



ASL SERVICES HOLDINGS, LLC

GLOBAL VRS
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Ms. Marlene H. Dortch,
Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: ASL Services Holdings, LLC Annual Compliance Report, Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS ("Global VRS") submits the attached *Annual Compliance Report* ("Report") and annual Customer Proprietary Network Information ("CPNI") compliance certification to the Commission. By its submission, GlobalVRS demonstrates and certifies its compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Telecommunications Relay Service Fund ("Fund") eligible Internet-based video relay services ("VRS"), as set forth in Sections 64.604 *et seq.* of the Commission's rules, 47 C.F.R. §§64.604 *et seq.*, and CPNI regulations pursuant to Section 64.5101 *et seq.* of the Commission's rules, 47 C.F.R. §§64.5101 *et seq.*

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Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,¹ and "Exemption 4" of the Freedom of Information Act,² GlobalVRS respectfully requests that identified sections of its *Report* be deemed confidential and protected, accordingly.

The redacted sections of GlobalVRS' *Report* constitute "trade secrets" as set forth in Section 0.457 of the Commission's rules,³ in that the information reveals specific strategic and technical actions taken by the Company that would be useful to competitors. Further, redacted sections of the Company's *Report* contain highly confidential information not intended for public consumption. GlobalVRS would not otherwise make this information publically available under any circumstance. Release of this information the public could cause GlobalVRS irreparable and inestimable harm. GlobalVRS requests that the redacted sections be withheld from public inspection, accordingly. Should disclosure of the redacted sections be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

¹ 47 C.F.R. §0.459.

² 47 C.F.R. §0.457(d). *See National Parks and Conservation Assn. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851,1860 (1998).

³ 47 C.F.R. §0.457.

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In support of its request and pursuant to Section 0.459(b) of the Commission's rules, GlobalVRS states as follows:

1. Identification of the specific information for which confidential treatment is sought.

GlobalVRS requests confidential treatment to the confidential data appearing at pages 1, 2, 4, 5 and 6 of its Report.

2. Identification of the circumstances giving rise to the submission.

GlobalVRS is providing confidential information to demonstrate its mandatory minimum standard compliance pursuant to 47 C.F.R. §64.606(g).

3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.

The confidential information constitutes highly confidential technical and operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

4. Explanation of the degree to which the information concerns a service that is subject to competition

The confidential information involves video relay services, a highly competitive service.

5. Explanation of how disclosure of the information could result in competitive harm.

Disclosure of confidential information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete.

6. Identification of any measures taken to prevent unauthorized disclosure.

GlobalVRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.

GlobalVRS does not make the redacted information to the public or to third parties. Confidential information has been provided to the Commission.

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8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

This information is being submitted by GlobalVRS. GlobalVRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to Global VRS.

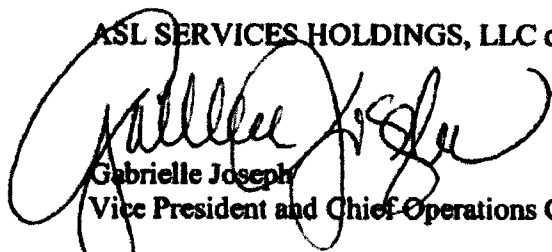
In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC dba GLOBALVRS



**Gabrielle Joseph
Vice President and Chief Operations Officer**

Attachments

cc: TRSreports@fcc.gov
Ms. Karen Peltz Strauss (via electronic delivery)
Mr. Eliot Greenwald (via electronic delivery)

ASL Services Holdings, LLC dba GlobalVRS

2018 Annual Compliance Report

I. INTRODUCTION

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") submits its initial *Annual Compliance Report* ("Report") to the Commission. This Report demonstrates GlobalVRS's continued compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Internet-based video relay services ("VRS").

By its Report, GlobalVRS demonstrates that the Company meets and/or exceeds the MMS for the provision of Telecommunications Relay Service Fund ("Fund") eligible VRS. In the past year, ASL has applied its unique trilingual, skill set¹ and capability to interpret nearly [REDACTED] calls representing more than [REDACTED] conversation minutes. [REDACTED]

GlobalVRS's 2018 annual report represents a complete accounting of the Company's MMS compliance as addressed in the transmittal letter.

A certification of the truthfulness, accuracy, and completeness of this Report by its Vice President and Chief Operations Officer is attached pursuant to Section 64.606(g)(2).

II. GLOBALVRS MMS COMPLIANCE

GlobalVRS currently meets or exceeds all non-waived VRS mandatory minimum standards as set forth in Section 64.604 of the Commission's rules² and other applicable regulations, below. Through the course of its more than six years of service as a TRS Fund-eligible VRS provider and coordination with the TRS Fund Administrator, the Enforcement Bureau and Consumer and Government Affairs Bureau, Consumer Groups, and other providers, GlobalVRS' compliance is well documented.

A. Operational Standards - 47 C.F.R. §64.604(a)

1. Communications Assistants - 47 C.F.R. §64.604(a)(1).

GlobalVRS believes that the competency of its Communications Assistants ("CAs") is paramount to the provision of excellent VRS to individuals with hearing and speech

¹ American Sign Language, Spanish, and English.

² 47 C.F.R. §64.604.

impairments. To that end, GlobalVRS is committed to maintaining rigorous proficiency standards that the Company's CAs are expected to meet. Skilled and well-trained interpreters and support staff are critical to the provision of exceptional service, call accuracy, and ultimately to an enhanced caller experience. GlobalVRS continues to employ an intensive screening process to select only well-qualified interpreters that exceed minimum typing, grammar, and interpretation skills and provide ongoing training to ensure interpreters' skills are effective and constantly improving.

GlobalVRS's bi-lingual (English-American Sign Language ("ASL") and Spanish-ASL) and tri-lingual (English-ASL-Spanish) CAs hold qualifications including, but not limited to, Registry of Interpreters for the Deaf ("RID"), National Association of the Deaf, Education Interpreter Performance Assessment, Board for Evaluation of Interpreters ("BEI"),³ and Quality Assurance Screening from the Florida Registry of Interpreters for the Deaf ("FRID"), as well as other similar state organizations throughout the country. Bi-Lingual CAs who have Spanish-ASL skill sets are subject to additional internal screening and testing standards developed by GlobalVRS over the course of its history of employing Spanish language interpreters. As there currently are no nationally recognized testing standards or certifications applicable to Spanish-to-ASL translation, GlobalVRS utilizes its own internal screening standards to ensure Spanish-ASL bi-lingual proficiency. These screening standards were developed by the Company's Chief Executive Officer and President, Angela Roth, based on her more than 30 years of experience in the Sign Language industry.⁴

A majority of GlobalVRS CAs have extensive VRS interpreting experience, and have worked with GlobalVRS for several years, many since GlobalVRS began providing VRS. All CAs are subject to periodic evaluations and quality assurance reviews by Deaf and hearing supervisors to verify skills and approach. Personality screening is also performed on supervisors to better understand and match management styles needed to maintain a productive work environment, thus enhancing CA interaction with Deaf and Hard-of-Hearing clients. GlobalVRS also frequently requests customer feedback regarding the CAs' demeanor and skill.

