

September 6, 2019

**VIA ECFS**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; CG Docket No. 10-51**

Dear Ms. Dortch:

By this letter, Convo Communications, LLC (“Convo”) clarifies mischaracterizations of its positions by other VRS providers in their comments on the Federal Communications Commission’s (“Commission”) May 15, 2019 Order and Further Notice of Proposed Rulemaking.<sup>1</sup>

Contrary to CSDVRS, LLC D/B/A ZVRS and Purple Communications Inc’s assertion of a “unanimous” agreement among commenters, Convo has not expressed the position that “the Commission should permanently authorize at-home call handling.”<sup>2</sup> Convo stated that the Commission should refrain from making changes to the present at-home interpreting pilot program while continuing to evaluate the information obtained from the program.<sup>3</sup>

Further, Convo did not take the position that at-home interpreters must transfer emergency/911 calls as suggested by Sorenson Communications, LLC (“Sorenson”).<sup>4</sup> A significant number of emergency calls do not start out as a 911 dial, such as callers connecting with a medical provider and subsequently asking the Video Interpreter (“VI”) to immediately dial 911 in a sequential call following the medical providers’ instructions, or for callers who dial around to a different VRS provider. Thus Sorenson’s recommendation that “a provider concerned about the ability of an at-home interpreter to handle an emergency call is to ensure that 911 calls are routed to the next available agent in a traditional call center environment” would not work in the context of a sequential or dialed around emergency call. Convo suggests that the Commission clarifies that it is allowable for at-home VIs to transfer emergency calls when the circumstances warrant it and there are VIs at a call center immediately ready to handle the call. This

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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> *Reply Comments of CSDVRS, LLC D/B/A ZVRS and Purple Communications, Inc.*, p. 2, CG Docket Nos. 10-51 and 03-123 (September 4, 2019).

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

<sup>4</sup> *Reply Comments of Sorenson Communications, LLC in Response to the Further Notice of Proposed Rulemaking*, p. 9, CG Docket Nos. 10-51 and 03-123 (September 4, 2019) (“Emergency callers should not be subjected to an additional hurdle to functionally equivalent communication on the basis that an at-home interpreter is unable to handle the call.”).

action is no different from the situations that a transfer is needed to connect with the correct Public Safety Answering Point (“PSAP”).

Sincerely,

/s/

Jeff Rosen  
General Counsel