



CSDVRS, LLC
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November 19, 2014

Via Courier and Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**RE: Annual Report of CSDVRS, LLC for Continued Certification as a VRS Provider
CG Docket Nos. 03-123 and 10-51 and Request for Confidential Treatment: CG Docket
Nos. 10-51 and 03-123**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.606(g), CSDVRS, LLC (d/b/a ZVRS, "ZVRS") hereby submits its annual report as a provider of video relay services ("VRS") that is eligible for compensation from the Interstate Telecommunications Relay Service ("TRS") Fund. **Attached is a copy of the report in its confidential form and is not for public inspection.** The redacted version of the report has been electronically filed in the Commission's dockets.

Pursuant to 47 C.F.R. § 0.459, ZVRS requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the exhibits accompanying the report and withhold that information from any public inspection. The confidential information has been redacted from the version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

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

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

ZVRS requests confidential treatment with respect to the confidential information redacted from the version filed electronically with the Commission.

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

ZVRS is providing updated corporate proprietary information per the requirements of 47 C.F.R. §64.606(g).

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

The confidential information in the exhibits of ZVRS' report is highly sensitive commercial information specific to the operational, functional and technological capabilities of ZVRS. This information is therefore safeguarded from competitors and is not made available to the public.

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

The confidential information involves TRS, a highly competitive service.

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

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against ZVRS and undermine the company's position in the VRS marketplace.

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

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

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

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

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

ZVRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to ZVRS.

Sincerely,

/s/

Michael Strecker
Compliance Officer

Attachment

cc: Gregory Hlibok, Chief, Disability Rights Office (via electronic delivery)
TRSreports@fcc.gov (via electronic delivery)

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

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

**ANNUAL REPORT OF CSDVRS, LLC FOR CONTINUED
CERTIFICATION AS A VIDEO RELAY SERVICES PROVIDER**

1. Introduction

Pursuant to 47 C.F.R. §64.606(g), CSDVRS, LLC (d/b/a ZVRS, “CSDVRS”) hereby submits its annual report as a certified provider of Video Relay Services (“VRS”). CSDVRS received full certification to provide VRS on November 20, 2012.¹ CSDVRS continues to (1) meet or exceed all non-waived operational, technical, and functional mandatory minimum standards contained in the Commission’s rules; (2) does not differ from the mandatory minimum standards; and (3) makes available adequate procedures and remedies for ensuring ongoing compliance with the Commission’s rules, including informational materials to VRS users on complaint procedures sufficient for these users to know the proper procedures for filing complaints. CSDVRS has timely and consistently submitted reports and other information required of it under the TRS rules and attests that it will continue to timely file all of the required reports and other information in full compliance with the TRS rules.

CSDVRS attaches to this Report updated exhibits. These application exhibits remain

¹ *The Consumer and Governmental Affairs Bureau Grants CSDVRS, LLC. Full Certification as a Provider of Video Relay Services Eligible for Compensation from the Interstate Telecommunications Relay Services (TRS) Fund, Public Notice, DA 12-1886, CG Docket No. 10-51 (November 20, 2012).*

true and accurate.

2. Continued Qualifications for Certification

CSDVRS describes below how it currently meets or exceeds and will continue to meet all non-waived mandatory minimum standards for VRS provided in 47 C.F.R. §64.604:

A. Communication Assistants (“CAs”)/Video Interpreters. All CAs at CSDVRS continue to meet the same service level standards, receive the same training, and enjoy the same high quality working conditions and employment practices described in CSDVRS’ application. All CSDVRS CAs are qualified interpreters capable of interpreting effectively, accurately and impartially, both receptively and expressively, using any required specialized vocabulary.² All CSDVRS CAs are required to have competent skills in grammar, spelling, and familiarity with deaf, hard of hearing and other disability cultures, languages and etiquette, and possess clear and articulate voice communications.³ All CAs continue to receive training to ensure that they effectively meet the specialized communication needs of deaf and hard of hearing individuals.⁴ CSDVRS CAs are continued to be required to stay on each call for a minimum of ten minutes (unless the CA and the VRS user are not able to communicate effectively)⁵ and transmit conversations in real time.⁶ CSDVRS makes its best efforts to accommodate requests for CAs of a specific gender when a call is initiated or during a transfer to a new CA.⁷ CAs are strictly compensated on an hourly basis and are not compensated, given a preferential work schedule or

² 47 C.F.R. §64.604(a)(1)(iv).

³ 47 C.F.R. §64.604(a)(1)(ii).

⁴ 47 C.F.R. §64.604(a)(1)(i).

⁵ 47 C.F.R. §64.604(a)(1)(v). *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CG Dkt. No. 03-123, FCC 06-81, ¶¶1, 9 (June 16, 2006).

⁶ 47 C.F.R. §64.604(a)(1)(vii).

