



CSDVRS, LLC

600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755
VideoPhone: 727-431-9692 Voice: 727-254-5600 Fax: 727-443-1537

December 21, 2015

Via Electronic Filing

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

RE: *Notice of Ex Parte – Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51, 03-123*

Dear Ms. Dortch:

On December 17, 2015, Sherri Turpin, CEO, and Megan Lawler of CSDVRS, LLC d/b/a ZVRS (“ZVRS”), as well as Jennifer Richter and Steve Rowings of Akin Gump Strauss Hauer & Feld LLP and Kim Dorgan of McBee Strategic Consulting, LLC, met with the following staff of the Federal Communications Commission: Edward Smith, Legal Advisor, Office of the Chairman; and Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau.

As described more fully in its comments¹ to the Further Notice of Proposed Rulemaking for the Video Relay Service (“VRS”),² ZVRS urged the Commission to extend the proposed rate freeze to all “smaller VRS providers.” The Commission previously defined Tier 1 and Tier 2 VRS providers as the “smaller VRS providers” that need opportunities to reach scale and compete effectively.³ ZVRS is the lone Tier 2 VRS provider and should be included in the freeze. ZVRS asked for extension of any rate relief until structural reforms are in place that will offer each smaller

¹ See Comments of ZVRS to the Compensation Rate Freeze, CG Docket Nos. 10-51, 03-123 (filed Dec. 9, 2015).

² *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, Further Notice of Proposed Rulemaking, FCC 15-143 (2015) (“FNPRM”).

³ FNPRM at para. 5; see also *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82, at para. 214 (2013).

VRS provider the opportunity to gain critical scale and market share – opportunities that do not exist today.

The parties discussed the Commission’s and the Chairman’s high hopes for the Accessible Communications for Everyone (“ACE”) application, and its potential to produce market-wide interoperability. ZVRS made the point that – (1) the theoretical possibility of interoperability that exists today from an engineering perspective; and (2) the theoretical possibility of interoperability that could result in the future through ACE – is not the same as actual interoperability in the field. The Commission needs to understand the extent to which there are continuing challenges with interoperability, and how that impacts the ability of smaller VRS providers to gain and retain new customers.

With respect to ACE, the Commission must study the devices that are predominantly used by the VRS community today and understand which devices, both large and small, are soft-client-compatible. Devices that are not soft-client-compatible will not support the use and promise of ACE. The potential positive impact of ACE on interoperability and VRS competition will be directly diminished by the limited functionality of VRS devices that are deployed. Unfortunately, as it stands, ACE is not likely to be a solution for all VRS users, or even a majority of VRS users. In the view of ZVRS, other policy and technical solutions beyond ACE will be needed in order to ensure interoperability and a functional VRS playing field.

Apart from challenges around interoperability, ZVRS expressed the view that the Commission needs to conduct a serious analysis of changes to the VRS program that are necessary and can be impactful over the long-term. ZVRS pledged its assistance to the FCC to examine both challenges to competition in the program and potential solutions.

Respectfully submitted,

_____/s/_____
Sherri Turpin
Chief Executive Officer