

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	)	
	)	

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**REPLY COMMENTS OF CONVO  
COMMUNICATIONS, LLC**

Convo Communications, LLC (“Convo”) offers its reply comments on the responses to the Federal Communications Commission’s (“Commission”) May 15, 2019 Order and Further Notice of Proposed Rulemaking on At-Home Interpreting, New and Porting Users Pending Verification, and Enterprise and Public Videophone (“VP”) Log-In Procedures for Video Relay Services (“VRS”).<sup>1</sup>

Convo asserted that the Commission should refrain from making changes to the requirements for the at-home interpreting pilot program.<sup>2</sup> Convo agrees with the salient points made by the Consumer Groups that more evaluation is needed in order to ascertain whether concerns regarding the confidentiality of VRS calls handled at-home have been alleviated and are properly resolved by safeguards and program requirements.<sup>3</sup>

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<sup>1</sup> *Structure and Practice of the Video Relay Service Program, Report and Order and Further Notice of Proposed Rulemaking*, FCC 19-39 (May 15, 2019) (“*Report and Order*” and “*FNPRM*”).

<sup>2</sup> *Comments of Convo Communications, LLC*, p.3, CG Docket Nos. 10-51 and 03-123 (August 5, 2019) (“*Convo Comments*”).

<sup>3</sup> *Comments*, Telecommunications for the Deaf and Hard of Hearing Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., Cerebral Palsy and Deaf Organization, American Association of the DeafBlind, p.2, CG Docket Nos. 10-51 and 03-123 (August 5, 2019) (“*Consumer Groups Comments*”).

Convo concurs with ASL Holding Services, LLC, dba Global VRS (“Global VRS”) that the percentage of a VRS provider’s compensation for at-home interpreting should continue to be limited to 30 percent.<sup>4</sup> Convo also reiterates its concern regarding the ability of at-home video interpreters to fully handle emergency or 911 calls. There is no comparing the degree of support that video interpreters may receive at a call center to that which may be offered to at-home interpreters, thus Convo has recommended that it be made absolutely certain that “at-home interpreters are allowed to transfer emergency calls to call centers once connecting the caller to the appropriate Public Safety Answering Point (“PSAP”), if a call center interpreter is readily available to promptly accept handling the call.”<sup>5</sup>

Providers and Consumer Groups broadly responded in agreement that the Commission should approve allowing new or porting Video Relay Service users to make calls, for up to two weeks, while their User Registration Database (“URD”) status is pending; and that those calls would be compensable once the user is verified through the URD.<sup>6</sup> As Convo commented, allowing users who rely on American Sign Language to telecommunicate using VRS during the verification period would ensure an experience more akin to hearing users who are granted access to the telecommunications world as soon as their phones are turned on at the store.<sup>7</sup> A two week temporary registration period will take the VRS industry a step further in ensuring functional equivalency in its

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<sup>4</sup> *Comments of ASL Services Holding, LLC dba GlobalVRS*, p.3-4, CG Docket Nos. 10-51 and 03-123 (August 5, 2019) (“*Global VRS Comments*”).

<sup>5</sup> *Convo Comments* at p.3.

<sup>6</sup> *Consumer Groups Comments* at p.2-3; *Comments of Sorenson Communications, LLC in Response to the Further Notice of Proposed Rulemaking*, p.4, CG Docket Nos. 10-51 and 03-123 (August 5, 2019) (“*Sorenson Comments*”); *Comments of CSDVRS, LLC D/B/A ZVRS and Purple Communications, Inc.*, p. 14, CG Docket Nos. 10-51 and 03-123 (August 5, 2019) (“*ZVRS/Purple Comments*”); and *Convo Comments* at p.4-5.

<sup>7</sup> *See Convo Comments*, p.5.

services. Convo urges the Commission to consider issuing an Order granting this temporary registration period as soon as possible and lift the barrier currently in place for users who face delays due to outages and slow down issues in URD verifications.

Convo agrees with Consumer Groups that any log-in procedure requirements for public video phones “will not ensure functional equivalency for all consumers.”<sup>8</sup> As Convo stated, the “exclusion of certain groups of users from accessing public VPs such as children, the elderly, ASL users traveling from abroad, and those with cognitive difficulties, all of whom have the right to access VRS and may find themselves unable to utilize...VRS” and possibly with fatal consequences in certain circumstances.<sup>9</sup> Commenters illustrated how difficult it already is for consumers to remember their ten digit numbers; without also having to add onto the procedure a PIN for public VPs.<sup>10</sup>

Commenters as a whole agreed that the risk of fraud or abuse of enterprise and public videophones is slim to none.<sup>11</sup> Video Interpreters are trained to recognize when a user is not an eligible user of VRS and disconnect immediately; and the User Registration Database provides further assurance of legitimate usage of VRS; as well as a reliable way of tracking such usage. The small possibility that an individual might misuse a public video phone (and Convo cautions that it cannot imagine how, given that the video interpreters will disconnect if an ineligible user attempts VRS use), does not outweigh the more pervasive and concerning risk to the population of users who will struggle with public videophones and find themselves without access.

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<sup>8</sup> *Consumer Groups* at p.5.

<sup>9</sup> *Convo Comments* at p.7.

<sup>10</sup> *See Consumer Groups Comments*, citing its February 20, 2018 *Ex Parte*; *Sorenson Comments* at p.5-6; *Global VRS Comments* at p.10; *ZVRS/Purple Comments* at p.15; and *Convo Comments* at p.6-7.

<sup>11</sup> *Id.*

Accordingly, Convo respectfully requests that the Commission refrain from modifying the requirements for the at-home interpreting pilot program; implement the two week temporary registration period for new and porting users of VRS; and refrain from requiring a log-in procedure or “PIN requirement” for enterprise and public videophones.

Respectfully submitted,

Amanda Montgomery  
Deputy General Counsel  
amanda.montgomery@convorelay.com  
(401) 213-1677

Jeff Rosen  
General Counsel  
jeff@convorelay.com  
(240) 406-7238

Convo Communications, LLC  
2028 E Ben White Blvd #240  
Austin, TX 78741

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