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

COMMENTS OF CONVO COMMUNICATIONS, LLC

Convo Communications, LLC ("Convo") hereby responds to Section II of the Federal Communications Commission ("FCC" or "Commission") Further Notice of Proposed Rulemaking ("*FNPRM*") proposing to adopt a limited-duration compensation rate freeze for Video Relay Service ("VRS") providers with 500,000 or fewer monthly minutes so that they are compensated at a rate of $5.29 per minute for a maximum of 16 months beginning July 1, 2015.[1] Convo incorporates in its *FNPRM* comments the points Convo and other Tier I VRS providers made in their *Emergency Petition* to freeze the rate prior to the next cut scheduled for January 1, 2016[2] and the information provided by Convo in its statement in support of the *Emergency Petition* about its operational and financial circumstances.[3] Convo supports the proposed 16-month rate freeze, which will ensure that Tier I providers have an opportunity to continue growing to scale by providing different products and services to diverse communities. Convo

[1] *Structure and Practice of the Video Relay Service Program*, Further Notice of Proposed Rulemaking, FCC 15-143, Section II (rel. Nov 3, 2015) ("*FNPRM*").
[2] *Emergency Petition for a Temporary Nunc Pro Tunc Waiver*, Convo Communications, LLC, Hancock Jahn Lee & Puckett, LLC dba CAAG/Star VRS, and ASL/Global VRS Services Holdings, LLC, CG Docket Nos. 10-51, 03-123 (November 25, 2015) ("*Emergency Petition*"). The Commission has defined Tier I VRS providers to mean certified VRS providers that relay less than 500,000 minutes of calls per month. *See, FNPRM*, ¶ 4 n.9.
[3] *Convo Statement*, CG Docket Nos. 10-51, 03-123, dated December 9, 2015 (filing confidential information) ("*Convo Statement*").

urges the Commission to retain a rate glide path for the Tier I providers after the end of the 16-month freeze period consistent with its original precept of avoiding the disruption of an abrupt rate change.

Further, Convo proposes that we take this opportunity to consider new models of well-designed compensation to motivate providers to take specific steps in advancing VRS towards functional equivalency which includes safeguards against fraud, waste and abuse of Telecommunications Relay Services ("TRS') funds. Convo looks to proven interpreting techniques such as matching consumers with interpreters and suggests a granular rate system to compensate for the implementation of these techniques in VRS. Convo also suggests compensating for services that achieve functional equivalency that are greater than required by the mandatory minimum standards, such as modest additional compensation for an average speed of answer time faster than an established standard to bring relay consumers closer to the equivalent of an instant dial tone on a hearing person's phone.

I. Introduction

As a deaf-owned and deaf-operated company, Convo appreciates the Commission's affirmation in the *FNPRM* of the benefit to VRS consumers of supporting quality-of-service competition through a robust number of providers. Telecommunications choices for relay consumers is a fundamental requirement of Title IV of the Americans with Disabilities Act ("ADA"), which obligates common carriers to make available relay services throughout the geographic areas in which they offer telephone services.[4] This requirement was intended to ensure that people with hearing or speech disabilities have the ability to choose service from a range of competitive telecommunications providers in an equivalent manner as people without those disabilities. In developing and advancing the structure of the VRS program, the

[4] 47 U.S.C. § 225(c).

Commission expressly supported the opportunity for a robust number of diverse providers to competitively participate in the program as a fundamental means of accomplishing the ADA Title IV mandate that relay services are "functionally equivalent"[5] and "available, to the extent possible and in the most efficient manner."[6]

As a result, the Commission has devised a VRS program in which sustainable competition among multiple providers has driven an abundance of service enhancements and product innovations. Although Convo is a younger and modestly resourced provider, it has been an indispensable part of the success of the VRS program. In its short time in the VRS market, Convo was the first to introduce a number of innovative services which support consumer autonomy in their use of telecommunications, including:

- a mobile web-based videophone;
- the ability for VRS consumers to independently disconnect with the other party;
- a video overlay that enables consumers to maintain visual connection with video interpreters at all times during a call; clickable phone numbers to directly connect to the listed entity through VRS; deaf-owned business directory features built into the videophone interface;
- ASL Contact Centers at several Federal agencies;
- an integrated mass communications systems platform; and
- a customizable call alerting system using Philips hue lights technology, which received the fourth annual Chairman's Awards for Advancement in Accessibility in the Internet of Things category.

