

KPS CONSULTING

“Building an Access Bridge in Technology and Telecommunications”

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September 2, 2004

By electronic filing:

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

Re: **Ex Parte Presentation**
CG Docket No. 98-67

Dear Ms. Dortch:

The following proposed measurement standard for determining a provider’s answer speed for video relay service calls was submitted by e-mail to Tom Chandler, Chief of the Disabilities Rights Office of the Consumer and Governmental Affairs Bureau, on September 2, 2004:

Answer Speed Measurement

(A) The call is considered delivered when the VRS facility's equipment accepts the call from the public IP network and an IP address is recognized by the VRS facility. The tracking of ASA begins at the time the call is delivered to the VRS facility's network that distributes calls to the next available video interpreter.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

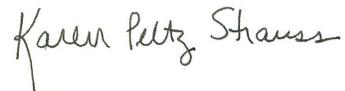
(C) A VRS provider's compliance with this rule shall be measured on a monthly basis, with reporting required in daily one hour increments.

(D) Calls must be answered sequentially in the order in which they were received, and video interpreters or networks cannot select or provide priority service to any particular inbound customer who may be holding or in a queue.

(E) Calls that are voluntarily removed from queue and later returned when hold times have improved must be considered abandoned in measuring answer speed.*

*It appears that there may be a practice of returning calls at a later time during periods when there are long wait times. Counting these calls in the ASA will skew ASA calculations by reducing hold times overall. This practice should not be allowed to mask sequential answer speed calculation and should be taken into consideration when providing a measure by including these as abandoned calls.

Sincerely,

A handwritten signature in cursive script that reads "Karen Peltz Strauss".

Karen Peltz Strauss
Legal Consultant for CSD