⁷ 47 C.F.R. §64.604(a)(1)(vi).

otherwise provided a benefit based upon the number of VRS minutes or calls that the CA handles, either individually or as part of a group.⁸ All CSDVRS CAs are employees of the company.

B. Confidentiality and Conversation Content. CSDVRS continues to prohibit its CAs from disclosing the contents of any relayed conversation and keeping records of the content of calls beyond the duration of the call.⁹ CSDVRS also continues to prohibit its CAs from intentionally altering a relayed conversation and requires that conversations are translated verbatim unless directed otherwise by the callers.¹⁰ CSDVRS also continues to maintain strict confidentiality of all VRS calls by limiting access to its call centers only to authorized personnel.

C. Types of Calls. CSDVRS continues to prohibit its CAs from refusing single or sequential calls or limiting the length of calls.¹¹ CSDVRS continues to be capable of handling all types of calls that have not been waived by the FCC.¹² CSDVRS CAs alert callers when they have dialed a number answered by a recorded message and interactive menu.¹³ CSDVRS does not impose any charges for additional calls, which may be made by the relay user in order to complete calls involving recorded or interactive messages. CSDVRS supports speed dialing and three-way calling functionalities.¹⁴ When requested to do so, CSDVRS interpreters can also

⁸ 47 C.F.R. §64.604(c)(5)(iii)(N)(3).

⁹ 47 C.F.R. §64.604(a)(2)(i).

¹⁰ 47 C.F.R. §64.604(a)(2)(ii).

¹¹ 47 C.F.R. §64.604(a)(3)(i).

¹² 47 C.F.R. §64.604(a)(3)(ii). *See Telecommunications Relay Services, and Speech-to-Speech for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Order, CG Docket No. 03-123 and WC Docket No. 05-196, Order, 27 FCC Rcd 7113 (CGB 2012); *Report on Waivers by CSDVRS, LLC.*, CG Docket Nos. 03-123 and 10-51, WC Docket No. 05-196 (April 15, 2013).

¹³ 47 C.F.R. §64.604(a)(3)(vii), codified for TTY users, has been implemented by CSSDVRS to the extent practicable for VRS.

¹⁴ 47 C.F.R. §64.604(a)(3)(vi).

leave voice messages on voice mail systems and retrieve voice messages for callers.¹⁵ CSDVRS also continues to provide video mail service so that hearing callers may leave messages when the recipient is unavailable. CSDVRS has enabled the following functionalities: 1) single line VCO in situations where the relay user's CPE is provided by ZVRS; 2) two-line VCO; 3) VCO-to-TTY service; 4) VCO-to-VCO calling; 5) single line hearing carry over ("HCO") where the relay user's CPE is provided by ZVRS; and 6) HCO-to-TTY service. In lieu of providing equal access to interexchange carriers, CSDVRS has handled and will continue to handle domestic long distance calls at no charge to its users.

D. Emergency Call Handling. An inbound 911 call continues to be prioritized by CSDVRS ahead of all incoming VRS calls and is automatically and immediately connected with the appropriate Public Safety Answering Point ("PSAP").¹⁶ The emergency call handling process remains the same as described in CSDVRS' application. For a dialed around emergency call, the CA collects the name and location information of the caller to connect with the appropriate PSAP.¹⁷ CSDVRS ensures that any information obtained as a result of handling an emergency call is made available only to PSAP or law enforcement personnel and is used for the sole purpose of identifying the caller's location or for some other emergency or law enforcement purposes.¹⁸ CSDVRS obtains from all of its customers prior to initiation of service a registered location¹⁹ and provides them with several methods of updating their registered location at will, in a timely manner, and including the use of iTRS access technology.²⁰ For each 911 call, CSDVRS

¹⁵ 47 C.F.R. §64.604(a)(3)(viii).

¹⁶ 47 C.F.R. §64.604(a)(4) applies to TTY-based TRS providers, 47 C.F.R. §64.605 provides the additional emergency calling requirements for internet-based TRS providers.

¹⁷ 47 C.F.R. §64.605(a)(2)(iii).

¹⁸ 47 C.F.R. §64.605(a)(2)(vi).

¹⁹ 47 C.F.R. §64.605(b)(4)(i).