These measures are intended to ensure that all CAs are capable of meeting specialized communication needs of Deaf, Hard-of-Hearing, and DeafBlind individuals by interpreting effectively, accurately and impartially, both receptively and expressively using any required specialized vocabulary.⁵ Consistent with the Commission's MMS, all GlobalVRS CAs have competent grammar and spelling, have a strong, native, understanding of the cultures, languages

³ Developed by the Department of Assistive and Rehabilitative Services, Office for the Deaf and Hard of Hearing (Texas).

⁴ Ms. Roth has served two terms as the RID National Certification Board Chair, served as the Chair person for the RID Diversity Council and also as the National Hispanic Team Leader and consultant for the 5-year long Federal National Multicultural Interpreting Project. Ms. Roth served as a consultant for the BEI Trilingual test development and has also served on the Florida Licensure task force. Her experiences, particularly her involvement in developing certification standards, make her uniquely qualified to develop a screening standard by which to evaluate the skills and proficiency of CAs delivering ASL and Spanish VRS services.

⁵ 47 C.F.R. §64.604(a)(1)(iv).

and etiquette of individuals who are Deaf, Hard-of-Hearing, DeafBlind or have speech disabilities, and possess clear and articulate voice communication.⁶ CAs must also be sensitive to customer needs and be able to work well under pressure. Failure to meet these skill levels will result in an interpreter being deemed unqualified for GlobalVRS.

Newly hired CAs are trained on subjects including basic information about GlobalVRS, VRS history and regulation, and an overview of Company technology, compliance processes, and data confidentiality, prior to being assigned to interpret calls. Following classroom instruction, all new interpreters receive hands-on training under an approved training syllabus, provided by a GlobalVRS trainer. GlobalVRS's training environment provides trainees with the identical platform and tools used when serving callers. This ensures a safe learning environment that does not jeopardize or degrade customers' GlobalVRS experience, yet enhances the CA's skills. Only when the trainer has determined that the video interpreter is ready to interpret live calls, will the interpreter be allowed to begin interpreting calls, and then under the initial supervision of an experienced supervisor or senior interpreter.

Post training, the CAs are fully supported by an experienced interpreting team. Experienced CAs will readily make themselves available for team interpreting, observation, case conferencing and overall support. All newly hired CAs are subject to a mandatory 90-day probationary period. During this period, the CA is evaluated in three areas: Technical skill, overall professional demeanor, and quality of service to clients. If necessary, extended probation will be given to the CA until they are completely proficient in all three evaluated areas.

GlobalVRS ensures that all CAs are routinely trained and knowledgeable about service requirements including, but not limited to, confidentiality, staying with calls for a minimum of ten minutes, and other requirements set forth in Section 64.604(a)(1) of the regulations. Initial training and regular updates on Commission rules are provided to CAs on a scheduled and *ad hoc* basis as needed. GlobalVRS has enhanced its training on regulatory compliance as part of its initial and ongoing training program in conjunction with its anticipated [REDACTED] obligations in the fourth quarter of 2018. This will further underscore the Company's and CA compliance obligations, while providing context to CA functions.

GlobalVRS uses its best efforts to accommodate users' requests for specific CA gender both at call initiation and at transfer, if necessary. GlobalVRS meets all other applicable Section 64.604(a)(1) obligations.

2. Confidentiality and Conversation Content -- 47 C.F.R. §64.604(a)(2).

CAs are expressly prohibited from disclosing the contents of any relayed conversation, of keeping records of the content of calls beyond their duration, and/or intentionally altering a relayed conversation. GlobalVRS instructs all CAs to ensure that all conversations are translated verbatim unless directed otherwise by the callers as required by Commission's rules, and engages in periodic spot check monitoring of CA calls to verify compliance.

⁶ 47 C.F.R. §64.604(a)(1)(ii).

All CA work stations are located in physically segregated areas that do not allow anyone other than the CA(s) engaged in the call to see or hear the caller or called party. GlobalVRS, through its comprehensive training modules and supervision, ensures that its CAs continue adhere to call confidentiality requirements. Further, GlobalVRS also requires all CAs to sign and abide by the RID Code of Professional Conduct, which includes call confidentiality obligations. CAs also receive initial and annual training on the Commission's Customer Proprietary Network Information regulations addressed below, as part of the Company's regulatory training.

3. Types of Calls -- 47 C.F.R. §64.604(a)(3).

Notwithstanding the Commission's Types of Calls Requirement waiver,⁷ GlobalVRS interpreters do not refuse single or sequential calls or otherwise limit the length of calls. All calls, including long distance calls, are and will continue to be completed without charge to the User. GlobalVRS has demonstrated its ability to interpret all non-waived call types and has the established experience to continue interpreting all non-waived call types.

4. Types of Calls - Voice Mail and Interactive Menus; Three way calling, Speed dialing and Video Mail features -- 47 C.F.R. §64.604(a)(3)(vii).

GlobalVRS offers three-way calling, speed dialing functionality, and video mail to its Registered Users.⁸

Three-way calling: GlobalVRS provides three-way calling capabilities for all callers. At the instruction of the inbound caller, GlobalVRS can connect up to two additional parties to any call (audio or video) and perform a three-way call.

Speed dialing functionality: GlobalVRS's VRS software application allows speed dialing. GlobalVRS's Registered Users are able to access their GX-Pro application address book and select added/saved contacts. The Registered User then has the option of selecting a contact in their address book or manually adding a telephone number into GlobalVRS's MyMMX application and make an outbound call that will connect to a GlobalVRS CA. Under either scenario, the Registered User's desired telephone number will then auto populate the CAs outbound call screen. The CA can simply connect the call without having to ask what number the Deaf caller wants to use. GlobalVRS also offers "Quick Dial" through its software applications. This feature allows Registered Users to assign their favorite contacts a number between 1 and 9. Instead of having to go to their address book and locate the contact, they can simply dial the

⁷ See *Telecommunications Relay Services And Speech to Speech Services for Individuals with Hearing and Speech Disabilities; Waivers of Mandatory Minimum Standards*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 29 FCC Rcd. 10697, 10703-04; 10705 (2014)(iTRS Exemption Order).

⁸ As used herein, a "Registered User" is an individual who has selected GlobalVRS as its default VRS provider, has completed the Company's registration process pursuant to 47 C.F.R. §64.611, and whose registration has been accepted by the Telecommunications Relay Services – User Registration Database Administrator as eligible to place TRS-Fund reimbursable calls.

number assigned to that contact and the telephone information will automatically appear on the CAs screen to complete the call.

Video Mail: GlobalVRS provides video mail to all Registered Users. Video mail is automatically available by default. Yet Registered Users have the option to disable voice mail using the settings in the GlobalVRS application. When a Registered User receives video mail, the Registered User will receive a notification when accessing the GlobalVRS application and can easily tap to open/view their messages.

Interactive Menus: GlobalVRS provides a dual tone multi-frequency feature for the Registered User to press “hot keys” when interactive menus (phone trees) are present in lieu of the CA having to select the numbers for the caller.

X-Card: X-Card allows Registered Users to port their address books from one provider to another. GlobalVRS has worked collaboratively with providers to ensure X-Card compliance within its platform and software application.