Convo also instituted video interpreting techniques which lock into consumer direction by

[5] 47 U.S.C. § 225(a)(3).
[6] 47 U.S.C. § 225(b)(1).

mirroring their conversation including tone rather than "approximating, filtering or explaining" as is typical of non-Convo video interpreters who inappropriately believe that they need to help think the conversation for ASL-using consumers to make it clearer to the other party. In support of Convo's consumer-centric interpreting approach, it has established a one-of-a-kind interpreter education program which assists its interpreters to personify the essence of consumer communications.

Consequentially, Convo has experienced a vigorous increase of relay consumers choosing to use its products and services while having virtually no interpreter turnover in the past two years. Convo and the other two emergent and minority-owned Tier I providers have thrived and productively contributed to the VRS market by offering different services to diverse communities. The Commission in its *FNPRM* underscored once again the substantial public interest benefits of the continued participation of the Tier I providers in the VRS program and the need to give them an opportunity to grow to a scale of efficient operation.[7]

II. A Rate Freeze is Necessary to Sustain Tier I Provider Participation

In their *Emergency Petition*, Convo and the other Tier I providers explained that their ability to stay in the VRS market and continue to deliver meaningful contributions to diverse and underserved consumers is jeopardized by a rate level that is lower than their permitted costs.[8] The rate cut on July 1, 2015 placed Convo in a considerable fiscal shortfall, which required it to obtain significant loans from the secondary market to cover the shortfall. The rate cut also left Convo with no flexibility for the additional capital needed to fund the necessary investments in technology, equipment and human resources to support the needs of an expanded consumer base.

[7] *FNPRM*, ¶¶ 15-17.

[8] *Emergency Petition*, Section III ("Rolka Loube has determined, and the Commission has acknowledged, that the Tier I Providers' permitted costs exceed the per-minute VRS compensation rates applicable to the Tier I Providers as of July 1, 2015." *Citing* FNPRM. ¶ 11).

Convo will lose a significant amount of money this year despite its steady growth.[9] Convo has declined to bring in venture capitalists that could float Convo until a period of sustainability because doing so would risk Convo's focus on consumer and interpreter oriented relay services.[10] Convo's orientation and culture leads to product innovation and service enhancements through its personnel asking each day about what would bring consumers closer to functional equivalency instead of us asking about how we can generate additional revenue for venture capitalists.

Compounding Convo's challenges as an emergent provider, new programs established in the Commission's 2013 *VRS Reform Order* which are intended to reduce certain service costs for VRS providers have either not moved forward or are at their earliest stages.[11] Thus Convo must absorb all of the rate cuts in the "glide path" of declining VRS rates established in the *VRS Reform Order* without the opportunities the Commission set out in the *VRS Reform Order* to alleviate these cuts. These new programs are intended to replace VRS providers' costs of research & development, outreach, achieving interoperability, increasing portability and video communications service platform technology, thus the lack of their timely implementation further deepened the financial hole Convo is striving to get out of. In addition, the *VRS Reform Order* imposed several new cost burdens on providers including the need to collect additional registration information from customers, adopt regulatory compliance plans, establish consumer information privacy mechanisms and working with the VRS Access Technology Reference Platform (now known as the ACE Platform).

The *Convo Statement* in support of the *Emergency Petition* demonstrates that it is incurring allowable, reasonable and necessary operational costs which are higher than the compensation rate now in effect and that, as a result, further rate reductions heighten the risk of

[9] *Ex Partes* of Convo Communications, LLC, CG Docket Nos. 10-51, 03-123 (April 15 and 21, 2015).
[10] *See* Convo April 15, 2015 *Ex Parte*.
[11] *See Report and Order and Further Notice of Proposed Rulemaking*, CG Docket Nos. 10-51, 03-123, 28 FCC Rcd 8618, 8696 ("*VRS Reform Order*") (Adopted: June 7, 2013).