²⁰ 47 C.F.R. §64.605(b)(4)(ii).

transmits to the PSAP or appropriate local emergency authority information from or through the appropriate automatic location (“ALI”) database²¹ and ensures that the PSAP has the Automatic Number Identification (“ANI”), the caller’s registered location, the name of the VRS provider and the CA’s identification number.²² All 911 calls are routed by CSDVRS through the use of ANI via the dedicated Wireline E911 Network.²³ CSDVRS also can immediately re-establish contact with the TRS user and the appropriate emergency authority and resume handling the call in the event one leg of the call is disconnected.²⁴

E. Visual Privacy Screens/Idle Calls. CSDVRS continues to prohibit its CAs from using privacy screens and requires the disconnection of a VRS call if a party enables a privacy screen or similar feature or is otherwise unresponsive or unengaged for more than 5 minutes, unless it is an emergency call or is legitimately on hold and is present and waiting for active communications to commence.²⁵

F. International Calls. CSDVRS continues to prohibit VRS calls which originate from an international IP address with the exception of calls made by customers who have pre-registered with ZVRS specified time periods and regions of their travel and CSDVRS verifies the identity and location of such callers.²⁶

G. Speed of Answer. CSDVRS continues to meet or exceed the FCC’s requirement for at least 85 percent of all VRS calls to be answered within 60 seconds, measured on a daily

²¹ 47 C.F.R. §64.605(b)(2)(iv).

²² 47 C.F.R. §64.605(b)(2)(ii).

²³ 47 C.F.R. §64.605(b)(2)(iii).

²⁴ 47 C.F.R. §64.605(a)(2)(v).

²⁵ 47 C.F.R. §64.604(a)(6).

²⁶ 47 C.F.R. §64.604(a)(7).

basis.²⁷ CSDVRS will also ensure adequate call center staffing to ensure that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.²⁸

H. TRS Facilities. CSDVRS continues to provide VRS in real-time 24 hours a day, 7 days a week, offering English-speaking sign language interpreters for deaf customers, tri-lingual interpreters for Spanish users, and voice carryover technologies for hard of hearing users.²⁹ The CSDVRS network continues to incorporate redundancy as described in its application in every single aspect, throughout its data processing and storage facilities, hardware, software, public and private networks, and connections, to ensure reliable and continuous service.³⁰ CSDVRS continues to ensure that its CAs do not relay calls from a location primarily used as a residence.³¹ CSDVRS continues to independently own and operate its automatic call distribution (“ACD”) platform.³²

I. Caller ID. CSDVRS continues to automatically transmit to the called party the ten digit number of the calling party, when available, or the CSDVRS’ facility number.³³

J. Public Access to Information. CSDVRS continues to engage in vigorous outreach efforts to all segments of the public through various print and internet media to ensure that callers throughout the country are aware of the availability and use of VRS and ten-digit numbering.³⁴ This is accomplished through attendance at deaf conferences and gatherings,

²⁷ 47 C.F.R. §§64.604(b)(2)(iii).

²⁸ 47 C.F.R. §64.604(b)(2)(i).

²⁹ 47 C.F.R. §64.604(b)(4)(i).

³⁰ 47 C.F.R. §64.604(b)(4)(ii).

³¹ 47 C.F.R. §64.604(b)(4)(iii).

³² 47 C.F.R. §64.604(b)(4)(iv).

³³ 47 C.F.R. §64.604(b)(6).

³⁴ 47 C.F.R. §64.604(c)(3).

providing an educational website, distributing e-mails containing information and updates about VRS, and working through affiliate state associations to educate their communities.

K. Rates. CSDVRS continues to handle long distance calls at no charge to its users.³⁵

L. Data Collection and Audits. CSDVRS continues the same procedures for tracking and reporting true and accurate call data as well as other historical and projected information as described in its application.³⁶ CSDVRS continues to employ an automated record keeping system to capture call record and speed of answer compliance data³⁷ and submits such data electronically, in a standardized format, without allowing human intervention during the call session for either conversation or session time.³⁸ A CSDVRS' senior executive with first-hand knowledge always certifies the accuracy and completeness of the information provided.³⁹ CSDVRS' reporting has proven complete, reliable, and effective for the TRS Fund Administrator with consequentially minimal or no withholdings. CSDVRS has always submitted to Commission audits and commits to continuing to do so in the future.⁴⁰ CSDVRS retains all of its call detail records and other substantiating information reported, in an electronic format, for a minimum of five years.⁴¹

M. Whistleblower Protections. CSDVRS continues to provide an accurate and complete description of the TRS whistleblower protections to all employees and contractors in

³⁵ 47 C.F.R. §64.604(c)(4).

³⁶ 47 C.F.R. §64.604(c)(5)(iii)(C) and (D).

³⁷ 47 C.F.R. §64.604(c)(5)(iii)(D)(4)(i).

³⁸ 47 C.F.R. §64.604(c)(5)(iii)(D)(4)(ii).

³⁹ 47 C.F.R. §64.604(c)(5)(iii)(D)(5).

⁴⁰ 47 C.F.R. §64.604(c)(5)(iii)(D)(6).