Importing X-Card/V-Card: Using GlobalVRS’s personal computer software application, the Registered User access contacts, selects the “myContacts” button, the “import” button, and the selected xcard/vcard is saved on their device. Once selected, Registered Users has access to their address book on the GlobalVRS software application. The Company has also adopted the standard “xCard” export interface to enable Registered Users to import their contact lists in xCard XML format.⁹

Exporting X-Card: Registered Users have two options:

1. X-Card: Registered Users direct their web browsers to <https://globalvrs.tv/contact/export/xcard> website, login to their account using the a user name and passcode and the X-Card file is automatically downloaded.

2. V-Card: Registered Users login on to their account via a personal computer or mobile device, go to contacts, select “myContacts”, select the export button, type a name to save the file, and select “Save.” V-Cards are then saved on the Registered User’s device.

GlobalVRS ensures that CAs immediately inform VRS users of the presence of any recorded messages and relay information conveyed by the recording when the caller places a call. Similarly, GlobalVRS ensures that CAs inform callers of any interactive menus that may be encountered in placing a call and assist callers with working through the menu to route their call to the preferred location or retrieve the information they want. GlobalVRS CAs are trained and directed to assist VRS users in leaving voice messages on voice mail systems.

⁹ 47 C.F.R. §64.621((b)(2).

5. Emergency Call Handling for TTY-Based TRS Providers 47 C.F.R. §64.604(a)(4).

GlobalVRS partners with Bandwidth.com, <https://www.bandwidth.com/>, a nationally-recognized emergency 911 platform provider, to provide compliant emergency VRS access to the Public Safety Answering Point serving the registered location of each Registered Users. GlobalVRS' compliance with this requirement and the Commission's emergency calling requirements pursuant to section 64.605 is detailed below.

6. STS Called Numbers -- 47 C.F.R. §§64.604(a)(5); 64.604(b)(7).

The Commission has waived for VRS providers, the requirement under this provision of the regulations that CAs maintain a list of names and telephone numbers speech-to-speech ("STS") users call.¹⁰ Should this waiver be lifted, GlobalVRS will comply with any established requirement.

7. Visual privacy screens/idle calls. -- 47 C.F.R. §64.604(a)(6).

CAs are strictly prohibited from using privacy screens. In the event that a caller enables a privacy screen or feature that obfuscates the caller, or in instances where a caller is unresponsive or unengaged for more than five minutes, CAs are instructed to terminate such calls immediately. The only exception to immediate termination is if the call has been established to be of an emergency nature or if the caller is legitimately on hold and the Registered User is present and awaiting call initiation. When terminating a call when a caller is unresponsive or unengaged for more than five minutes, the CA must announce his/her intent to disconnect a call unless a party indicates the desire to continue the call. When terminating such calls CAs must document the date, time, and reason for termination using a GlobalVRS form available from each work station via the Company's intranet.

8. International calls. -- 47 C.F.R. §64.604(a)(7).

Registered Users are informed of the requirements associated with placing VRS calls using GlobalVRS when traveling outside of the U.S. via GlobalVRS's website and when contacting a Customer Care representative or CA. Registered Users must pre-register for international calling by completing an international travel request prior to travel with GlobalVRS Customer Care. The International travel request asks the Registered User to indicate the dates of travel and reason for making the request. Requests are limited to a 30 day period.¹¹ International travel pre-registrations are documented in GlobalVRS's "At A Glance" (AAG) intranet for access by CAs and also as a printed document provided to each CA.

¹⁰ *iTRS Exemption Order*, para. 53.

¹¹ [REDACTED]

The AAG intranet is available to all CA's in all centers. It is used to post pertinent information that a CA might need while on a call. CAs can easily reference at any time to verify which users are currently under a Traveler's Permit.

The information is also posted as a hard copy notification of CAs and placed in every station in all centers. The GlobalVRS Lead trainer is responsible to obtain the Traveler's Permission to post the AAG for Interpreter reference.

On the Traveler's designated departure date, Customer Care is responsible to whitelist the Traveler's assigned ten digit number ("TDN") GlobalVRS's automatic call distribution platform function enables creation of calendar reminders for each Traveler's return date/time, and to ensure that the international whitelist designation is removed upon the Registered User's return date. These actions enable the platform to automatically detect that the TDN inserted in the platform whitelist is eligible to place internationally calls only until the scheduled return date.

Should a user attempt to place international calls without being whitelisted on the platform, the platform will automatically detect the Internet Protocol ("IP") address as an international IP address and prohibit the user from placing a call. GlobalVRS CAs are trained to reject any VRS call originating from any non-U.S. Internet Protocol address unless the call is initiated by a Registered User who has pre-registered with GlobalVRS to place international calls during specified time periods and within specified regions. GlobalVRS CAs are trained to identify and report potentially fraudulent calls to senior management, who coordinate with the Commission.

B. Technical Standards - 47 C.F.R. §64.604(b)

1. ASCII and Baudot - 47 C.F.R. §64.604(b)(1).

The ASCII and Baudot communication requirement contained in this rule is waived for VRS.¹²

2. Speed of Answer-- 47 C.F.R. §64.604(b)(2).

GlobalVRS has and will continue to ensure that it meets or exceeds the 80 percent within 120 seconds response time for VRS, measured monthly pursuant to 47 C.F.R. §64.604(b)(2)(iii). GlobalVRS submits speed of answer ("SoA") statistics in the monthly filing with the Fund Administrator that demonstrates ongoing compliance. GlobalVRS' internal SoA goal is to personally answer all calls within thirty seconds, far exceeding the current standard applicable to VRS. GlobalVRS has not only exceeded the current SoA requirement of 120 seconds, but set the bar even higher to ensure fast response time.

Between September 1, 2017 and August 31, 2018 GlobalVRS met a 60 second SoA [REDACTED] of the time measured monthly; year to date, between January 1, 2018 to October 21, 2018, all calls met a 60 seconds SoA [REDACTED] of the time, measured monthly.

¹² *iTRS Exemption Order*, para. 54.

GlobalVRS's exceptional SoA is based on staffing procedures that ensure ample coverage, even during peak usage periods.

- GlobalVRS has developed a SoA report that reflects SoA within 10 seconds, 30 seconds, 60 seconds and 120 seconds intervals. Reports are reviewed daily and summarized in a Daily Administration Report ("DAR"). The DAR reflects the daily SoA average for all calls answered under 60 seconds, under 30 seconds and under 10 seconds. The DAR also evaluates the CA's SoA performance and reflects a per CA average for each que.

Example:

Speed Of Answer			
FCC SOA Report - Percent for the day (under 60 sec - percent)	under 60 secs (current)	under 30 secs	under 10 secs
FCC SOA scripts received from nWise	100.00%	95.57%	92.71%
FCC SOA calculation from Stat File (Incl. blacklisted)			

Interpreting Team Performance			
Per Queue	Total	Main Queue	Eng Queue
Average interpreter SOA per answered call	0.13	0.12	0.08

- GlobalVRS conducts weekly forecasting meetings to closely monitor workforce scheduling. In these meetings, managers monitor call volume, number of CAs scheduled, length of calls, abandoned calls on an hour by hour basis. Adjustments are made to ensure the proper staffing is available for the upcoming week as needed.
- In instances of un-anticipated "spikes" in call volume, GlobalVRS designates a Scheduling Team available during and after business hours who can coordinate "on Call" Staff Interpreters to be called in and support as needed.

