



CSDVRS, LLC
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November 20, 2015

REDACTED FOR PUBLIC INSPECTION

Via Courier and Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554
ATTN: Alison Kutler, Acting Chief, Consumer and Governmental Affairs Bureau

RE: Application of CSDVRS, LLC D/B/A ZVRS, as Indirectly Majority-Owned and Controlled by Kinderhook, for Full Certification to Provide Video Relay Service and Request for Confidential Treatment; CG Docket Nos. 03-123 and 10-51
Second Amendment

Dear Ms. Dortch:

On February 20, 2015, CSDVRS, LLC d/b/a ZVRS (“ZVRS”), as indirectly majority-owned and controlled by Kinderhook Capital Fund IV, L.P. and its affiliate Kinderhook Capital Fund IV-B, L.P., both of which are advised by Kinderhook Industries, LLC (collectively referred to herein as “Kinderhook”), submitted an application (the “Application”) for a full certification to provide Video Relay Service (“VRS”) that is eligible for compensation from the Interstate Telecommunications Relay Service Fund (“TRS Fund”).¹ ZVRS filed an amendment to the Application on July 14, 2015.

¹ ZVRS is currently operating pursuant to a conditional certification on an interim basis following the consummation of Kinderhook’s acquisition of ZVRS on February 5, 2015. *See Notice of Grant of Conditional Certification for CSDVRS, LLC, to Provide Video Relay Service After Its Acquisition by Kinderhook Capital Fund IV, L.P.*, Public Notice, 29 FCC Rcd 16237 (CGB rel. Dec. 23, 2014) (“Public Notice”), *recon. denied*, Order, 30 FCC Rcd 583 (CGB rel. Jan. 28, 2015).

Pursuant to Section 1.65 of the Commission's rules, the applicants are filing the enclosed second amendment to the Application in order to advise the Commission of certain updates to the information supplied in the Application.

For the reasons set forth in the Application, ZVRS requests confidential treatment of the company-specific, highly sensitive and proprietary commercial information provided in the Application, as amended, and requests that such information be withheld from public inspection.

Respectfully submitted,

/s/ Aaron Wegehaupt
Aaron Wegehaupt, VP of Operations
CSDVRS, LLC
600 Cleveland Street
Suite 1000
Clearwater, FL 33755
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Attachments

cc: Gregory Hlibok

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
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
)	

To: Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program

**SECOND AMENDMENT TO APPLICATION OF CSDVRS, LLC (D/B/A/ ZVRS), AS
INDIRECTLY MAJORITY-OWNED AND CONTROLLED BY KINDERHOOK,
FOR CERTIFICATION TO PROVIDE VIDEO RELAY SERVICE**

Pursuant to Section 1.65 of the Commission’s rules,¹ CSDVRS, LLC d/b/a ZVRS (“ZVRS”), as indirectly majority-owned and controlled by Kinderhook Capital Fund IV, L.P. and its affiliate Kinderhook Capital Fund IV-B, L.P., both of which are advised by Kinderhook Industries, LLC (collectively referred to herein as “Kinderhook”), hereby submits this second amendment to the pending and unopposed application (the “Application”) filed on February 20, 2015 (and as amended on July 14, 2015) seeking a full certification for ZVRS to provide Video Relay Service (“VRS”) that is eligible for compensation from the Interstate Telecommunications Relay Service Fund (“TRS Fund”).²

Specifically, the applicants are hereby submitting a revised Exhibit A which contains an updated list of ZVRS call centers.

¹ 47 C.F.R. § 1.65.

² ZVRS is currently operating pursuant to a conditional certification on an interim basis following the consummation of Kinderhook’s acquisition of ZVRS on February 5, 2015. *See Notice of Grant of Conditional Certification for CSDVRS, LLC, to Provide Video Relay Service After Its Acquisition by Kinderhook Capital Fund IV, L.P.*, Public Notice, 29 FCC Rcd 16237 (CGB rel. Dec. 23, 2014) (“Public Notice”), *recon. denied*, Order, 30 FCC Rcd 583 (CGB rel. Jan. 28, 2015).

There are no updates to Exhibits B, C or D.

A revised Exhibit E is attached. Exhibit E contains a description of the organizational structure of ZVRS that reflects consummation of the Kinderhook transaction, and also identifies those individuals or entities that hold at least a 10 percent equity interest in ZVRS, have the power to vote 10 percent or more of the securities of ZVRS, or exercise *de jure* or *de facto* control over ZVRS.³ Exhibit E also provides an updated list of the names of ZVRS' executives and officers and the members of its board of directors.⁴

Also attached is a revised Exhibit F which provides an updated organizational chart.

In addition, ZVRS has attached a revised Exhibit G which provides an updated list of the number of full-time and part-time ZVRS employees involved in ZVRS' TRS operations, categorized by the following positions: the executives and officers; video phone installers; CAs; persons involved in marketing and sponsorship activities; and persons involved in administration and operations.⁵

ZVRS has attached a revised Exhibit H which provides an updated list of sponsorship agreements.

Finally, ZVRS has attached its updated Compliance Plan as Exhibit I.

ZVRS remains committed to providing the highest quality service and a variety of innovative products that support the needs of relay consumers. For the reasons set forth in the Application, as amended herein, it is in the public interest to grant ZVRS, as indirectly majority-owned and controlled by Kinderhook, a full certification to receive direct compensation from the

³ 47 C.F.R. § 64.606(a)(2)(ii)(B).

⁴ *Id.*

⁵ 47 C.F.R. § 64.606(a)(2)(ii)(C).

TRS Fund for the provision of VRS.

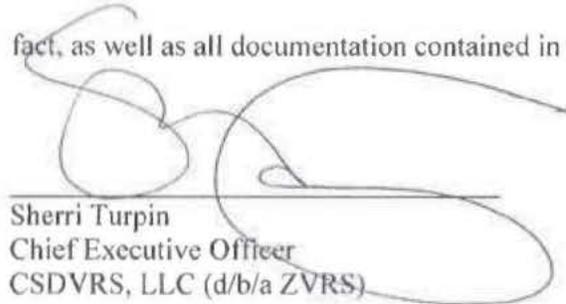
Respectfully submitted,

/s/ Aaron Wegehaupt
Aaron Wegehaupt, VP of
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November 20, 2015

DECLARATION OF CORPORATE OFFICER

I swear under penalty of perjury that I am Sherri Turpin, Chief Executive Officer of the above-named applicant; that I have examined the foregoing submissions; that all information required under the Commission's rules and orders has been provided; and that all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.



Sherri Turpin
Chief Executive Officer
CSDVRS, LLC (d/b/a ZVRS)

Date: November 20 2015