

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)	
_____)	

REPLY COMMENTS OF CONVO COMMUNICATIONS, LLC

Convo Communications, LLC (“Convo”) agrees with the Consumer Groups that video relay service (VRS) providers should be “adequate[ly] compensated for their services”,¹ which they commented in response to the Interstate Telecommunications Relay Service Advisory Council’s (TRS Advisory Council) Petition for Reconsideration (Petition) recommending the additional compensation for offering skills-based interpreting on a trial basis.² Convo requested an equivalent opportunity to participate in the trial by being adequately compensated \$7.05 per minute for skills-based interpreting, which is the percentage increase being petitioned for Tier II providers (the median of 3 tiers) over the emergent rate.³ Although the Petition did not discuss the compensation of emergent providers such as Convo, we agree with the Consumer Groups that “[r]eimbursement decisions must be flexible enough to also allow reimbursement for expenses

¹ Comments of Consumer Groups in Response to the Petition for Reconsideration of the Report and Order and Order. FCC 17-86, on Behalf of the Interstate Telecommunications Relay Service Advisory Council, CG Docket Nos. 10-51 & 03-123, p. 3 (November 9, 2017) (Consumer Groups Comments).

² Petition of Interstate Telecommunications Relay Service Advisory Council for Reconsideration, CG Docket Nos. 03-123, 10-51 (Sept. 21, 2017) (Petition); *see also*, Consumer & Governmental Affairs Bureau Seeks Comment on Interstate Telecommunications Relay Service Advisory Council Petition for Reconsideration of the VRS Rates Order, Public Notice, DA 17-980, CG Docket Nos. 10-51 & 03-123 (October 6, 2017).

³ Comments of Convo Communications, LLC, CG Docket Nos. 10-51 & 03-123 (November 9, 2017) (Convo Comments).

generated in developing and delivering continuously higher quality VRS service...”⁴ Convo agrees with Consumer Groups that “[s]kills-based routing in VRS would allow consumers to attain more effective communication...”⁵

Convo concurs with ASL Services Holdings, LLC dba GlobalVRS (GlobalVRS) that the Commission should “consider compensating emerging providers proportionately for their costs” and not doing so would “create an unfair competitive advantage to larger providers and provide no incentive for others to participate....”⁶ Convo commented that the lack of a proportionately equivalent funded opportunity for it to participate in the trial would cause it to lose its customers to other providers and seriously harm its growth out of the emergent stage.⁷

Convo agrees with ZVRS and Purple that “the success of the trial depends entirely on the participation of the VRS providers.”⁸ Convo commented that the trial would clearly benefit from the inclusion of Convo’s consumer oriented approach to skills-based interpreting.⁹

Convo concurs with Sorenson that the providers would need to be “compensated commensurately” for the “additional development and implementation costs” to participate in the trial.¹⁰ Convo requested that the additional costs for participating in a trial be covered under a rate increase or by reimbursing it for its engineering costs.¹¹

Convo appreciates the Commission’s commitment to advancing the effectiveness of VRS through the enhancement of interpreting services. Convo looks to continuing to contribute to this

⁴ Consumer Groups Comments at p.3.

⁵ Id. at p. 2.

⁶ Comments of ASL Services Holdings, LLC dba GlobalVRS to Petition for Reconsideration of the Report and Order and Order, FCC 17-86, on Behalf of the Interstate Telecommunications Relay Service Advisory Council, CG Docket Nos. 10-51 & 03-123, p.4 (November 9, 2017).

⁷ Convo Comments at p. 4.

⁸ Comments of ZVRS Holding Company, ZVRS and Purple Communications on Interstate Telecommunications Relay Service Advisory Council Petition for Reconsideration of the VRS Rates Order, CG Docket Nos. 10-51 & 03-123, p. 2 (November 9, 2017).

⁹ Convo Comments at p. 2.

¹⁰ Comments of Sorenson Communications, LLC on the Interstate Telecommunications Relay Service Advisory Council Petition for Reconsideration of the VRS Rates Order, CG Docket Nos. 10-51 & 03-123, p. 2 (November 9, 2017).

¹¹ Convo Comments at pp. 3-5.

progress through proportionately equivalent funding to enable its participation in the trial.

Respectfully submitted,

Jeff Rosen
General Counsel
Convo Communications, LLC
2028 E Ben White Blvd #240
Austin, TX 78741
(240) 560-4396
jeff@convorelay.com

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