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WRITER'S DIRECT DIAL

July 18, 2003

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

RE: Docket 98-67

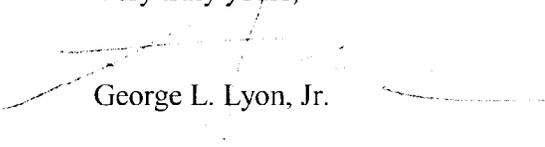
Dear Madame Secretary:

On July 11, 2003, the undersigned and Ronald E. Obray, President of Hands On Video Relay Service, Inc. met with Margaret Egler, Thomas Chandler, Sean O'More, Warren O'Hearn and Gregory Hlibok of the Consumer & Governmental Affairs Bureau.

The subject of the discussion was the Commission's interim 2003-04 rate for Video Relay Service and adjustments the Commission made concerning Hands On's estimated costs of providing the service. Also discussed was the differences between VRS and Video Remote Interpreting. The attached document was distributed.

Should any questions arise concerning this matter, kindly contact this office.

Very truly yours,


George L. Lyon, Jr.

cc: Margaret Egler
Thomas Chandler
Sean O'More
Warren O'Hearn
Gregory Hlibok
Hands On Video Relay Service, Inc.

Requirements for Providing Service:

A comparison of Video Relay Service and Video Remote Interpreting Hands On Video Relay Services, Inc.

Definition of terms:

Video Relay Service (VRS): A public, on-demand telecommunication service regulated under the FCC's TRS program that provides Deaf and Hard of Hearing persons with access to communication over standard phone lines.

Video Remote Interpreting (VRI): A fee-for-service form of interpreting which allows consumers to schedule interpreters via a point-to-point videoconference instead of having a live, on-site interpreter.

Requirement	VRS	VRI	Comment
All FCC references pertain to FCC TRS Rules 47 U.S.C. § 225 Docket 98-67			
DS 3 Internet Connections 47 C.F.R. § 64.604(b)(2)	Yes	No	VRS required to accommodate many simultaneous calls. VRI can operate on one ISDN or T-1, or high-speed access line.
Local Area Network Required 47 C.F.R. § 64.604(b)(2)	Yes	No	All VRS stations are connected to the network to handle multiple calls.
Redundant Networks 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS regulations, service must be provided even in the event of emergencies or disasters.
Firewall Technology 47 C.F.R. § 64.604(a)(2)(i)	Yes	No	VRI is "point-to-point." VRS must deal with firewall issues on the customers' end. VRS must guarantee the confidentiality of calls, requiring heavy-duty firewall protection.
Network Engineer 47 C.F.R. § 64.604(a)(2)(i)	Yes	Limited	VRS requires high-level engineers for integration with Telecom's platforms and guaranteed service despite emergencies or disasters. VRI can operate with technician-level personnel.
Extensive Hardware Investment 47 C.F.R. § 64.604(b)(2)	Yes	No	VRS must accommodate multiple call volume. VRI can initiate service with one workstation.
Emergency Power Requirements 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS Regulations.
Telephone Network 47 C.F.R. § 64.603	Yes	No	Outbound calls are made on POTS lines. Also, Voice Initiated Calls are received by phone. Note that currently, technology does not exist for providing voice initiated calls via VRS, and must be developed to comply with TRS regulations.
VRS Platform/Database 47 C.F.R. § 64.604(c)(5)(ii) 47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E) 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	Required of VRS by Telecoms for reporting purposes.