Convo going out of business before it can mature to operate at an efficient scale.[12] Convo has experienced rapid and substantial growth at a highly efficient level, without the benefits of large capital inflows. Yet Convo needs a sustainable rate over an adequate period of time to grow to scale.

Convo is at a confluence of financial and operational circumstances which will determine the course of its continuation of services. As an emerging provider yet to reach scale, Convo has several times approached its break-even point only to fall back each time because of a rate cut. Convo has not had the equivalent opportunity to grow to match the economies of scale applicable to the larger VRS providers, which have had the benefit of building their businesses with historically significantly higher rates.[13] A rate cut on January 1, 2016 would force Convo to make operational reductions and those changes would correspondingly affect service quality. A rate freeze would provide Convo with the flexibility to continue investing in its operations and technology so that it can grow to a level of efficiency where it has a sustainable business even at a lower VRS compensation rate. Convo has steadily lowered its per-minute costs through greater efficiencies and rigorous cost controls but has not yet reached the scale necessary to break even.[14] A lack of significant long-term debt positions Convo to be a strong contender to help make the market more competitive. A rate freeze as proposed in the *FNPRM* will allow Convo the ability to survive and roll out in 2016 service enhancements that will support the progression of the VRS consumer's experience towards functional equivalence.

III. A Rate Freeze Will Provide a True Opportunity to Compete Long-Term

The rate freeze as proposed in the *FNPRM* would place Convo solidly on the path of

[12] *Convo Statement*, section II.
[13] The largest providers received an average rate of over $7 per-minute in the decade before Convo's certification as a provider in 2011 even with the omission of the one year spike of $17.044 per minute in 2002-2003. *See* Relay Services' Reimbursement Rate, Contribution Factor & Fund Size History, Rolka Loube's website at: http://media.wix.com/ugd/455e4d_15bfc799fecd40e28fa9ef1644e39f10.pdf.
[14] *Convo Statement*, section II.

achieving "minimum efficient scale"[15] in 2016. However the Commission has held fast to its intent to transition to a "disaggregated, market-based compensation methodology" as it implements VRS structural reforms.[16] Further the Commission has proposed setting VRS compensation rates through a "competitive bidding process."[17] Thus to have a true opportunity to compete in such a transitioned VRS market, Convo must grow well past a break-even point to a position where it is able to provide innovative products and specialized services on a large scale.

An example of Convo's competitive challenges is the reaction of the dominant VRS provider Sorenson Communications, Inc. ("Sorenson"), which initially declined a request by an administrator of a large deaf school that used Sorenson's videophones to make an emergency notification system available on their technology platform because Sorenson considered that "there was no return on that investment." Not until after Convo developed a video technology platform which provided the capability for mass communications including emergency notifications and replaced all Sorenson videophones in that deaf school in a phenomenal timeframe of three months did Sorenson decide to also include an emergency alert feature in their videophones for schools. Sorenson not only has the benefit of an entrenched consumer base at deaf schools, it is far best positioned among providers to make its VRS products and services quickly available on a large scale and fill VRS consumers' needs before their competitors can. It is our understanding that Sorenson has offered to cover the expenses of two information technology administrators from a number of deaf schools for a gathering this month regarding its new emergency alert feature, further undercutting its competition. This example not only illustrates the benefit Convo provides to consumers through its innovations, but also shows the

[15] *See FNPRM*, note 40, citing a previous Commission rulemaking which defined "minimum efficient scale" as "the point on the scale curve at which the volume of a firm's output is high enough to take substantial advantage of economies of scale so that the average costs are minimized," or "the point at which the per-unit cost begins to 'flatten' as the volume of output increases."
[16] *See FNPRM* ¶ 12.
[17] *See id.*¶ 3.

importance of sustaining the opportunities for multiple providers to challenge each other to enhance their VRS products and services for consumers. However, Convo must compete with larger providers like Sorenson on a far from level playing field.

Thus Convo must work incrementally in making its products and services available in order to grow its business, even with a rate freeze in place. To be able to compete in the transitioned VRS market as envisioned by the Commission, Convo must grow beyond "minimum efficient" scale and be large enough to provide on demand for VRS consumers innovative products and specialized services.

