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January 8, 2015

Via Electronic Filing

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

RE: Ex Parte Notice: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On January 6th, 2014, Lydia Runnels, Vice President of Engineering and Product Development, Mike Strecker, Vice President of Logistics and Telesales, and Megan Lawler, of CSDVRS, LLC (“ZVRS”) participated in a meeting with Karen Strauss, CGB Deputy Chief, Gregory Hlibok Chief of Disability Rights Office, David Schmidt, TRS Fund Program Administrator, Eliot Greenwald, DRO Attorney Advisor, Darryl Cooper, DRO Attorney Advisor, Caitlin Vogus, DRO Attorney Advisor, and Diane Mason, OMD Attorney Advisor.

In the meeting, ZVRS discussed several matters with the Commission.

- 1) ZVRS briefly discussed Speed of Answer Service Level. . The Speed of Answer is now 80 percent of calls answered in 120 seconds measured on a monthly basis. The Commission stated they have not received any consumer complaints and this went into effect since the courts vacated the new rates in the 2013 Rate Order.¹
- 2) ZVRS reiterated the need for at-home interpreting. This allows for a greater pool of qualified interpreters and also alleviates challenges with unforeseen events such as

¹ See *In the Matter of Structure and Practices of the Video Relay Service Program: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CG Docket Nos. 10-51 and 03-123, DA 14-878 at ¶ 2 and *Sorenson Communications, Inc. v. FCC* (D.C. Cir., No. 13-1215, decided September 2, 2014).

weather and network outages. Further, at-home call centers are efficient, effective, and can be monitored and supervised remotely.²

- 3) ZVRS reminded the FCC they had filed a waiver request for VRS for Deaf in Confinement over a year ago and had not received any response or feedback. The waiver would “enable health care, judicial and detention entities- hospitals, hospices, nursing homes, assisted living facilities, medical offices and clinics, outpatient facilities, courts, correctional facilities, prisons, and detention centers- to provide individuals within their confined facilities a CSDVRS videophone (“VP”) software application to make VRS and point to point (“P2P”) video calls in compliance with the Americans with Disabilities Act of 1990, as amended (“ADA”).³ ZVRS further mentioned that clarification is needed from the FCC on registering the ten digit phone numbers for public Kiosks or videophones that are owned by enterprise institutions.
- 4) ZVRS presented the idea of a VRS call where all parties are on video. More and more hearing individuals have access to videophone applications. ZVRS believes it would be extremely beneficial to allow the interpreter, hearing individual, and deaf individual to be on video. This would allow the deaf and hearing person to see each other even though the hearing person does not know American Sign Language (ASL).
- 5) ZVRS discussed the need to support new technologies for VRS calls. Examples are Google Hangout, Microsoft Skype, and Apple FaceTime. ZVRS encouraged the Commission to support these as options as technology advances for video communication.
- 6) ZVRS asked for a more definitive statement on the use of historical data in order to discriminate when soliciting a customer. For example, can a provider give away a big screen television, laptop, multiple tablets, or other high value gifts that work with their products to historically high volume users of VRS as long as there is no tie to future use? ZVRS feels these types of incentives are in direct conflict with the May 28, 2008 Declaratory Ruling⁴, specifically the section regarding incentive based marketing, financial incentives, and discriminatory marketing practices.

² See *In the Matter of 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 Further Notice of Proposed Rulemaking, CG Docket Nos. 10-51 and 03-123, FCC 13-82 at ¶ 280 (rel. June 10, 2013) (“FNPRM”) and *Ex Parte* Letter from Sean Belanger, CEO of CSDVRS, LLC, to Marlene H. Dortch, Secretary, CG Docket Nos. 10-51 and 03-123 (dated November 25, 2014).

³ See *In the Matter of Structure and Practices of the Video Relay Service Program: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Petition for Temporary Waiver, CG Docket Nos. 10-51 and 03-123 (dated October 23, 2013).

- 7) In regards to customer data and the TRS-URD, ZVRS asked the Commission if they move forward with the enforcement of requiring information such as providing social security numbers in order to be a VRS user. A 60-day requirement was discussed and an ex-parte letter was discussed in order to show the Commission the reasoning for an extension.⁴ ZVRS committed to providing feedback to the Commission regarding a fair timeframe and things to consider as part of the transition to the TRS-URD. ZVRS also requested that the Commission file some type of Public Notice informing VRS consumers that requiring the last four (4) digits of social security numbers will be a required field. ZVRS feels this community outreach needs to be done both in written form (i.e. a Public Notice), but also should be communicated via American Sign Language.

In addition, Lydia Runnels, Mike Strecker, and Megan Lawler met with Jonathan Chambers, OSP Chief, in a separate meeting. During this meeting, ZVRS discussed their views on interoperability and the value of SIP interoperability testing.

Respectfully submitted,

/s/

Mike Strecker
Vice President of Telesales and Logistics
CSDVRS, LLC

cc (by e-mail):

Karen Strauss
Gregory Hlibok
Eliot Greenwald
Caitlin Vogus
David Schmidt
Diane Mason
Darryl Cooper

⁴ See FNPRM at ¶ 251.