⁴¹ 47 C.F.R. §64.604(c)(5)(iii)(D)(7).

writing, including in its employee handbook.⁴²

N. Eligibility for Reimbursement. CSDVRS continues to offer without fail its services in a manner which clearly identifies it as the provider of such service (“ZVRS”) and always clearly identifies itself as the eligible VRS provider when it utilizes a sub-brand (e.g., HolaVRS).⁴³ CSDVRS continues not to contract with a third party to provide interpretation services or call center functions.⁴⁴ All third-party contracts to provide ZVRS with services or functions related to the provision of VRS other than interpretation services or call functions are in writing and available to the Commission or the TRS Fund Administrator upon request.⁴⁵

O. Call Center Reports. CSDVRS has without fail timely filed written reports with the Commission and the TRS Fund Administrator providing the required call center information and at least 30 days advance notification of any change of call centers.⁴⁶

P. Remote Training Session Calls. CSDVRS continues not to arrange, schedule, sponsor, host, conduct or promote remote training sessions or comparable activity which involve VRS calls.⁴⁷

Q. Complaint Procedures. All complaint procedures described in the application remain in effect, including those for the handling of complaints. CSDVRS remains prepared to comply with all procedures and time frames specified in the Commission’s rules for the resolution of consumer formal or informal complaints filed against CSDVRS.⁴⁸ CSDVRS has

⁴² 47 C.F.R. §64.604(c)(5)(iii)(M).

⁴³ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(ii).

⁴⁴ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(iii).

⁴⁵ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(v).

⁴⁶ 47 C.F.R. §64.604(c)(5)(iii)(N)(2).

⁴⁷ 47 C.F.R. §64.604(c)(5)(iii)(N)(4).

⁴⁸ 47 C.F.R. §§64.604(c)(6).

without fail timely submitted consumer complaint logs. CSDVRS' designated agent for receiving complaints, inquiries, orders, decisions and notices from the Commission is Michael Strecker, Compliance Officer, 600 Cleveland St., Suite 1000, Clearwater, Florida 33755, 727-254-5614, mstrecker@zvrs.com.

R. End-User Information. Any customer information that CSDVRS acquires is used only for the purpose of connecting TRS users with called parties, and is not sold, distributed, shared or revealed in any other way.⁴⁹ As further provided below, CSDVRS will fully comply with the new rules pertaining to the handling of customer proprietary network information ("CPNI").

S. Discrimination and Preferences. CSDVRS has not and will not: (i) directly or indirectly, by any means or device, engage in any unjust or unreasonable discrimination related to practices, facilities, or services for or in connection with like relay service; (ii) engage in or give any undue or unreasonable preference or advantage to any particular person, class of persons, or locality; or (iii) subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.⁵⁰

T. Unauthorized and Unnecessary use of VRS. CSDVRS has not and will not engage in any practice that causes or encourages: (i) false or unverified claims for TRS Fund compensation; (ii) unauthorized use of VRS; (iii) the making of VRS calls that would not otherwise be made; or (iv) the use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner.⁵¹ CSDVRS will not seek payment from the

⁴⁹ 47 C.F.R. §64.604(c)(7).

⁵⁰ 47 C.F.R. §64.604(c)(12).

⁵¹ 47 C.F.R. §64.604(c)(13).

TRS Fund for any minutes of service it knows or has reason to know are resulting from such practices. If CSDVRS becomes aware of such practices being or having been committed by any person, CSDVRS will, as soon as practicable, report such practices to the Commission or the TRS Fund Administrator. CSDVRS requires their CAs to immediately terminate any call which does not involve an individual eligible to use VRS or, pursuant to the TRS rules and/or the provider's policies, the call does not appear to be a legitimate VRS call; CSDVRS will not seek compensation for such calls.

U. Notification of Substantive Changes. CSDVRS has always and confirms that it will continue to notify the FCC of substantive changes within 60 days of the time that such changes occur, and to certify continued compliance with the FCC's minimum standards after such changes are implemented.⁵²

V. Service Interruptions. CSDVRS commits to providing VRS without unauthorized voluntary service interruptions.⁵³ If for some reason CSDVRS seeks to voluntarily interrupt service or in the event of an unforeseen service interruption due to circumstances beyond its control, CSDVRS will seek advance authorization or timely provide information to the Commission via written notice and the public through an accessible web site as prescribed in the TRS rules.⁵⁴

W. Default Provider. CSDVRS continues the registration process described in its application for VRS users to obtain geographically appropriate North American Numbering Plan

⁵² 47 C.F.R. § 64.606(f)(2).

⁵³ 47 C.F.R. §64.606(h)(1).