For Convo to have a true opportunity to grow large enough to well compete with established providers in a transitioned market, it is absolutely essential that the Commission adopt a 16-month rate freeze for Tier I providers as proposed in the *FNPRM*. A 16-month rate freeze period will sustain Convo and allow it to achieve a minimum efficient scale in 2016. It also will begin to allow Convo the flexibility to produce on a larger scale the innovative products and specialized services which will provide it with an opportunity to grow well enough to truly be able to compete with larger and better resourced providers.

It is equally essential that a "glide path" be resumed for Tier I providers after the rate freeze ends to provide them with a true opportunity to become positioned to compete with established providers in a transitioned market. With the elimination of outreach costs from the rate,[18] additional time after a rate freeze must be allowed for a critical mass of VRS consumers to discover the benefits of the Tier I providers products and services so that they have an opportunity to grow beyond a minimum efficient scale. For the above reasons, any rate adjustment for Tier I providers upon the expiration of the 16- month rate freeze at $5.29 per-minute on October 31, 2016 must not be lower than $5.06 per-minute, which is the next

[18] *See FNPRM*, note 29.

scheduled rate for Tier I set forth in the *VRS Reform Order*.[19] Thereafter further rate cuts for Tier I providers should be no lower or and occur no more quickly than the rate glide path set forth in the *VRS Reform Order* with new effective dates adjusted to reflect the 16-month rate freeze.

The Commission should maintain the Tier I dividing line at a minimum of 500,000 minutes a month to give small providers the time and resources to grow to be able to compete in a transitioned market. Convo agrees that while operating at a level below 500,000 monthly minutes, it will continue to have significantly higher per-minute costs as compared with larger providers.[20] Convo believes attaining at least 500,000 monthly minutes is critical to its ability to compete effectively with larger providers in a transitioned market. Convo is on schedule to reach that milestone in late 2017 or early 2018 provided that there is a 16-month Tier I rate freeze and a glide path thereafter. Convo's growth path is commensurate with those of larger providers albeit at significantly lower rates than those historically received by larger providers. Convo agrees that the proposed 16 month Tier I rate freeze with a glide path thereafter will "maximize [Tier I providers'] chances of success after the structural reforms are implemented."[21]

Despite the business maxim that it is harder to win a new customer than it is to keep a current one, Convo has been challenged by the hardened consumer perception that competitors' videophones do not interoperate at all or as well with Sorenson videophones. Sorenson predominately occupies the VRS market after a decade of being able to flood the market, during a period of historically higher rates, with free videophones and multi-purpose equipment such as large television sets. This locked customers in to Sorenson's offering, which is marked by a lack of portability and other anti-competitive limitations. By far the most common question Convo receives from customers regardless of the level of their sophistication regarding technology is

[19] *See id*, ¶ 5.
[20] *Id.* ¶ 18.
[21] *Id.* ¶¶ 4, 15.

whether Convo videophones will work with Sorenson videophones. Although Convo has pushed for the interoperability of videophones through a provider group and providers are now transitioning towards SIP standards,[22] Convo is of the opinion that the operation of the ACE Platform is essential in making consumers well-aware about the interoperability of competitors' videophones through rigorous testing and verification so that they become significantly less hesitant to try alternative product options. The mature implementation of the VRS structural reforms, including the ACE platform which will enhance interoperability and portability, along with a Tier I rate freeze and glide path thereafter, will create a market in 2018 in which Convo believes it would be fair to require all providers to compete under the same unitary base compensation rate.

IV. Unlocking Functional Equivalency with a Granular Rate Structure

Convo appreciates the Commission's inquiry into whether different rates should apply to certain categories of "specialized features or services."[23] Convo understands this to embody the Commission's desire for providers to continue to enhance services for relay consumers, especially those in underserved populations, towards a functionally equivalent experience so that all deaf, hard-of-hearing, deaf-blind and speech-impaired individuals may gain the opportunities created by the civil right to accessible telecommunications regardless of their particular economic, linguistic, cultural or social background. It is unquestionable that a base VRS rate must be correctly set so that VRS that meets the mandatory minimum standards is always readily available for consumers. However a different structure above a base rate must come into play to create VRS which attains the objectives and strictures of the ADA mandates. Convo supports undertaking structural reforms that center on a holistic, integrated, and consistent framework for

