

11/16/15

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

Re: Mezmo Corporation, Amendment to Application—CG Docket No. 03-123

Dear Ms. Dortch,

Please find attached the Amendment to Mezmo Corporation's application for certification as a provider of Internet Protocol Captioned Telephone Services.

Sincerely,

Cristina Duarte
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Mezmo Corporation
3930 Pender Dr, Ste 130.
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571-232-4402
cristinaduarte@innocaption.com

**Before The
FEDERAL COMMUNICATION COMMISSION
Washington, D.C.**

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities Application for TRS)	
Certification to Provide IP Captioned)	
Telephone Service)	
)	
)	

**AMENDMENT TO APPLICATION OF MEZMO CORPORATION FOR
CERTIFICATION AS A PROVIDER OF INTERNET PROTOCOL CAPTIONED
TELEPHONE SERVICES**

This Petition is to amend Mezmo Corporation’s (“InnoCaption”) application for federal certification as a provider of Internet Protocol Captioned Telephone Services (“IP CTS”) and to respectfully request the Federal Communications Commission (“Commission”) lift the suspension of InnoCaption’s temporary certification to provide IP CTS Services.

(I) AMENDMENT TO INNOCAPTION’S APPLICATION TO BECOME AN IP CTS PROVIDER

Pursuant to Sections 1.65(a) and 64.606(a) (2) of the Federal Communication Commission’s (“Commission”) rules, respectfully submits this amendment to its November 23, 2011 application for federal certification as a provider of Internet Protocol Captioned Telephone Services (“IP CTS”). The purpose of this amendment is to provide the following updated information:

I. Updates to Section (II)(A)(1) Communications Assistant Competency

Qualifications

In the Application filed on November 23, 2011, InnoCaption mentions using “captioning partners” and “call centers”. InnoCaption no longer contracts with its previous captioning partners and will not be using their call centers. Instead, InnoCaption is contracting with individual Communications Assistants (“CA”) who are independent contractors and provide transcription services remotely. Accordingly, any mention in InnoCaption’s initial application regarding CA managers, break rooms, or call centers is no longer accurate.

InnoCaption will continue to ensure all CAs complete mandatory training in accordance with the Commissions Rules and consent decree requirements. Additionally, InnoCaption will continue to perform pre-hiring evaluations of CAs in order to ensure typing speeds and accuracy consistent with InnoCaption’s initial application.

II. Updates to Section (II)(A)(6) Emergency Call Handling

InnoCaption supports E911 calls. However, the calls no longer are sent directly from the user’s phone to the Public Safety Answering Point (PSAP) due to prior issues with its emergency call handling. Instead, when an InnoCaption user dials 911 from the InnoCaption application, their call is routed to Intrado’s 24/7 Emergency Call Relay Center (ECRC) where the operator will obtain the users (1) name, (2) location, and (3) callback number. In the event the user does not know their location, or is unable to speak, the ECRC will ask them to hold on while they obtain the latitude and longitude as provided by InnoCaption when the ECRC Operator hits any number on his or her phone.

The Operator also has access to the user's captioning number which appears on the Operator's caller ID in the event the user does not know it. Once the information is obtained, the ECRC operator transfers the call to the local PSAP. The ECRC operator identifies themselves to the PSAP and provides the users (1) name; (2) location; and (3) callback number to the PSAP operator. The ECRC operator only disconnects from the call once the user is connected to the PSAP and the communication is initiated.

III. Updates to Section (2)(A)(11) Contact Person

InnoCaption's contact person for consumer information, complaints, and Commission Correspondence is:

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IV. The New Functions of the InnoCaption Application

- a. User Numbers with Area Codes:** Previously all registered users were provided InnoCaption numbers with a California area code due to limitations with our previous VOIP provider. InnoCaption received a significant amount of feedback from users which expressed frustration with being assigned a number with a California area code.

Upon InnoCaption's relaunch, all users will have to re-register and will be provided with InnoCaption numbers with an area codes which will correspond with the area in which they reside.

- b. Alternate Voice Channel on Outgoing Calls:** Previously users had to receive both the voice channel and captions on their mobile device. InnoCaption now allows its users to preregister phone numbers which the user would like to receive the voice line on for outgoing calls. For example, a user could register their home phone and work phone to enable them to receive the call and captions on their mobile device, but hear the speaker's voice on the phone of their choosing. At the beginning of each outgoing call the user is asked which phone they would like the voice channel to come through on. The captions remain on the user's mobile device and there is no option to view the captions anywhere else. This new function provides greater functional equivalence to InnoCaption users by allowing them a more private alternative to having the caller come across on their speaker phone for outgoing calls.
- c. Optional Captions Always On:** Previously, InnoCaption users would have to initiate captions on all of their outgoing calls. Now, upon launching the application users are asked if they would like to have all of their calls captioned. A user may opt to manually enable captions for each call, or to have automatic captioning on their outgoing calls.
- d. Voicemail:** InnoCaption has improved its voicemail system by providing users options after hearing their messages. Users are provided the following options: "press 7 to delete"; "press 9 to save"; "press * or hang up to disconnect". Users are now able to read saved messages instead of having to call the voice mail to replay the messages.

- e. **911 Call Display:** When an InnoCaption user dials 911, their captioning number will appear at the top of their screen for reference.
- f. **Favorites Menu:** InnoCaption users now have the ability to add people to a “Favorites” list.

V. Conclusion

As a result of InnoCaption’s suspension as an IP CTS provider, the company underwent corporate restructuring. As detailed above, during the suspension period, InnoCaption improved upon its product to provide a higher level of functional equivalence to users and ensure access to emergency services. InnoCaption asserts the application, as amended, satisfactorily demonstrates compliance with all requirements for federal certification of its IP CTS offering.

Respectfully Submitted,

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DECLARATION UNDER PENALTY OF PERJURY OF CRISTINA DUARTE

I swear under penalty of perjury that I am Cristina Duarte, Senior Regulatory Affairs Manager, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as documentation contained in this submission, are true, accurate, and complete.

/s/ Cristina Duarte

Cristina Duarte

October 20, 2015