

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In re)
)
Telecommunications Relay Services and)
Speech-to-Speech Services for Individuals) CG Docket No. 03-123
With Hearing and Speech Disabilities)
Application for TRS Certification to)
Provide IP Captioned Telephone Service)

To: Chief, Consumer and Governmental Affairs Bureau,
Internet-based TRS Certification Application

VTCSecure, LLC REQUEST FOR WAIVER

VTCSecure, LLC (“VTCSecure”) respectfully requests that the Federal Communications Commission (“Commission”), pursuant to Section 1.3 of the Commission’s Rules, waive certain requirements applicable to the Company as an Internet Protocol Captioned Telephone Service (“IP CTS”) provider, compensated by the federal Telecommunications Relay Service (“TRS”) fund. This Request for Waiver is being filed as an addendum to VTCSecure’s Application for certification as an IP CTS provider previously filed.

The Commission is authorized to waive certain requirements in instances where good cause can be established.

I. Background and Request for Waiver

The VTCSecure solution, as states in our IP CTS application, utilizes a Hybrid approach that allows for traditional use of Communication Assistants (CA) as well as adding Automated Speech Recognition (“ASR”) technology to reduce cost of delivery of IP CTS, prevent waste, fraud, and abuse, and improve user experience of IP CTS. VTCSecure is seeking waiver of specific aspects of the required IP CTS service only in the situations and times that calls are being processed only using ASR and not a CA. In the event a CA is being used, VTCSecure will comply with all aspects of the current IP CTS requirements.

II. Request for Waiver

Specifically, VTCSecure seeks waiver of Section 64.604(a)(1) of the Commission’s Rules relating to the use of and standards applicable to CAs, including typing speed and call timing minimums. These are not applicable as calls using ASR can start immediately and since the machine is doing the ASR there is no typing.

VTCSecure will maintain the confidentiality of any relayed conversation, regardless of content and will not intentionally alter any relayed conversation; however, during calls where only ASR is used we seek a waiver of Section 64.604(a)(2) Since during ASR calls there is no CA to alter the conversation. When ASR is being used it will always take the next call in order and is not able to limit the length of a call in accordance with Section 64.604(a)(3)(i)-(ii). However, in the event that a user presses a button to bring on a live CA, these calls will then be placed in a first come first serve queue for next available CA. VTCSecure requests waiver of the requirements that CAs alert the users of recorded messages, as outlined in Section 64.604(a)(3)(vii). We request this waiver as when using ASR we will not be able to inform the user that it is an automated voice and not live person speaking as ASR will not

recognize the difference. Any recordings or IVRS will be converted to text like any other speaker. As for transcription of voice mails our app will provide transcription using ASR and handled automatically as part of VTCSecure's application.

VTCSecure seeks waiver of requirements that pertain to the disclosure of CA identification numbers when connecting emergency calls to the Public Safety Answering Point, specifically Sections 64.605(a)(2)(iv) and 64.605(a)(2)(v) of the Commission's Rules. If for some reason ASR is being used during an Emergency call we would like a waiver for the need to present identification to the agent. However, VTCSeucre's plan is to always have an agent come on during an emergency call. For the sake of time, that call may start using ASR with the agent coming on the call at any point after the call has started. If an agent does come on the call they can still provide the CA identification #.

VTCSecure also requests waiver for Section 64.611(j)(1)(v) requirement to obtain certification from the user that he or she understands that IP CTS is "provided by a live communications assistant who listens to the other party on the line and provides text on the captioned phone" Our intent is to inform the users that there "may" be a CA on their call, since we a Hybrid service, but also explain the use and benefits of using ASR. We also plan to inform the user that they have a choice by default or change at any point during the call.

Lastly, VTCSecure requests waiver of Section 64.604(c)(5)(iii)(D)(2)(ii) of the Commission's Rules. We will not be able to provide a CA identification number in its reports to the TRS Administrator for compensation of call minutes when there was no CAs utilized in provision of the service. If a CA is added to the call while call in session we will be able to provide the CA number.

III. Conclusion

For the foregoing reasons, VTCSecure respectfully requests that the Commission waive requirements only when call is utilizing ASR and not a traditional CA.

Respectfully submitted,

VTCSecure, LLC

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