GlobalVRS's automatic call distribution platform uses an automated monitoring system which continually measures SoA with regular reports provided to GlobalVRS. GlobalVRS continually monitors calling trends to schedule sufficient operators to ensure ongoing compliance.

3. Equal Access to Interexchange Carriers -- 47 C.F.R. §64.604(b)(3).

Equal access to interexchange requirements have been waived for VRS providers, so long as free long distance service is provided to end users. GlobalVRS does not charge users for long distance service or placing VRS calls.¹³ Further, the Commission's ten-digit number assignment requirements necessarily make GlobalVRS its Registered Users' "presubscribed" – default VRS provider.

¹³ iTRS Exemption Order, para. 16.

4. TRS Facilities -- Continuous Operations -- 47 C.F.R. §64.604(b)(4).

GlobalVRS operates on a perpetual basis, accepting calls twenty-four hours a day, seven days a week through its call centers. The Company's call centers rely on equipment, system, and facility redundancy. Call centers are supported by uninterruptable emergency power backup generators and batteries, and redundant broadband Internet access to secure cloud-based data storage to ensure continuous operations.

GlobalVRS' call centers utilize commercial-sized power generators with battery back-up power available in the event of a power outage, to ensure uninterrupted operations. Each generator is capable of powering the call center for at least three hours in the event of an outage. GlobalVRS' primary Kissimmee, Florida call center is located in a building with two separate power grid systems to minimize the likelihood of power interruptions. Additionally, GlobalVRS has a built-in redundancy to ensure that, in the event of an interruption at a call center, calls may be immediately routed to a non-affected call center. Managers are on-call 24 hours a day seven days a week, to ensure services are continuously operational.

GlobalVRS's automatic call distribution platform and support resides on secure and redundant Amazon cloud-based servers to ensure uninterrupted operation under virtually any circumstance. The platform is supported by technical staff that is intimately knowledgeable with the platform and its operations and has the capability of ensuring that the platform remains fully operational at all times.

Since its inception GlobalVRS has maintained continual operations, even in the face of two catastrophic hurricanes that affected its Puerto Rico call centers in 2017.

CAs interpret exclusively from Company call centers. To the extent that GlobalVRS may engage in remote interpreting trials, GlobalVRS is prepared to designate qualified interpreters to engage in such trials as set forth in Section.64.604(b)(8) of the Commission's rules.

5. Technology -- 47 C.F.R. §64.604(b)(5).

GlobalVRS leases an advanced, comprehensive automatic call distribution platform,¹⁴ robust in functionality, scalable, and adaptable to ongoing requirements and Registered User needs. GlobalVRS's "MyMMX" VRS platform maximizes current video, voice, and transmission processing technology to enhance the calling experience. GlobalVRS has enhanced system capabilities with applications enabling use of the Company's VRS with commercial and proprietary VRS provider mobile and fixed devices, and continues to make service enhancements based on Registered User recommendations and the Company's own innovative approach to provide the best possible calling experience. Commensurate with industry goals,

¹⁴ Developed by nWise AB, a Swedish technology company that provides relay service platforms throughout Europe, Asia, and the U.S. nWise has partnered with GlobalVRS since GlobalVRS inception to design secure, , versatile, scalable, and compliant VRS.

GlobalVRS has discontinued use of H323 technology and fully implemented SIP Standards in accordance with the SIP Protocol created through provider cooperation.^{15 16} GlobalVRS is currently the only known provider with Braille display compatibility.

6. Caller ID - 47 C.F.R. §64.604(b)(6).

GlobalVRS transmits Caller ID on all calls. This is accomplished by transmitting the Registered User's assigned TDN when placing an outbound call. In the rare instance where a Registered User enables the ability to block caller ID on other provider technology, GlobalVRS's automatic call distribution platform can still successfully negotiate the call signaling and capture the corresponding TDN and required information for reporting, even though the caller ID will appear as anonymous to the outbound caller.

7. Voluntary at-home VRS call handling pilot program - 47 C.F.R. §64.604(b)(8).

GlobalVRS has identified experienced interpreters who are qualified to participate in the at-home VRS call handling program. The Company is prepared to participate in program trials at such time as it becomes authorized to do so and will submit a separate compliance plan demonstrating compliance with at-home interpreting regulations at that time.

C. Functional Standards - 47 C.F.R. §64.604(c)

1. Complaint Log - 47 C.F.R. §64.604(c)(1).

GlobalVRS maintains a log of all consumer complaints received. The consumer complaint log lists the date the complaint was filed, the nature of the complaint, an explanation of how the complaint was resolved, the date resolved, and employee responsible for resolution. GlobalVRS will continue to submit to the Commission a report of the number of complaints received annually on or before July 1 of each year. These reports have been submitted to the Commission since the Company was first granted conditional eligibility. Additionally, GlobalVRS will include a complete statement of the facts and supporting data, where available, in response to any informal or formal complaints received by the Commission and directed to the Company.

¹⁵ 47 C.F.R. §64.621(c).

¹⁶ GlobalVRS utilizes Session Initiation Protocol (SIP) for call signaling and does not directly utilize SS7 technology. GlobalVRS' platform is capable of supporting SS7 technology (*i.e.* calls come in with Blocked Caller ID), not showing the respective ten digit telephone number to the agent or the hearing party, but keeping the necessary data for reporting to the Commission.

2. Contact Person - 47 C.F.R. §64.604(c)(2).

The designated GlobalVRS contact person to coordinate with the Commission, its designees and the TRS Fund Administrator is:

Gabrielle Joseph
3700 Commerce Blvd.,
Kissimmee, Florida 34741
Phone: 407-518-7900 x 321
E-Mail: gabrielle@aslservices.com

Ms. Joseph serves as Chief Operations Officer and has been designated Company Compliance Officer.

3. Public Access to Information and Consumer Outreach 47 C.F.R. §64.604(c)(3).

GlobalVRS continues to engage in an active consumer information campaign to educate the public with significant effort made in outreach to underserved Spanish language Deaf and Hard-of-Hearing and DeafBlind communities.

GlobalVRS communicates with its stakeholders through direct contact – in community interpreting environments, through private and governmental agencies that support the Deaf and Hard-of-Hearing and DeafBlind communities.