⁵⁴ 47 C.F.R. §64.606(h)(2) and (3).

telephone numbers prior to service.⁵⁵ CSDVRS continues to require its customers to self-certify in accordance with the TRS rules as part of registration, maintains the confidentiality of the registration and certification information and verifies that the location provided by the customer in registering is complete, accurate and in the United States or its territories, that the user is deaf, hard of hearing, or has a speech disability and needs VRS to communicate with others, and understands that the cost of VRS calls is paid for by contributions made by other telecommunications users to the TRS Fund. CSDVRS continues to provide the required user notifications to VRS users through its website and customer support.⁵⁶ CSDVRS continues to obtain and handle routing information compliant with the TRS rules as described in its application.⁵⁷ CSDVRS does not provision proxy numbers.⁵⁸ CSDVRS continues not to issue VRS users toll free numbers, linking any VRS user's subscribed toll free number from a toll free service provider with a geographically appropriate NANP number in the TRS Numbering Directory.⁵⁹

CSDVRS commits to strict compliance with the TRS rules on changes to default TRS providers.⁶⁰ CSDVRS, either directly or through its numbering partner, will not port a number prior to obtaining verified authorization from the user by a written or electronically signed authorization. CSDVRS will maintain for at least 5 years all records of the verified authorization. CSDVRS will implement the port within 60 days of verification. During the port, CSDVRS will not (i) reduce the level or quality of service, or (ii) reduce the functionality of VRS access technology. CSDVRS' letter of authorization is a separate document, located on a separate

⁵⁵ 47 C.F.R. §64.611.

⁵⁶ 47 C.F.R. §64.611(g).

⁵⁷ 47 C.F.R. §64.611(a)(1),(c)(1),(2), and (f).

⁵⁸ 47 C.F.R. §64.611(d).

⁵⁹ 47 C.F.R. §64.611(e); 47 C.F.R. §64.613(a)(3).

⁶⁰ 47 C.F.R. §64.631 through 64.636.

screen or webpage and is titled "Letter of Authorization to Change my Default Provider." CSDVRS requires that the letter of authorization be signed and dated. CSDVRS' letters of authorization submitted with an electronically signed authorization includes the consumer disclosures required by Section 101(c) of the Electronic Signatures in Global and National Commerce Act. CSDVRS' letter of authorization is printed with a type of sufficient size and readable type to be clearly legible and must contain clear and unambiguous language that confirms: (1) the user's registered name and address and each telephone number; (2) the decision to change the default provider; (3) that the user designates CSDVRS to act as the iTRS user's agent and authorizing the new default provider to implement the default provider change; and (4) that the user understands that only one iTRS provider may be designated as the TRS user's default provider for any one telephone number. CSDVRS does not and will not affect freezes which prevent a change in a user's default provider selection unless the user provides express consent.

When informed by a user or original default provider of an unauthorized default provider change, CSDVRS will (i) notify the FCC's Consumer and Governmental Affairs Bureau (CGB) and (ii) shall inform that iTRS user of the right to file a complaint with the CGB. CSDVRS will also inform the iTRS user that they may contact and file a complaint with the alleged unauthorized default provider. Not more than 30 days after notification, CSDVRS will provide to the CGB a copy of any valid proof of verification of the change. CSDVRS will identify the Fund Administrator, Rolka Loube, minutes associated with the user after the date of the alleged unauthorized change.

X. Interoperability and Portability. All VRS users are able to place a VRS call through

any of the CSDVRS' products. CSDVRS is able to receive calls from, and make calls to, any VRS user. CSDVRS does not and will not take steps that restrict a user's unfettered access to another provider's service, such as providing degraded service quality to VRS users using VRS equipment or service with another provider's service. CSDVRS will ensure that its VRS access technologies and their video communication service platforms are interoperable with the VRS Access Technology Reference Platform, including for point-to-point calls. CSDVRS will ensure that their VRS access technologies and their video communication service platforms are interoperable with the Neutral Video Communication Service Platform, including for point-to-point calls.

Y. CPNI. CSDVRS does not and will not track, use, disclose or permit access to CPNI related to a customer call to a competing provider. By the effective date of the new requirements, CSDVRS will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. CSDVRS shall provide access to and shall require all personnel, including any agents, contractors, and subcontractors, who have contact with customers to initially verify the status of a customer's CPNI approval. CSDVRS will require and provide CPNI training, maintain a record of CPNI use, establish a supervisory review process, certify compliance on an annual basis, and notify CGB if the opt-out process fails. By the effective date of the new requirements, CSDVRS will provide individual notice including all the required information to customers when soliciting approval to use, disclose, or permit access to customers' CPNI. CSDVRS will follow the limits on the permissible use, disclosure and access to CPNI. CSDVRS understands that it may obtain opt-in approval to use CPNI through written, oral, electronic, or sign language methods and that such approval or disapproval must remain in effect until the customer revokes, whether in written, oral, electronic, or sign language methods.

