRS technician.
- Just as all CAs are required to do in a call center, the at-home CA will be required to login and provide a password on the workstation prior to taking calls. A white noise machine will be installed to ensure there are no outside interruptions. A surveillance video camera will be installed in the home office for remote monitoring by ZVRS Operations staff.

Successful completion of the at-home VRS call handling training and at-home installation and evaluation processes must occur within the first sixty days of the selection of the At-Home CA, and the At-Home CA will not begin handling calls at home until such training, installation, and evaluation has been completed.

Exhibit F

ZVRS At-Home Monitoring Technology

The following is a description of the monitoring technology to be used by ZVRS to prevent waste, fraud and abuse that could arise from at-home call handling, and to ensure that off-site supervision approximates the level of supervision at ZVRS's call centers:

- A surveillance video camera will be installed in the home office for remote monitoring by ZVRS's Operations staff.
- All At-Home CAs will report to a designated supervisor, who will be available to At-Home CAs via an internal chat tool.
- A surveillance video camera will be activated for live monitoring at all times while the At-Home CA is logged in to process VRS calls.
- Monitoring will be conducted by either a call center manager or a floor supervisor from a designated call center.
- Daily reporting will include reviewing login times, start and end times compared to schedule start and end times.
- Review of key performance measurements to ensure consistency with peers who are scheduled in the traditional call centers.

Exhibit G

ZVRS At-Home Network & Redundancy Technology

The following is an explanation of how ZVRS's at-home workstations will connect to its network, including how they will be integrated into the call center routing, distribution, tracking, and support systems, and how ZVRS will ensure system redundancy in the event of service disruptions in at-home workstations
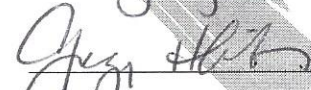
- Workstations in At-Home CA's homes will be connected to ZVRS's network in the same way as it is for a workstation at ZVRS's call centers. IT will confirm that the At-Home CA's home has a robust and reliable high-speed broadband capacity sufficient to support a high quality video connection.
- The At-Home CAs will be set up for call routing identical to CAs in ZVRS call centers. They will be assigned an agent number just like CAs in a call center. Each At-Home CA, including their location, will be uniquely identified by their agent number. Detailed tracking and reporting will be done based on the agent number.
- An uninterrupted power supply for redundant power will be setup in the at-home office of the At-Home CA. In addition, there is always more than one CA logged onto the platform to take calls. Every VRS call can be routed to all CAs on the platform. The same Operations and Engineering teams which support our call centers will support our at-home CAs.
- IT will install a secure, private connection on a dedicated internet connection which connects to a router installed within the CA home. The business class internet connection will be managed and monitored by ZVRS. The software will be installed on the agent station PC. Extensive testing will be done, by ZVRS's engineering team, to ensure all is working identical to workstations in ZVRS call centers. The agent station including PC, monitors, webcam, software, and headset will be identical to the agent station installed within ZVRS's call centers. The agent station will only have the ability to connect to the platform. The PC will be shipped directly from ZVRS to the At-Home CA's home for installation. The PC will be pre-configured by the engineering team and tested prior to shipment to the CA. Like CAs in call centers, each At-Home CA will be required to login and provide a password on the agent station prior to taking calls.
- The at-home interpreting call routing will be in a "round robin" pattern to ensure calls are placed in the queue on a first-come first-served basis and are not directed to a specific CA/at-home or call center location.

Exhibit H

ZVRS At-Home Workstation Inspection Certification

I am Gregory Hlibok, Chief Legal Officer of ZVRS Holding Company, parent company of CSDVRS, LLC, d/b/a ZVRS. I hereby certify that ZVRS will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the At-Home Call Handling Pilot Program.

Printed Name: _Gregory Hlibok_

Signature: _Greg Hlibok_

Date: _9/1/2017_

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Exhibit I

ZVRS At-Home Pilot Program Compliance Commitment

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CSDVRS, LLC, d/b/a ZVRS ("ZVRS") submits this commitment of its intention to participate in the FCC's At-Home VRS Call Handling Pilot Program ("Pilot Program"). ZVRS is committed to comply with the following requirements and safeguards outlined in Section 64.604(b)(8) of the Commission's rules.

1) *Call record integrity.* ZVRS commits that its monthly call data record submission will consist of limited minutes served by at-home CA workstations of up to a maximum of *either* thirty percent (30%) of its total minutes for which compensation is paid in that month *or* thirty percent (30%) of its average monthly minutes for the twelve (12) months ending October 31, 2017, whichever is greater.