[22] *Ex parte presentation by VRS Providers on Status of Developing and Implementing U.S. VRS SIP Interoperability Profile*, CG Docket Nos. 10-51, 03-123 (June 26, 2015).
[23] *FNPRM*, ¶¶ 21-22.

the functional equivalence of VRS which by necessity would encompass consideration of specialized services for certain user populations such as deaf-blind individuals, Spanish-speaking persons or deaf-owned businesses, as well as the VRS improvement measures discussed in Part III of the *FNPRM*.[24]

Since the *FNPRM* decouples the rate freeze request from specific service enhancements as presented by the joint VRS providers, Convo believes this is an opportune time to examine the functional equivalency of VRS as a whole and how to stimulate its accomplishment in considering the path forward for the VRS program. At the same time, Convo supports putting into place or conducting trials of certain service measures rather than deferring them to some later point in time. Because VRS fundamentally impacts the economic and public participation opportunities of consumers, the VRS program must provide as much functionally equivalent services as possible at the earliest time, which also includes the necessary protections to prevent fraud, abuse and waste of the TRS Fund to well preserve the VRS program for the long-term.

It appears to Convo that the most significant challenges to developing a functional equivalency framework is the lack of certainty about what measures would actually achieve it in the VRS market. Convo suggests that the Commission begin with the familiar in constructing a path towards functional equivalency. There are certain long established standards and practices for in-person interpreting which are essential components for effective interpreting. These include:

- matching consumers with interpreters;
- consumer and interpreter familiarity with each other;
- interpreter familiarity with the subject matter; ensuring that interpreters possess

[24] *See e.g.*, U.S. Government Accountability Office ("GAO") published on April 29, 2015, http://www.gao.gov/products/GAO-15-409 ("the lack of specific TRS performance goals—and specific performance measures crafted around those goals" which made it "difficult to determine in an objective, quantifiable way if TRS is making available functionally equivalent telecommunications services").

the professional skills and knowledge required for the specific interpreting situation;

- heeding consumer direction in their conversation;
- teaming for lengthy sessions;
- the use of deaf interpreters;
- cultural and linguistic competency;
- appropriate clothing and specialized signing for deaf-blind;
- mentoring; and
- an emphasis on continuing education and training.[25]

These long-standing standards and practices for effective in-person interpreting are either disallowed or not supported in VRS.

The Consumer Groups' 2011 *TRS Policy Statement* was a significant step in introducing a framework and core principles for achieving functional equivalency.[26] The National Association of the Deaf's 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.[27] Convo believes that it is time for the Commission to move forward in collaboratively fashioning a functional equivalency roadmap with specific milestones and timetables for functional equivalency measures in the same clear and

[25] *See* Registered Interpreters of the Deaf, Inc Standard Practice Papers, http://www.rid.org/about-interpreting/standard-practice-papers/.
[26] Consumer Groups' TRS Policy Statement (April 12, 2011) (attached to Consumer Groups' Notice of *Ex Parte* Meeting, CG Docket Nos. 10-51, 03-123 (April 12, 2011)) ("*TRS Policy Statement*").
[27] National Association of the Deaf, Position Statement on Functionally Equivalent Telecommunications for Deaf and Hard of Hearing People at http://nad.org/position-statement-functionally-equivalenttelecommunications-deaf-and-hard-hearing-people.

predictable manner as was set out for the rate plan in the *VRS Reform Order*.

Convo personnel, as regular consumers of interpreting ourselves, have first-hand experience in the significant disparity between in-person and VRS interpreting with respect to the consistency, reliability, and effectiveness. Convo appreciates the Commission's sensitivity with respect to fraud, abuse and waste, but Convo believes the Commission is obligated to now exert a greater effort in applying proven interpreting standards and practices in VRS to effectuate functional equivalency, along with tailored preventive security measures.

Some effective in-person interpreting practices should cost little if anything additional if applied to VRS such as allowing for consumers to work with a consistent pool of interpreters so they become more familiar with each other or matching customers with interpreters based on subject or signing-style needs although a different VRS-call routing mechanism would have to be permitted to enable such practices. Other effective interpreting practices such as using deaf interpreters would entail a cost above a base rate if implemented for VRS.[28] Trilingual interpreters for Spanish-speaking customers are more difficult to obtain, require different training and employ more complex interpreting skills. Therefore it makes sense that their cost would be higher than reflected in a base VRS rate, especially when considering that more than average time may be necessary to reach and serve Spanish-speaking customers.