CSDVRS will maintain records of approval during the time period that the approval or disapproval is in effect and for at least one year thereafter. CSDVRS will provide notification to obtain opt-out approval through electronic or written methods, but not by oral or sign language communication (except to obtain limited, one-time use of CPNI for inbound and outbound customer telephone, TRS, or point-to-point contacts for the duration of the call). CSDVRS will wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. CSDVRS will authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, TRS call, point-to-point call, online account access, or an in-store visit. CSDVRS will notify law enforcement of a breach of its customers' CPNI as provided in the TRS rules, and will not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement.

3. Certification Documentation

CSDVRS provides the following summary updates to the documents it provided the Commission with its application:

- Exhibit A- "Call Center Leases" (updated to reflect opened call center locations since filing);
- Exhibit B- "Network Diagram" (updated to reflect opened call center locations since last filing);
- Exhibit C- "Call Center Technology and Equipment" (no change);
- Exhibit D- "Automatic Call Distribution" (updated with changes to services

and equipment purchased);

- Exhibit E- “Ownership and Control” (no change);
- Exhibit F- “Organizational Structure Diagram” (updated to reflect current organization);
- Exhibit G- “ZVRS’ TRS Personnel” (updated count of TRS staff for company);
- Exhibit H- “Sponsorship Agreements” (updated listing of sponsorship activities); and
- Exhibit I- “Compliance Plan” (updated to reflect current compliance measures).

The updated Exhibits are attached to this Report. The Exhibits submitted remain true and accurate.

4. Procedures for Ensuring Compliance

In order to ensure compliance with all of the FCC’s rules governing VRS providers, CSDVRS continues to train all employees when they are hired and covered contractors when they are engaged. In addition, CSDVRS makes available online to all covered personnel a regularly updated VRS Compliance Manual which provides information on TRS rules and FCC guidance. CSDVRS continues to be informed about FCC decisions, actions, and policies by its Compliance officer and regularly studies all rule changes as they are implemented. CSDVRS instituted a Corporate and Regulatory Compliance Committee in 2010. It is a cross sectional

team to recommend and execute company-wide compliance policies in regard to corporate ethics and federal and state regulatory issues. CSDVRS has established a compliance plan describing its policies, procedures, and practices for complying with the TRS rules including preventing the unauthorized or unnecessary use of VRS, attached as Exhibit I. ZVRS also has a corporate Code of Ethics, published on its website at <http://www.zvrs.com/about-us/the-z/our-code-of-ethics>, which is mandatory for all ZVRS personnel, agents, and contractors to follow.

5. Conclusion

CSDVRS has provided and remains committed to providing VRS fully compliant with the Commission's rules and guidance. CSDVRS will continue to file annual compliance reports demonstrating continued compliance with these rules. CSDVRS appreciates the opportunity to provide high quality, innovative services, and products for VRS users.

Respectfully submitted,

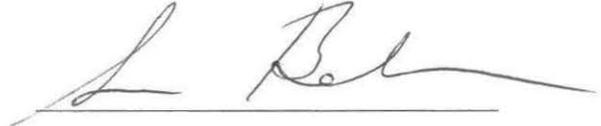
Sean Belanger
Chief Executive Officer
CSDVRS, LLC

Michael Strecker
Compliance Officer
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November 19, 2014

CERTIFICATION

I swear under penalty of perjury that I am Sean Belanger, Chief Executive Officer, an officer of the above-named reporting entity, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

A handwritten signature in black ink, appearing to read 'S. Belanger', written over a horizontal line.

Sean Belanger, CEO

Date: 11/19/2014

Exhibit A

Call Center Leases

[REDACTED]

Exhibit B

Network Diagram

[REDACTED]

Exhibit C

Call Center Technology and Equipment Documentation

[REDACTED]

Exhibit D

Automatic Call Distribution Documentation

[REDACTED]

Exhibit E

Names of ZVRS' Executives, Officers and Board Members

[REDACTED]

Exhibit F

Organizational Structure Diagram

[REDACTED]

Exhibit G

ZVRS' TRS Personnel

[REDACTED]

Exhibit H

Sponsorship Agreements

[REDACTED]

Exhibit I

Compliance Plan



CSDVRS, LLC's Compliance Plan November 19, 2014

CSDVRS, LLC (d/b/a ZVRS, "ZVRS") is a video relay service ("VRS") provider. This Compliance Plan provides a description of ZVRS' policies, procedures and practices for complying with the Federal Communication Commission ("FCC") telecommunications relay service ("TRS") rules and requirements applicable to VRS providers, including those which prevent the unauthorized and unnecessary use of VRS.¹

The Compliance Plan will be provided to all ZVRS personnel, new hires, agents and contractors ("Covered Personnel") carrying out duties for ZVRS related to the provision of VRS. The Compliance Plan is included in the ZVRS annual report as a certified VRS provider.²

1. Compliance Officer

ZVRS has designated Michael Strecker as its Compliance Officer. Mr. Strecker is a senior corporate manager with the requisite corporate and organizational authority to serve as Compliance Officer. Mr. Strecker has the general knowledge of the Communications Laws necessary to discharge his duties under the CD. Mr. Strecker possessed specific knowledge of the TRS Rules prior to assuming his duties as a Compliance Officer.

