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August 7, 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 August 5th, 2015, Mike Strecker, Vice President of Logistics and Telesales and Compliance Director of CSDVRS, LLC. (“ZVRS”), communicated with Gregory Hlibok, Chief of Disability Rights Office, David Schmidt, TRS Fund Program Administrator, Jonathan Chambers, Chief of Office of Strategic Planning, Eliot Greenwald, Disability Rights Office Deputy Chief, and Caitlin Vogus, DRO Attorney Advisor the following information on ZVRS’s behalf.

ZVRS asked if there was an update to the Joint Provider proposal and again stressed the importance of issuing a rate freeze in coordination with the additional functional equivalent services that were proposed within the Joint Provider submission.¹

ZVRS again presented to the CGB its support for what’s termed “At-Home Interpreting”, or “Secure Remote Interpreting”. ZVRS wanted to make sure the FCC was aware that several consumer groups support the concept of At-Home Interpreting if handled and managed in the correct way. Furthermore, ZVRS wanted to emphasize with the FCC that At-Home Interpreting is an approach that can be used by providers to help recruit qualified interpreters that do not live

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*, Joint Proposal of All Six Providers for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 and 03-123 (dated March 30, 2015).

near a call center, may only want to work during limited hours, as well as be used as a team by providers to handle sudden surges in call volume. Additionally, it's important to note that ZVRS only supports the concept of At-Home Interpreting in VRS "IF" it's done in a secure manner as previously presented by ZVRS.²

During the meeting, ZVRS stressed the importance of phone book portability for VRS consumers. ZVRS feels the customer's address book is the property of the consumer and if the consumer switches default provider, they should be able to take their address book, or contact list, with them to the new provider.

Additionally, ZVRS asked the Commission if a final decision has been made in terms of handling the registration and validation of videophones used in kiosk like settings or those devices that are owned by the business/organization and are therefore not directly assigned to an individual user. ZVRS referenced the letter dated July 27th from Rolka Loube ("RL") to the Commission regarding the TRS URD Schedule Update. As mentioned within that letter, RL feels that clarification is needed for devices used in these types of settings. ZVRS agrees with RL and further asks the Commission to provide clarification to ensure VRS providers have adequate time to ensure these devices are tracked accordingly for the purpose of the TRS URD.³

In closing, ZVRS discussed with the Commission the need to provide clarification as to what constitutes "Slamming" within the VRS industry.⁴

Respectfully submitted,

/s/

Mike Strecker
Vice President of Telesales and Logistics and Compliance Director
CSDVRS, LLC.

Cc:

Gregory Hlibok
Eliot Greenwald
Caitlin Vogus
Jonathan Chambers
David Schmidt

² See *Petition for Temporary Waiver of CSDVRS, LLC.*, CG Docket No. 10-51 (August 12, 2011).

³ See *Letter from David Rolka of Rolka Loube Public Utility and Telecommunications Consulting re: URD Schedule Update* to Andrew Multiz (July 27, 2015).

⁴ See *In the Matter of Structure and Practices of the Video Relay Services 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 (June 10, 2013) ("FNPRM").