More fundamentally, Convo believes that the VRS program is at a point where innovative approaches are needed to stimulate the provision of service enhancements designed to help accomplish functional equivalency beyond a service that is focused on meeting mandatory minimum TRS standards. We think this is especially the case in an environment where regularly lowered rates have blunted the providers' interest in providing customers with enhanced products

[28] It is noted, however, that several frequently contacted Federal agencies such as the Social Security Administration find it cost effective to use deaf interpreters in video relay interpreting because their inclusion frequently helps considerably shorten the length of the conversation.

and services. The focus on meeting mandatory minimum standards in the area of Speed of Answer ("SoA"), for example, has caused extensive (and possibly excessive) discussion about the penalties associated with missing the SoA standard rather than a system which motivates providers to consistently answer calls faster than the standard. Once the SoA standard is set under a base VRS rate, Convo believes there would be greater returns for consumers in an approach which modestly rewards providers for a significantly lesser wait time than provided by the standard. Similarly, Convo believes that advancing the effectiveness of interpreting, including more consistently utilizing standard practices such as teaming, can be better accomplished through an incentive-based system that rewards providers for superior service as audited by an independent group of experts. The Commission regularly audits providers about the accuracy of their cost information and their compliance with regulatory procedures. It is now time for the Commission to begin auditing providers on the quality of their services which focuses on rewarding providers for attaining a certain level of quality service. Such innovation in the rate structure is necessary to break out of the current service doldrums and get back on the path of progressing towards functional equivalency. In any event, the Commission will need to consider such radical rate approaches if it is to move forward to a disaggregated, competitively bid market. We must work to develop quality of service indicators that become the leading criteria in a transitioned market rather than a focus on competing based on the cost of services.

In its subsequent *FNPRM* comments, Convo intends to expand on its introductory thoughts about functional equivalency and the necessary and corresponding refinements to the rate structure. The Commission has made an ongoing commitment to vigorously reform VRS to better accomplish ADA mandates. Tremendous strides have been made to eliminate fraud, waste and abuse from the program. The *VRS Reform Order* adopted several initiatives designed to rebalance the VRS market among providers. Now is the time to establish the functional

equivalency framework with a schedule of service improvements. Otherwise, we risk an incomplete VRS program when entering into a transitioned market. The Commission and relay stakeholders have invested far too much in VRS to enter a transitioned market with significant gaps in functional equivalency and the tools available at that point may not be sufficient to make up for any shortfall. Convo is confident that a focused dialogue on an innovative and granular rate structure will result in productive quality-of-service measures that are price conscious so as to advance functional equivalency while preserving the TRS Fund for the long term.

V. Conclusion

The Commission's adoption of the proposal to freeze Tier I rates for 16-months with a rate glide path thereafter will turn Convo around from operating at a loss because it has yet to reach scale to an opportunity to break even and become positioned to compete in a transitioned market. Convo has responded to the Commission's willingness to tolerate some degree of rate inefficiency by Tier I providers by developing game-changing product innovations and service enhancements. This organic and contributive growth by Convo is a desirable component of a healthy VRS marketplace that sustains robust competition and consumer choices. Adequate funding for VRS providers, especially emergent providers like Convo, is essential in pushing for functional equivalency with the unceasingly evolving telecommunications features and functional upgrades available to hearing people.

Convo appreciates the Commission's allocation of limited time and resources to reforming the VRS program and the challenges of transitioning it to a model of accessible telecommunications provided by the private sector. The deaf community regards VRS as one of the most life-changing experiences of their generation, and their economic and public participation opportunities are much greater due to VRS. Yet, the Commission needs to keep the VRS program progressing towards the ADA mandates because the quality of deaf people's lives depends on the

quality of their VRS. As a deaf company, Convo intrinsically understands that need, and is thankful that it has a meaningful chance to help shape VRS for the future of the deaf community.

Respectfully submitted,

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