The Compliance Officer has responsibility for implementation of this Compliance Plan. The Compliance Officer's specific responsibilities include: oversight of compliance training for all ZVRS' officers, employees and contractors; monitoring and responding to changes in the ZVRS' business that may impact compliance issues, including review and evaluation of programs and activities to ensure that ZVRS' activities are consistent with applicable laws, regulations and contracts to which ZVRS is subject, and policies ZVRS has adopted. The Compliance Officer shall promptly report to the Board any non-compliance issues, remedial actions taken and recommendations for further remedial action. The Compliance Officer shall have authority to monitor ongoing ZVRS activities and have access to all ZVRS files and documentation relevant to his duties. The Compliance Officer oversees procedures to screen out any internally generated relay minutes of use and prevent such minutes of use from being included in billings made to the TRS Fund. The Compliance Officer reports to the CEO and the Board.

¹ <http://www.fcc.gov/encyclopedia/telecommunications-relay-services-rules>; 47 C.F.R. §64.604(c)(13).

² 47 C.F.R. §64.606(g)(3).

2. Corporate and Regulatory Compliance Committee

The ZVRS Corporate and Regulatory Compliance Committee regularly reviews all ethical and regulatory matters pertaining to the company including, but not limited to the following:

- regulatory matters affecting the provision of VRS as promulgated by the FCC, the TRS Fund Administrator, or any associated federal governing body;
- any and all anomalous issues arising in the ZVRS call detail records;
- any and all ethical matters pertaining to company operations;
- any and all complaints or instances of “whistleblowing” in the company;
- operating procedures to ensure compliance with the applicable ADA and TRS rules;
- a comprehensive VRS Compliance Manual which explains the TRS Rules related to VRS; and
- oversight over the implementation of any FCC requirements including consent decrees.

The Committee recommends and/or implements company-wide compliance policies in regard to corporate ethics and federal and state regulatory issues. It is chaired by the Compliance Officer.

The following individuals are currently members of ZVRS’s Corporate and Regulatory Compliance Committee:

- Michael Strecker – Compliance Officer
- Lydia Runnels – Vice President, Product Development & Engineering
- Aaron Wegehaupt – Vice President, Interpreting Operations
- Chris Wagner – Vice President of Sales & Field Operations
- Dawnmarie Caggiano – Sr. Director of Marketing
- Christine Valdez – Controller
- Megan Lawler –Contract and Regulatory Affairs Associate

3. Compliance Plan

ZVRS established a central database accessible to ZVRS managers Operating Procedures that ZVRS, the Compliance Officer and all covered personnel must follow these procedures to ensure ZVRS’s compliance with the TRS Rules. ZVRS’s Operating Procedures include internal procedures and policies specifically designed to ensure that its operations are in compliance with Section 225 of the Act and the TRS Rules applicable to VRS. In addition, the Operating Procedures include procedures for conducting annual compliance training and documenting covered personnel participation in compliance training, procedures for conducting and maintaining documentation of FCC compliance assessments for all new products, and procedures for reviewing requests for reimbursements from the TRS Fund prior to submissions to the TRS

Fund administrator. ZVRS' Compliance Officer, Compliance Committee and management regularly reviews the Operating Procedures to ensure that it is up to date, reflects all the necessary information and is implemented without fail.

ZVRS procedures ensures that: 1) all new products meet the necessary compliance assessments and are approved by the Compliance Officer as such prior to launch; 2) submissions for payment to Rolka Loube Saltzer Associates (RLSA) have been reviewed for accuracy by the applicable departments; and 3) emergency advisories are reflected accurately within all product literatures provided to the public as well as tracks and records when any product literatures was modified and used. Additional procedures ensures that the applicable compliance training is provided to all new Covered Personnel within thirty (30) days, and work numbers are accurately tracked for all Covered Personnel and added to ZVRS's non-billable list.

ZVRS assigns all Covered Personnel a work number and instructed all Covered Personnel in writing that they must use the work number whenever they access or use VRS for a business purpose, whether or not at the workplace. ZVRS implemented an operating procedure to segregate and keep the call detail records for all work numbers to ensure that calls made by Covered Personnel in connection with business activities are identifiable as such and are not submitted to the TRS Fund administrator for compensation from the TRS Fund.

ZVRS's Compliance Committee reviews monthly call detail records ("CDR") data looking for anomalies in the data that might reflect abuse and/or fraud. If anything is identified as a possibility, the Committee does further investigation and if necessary will ensure ZVRS does not bill RLSA for minutes that would constitute fraud or abuse.