Further, GlobalVRS engages in the following consumer outreach initiatives:

- Senior managers represent the Company in Deaf community trade shows and are frequent speakers on Deaf issues;
- GlobalVRS' founder, Angela Roth, writes periodic articles and makes presentations regarding the VRS industry and multi-culturalism;
- GlobalVRS has also created and frequently hosts workshops, open to the public, which focus on educating the public on the Americans with Disabilities Act and related industry topics;
- Website: GlobalVRS' Website (<https://globalvrs.com/>) includes information regarding the relay service programs and requirements;
- Expo Education: GlobalVRS supports various Deaf expositions and tradeshow throughout the country. Its sponsorship assists in supporting each venue to showcase various products and services within the Deaf and Hard-of-Hearing community. In addition, GlobalVRS sends teams of interpreters to work at its booth and talk one-on-one with the Deaf and Hard-of-Hearing attendees in order to answer their questions regarding VRS. GlobalVRS also provides products, such as educational handouts, that clearly address common questions about VRS raised within the Deaf and Hard-of-Hearing community. GlobalVRS has also participated in live stage presentations where the

GlobalVRS team has taught the audience on a variety of subjects including CPR survival skills, VRS vs. VRI Interpreting, ADA Laws, VRS Services and many other topics;

- Email Blasts: GlobalVRS sends periodic “email blasts” to Registered Users who authorize GlobalVRS to do so, describing GlobalVRS’ services and ways to access VRS.
- Meetings/Workshops: GlobalVRS sends representatives to a variety of locations to give in-services and workshops to interpreters, and the Deaf, Hard-of-Hearing, and business communities, explaining the differences between VRS and video relay interpreting services to promote compliance with FCC rules;
- Remote Area Education: GlobalVRS recognizes that there are many remote areas where Deaf (and Hard-of-Hearing) and Spanish Deaf (and Hard-of-Hearing) individuals live. GlobalVRS strives to reach out to Deaf and Hard-of-Hearing persons residing in rural areas, as it recognizes that other VRS providers may focus their educational efforts and resources to attract current (and potential) VRS users living in larger metropolitan areas;
- Direct Customer Service Follow-Up: GlobalVRS utilizes its Deaf and Hard-of-Hearing customer service representatives to make direct contact with VRS clients to ensure that they understand the services offered; and
- English-Spanish Translation: Indicative of its commitment to public education about the availability of tri-lingual VRS services, GlobalVRS invests considerable time and financial resources translating its educational materials, maintaining both Spanish and English versions of the GlobalVRS website, and engaging in the above community outreach activities both in English and in Spanish.

4. Rates -- 47 C.F.R. §64.604(c)(4).

GlobalVRS does not charge, and has not charged, VRS callers to place VRS calls. GlobalVRS remains compliant with the Commission’s rule prohibiting relay service providers from charging rates that are any greater than rates paid for functionally equivalent voice communications services with respect to the duration of the call, the time of day, and the distance from the point of origination and point of termination, accordingly.

5. Jurisdictional Separation of Costs 47 C.F.R. §64.604(c)(5) (As Applicable).

Data collection and audits. 47 C.F.R. §64.604(c)(5)(iii)(D)(1). GlobalVRS has provided, and will continue to provide “true and adequate data and other historical, projected,” and rate-related information requested by the Fund Administrator necessary to determine TRS fund revenue requirements, subject to Fund Administrator Audits. Further, GlobalVRS has separately provided additional cost data to the Commission. GlobalVRS has successfully completed annual Fund Administrator audits and implemented all recommendations, most recently an audit of its user registration process in mid-October 2018.

[REDACTED] Through the efforts of the Company’s chief financial officer, a qualified senior tax attorney hired in 2016, Global has adopted and is documenting enhanced practices that have been adopted to further ensure accurate, compliant cost reporting consistent with the [REDACTED] previous audit findings.

All direct expenses associated with the provision of VRS are accurately segregated and documented. All shared expenses and indirect costs are subject to detailed analysis by the Company's Chief Financial Officer and executive management team, and allocations performed to only capture VRS related expenses. Payroll allocations have also been enhanced to be recorded through coding within Paycom¹⁷ in lieu of other previous payroll allocation methods.

Call data required from all TRS providers 64.604(c)(5)(iii)(D)(2) to (5). Pursuant to Section 64.604(c)(5)(iii)(D)(2), GlobalVRS's automatic call distribution platform automatically generates call detail records including all required data. These data are formatted by use of scripts according to the TRS Fund Administrator's detailed guidelines. Scripts are automated and cannot be manipulated by a GlobalVRS employee. Required monthly reports are compiled, reviewed, approved and then uploaded into the Fund Administrator's online "extranet" portal.

Current monthly reporting includes:

CDRV:	Call Data Reports
DEVS:	Listing of current devices registered with GlobalVRS.
HRUS:	Listing of current Hearing Users registered with GlobalVRS.
IPAS:	Listing of current IP addresses used by GlobalVRS operations
NUMS:	Listing of current TDN's blacklisted by GlobalVRS. Assigned ten-digit telephone numbers used to place calls that are not reimbursable including numbers assigned to affiliates and used for testing purposes, are "blacklisted" from any reimbursement.
SOAV:	Listing of speed of answering statistics for corresponding month
SIGN:	An attestation form with signature from a company officer

All reports are reviewed by the Company's senior engineer on a daily basis using company DAR and also on a monthly basis using company MVR- Monthly Verification Report where all data is audited. Once data auditing is completed, the submissions are certified by the Company's President & CEO officer who has first-hand knowledge of the data and its accuracy

All call detail records and SoA data are retained for a minimum of five years and are available for review by the Commission, the Fund Administrator, and their designees.

Audits 64.604(c)(5)(iii)(D)(6). Since its inception, GlobalVRS has actively participated in annual TRS Fund Administrator audits and provided detailed information responsive to the auditors' requests. GlobalVRS has enhanced its documentation procedures based on enforcement Bureau findings to further ensure full documentation is available to auditors at the time that audits are conducted to obviate the need for post-audit requests.

Call Data Retention 64.604(c)(5)(iii)(D)(7). Pursuant to Section 64.604(c)(5)(iii)(D)(7), GlobalVRS retains all supporting documentation for a minimum of five years in secure,

¹⁷ Contracted payroll administrator for GlobalVRS

password-protected servers with backup copies that are available to the Commission and Fund Administrator upon request.

Information Filed With the Administrator 64.604(c)(5)(iii)(I). GlobalVRS's President and CEO will continue to certify under penalty of perjury that conversation minutes submitted to the Fund for reimbursement are accurate in compliance with Section 225 of the Communications Act of 1996, as amended and Commission rules, including user registration rules and rules that prohibit against financial incentives or calls intended to generate usage.

[REDACTED - Begin]

[REDACTED - End]

Whistleblower Protections - 47 C.F.R. § 64.604(c)(5)(iii)(M) GlobalVRS has an established Whistleblower Policy incorporated into the Company's employee handbook. This policy encourages employees to immediately report any non-compliant activity directly to the Commission and advise senior management. Employees receive training on Commission regulation generally and on applicable regulations. GlobalVRS periodically briefs employees regarding regulatory developments and employee compliance and whistleblower obligations. A copy of the Commission's Mandatory Minimum Standards and other attendant regulations are available to all employees interpreter as a reference in the company's AAG intranet. These steps not only ensure that video interpreters are familiar with Commission requirements, but underscore the Company's compliance commitment.

Eligibility for Reimbursement from the TRS Fund - 47 C.F.R. §64.604(c)(5)(iii)(N)

64.604(c)(5)(iii)(N)(1)(ii). GlobalVRS has since its inception clearly identified itself as an eligible VRS provider in all communications with the public. The Company does not currently engage with any other entity in the provision of VRS interpretation.

64.604(c)(5)(iii)(N)(1)(iii), (iv), and (v). GlobalVRS does not contract with, or otherwise authorize any third party to provide interpretation services or call center functions.

64.604(c)(5)(iii)(N)(2). GlobalVRS has faithfully submitted call center reports and submitted substantive change notices in instances where its call centers have been impacted by

natural events and provided substantive change notices on thirty days' notice, when call center reorganizations have necessitate submission, as is a matter of record with the Commission. The Company will continue maintaining compliance with all call center reporting obligations.

