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Via Electronic Comment Filing System

February 2, 2016

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

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

Dear Ms. Dortch:

On February 1, 2016, Angela Roth, President and Chief Executive Officer, ASL Services Holdings, LLC dba GlobalVRS (“ASL/Global VRS”), and Gabrielle Joseph, Vice President and Chief Operations Officer, ASL/GlobalVRS met separately with Edward Smith, Legal Advisor, Office of Chairman Wheeler; Rebekah Goodheart, Legal Advisor Office of Commissioner Clyburn; Nickolas Degani, Legal Advisor, Office of Commissioner Pai; and Amy Bender, Legal Advisor, Office of Commissioner O’Reilly.

In each meeting, Ms. Roth and Joseph discussed ASL/Global VRS’ history and development under the Commission’s Video Relay Service (“VRS”) reforms. Ms. Roth and Ms. Joseph reiterated the unique financial and operational challenges faced by smaller providers, including ASL/GlobalVRS who were granted Telecommunications Relay Service Fund eligibility in late 2011. They stressed that these challenges are not faced by well-established incumbent providers.

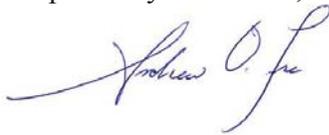
The impact of the declining rate structure on the Company’s operations and sustainability was also addressed, as was the inability of the Company to reinvestment in its operations under the current compensation structure. Ms. Roth and Ms. Joseph further discussed the impact of elimination of compensation for research and development and outreach, and the interoperability challenges still faced by the Company, each undermining the Company’s ability to grow.

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Ms. Roth and Ms. Joseph stressed that these challenges have precluded smaller companies from gaining market share and being able to compete, let alone be profitable. They stressed that companies with less than a million minutes of use per month cannot achieve the same economies of scale as the larger incumbent providers.

Ms. Roth and Joseph concluded that unless the Commission can affirmatively compensate smaller providers in accordance with their service costs and implement other needed reforms to enable smaller providers to meaningfully compete, that the smaller providers will be forced to exit the provision of VRS, resulting in a severe limitation on consumer choice and services to underserved communities.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Andrew O. Isar". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

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*Regulatory Consultants to
ASL Services Holdings, LLC dba GlobalVRS*