

## FILED REDACTED VERSION

April 20, 2015

### VIA ECFS

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

*Re: Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech to Speech Services for Individuals with Hearing and Speech Disabilities* CG Docket Nos. 10-51 & 03-123

Dear Ms. Dortch:

Convo Communications, LLC (“Convo”) hereby submits a response to questions posed by the Commission staff at the April 8, 2015 meeting with Video Relay Service (“VRS”) providers. In addition, to this filing, which contains provider-specific proprietary information, the providers are submitting a joint response addressing a number of the questions below. The highly sensitive and proprietary commercial information was redacted in the version of the ex parte electronically filed in the Commission’s dockets.

**1) Is there evidence that lower rates have contributed to lower interpreter salaries or higher interpreter stress?**

Convo is one of the fastest growing VRS companies in terms of volume (or percentage growth) over the past year. Of all of the variable costs with respect to providing VRS, video interpreters’ (“VIs”) salaries are the most dynamic. Our market research shows that Convo VIs are paid at or above the average for the industry. We strive to be a leader in compensation for our VIs. This helps to ensure Convo is only hiring and retaining the most qualified VIs.

As demand for Convo’s VRS grows and in order to maintain the service and speed of answer requirements established by the Commission, Convo needs to preemptively grow staff at its call center locations. Convo is also challenged by having a greater proportion of administrative costs as compared to mature large providers operating at a sustainable economy of scale. However Convo has declined to lower salaries or impose greater work requirements for VIs commensurate with the dropping VRS rates. As we have demonstrated to the Commission, it is operating with no margin and plunging back into negative revenue with each rate decrease.<sup>1</sup> Further rate cuts will drastically reduce Convo’s ability to provide appropriate overhead and ancillary support to VIs and to ensure adequate staffing during growth cycles.

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<sup>1</sup> Convo *Ex Parte* letter, CG Docket Nos. 03-123, 10-51 (filed April 15, 2014).

Convo VIs have expressed to management great concern about the impact of the declining rate plan. Convo has been proactive in addressing their stress in regularly communicating with its workforce the work it is doing to help stabilize the VRS market.

**2) Is it possible to achieve functional equivalence at upcoming rates?**

The National Association of the Deaf (“NAD”) in a position statement on functionally equivalent telecommunications listed an array of specific needs to close the gap, among other things, technological innovations, adequate research and development funding, better video connectivity, stability and interoperability, skills-based routing, deaf interpreters, streamlined technology troubleshooting, higher quality video interpreting and greater access for underserved populations.<sup>2</sup> Under the upcoming rates, Convo will not have adequate resources to continue progressing on the functional equivalency needs identified by NAD. As previously discussed, Convo will be hard pressed under the declining rates to continue engaging high quality VIs. Convo will also no longer be able to make investments in technology for VRS customers.

**3) What is the turnover rate for interpreters today versus 2 years ago?**

2013	2014	2015 to date
Turnover █████ %	Turnover █████ %	Turnover █████ %

**4) How long do positions stay open today versus 2 years ago?**

As a growing company Convo is always advertising for high quality qualified VIs.

**5) What do you hope to learn from the trial?**

This question is addressed in the VRS providers’ joint filing.

**6) What is the market rate for interpreters with various skills versus generalist interpreters? How much will the trial of skills-based routing increase costs?**

This question is addressed in the VRS providers’ joint filing.

**7) What percent of calls would be skills-based routed?**

This question is addressed in the VRS providers’ joint filing.

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<sup>2</sup> National Association of the Deaf, Position Statement on Functionally Equivalent Telecommunications for Deaf and Hard of Hearing People, at <http://nad.org/positionstatement-functionally-equivalent-telecommunications-deaf-and-hard-hearing-people>.

**8) What does the 80/45 proposal mean in terms of an average?**

Convo believes that it achieves among the best speed of answer (“SoA”) time in the VRS industry. However, it would be exceedingly difficult for VRS providers to achieve a unfailingly low SoA time each day unless VRS providers expend significant additional resources to overstaff their call centers, which is not cost efficient and not feasible under the declining rates.

If the Commission requires 80 percent of calls to be answered within 45 seconds, Convo expects the average speed of answer would range between [REDACTED] % of its calls answered within 45 seconds. If the Commission requires 80 percent of calls to be answered within 30 seconds, Convo expects the average speed of answer would range between [REDACTED] % of its calls answered within 30 seconds. For more information, see VRS providers’ joint response.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Gregory Hlibok, Chief  
Disability Rights Office