



ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via ECFS

August 19, 2015

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

RE: *Structure and Practices of the Video Relay Service program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Secretary Dortch:

ASL Services Holdings, LLC (“ASL/Global VRS”) requests that the Commission expedite release of its promised TRS Fund compensation FNPRM. Emerging providers in particular strain to meet increasing obligations under reduced Fund compensation. Protracted Commission delays in addressing Fund compensation concerns will ultimately harm the Deaf and TRS Fund.

In mid-April, we shared our concerns with the Commission. The Commission expressed its understanding. It later indicated a FNPRM was forthcoming to address compensation issues. Yet the Commission’s silence is deafening and inaction stifling. Now four months later:

- No Commission *action* has been taken to address the challenges our firm has faced as an emerging provider when competing with dominant providers.
- No Commission *action* has been taken to address our added costs of providing marginalized communities including Spanish speaking Deaf with language translations and of staffing professional tri-lingual interpreters.
- No Commission *action* has been taken to mitigate our costs of implementing a myriad of new requirements intended to preclude fraud including the moving target of implementing the technical requirements associated with the URD.

And in the face of continuing reductions in compensation, no *action* has been taken to address how long providers such as ASL Services Holdings can continue providing service.

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The impact of Commission inaction is exacerbated by the user registration database (“URD”) issues raised in Rolka Loube’s July 27, 2015 URD Schedule Update letter to Andrew Multz. Providers are squeezed between semi-annual compensation reductions, seemingly endless URD implementation costs pending guidance, and the delayed release of a promised compensation FNPRM.

The Commission has the capability to address these issues now. Its seeming inaction is precariously taxing video relay service quality, capacity, and provider capabilities. Protracted delays may ultimately result in too little, too late. Providers need “treatment” now, not cardiac pulmonary resuscitation after going into cardiac arrest.

We have strived to exceed our obligations and subscribers’ expectations, but find it untenable to do so indefinitely. The Commission must ACT NOW to address relief for emerging providers and promote the type of competition it has espoused. We trust that the Commission will not fail us, and in so doing, not fail the Deaf Community that relies on funded relay services as their lifeline to the world.

Sincerely,

ASL SERVICES HOLDINGS, LLC

A handwritten signature in black ink, appearing to read "Angela Roth", written over a horizontal line.

Angela Roth
Chief Executive Officer

cc: Via eMail:
Commission Attendees (April 21 and 22, 2015 VRS Providers *ex parte* meeting)
Andrew Multz