64.604(c)(5)(iii)(N)(3). GlobalVRS interpreters are compensated in accordance with each interpreter's experience, work history, shift, and the time available to interpret calls. Under no circumstance is interpreter compensation tied to the number of calls or length of calls interpreted.

64.604(c)(5)(iii)(N)(4). GlobalVRS clearly recognizes that no business related calls including remote training session calls are reimbursable from the Fund and has blacklisted all Company numbers to ensure that no call placed from those numbers is reimbursable. All employees are advised of the prohibition against placing compensable business-related calls. GlobalVRS otherwise does not conduct, host, or otherwise promote use of remote training sessions. See Information Filed With the Administrator 64.604(c)(5)(iii)(I) discussion, *supra*.

6. Complaints -- 47 C.F.R. §64.604(c)(6).

GlobalVRS' Registered User complaint procedures are described in detail at Section VIII, *infra*. GlobalVRS maintains a log of all consumer complaints received. GlobalVRS submits an annual complaint log to the Commission on or before July 1 applicable to the 12-month period ending May 31 of each year. GlobalVRS reiterates its commitment to cooperate fully in any investigation or other procedure the Commission may undertake to resolve complaints it may receive regarding GlobalVRS services.

GlobalVRS may be contacted at via telephone, Email, or in writing to the Company's address:

Address:	3700 Commerce Blvd., Kissimmee, Florida 34741
Phone:	888-472-6768 (Spanish VRS) 888-472-6778 (English VRS)
E-Mail:	gabrielle@aslservices.com
Website:	www.GlobalVRS.com
Facsimile:	407.518.7903
Voice Telephone:	1.877.326.3877
English and Spanish VP Users:	Globalvrs.tv

7. Confidential Treatment of TRS Customer Information –47 C.F.R. §64.604(c)(7).

GlobalVRS commits that, consistent with this provision and Customer Proprietary Network Information (“CPNI”) regulations, all customer information, however generated, will be treated as confidentially and will not be sold, distributed, shared, or revealed in any way by GlobalVRS or any of its staff or automatic call distribution platform provider, unless compelled to do so by lawful order. GlobalVRS has and will continue to comply with the provisions governing protection of CPNI as set forth in Sections 64.5101 *et seq.* of the Commission’s rules.¹⁸

8. Discrimination and preferences –47 C.F.R. §64.604(c)(12).

GlobalVRS has not, nor will it, discriminate directly or indirectly, by any means or device, or engage in any unjust or unreasonable discrimination related to practices, facilities, or services for or in connection with like relay service, engage in or give any undue or unreasonable preference or advantage to any particular person, class of persons, or locality, or subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.

GlobalVRS has not, nor will it, engage in any practice that GlobalVRS knows or has reason to know will cause or encourage false or unverified claims for TRS Fund compensation; Unauthorized use of VRS; the making of VRS calls that would not otherwise be made; or use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner.

GlobalVRS ensures that only eligible Registered Users may place calls that are reimbursable from the Fund in strict compliance with Section 64.611 of the Commission’s rules,¹⁹ [REDACTED]. All GlobalVRS Registered Users are uploaded into the Telecommunications Relay Service - User Registration Database as further evidence that the processes undertaken by the Company complies with Commission requirements to ensure only authorized provision of VRS. Detailed discussion regarding GlobalVRS’ compliance with the Internet-based TRS registration requirements as set forth in Section 64.611 of the Commission’s rules is addressed *Infra*.

9. Unauthorized and Unnecessary Use of VRS – 47 C.F.R. §64.604(c)(13).

GlobalVRS has not knowingly, nor will it, engage in any practice resulting in false or unverified claims for TRS Fund compensation, unauthorized use of VRS, the making of calls

¹⁸ 47 C.F.R. §§64.5101 through 64.5111.

¹⁹ 47 C.F.R. §64.611.

that would not otherwise be made or the use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner.

[REDACTED - Begin]

[REDACTED- End]

Further, GlobalVRS continues to train its CAs to be vigilant of potential forms of unauthorized usage by users and encouraged to report unauthorized usage of any kind through its whistleblower process.

D. Compliance with Other Standards –47 C.F.R. §64.604(d).

Section 64.604(d) incorporates the applicable requirements of Sections 64.605, Emergency Calling Requirements; 64.611, Internet-based TRS registration; 64.615, TRS User Registration Database and administrator; 64.621, Interoperability and portability; 64.631, Verification of orders for change of default TRS providers; 64.632, Letter of authorization form and content; 64.5105, 64.5107, 64.5108, 64.5109, and 64.5110 governing TRS customer proprietary network information, of the Commission's rules,²⁰ as mandatory minimum standards. GlobalVRS complies with each of these rules as specifically discussed below.

1. Compliance With Emergency Calling Requirements – 47 C.F.R. §64.605

47 C.F.R. §64.605(a).²¹ GlobalVRS has since its inception complied with emergency calling requirements in conjunction with its emergency calling partner, Bandwidth.com addressed *supra*. Bandwidth.com's emergency call platform is integrated with GlobalVRS

²⁰ 47 C.F.R. §§64.611, 64.615, 64.621, 64.631, 64.632, 64.5105, 64.5107, 64.5108, 64.5109, and 64.5110 . 47 C.F.R. §64.617, Neutral Video Communications Service Platform has been repealed.

²¹ Excluding 47 C.F.R. §64.605(a)(1)(i) and (iv) inapplicable to iTRS providers.

automatic call distribution platform to seamlessly connect Registered Users who place emergency 911 calls to the caller's serving public safety answering point ("PSAP"). Automatic number identification ("ANI"), the caller's Registered Location, information indicating that the call is being placed by GlobalVRS and the CA's identification number, and call back number are all passed through to the serving PSAP following confirmation of the caller's information. All 911 calls will be routed through the use of ANI and, if necessary pseudo-ANI, via Bandwidth.com's dedicated wireline E911 network.²²

GlobalVRS's automatic call distribution platform implements an automated system to prioritize emergency calls so that they are answered before non-emergency calls. This is done through the configuration of the 911 queue on the GlobalVRS automatic call distribution platform. Emergency 911 calls are automatically recognized by GlobalVRS's call distribution platform software and given the highest priority in the call queue system ahead of any other non-emergency calls. In the unlikely event a 911 call comes in while all CAs are in active calls, the system will also notify all CAs that there is a 911 call waiting using a bright red frame on their screen. CAs are then encouraged to answer it as fast as possible without willfully terminating the existing call without reason.

When an emergency caller connects to a GlobalVRS CA, the CA is trained to request and document the caller's name and location at the beginning of any emergency call, even if the caller's registered location information is already on file with GlobalVRS. In the event one or both legs of an emergency call are disconnected, GlobalVRS does and will ensure that the CAs are trained to re-establish the call by contacting the calling party, the PSAP, or both.

GlobalVRS recognizes that information obtained by GlobalVRS as a result of assisting with an emergency call will be used only for emergency or law enforcement purposes. Protection of all proprietary information is underscored in GlobalVRS's privacy and confidentiality training.