2) *Personnel safeguards.* ZVRS commits that, before permitting CAs to handle VRS calls from at-home workstations, ZVRS will, as described in Exhibits A, B, C & D:
   a. Ensure that each CA handling calls from an at-home workstation ("At-Home CA") has the experience, skills, and knowledge necessary to effectively interpret from these workstations, including a thorough understanding of the TRS mandatory minimum standards and at least three years of experience as a call center CA;
   b. Establish protocols for the handling of calls from at-home workstations (to the extent there are additional protocols that differ from those applicable to the provider's call centers) and provide training to At-Home CAs on such protocols, in addition to all applicable training that is required of CAs working from call centers;
   c. Provide each At-Home CA working from an at-home workstation equivalent support to that provided to CAs working from call centers, as needed to effectively handle calls, including, where appropriate, the opportunity to team interpret and consult with supervisors, and ensure that supervisors are readily available to At-Home CAs to resolve problems that may arise during a relay call, such as difficulty in understanding a VRS user's signs, the need for added support for emergency calls, and relieving an At-Home CA in the event of the At-Home CA's sudden illness;
   d. Establish grounds for dismissing an At-Home CA from the Pilot Program, requiring them to work in a ZVRS call center, and provide such grounds and process in writing to each At-Home CA participating in the Pilot Program; and
   e. Obtain from each CA handling calls from an at-home workstation a certification in writing of the At-Home CA's understanding of and commitment to complying with the rules governing TRS, including rules governing caller confidentiality and fraud prevention, and the At-Home CA's understanding of the reasons and process for dismissal from the Pilot Program.

3) *Technology & Environment Equivalency to a Call Center.* ZVRS commits that it will ensure that each home environment used for at-home VRS call handling enables the provision of confidential and uninterrupted services to the same extent as the provider's call centers and is seamlessly integrated into the provider's call routing, distribution, tracking, and support systems.

4) *Technical and environmental safeguards.* ZVRS commits that, before permitting CAs to handle VRS calls from at-home workstations, it will ensure, as described in Exhibit E, that each at-home workstation:
   a. Resides in a separate, secure location in the At-Home CA's home, where access is restricted solely to the At-Home CA;
   b. Allows an At-Home CA to use all call-handling technology to the same extent as other CAs, including the ability to transition a non-emergency call to an emergency call, engage in virtual teaming with another CA, and allow supervisors to communicate with and oversee calls;
   c. Is capable of supporting VRS in compliance with the applicable mandatory minimum technical and emergency call handling standards to the same degree as these are available at call centers, including the ability to route VRS calls around individual CA workstations in the event the At-Home CA experiences a network outage or other service interruption;
   d. Is equipped with an effective means to prevent eavesdropping, such as white noise emitters or soundproofing, and to ensure that interruptions from noises outside the room do not adversely affect an At-Home CA's ability to interpret a call accurately and effectively; and
   e. Is connected to ZVRS's network over a secure connection to ensure caller privacy.

5) *Monitoring and oversight obligations.* ZVRS commits that, before permitting CAs to handle VRS calls from at-home workstations, it will, as described in Exhibits E & F:
   a. Inspect and approve each at-home workstation before activating an At-Home CA's workstation for use;
   b. Assign a unique call center ID number to each VRS at-home workstation and use this call center ID to identify all minutes handled from each such workstation in its call detail records submitted monthly to the TRS Fund administrator;
   c. Equip each at-home workstation with monitoring technology sufficient to ensure that off-site supervision approximates the level of supervision at the provider's call center, including the ability to monitor both ends of a call (i.e., video and audio) to the same extent as is possible in a call center, and regularly analyze the records and data produced by such monitoring to proactively address possible waste, fraud, and abuse;
   d. Keep all records pertaining to at-home workstations, including the data produced by any at-home workstation monitoring technology, except for any data that records the content of an interpreted conversation, for a minimum of five years; and

e. Conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program.

6) *Commission audits and inspections.* ZVRS commits that it will make all of its at-home workstations and workstation records accessible and available for review, audit, and inspection by the Commission and the Fund administrator and unannounced on-site inspections by the Commission to the same extent as other call centers and call center records subject to the TRS rules.

7) *Monthly reports.* ZVRS commits that it will report the following information to the TRS Fund administrator with its monthly requests for compensation:
   a. The call center ID and full street address (number, street, city, state, and zip code) for each at-home workstation and the CA ID number for each individual handling VRS calls from that workstation; and
   b. The location and call center IDs of call centers providing supervision for at-home workstations, plus the names of persons at such call centers responsible for oversight of such workstations.

8) *Six-month report.* ZVRS commits that it will submit, no later than seven months after the start of its program, a report covering the first six months of its program, containing the following information:
   a. A description of the actual screening process used to select CAs for the at-home call handling program;
   b. Copies of training materials provided to At-Home CAs;
   c. Copies of written protocols used for CAs working from home;
   d. The total number of CAs handling VRS calls from at-home workstations over the first six months of the program;
   e. The number of 911 calls handled by the provider's at-home workstations;
   f. A description and copies of any surveys or evaluations taken of CAs concerning their experience using at-home workstations and participating in an at-home call handling program;
   g. The total number of CAs terminated from the program;
   h. The total number of complaints, if any, submitted to the provider regarding its at-home call handling program or calls handled by At-Home CAs;
   i. The total number of on-site inspections conducted of at-home workstations and the date and location of each inspection;
   j. A description of the monitoring technology used to monitor CAs working at home and an analysis of the experience of supervisors overseeing At-Home CAs compared to overseeing CAs in a call center;
   k. Copies of any reports produced by tracking software and a description explaining how the provider analyzed the reports for anomalies; and
   l. Detailed documentation of costs incurred in the use of at-home workstations, including any costs associated with CA recruitment, training, and compensation, engineering and technical set-up (including workstation set-up), and

administrative and management support (including oversight, evaluation, and recording).