

April 30, 2015

BY ECFS

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

Re: *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*

Dear Ms. Dortch:

All six providers of Video Relay Service (“VRS”) (collectively, the “Unified Providers”) write jointly to (1) reiterate the importance of immediately stopping the scheduled declines in VRS rates and (2) indicate their support for steps, particularly with respect to compensation, to preserve competition and ensure the existence of the three newest and smallest VRS providers until the Commission establishes sustainable rate rules in its ongoing ratemaking proceeding.

As explained in the Joint Proposal¹ and follow-up responses to the staff’s questions,² providers have endured dramatic rate cuts in 2010 followed by four successive cuts in the last

¹ Joint Proposal of All Six VRS Providers for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Mar. 30, 2015).

² Joint Response of All Six VRS Providers to Staff Questions re VRS Providers’ Joint Proposal for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Apr. 17, 2015). During the meeting with Consumer and Governmental Bureau staff, each provider other than CSDVRS, LLC met individually to discuss their individual responses to staff’s questions. Ex Parte Letter of Convo Communications, LLC, CG Docket Nos. 10-51 & 03-123 (filed Apr. 20, 2015); ASL Services Holdings, LLC/ GlobalVRS’s Response to Staff Questions re VRS Providers’ Joint Proposal for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Apr. 20, 2015); Hancock Jahn Lee & Puckett, LLC d/b/a Communication Axxess Ability Group (“CAAG”)’s Response to Staff Questions re VRS Providers’ Joint Proposal for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Apr. 20, 2015); CSDVRS’ Response to Staff Questions re VRS Providers’ Joint Proposal for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Apr. 21, 2015); Sorenson Communications, Inc.’s Response to Staff Questions Re: VRS Providers’ Joint Proposal for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Apr. 20, 2015); Purple Communications’ Response to Staff Questions re VRS Providers’ Joint Proposal for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Apr. 21, 2015).

two years. Immediate rate stability is crucial in order to prevent further erosion of functional equivalence, to preserve providers' ability to innovate, and to preserve reasonable working conditions and compensation for VRS interpreters. Rate stability is also a prerequisite to the other reforms proposed in the Joint Proposal—including the more stringent speed-of-answer requirement, the trial of skills-based routing, and increased use of deaf interpreters. Speed-of-answer requirements and penalty rules, for example, directly affect the level of overstaffing required to accommodate fluctuations in calling volume—which means interpreter costs increase as speed-of-answer requirements become more stringent, even at the same volume of calls. Each of these consumer-requested reforms would take VRS closer to the functional equivalence mandated by the Americans with Disabilities Act, but none of these reforms is possible if the scheduled rate cuts proceed as planned.

The Unified Providers also recognize the unique challenges faced by the newest and smallest three providers of VRS. The Commission has not moved forward to implement on the schedule set forth in the June 2013 Order new programs which the Commission intended to save costs in the provision of VRS. While all providers have had negative impacts as a result of the rate cuts in anticipation of these new program offerings, the most severely affected are the smallest three providers who are least positioned to sustain those cuts. Accordingly, given the reductions that have already occurred, even rate stabilization may not be enough to keep these smallest three providers in business. The Unified Providers therefore support taking equitable measures, particularly with respect to compensation, to preserve competition and ensure the existence of the newest and smallest providers during the transition to a sustainable rate-setting model.

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The Commission can and should act quickly to adopt the Joint Providers' proposal, including by putting it out for immediate public comment. It should also include the Joint Proposal as among the options considered in setting the annual TRS contribution factor. With the next rate cuts scheduled to take effect on July 1, 2015, prompt action is critical.

Respectfully Submitted,

/s/ _____
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/s/ _____
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