



October 21, 2014

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

Re: Notification of Substantive Change, *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Service and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123—47 C.F.R § 64.606(f)(2).

Dear Ms. Dortch:

Pursuant to 47 C.F.R § 64.606(f)(2), CSDVRS, LLC, (“ZVRS”) hereby notifies the Commission of substantive changes to its TRS service. On September 24, 2014, ZVRS first launched an upgrade to its Z5 iOS, for iPhone and iPad, Mobile software. In addition, ZVRS began shipments on its new Firefly flasher units on or around September 10th, 2014.

The new products and upgrades offered or added the following features:

**Z5 Mobile software for iOS:**

- **Number Lookup:** allows callers to use a GPS-enabled map search within Z5 Mobile *prior* to making VRS calls.
- **Firefly Support:** compatibility with ZVRS’ new Firefly product, an external alerting device.
- **iOS 8 Optimization:** support for iOS version 8, as well as improvements of in-call button placement.
- This version only supports the iPhone 4s and newer; the previous version remains available directly from Customer Service for those with the iPhone 4.



**Firefly product:**

- Firefly is the industry's first Bluetooth enabled home flasher system built specific for the Deaf community to be used in multiple room locations.
- Consists of a Master and Remote units synced to the Firefly supported device providing real time call notification as well as video mail alerts.  
Is supported by Z5 Mobile for iOS & Android devices.
- Is supported by Z5 MAX running Windows 8.1

ZVRS does not anticipate that these changes affect compliance with the requirements set forth in the Commission's TRS Rules and Orders.

Sincerely,

/s/

Tim Rarus  
VP of Marketing