47 C.F.R. §64.605(b) E911 Service for VRS. As noted, when a Registered User places an emergency 911 call through GlobalVRS, the Registered User's ANI, Registered Location, GlobalVRS's name and the CA's identification number are transmitted to the serving PSAP through Bandwidth.com's E911 platform in accordance with Sections 64.3000 *et seq.* of the Commission's rules.²³

Regarding Section 64.605(b)(4) specifically governing Registered Locations, as part of the registration process described below, GlobalVRS obtains each prospective Registered User's physical location. GlobalVRS verifies the Registered User's physical location by requiring independent documentation that correlates the prospective Registered User to the address to be registered. Registered Users are informed of the importance of updating their Registered Location and may easily update their information by updating their customer profile at will.

²² See, Bandwidth.com 911 FAQ: <https://www.bandwidth.com/wp-content/uploads/9-1-1-Lo-down.pdf>

²³ 47 C.F.R. §§64.3000 to 64.3004.

GlobalVRS has established a means by which Registered Users can easily update their Registered Location information through the GlobalVRS' Personal Online Profile.²⁴ Registered Users are also able to update their registered location information by contacting GlobalVRS Customer Care. When a Registered User contacts Customer Care, the representative will ask pre-established Registered User security questions to verify identity, confirm existing information, and then manually update the new/updated information in GlobalVRS's WordPress Registered User account application and in the MMX platform. All CAs will be able to see the Registered User's new address when the Registered User places a call.

GlobalVRS has interpreted [REDACTED] emergency calls year to date.

The Commission's September 26, 2018 *Notice of Proposed Rulemaking* regarding Kari's Law and Section 506 of RAY BAUM'S Act and inquiry concerning 911 access, routing, and systems location in enterprise communications systems²⁵ proposes *inter alia* to "allow TRS providers flexibility in implementing dispatchable location solutions, and to fall back to Registered Location options when real-time location is not feasible."²⁶ Pending adoption of corresponding regulation and/or policy regarding VRS provided to corporate Registered Users with multi-location telephone systems ("MTLS"), GlobalVRS is reviewing methods to identify and establish specific locations for Deaf callers from MTLS locations as organizational entity Registered Locations, e.g. "second floor third cubical on right" that can be transmitted to Public Safety Answering Points on 911 calls made from MTLS locations to the extent possible.

2. Compliance With Internet-based TRS registration – 47 C.F.R. §64.611.

[REDACTED - begin]

[REDACTED - End]

Among the enhancements to its registration process, GlobalVRS has trained its customer care representatives to independently verify new registrants' eligibility self-certifications,

²⁴ See 47 C.F.R. §64.605(b)(4)(ii).

²⁵ *In the Matter of Implementing Kari's Law and Section 506 of RAY BAUM's Act, Inquiry Concerning 911 Access, Routing and Systems Location in Enterprise Communications Systems*, PS Docket Nos. 18-261 and 17-239, *Notice of Proposed Rulemaking*, FCC 18-132 (September 26, 2018).

²⁶ *Id.* at para. 81.

identity, Registered Locations, and consent to transmit registration data to the TRS-URD. For those who change their default provider to GlobalVRS, GlobalVRS Systems Administrator is trained to access the TRS-URD to verify information. Customer Care will still take lead in collecting and verifying documentation for submission to the TRS-URD. All required attestations for new Registered Users are currently completed during online registration and signed using Electronic Signature Disclosures guidelines. Forms are then automatically stored in WordPress account software, downloaded, and saved as an Adobe Acrobat electronic file in the Company's secured internal network. An independent management review of all new registrations including separate, stand-alone supporting documentation using a required item checklist is also now performed.

When assigning TDNs to new Registered Users, GlobalVRS coordinates with its numbering partner, Bandwidth.com, to ensure numbers are geographically relevant to the registrant's Registered Location under the North American Numbering Plan. GlobalVRS has amended its registration process to ensure that no TDN can be used by a registrant to place a call until the registrant has been successfully entered into the TRS-URD. TDNs are assigned based on area codes local to the Registered Location. Toll free numbers are not accessible online and can only be generated by a manual request to Bandwidth.com. Should a toll free numbering be provided, only designated administrative team members will have access to Bandwidth.com to make request a toll free number, and if obtained, the toll free number is required to be provisioned in iTRS by the GlobalVRS Systems Administrator.

The confidentiality of all collected data is strictly maintained pursuant to the Company's compliance with Customer Proprietary Network Information ("CPNI") rules, addressed below, and CAs and customer care representatives are subject to recurring CPNI compliance reviews, as noted.

GlobalVRS has worked closely with the Fund Administrator to successfully integrate its registration process with the TRS-URD. GlobalVRS has now ensured that its registration procedures meet the "reasonable process" for Registered User registration established by the Commission.

Regarding compliance with the User Notification and Acknowledgement requirement, 47 C.F.R. §64.611(g), the Company has enhanced its notifications to new registrants to improve registrant understanding. GlobalVRS's notification process continues to comply with the Electronic Signatures in Global and National Commerce Act

3. Compliance With TRS User Registration Database and Administrator Requirements – 47 C.F.R. §64.615

On January 1, 2018, the Fund Administrator released its initial *Internet Telecommunications Relay Services Video Relay Service Registration Database Filing Instructions* ("Instructions"). These initial Instructions present detailed requirements for provider TRS-URD interfaces. Senior GlobalVRS information technology managers have closely coordinated with the Fund Administrator to deploy seamless, automated interfacing system that meets Instructions requirements and attendant Commission rules, as evident through

GlobalVRS successful uploading of all Registered Users and Subsequent amendments to Registered User records.

4. Compliance With Interoperability and Portability – 47 C.F.R. §64.621

GlobalVRS does not, nor has it, restricted any user's unfettered access to another provider's service or otherwise degraded service quality with another provider's service. GlobalVRS has incorporated the Session Initiated Protocol profile, planning for RUE implementation once final requirements are established, and xCard capability on its automatic call distribution platform in conjunction with technical amendments coordinated with its automatic call distribution platform provider.

Through its active involvement in provider SIP implementation conferences and development calls, GlobalVRS has adopted technical enhancements to its automatic call distribution platform to comply with the Commission's SIP profile adoption requirements. GlobalVRS is actively involved with MITRE and all providers in ensuring full interoperability, as further discussed below.

As RUE specifications continue to evolve and GlobalVRS is closely monitoring the rules that are soon to be finalized and is working with the VRS Access Technology Reference Platform ("VATRP") Team on testing.²⁷

And, as noted above, GlobalVRS has implemented the X-Card requirements to ensure address book portability among providers.

[REDACTED - Begin]

[REDACTED - End]

²⁷ GlobalVRS has joined other providers in requesting an immediate pause and further development of the VATRP. See Letter from ASL Services Holdings, LLC dba GlobalVRS, CSDVRS, LLC, Convo Communications, LLC, Purple Communications, Inc., and Sorenson Communications, LLC to Mr. Eliot Greenwald, Deputy Chief Disability Rights Office, Consumer and Governmental Affairs Bureau (October 17, 2018).

5. Verification of Orders for Change of Default TRS Providers – 47 C.F.R. §64.631

As part of GlobalVRS's compliance with Commission registration rules, GlobalVRS strictly complies with the associated requirements of Section 64.631 governing order – default provider - verification. GlobalVRS relies on an electronically signed letter of authorizations (“LoA”) form that complies with Section 64.632, addressed below. The Company processes new default provider registrations immediately. GlobalVRS retains all documentation, including LoAs for no less than five (5) years, and indefinitely for Registered Users who remain GlobalVRS Registered Users.

