

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Structure and Practices of the Video Relay |) | CG Docket No. 10-51 |
| Service Program |) | |
| |) | CG Docket No. 03-123 |
| Telecommunications Relay Services and |) | |
| Speech-to-Speech Services for Individuals with |) | |
| Hearing and Speech Disabilities |) | |

REPLY COMMENTS OF ZVRS HOLDING COMPANY

ZVRS Holding Company (“ZVRS Holding”), parent company of CSDVRS, LLC d/b/a ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”) (collectively, the “Companies”), hereby replies to comments made in response to the petition for reconsideration (“Petition”) filed by the Interstate Telecommunications Relay Service Advisory Council (“Council”) regarding skills-based routing. The Petition seeks reconsideration of the rates and commencement date for a skills-based routing trial for the video relay service (“VRS”), focusing on legal, medical, and technical computer support (the “Trial”).¹ The Companies agree with commenters that: (1) the rates for skills-based routing during the Trial should be increased to at least \$5.29 per minute, holding these rates steady until permanent rates are adopted for skills-

¹ Petition of Interstate Telecommunications Relay Service Advisory Council for Reconsideration, CG Docket Nos. 03-123 & 10-51 (filed Sept. 21, 2017), referencing *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Order, 32 FCC Rcd. 5891 (July 6, 2017) (“2017 VRS Rates Order”); see also *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436, 2438-44, paras. 4-19 (Mar. 23, 2017) (authorizing a skills-based trial for VRS calls pertaining to legal, medical, and technical computer support) (“2017 VRS Improvements Order”).

based routing; and (2) the Commission should increase the categories of authorized skills-based routing.

First, the record reflects unanimous agreement among VRS providers and consumers that the Commission should increase the compensation rates for skills-based routing to a level that will account for providers' incremental costs of providing the service, and encourage providers to participate in the Trial.² All five VRS providers have explained that participation in the Trial will cause them to incur additional costs, including the costs of recruiting and staffing specialized Communications Assistants ("CAs") to handle skills-based calls.³ The costs of providing skills-based routing also will vary depending on the percentage of customers that elect to use the service. ZVRS and Purple agree with Sorenson and the Consumer Groups that the Commission should increase compensation for VRS providers participating in the Trial to *at least* the emergent rate of \$5.29 per minute.⁴

² See Sorenson Communications, LLC Comments, CG Docket Nos. 10-51 & 03-123, at 5 (filed Nov. 9, 2017) (requesting that the Commission "grant the Petition and set the compensation rates for skills-based routing of calls to a level that will encourage Sorenson and other providers to participate in the Trial") ("Sorenson Comments"); Comments of Convo Communications, LLC, CG Docket Nos. 10-51 & 03-123, at 7 (filed Nov. 9, 2017) (stating that "Convo needs additional compensation to incent its participation in the trial") ("Convo Comments"); Comments of ASL Services Holdings, LLC dba GlobalVRS, CG Docket Nos. 10-51 & 03-123, at 2 (filed Nov. 9, 2017) (noting that the Petition's underlying concerns "are entirely valid and should be addressed by the Commission in the context of the Council's Petition.") ("GlobalVRS Comments"); Comments of Consumer Groups, CG Docket Nos. 10-51 & 03-123, at 1-2 (filed Nov. 9, 2017) ("Consumer Groups support TRS Advisory Council's calls to provide additional compensation to TRS providers for a trial of skills-based routing") ("Consumer Groups Comments").

³ See Sorenson Comments at 3 ("As the Commission is well aware, all providers have stated they would incur some additional costs associated with the Trial."); Convo Comments at 3 ("Convo agrees with Rolka Loube that participation in the skills-based trial will cause it to incur additional costs."); GlobalVRS Comments at 2 ("The 2017 Report and Order acknowledged the providers' contention that additional costs will be incurred with the Trial.").

⁴ See Sorenson Comments at 2 ("VRS providers would need to be compensated commensurately with the additional costs involved in providing skills-based routing."); Consumer Groups Comments at 3-4 ("VRS providers are dependent on reimbursement rates that cover the entirety of their legitimate costs; without such, they will be incapable of maintaining an adequate quality of service and, at worst, may cease providing VRS altogether.").

Sorenson recommends that the Commission maintain the per-minute compensation rates for skills-based routing, that it adopts for the Trial, until permanent rates are adopted.⁵ ZVRS and Purple agree that maintaining this rate would ensure the continuation of skills-based services, avoiding unwarranted confusion, during the gap between the conclusion of the Trial and adoption of permanent rates for skills-based routing.⁶

Second, ZVRS and Purple agree with Sorenson that the Consumer and Governmental Affairs Bureau should consider authorizing skills-based routing for additional specializations, including DeafBlind, prison, mental health, emergency, government, and corporate language skills.⁷ Sorenson correctly observes that there are “myriad other skills from which the Deaf and hard-of-hearing community would benefit,” and that “individual providers are best positioned to assess the needs of their consumers and the capabilities of their staff.”⁸ Sorenson’s proposal is also consistent with the comments of the Consumer Groups, who explain that “[s]kills-based routing in VRS would allow consumers to attain more effective communication and would be more aligned with community interpreting standards and codes of conduct.”⁹ Data gathered during the eight-month Trial period will provide insight on the demand for and feasibility of providing additional categories of specialized services to the Deaf and hard-of-hearing community.

⁵ See Sorenson Comments at 5.

⁶ See *id.*

⁷ See *id.*

⁸ *Id.*

⁹ Consumer Groups Comments at 2.

The Companies appreciate the Commission's ongoing efforts to improve the quality and efficiency of communications services available to the Deaf and hard-of-hearing community and encourage the Commission to adopt the recommendations herein.

Respectfully submitted,

/s/_____

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