Video Codec Research and Development 47 C.F.R. § 64.604(c)(5)	Yes	No	VRS must accommodate all callers, despite low bandwidth. NetMeeting is not satisfactory to users.
Customized Software 47 C.F.R. § 64.604(c)(5)(ii) 47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E) 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	VRI = off-the-shelf programs. FCC requires complex reporting and data capture.
Software Engineers	Yes	No	See Network Engineer comments.
Extensive Software Investment 47 C.F.R. § 64.604(b)(2)	Yes	No	VRS must accommodate call volume. VRI can use off-the-shelf components, and initiate service with one workstation, thus requiring fewer software licenses, etc.
Limited Equipment Cost	No	Yes	VRI requires a simple “point-to-point” video program. VRI can elect to limit provision of service. VRS must accept calls from any point of origination, including ISDN or IP lines, Mac or PC computers, videophones, or set-top videoconferencing devices.
Secure Call Center	Yes	No	Per FCC TRS Regulations, service must be provided from a secure location.
Call Center Management 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	Per FCC TRS Regulations. Secured call center requires Management for daily operations.
Full-time Trainer(s) 47 C.F.R. § 64.604(a)(1) 47 C.F.R. § 64.604(a)(2)(ii)	Yes	No	Per FCC TRS Regulations, VRS must offer standardized service, functionally equivalent to a phone call. This requires training.
Standardized Policies and Procedures 47 C.F.R. § 64.604(a)(3)	Yes	No	Per FCC TRS Regulations, VRS must offer standardized service, functionally equivalent to a phone call.
Customer Service Organization and Database 47 C.F.R. § 64.604(c)(1)(i) 47 C.F.R. § 64.604(c)(1)(ii) 47 C.F.R. § 64.604(c)(2)(i) 47 C.F.R. § 64.604(c)(2)(ii)	Yes	No	VRI is not regulated. Telecoms require customer service function from VRS.
Marketing/Outreach Personnel 47 C.F.R. § 64.604(c)(3)	Yes	Limited	FCC requires TRS providers to conduct Marketing and Outreach programs via Internet, television, publications, conferences, and media that targets the Deaf and Hard of Hearing population. Further, FCC requires that TRS providers offer training for use of services.
Quality Control/Quality Assurance Department 47 C.F.R. § 64.604(c)(1)(i) 47 C.F.R. § 64.604(c)(1)(ii)	Yes	No	Per FCC TRS Regulations. VRS is required to file customer comments with the FCC.

<p>Comprehensive support staff</p> <p>47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(c)(1)(i) 47 C.F.R. § 64.604(c)(1)(ii) 47 C.F.R. § 64.604(c)(2)(i) 47 C.F.R. § 64.604(c)(2)(ii)</p>	Yes	No	VRI does not have the same complex scheduling/forecasting, billing, technical support, compliance, or customer service demands that VRS does.
<p>24 Hour Operation, 365 Days/Year</p> <p>47 C.F.R. § 64.604(b)(4)</p>	Yes	No	Per FCC TRS Regulations.
<p>Scheduled Services/Managed Volume</p> <p>47 C.F.R. § 64.604(b)(2)</p>	No	Yes	<p>FCC requires that VRS accommodate call demand. Providers have no control over call volume. VRS will never achieve the occupancy rates of other types of TRS, due to the physical/mental demands of sustained interpreting and inability to recruit qualified candidates if work demands deviate far from Interpreter Industry standards (see Registry of Interpreters for the Deaf Standard Practice Paper at www.rid.org/115.pdf).</p> <p>VRI can schedule and limit service provided. Typically, VRI requires 24 – 48 hour advance notice or higher rates are charged. Often a minimum number of minutes must be purchased for each session. If session is cancelled with less than 24 hours notice, customer is still billed.</p>
<p>Coverage for Potentially Unlimited Volume</p> <p>47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(b)(4)</p>	Yes	No	VRS is required to forecast and provide coverage for call volume.
<p>ASA Requirements</p> <p>47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(b)(4)</p>	Yes	No	Per FCC TRS Regulations, must have sufficient staff to provide less than 10 second wait time for 85% of calls received. Failure to comply results in \$1000/day imposed fines.
<p>Complex Reporting and Billing</p> <p>47 C.F.R. § 64.604(c)(5)(ii) 47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E) 47 C.F.R. § 64.604(c)(5)(iii)(H)</p>	Yes	No	FCC requires extensive reporting features.

Certified/Qualified Interpreters 47 C.F.R. § 64.604(a)	Yes	No	Per FCC VRS Regulations. VRI is not regulated. This is desirable but not required for VRI.
Discrimination in Accepting Interpreting Assignments 47 C.F.R. § 64.604(a)(1)	No	Yes	VRI allows for discrimination in acceptance of interpreting assignments and placement according to skill level. VRS interpreters must ALL have a level of competence to handle any call that is received with no advance notice of the subject matter or signing styles involved. This requires many years of experience to acquire the depth of skill necessary, which translates into higher costs for such skills, and higher costs for recruitment.
Personnel/Legal Consultation for Compliance with FCC Regulations	Yes	No	VRS requires working with the FCC, incurring legal costs and expenses.
Contract Negotiations 47 C.F.R. § 64.604(f)(2)	Yes	No	VRS providers are not allowed to seek rate reimbursement directly. Providers must pay up to 30 – 35% for “pass-through” reimbursement.