ZVRS's website advises consumers about how to make emergency calls using any VP product offered by ZVRS. ZVRS established procedures for modifying or adding emergency calling advisories to all product literature provided to the public. ZVRS maintains a record of when product literature was modified and used.

ZVRS established procedures for documenting and retaining compliance assessments with FCC rules and requirements for new products.

4. Compliance Training

ZVRS developed a compliance training program for covered personnel. Employees and for a specific set of Independent Contractors used by ZVRS to perform presentations, customer installs, and general outreach ("ZAs") are required to view a training video in ASL with voice over and captioning to ensure all representatives of ZVRS fully understand the material being presented. To ensure these individuals are properly tracked, ZVRS requires that the individual first register to watch the video. Once the individual finishes their training video, they are required to provide an electronic signature confirming they understand the material as well as the date they finished the training. In addition, all such individuals are provided a link where they can download ZVRS' VRS Compliance Manual. As part of the compliance training program, ZVRS advised covered personnel of ZVRS's obligation to report any noncompliance with the TRS Rules and provided information about how to disclose noncompliance to the Compliance Officer.

Compliance Training as it applies to all other Covered Personnel (i.e. vendors, independent contractors, and agents of ZVRS who perform, supervise, oversee, or manage duties related to VRS), is performed via a written document which covered the applicable training material. ZVRS implemented policies that require any new vendor to go through a validation process with the Compliance Officer within thirty (30) days of utilizing the vendor, and if deemed necessary, must be trained on Compliance within the thirty (30) day window. If it is deemed that the vendor does require training, the vendor must sign-off on its training document and provide ZVRS with all applicable work numbers that the vendor will be utilizing in its efforts to meet the terms of its agreement with ZVRS. ZVRS adds these numbers to its list of non-billable phone numbers in accordance with the CD and the TRS rules. In addition, all employees of said vendors, if they would be performing work in accordance with the vendor's relationship with ZVRS, were required to provide their signature and work phone numbers as well.

5. Internal Audit of Submitted VRS Minutes

- 1) Process used to manage the security of systems related to call detail records.

Data is first collected in a series of log files. The data is written to the log files automatically and is read only. At regular intervals throughout the day, the information is collected from these log files using a Logging Server. The information is gathered from the logs and inserted into the database. While the data is on the ACD, the logs are read only. The log files are archived and stored daily where System Administrators have access.

- 2) Internal audit work performed related to CDR and the systems used to process this information.

Throughout the process outlined above, there are daily checks that occur to ensure the integrity of the data. In addition, there is a check to compare the data from the ACD agent activity logs to the data from the call detail logs where we look for discrepancies.

The first step of preparing the monthly reports for RLSA is to run a series of scripts to look for and mark non-billable any calls that might have incomplete or invalid data. Once the CDR table has been prepared, another script is run by the database administrator for another series of checks to look for things like an internal system prefix added to a number or a number where they dialed extra digits. These numbers are truncated or adjusted to the appropriate ten-digit number.

ZVRS additionally validates the IP Addresses for the video phones by evaluating them against the video gateway records and records from our servers. This information is checked monthly, prior to submitting the CDR records to RLSA

- 3) Description of system and processes used to assign and verify CA information to CDR data.

The agent is assigned to a call using the ACD and the process that records and assigns the agent to the call is fully automated and outside of ZVRS's control. We compare the call data from the media server ("MS") to the time the agent is recorded as being in-call from the ACD. This allows us to compare that the time the MS reports the agent as being in call aligns with the time the ACD reports the agent as being in call. This check is run on a daily basis as part of the routine for evaluating the previous day's activity.

6. Additional Compliance Measures

Any suspected violations are required to be reported to ZVRS' Compliance Committee, which has the responsibility to investigate all reported suspected violations. The Compliance Committee may be reached by U.S. Mail using ZVRS' corporate address or by emailing compliancedirector@zvrs.com. Such consultations will be treated confidentially. The Compliance Committee will maintain a means whereby employees may anonymously report matters that may raise compliance issues. ZVRS will not retaliate against any employee or contractor raising a compliance issue, nor tolerate retaliation against an employee or contractor raising a compliance issue.

Waste, fraud or abuse may also be reported to the FCC's Office of Inspector General at (202) 418-0473, toll free at (888) 863-2244 or by e-mailing hotline@fcc.gov (for more information, see: www.fcc.gov/oig).

The information about how Covered Personnel may report waste, fraud, or abuse through the general hotline number and website address for the FCC's Office of the Inspector General is included in ZVRS' Compliance Manual which is distributed to all covered personnel, provided to new hires and trainees and made available online. A complete description of ZVRS' Whistleblower Policy and contact information is also included in ZVRS' Employee Handbook.

BY:

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