6. Compliance With Letter of Authorization Form and Content – 47 C.F.R. §64.632

GlobalVRS's registration process is automated on line.²⁸ LoAs are generated upon completion of the registration process and contain the language set forth in Section 64.632(d) of the Commission's rules. GlobalVRS maintains standalone electronic copies of the LoA that are available upon Commission request as set forth in Section 64.631.

7. Compliance Customer Proprietary Network Information Regulations – 47 C.F.R. §§64.5105, 64.5107, 64.5108, 64.5109, and 64.5110

GlobalVRS has always strictly complied with Commission Compliance Customer Proprietary Network Information (“CPNI”) rules and maintained strict privacy of all user data since its inception. All GlobalVRS employees receive initial and recurring training regarding CPNI protection and attendant Commission rules, as required per Section 64.5109(b). The Company strictly limits those individuals who may access user data to a need to know basis – customer care, CAs, and information technology/operations individuals, the latter including GlobalVRS's contracted automatic call distribution platform vendor who is bound to comply with CPNI. As noted, CPNI is transmitted with emergency 911 calls exclusively to PSAPs via Bandwidth.com, as authorized pursuant to Section 64.5105(c)(4). Protection for the confidentiality of transmitted CPNI associated with emergency 911 calling is established in GlobalVRS's agreement with Bandwidth.com. GlobalVRS provides CPNI to the Fund Administrator for use in the TRS-URD with the affirmative Registered User's approval as set forth in Section 64.611 and otherwise pursuant to Section 64.5107, and when requested by the Fund Administrator for oversight of the Fund pursuant to Section 64.5105(c)(5).

GlobalVRS uses CPNI exclusively to support its provision of VRS. The Company neither sells CPNI to others nor does it provide such information to – nor seek to obtain confidential information from – competitors.

²⁸ GlobalVRS may initially rely on electronic mail registrations for entities, device registration, and point-to-point registrations at such time as the Company initiates such registrations.

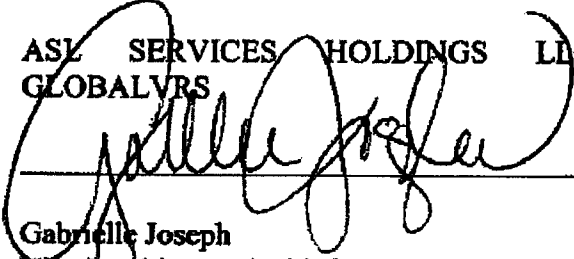
Access to CPNI is password protected, either by designated Company representatives or by Registered Users. If a Registered User seeks to access the Registered User's own CPNI, the individual may only do so through a password protected online logon that requires further authentication through the correct response to the Registered User's pre-established security questions. In instances of forgotten passwords, the Registered User must contact customer care and independently verify his or her identity. GlobalVRS has not been the victim of hacking. Yet pursuant to Section 64.5111, GlobalVRS has established a SOP for notification of information security breaches in the event that confidential records may be compromised for any reason.

GlobalVRS has submitted its annual CPNI compliance certification pursuant to Section 64.5109(e) as evidence of its compliance. The Company's compliance officer assumes responsibility for ensure strict and ongoing compliance with CPNI rules.

III. CONCLUSION

As demonstrated herein, ASL continues to meet the MMS and additional requirements for the provision of Fund-eligible VRS, now with the benefit of its clearer understanding of certain requirements, enhanced processes and coordination with the Commission

Respectfully submitted this 31st day of October,

By: 
ASL SERVICES HOLDINGS LLC dba
GLOBALVRS
Gabrielle Joseph
Vice President and Chief Operations Officer
38700 Commerce Boulevard, Suite 216
Kissimmee, FL 34741
Telephone: 407.518.7900 ext. 201

CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER IN CG DOCKET
NOS. 03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

STATE OF FLORIDA
COUNTY OF OSCOLA

)
) ss.
)

CERTIFICATION

I, Gabrielle Joseph, swear under penalty of perjury that I am Vice President and Chief Operations Officer of ASL Services Holdings, LLC dba GlobalVRS, the reporting entity, and that I have personally examined the foregoing submission, and that all information required under the Commission's rules and orders have been provided, and that all statements of fact, as well as all documentation contained in this submission are true, accurate and complete.

ASL SERVICES HOLDINGS LLC dba
GLOBALVRS

By: _____

Gabrielle Joseph
Vice President and Chief Operations Officer
38700 Commerce Boulevard, Suite 216
Kissimmee, FL 34741
Telephone: 407.518.7900 ext. 201

Subscribed and Sworn to me this 31st day of October, 2018

Kathleen A. Dickson
Notary Public

My commission expires 10/10/2020

SEAL



Kathleen A. Dickson
NOTARY PUBLIC
STATE OF FLORIDA
Comm# 0082827
Expires 10/10/2020

Annual 47 C.F.R. §64.5105 et seq. CPNI Certification

Annual Customer Proprietary Network Information ("CPNI") Certification covering the period January 1, 2017 through December 31, 2017, pursuant to 47 C.F.R. §64.5109(e).

Date Filed: November 1, 2018

Name of Company covered by this Certification: ASL Services Holdings, LLC dba Global VRS

Name of Signatory: Gabrielle Joseph

Title of Signatory: Chief Executive Officer

Certification: I, Gabrielle Joseph, do hereby certify under penalty of perjury that I am an officer of ASL Services Holdings, LLC dba Global VRS, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules for Internet-based Telecommunications Relay Service Providers, 47 C.F.R. §§64.5101 et seq.

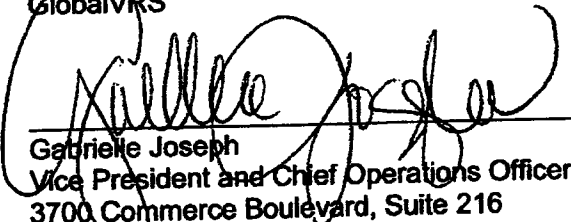
Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.5105 et seq. of the Commission's rules as applicable.

The Company has not taken any actions (i.e. proceedings instituted or petitions filed by a company at either state commissions, the court system or the Commission against data brokers) against data brokers in the past year.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 19 of the U.S. Code and may be subject to enforcement action.

ASL Services Holdings, LLC dba
GlobalVRS



Gabrielle Joseph
Vice President and Chief Operations Officer
3700 Commerce Boulevard, Suite 216
Kissimmee, Florida
Telephone: 407.518.7900

Attachment 1: Statement Concerning Company Procedures

ASL Services Holdings, LLC dba Global VRS ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any individual not directly involved in the provision of service, subject to disciplinary action and termination of employment. All individuals receive an initial CPNI protection briefing and periodic reminders thereafter. All individuals and the Company's automatic call distribution vendor partner and its employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those individuals with a "need to know" for purposes of serving Registered Users and users. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with Registered Users and users is documented through retention of electronic notes and retained for a minimum of three years, as set forth in 47 C.F.R. §64.5109. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2017, the Company took no action against data brokers. In calendar year 2017, the Company received no consumer complaints regarding CPNI issues.