

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Telecommunications Relay Services and )  
Speech-to-Speech Services for ) CG Docket No. 03-123  
Individuals with Disabilities )  
 )  
VRS and IP Relay Certification Application )  
 )

**Application of Convo Communications LLC  
for  
Certification as a Video Relay Service Provider**

**October 30, 2009**

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## **I. Introduction**

Convo Communications LLC (“Convo”) submits this application pursuant to 47 C.F.R §64.606, which sets forth the VRS and IP Certification Application requirements. In this application, Convo will demonstrate its present and future compliance with Federal Communications Commission (the “Commission” or the “FCC”) mandatory minimum standards enumerated in §64.601, et. seq., for providing TRS and thus meets the specifications to be certified as a VRS and/or IP Relay provider. Convo seeks approval of its application so that Convo will be eligible for direct reimbursement from the Telecommunications Relay Services (“TRS”) Fund.

The primary mission of Convo is to serve consumers with hearing loss who use sign language alone or in conjunction with their existing speech capabilities and who seek to make typical and normal telephone calls. Inherent in Convo’s service delivery model are concrete processes to ensure that VRS conversation minutes are legitimately generated prior to proper billing to the TRS Fund.

Convo asserts herein that Convo currently is and will remain capable of complying with all the non-waived operational, technical, and functional mandatory minimum standards as published by the FCC for VRS providers. Examples, though not exhaustive, are as follows:

- Convo has set up complaint filing and resolution procedures and maintains records necessary to meet the annual VRS Consumer Complaint reporting obligation.
- Video Communications Assistants (“CAs”) are screened and evaluated to ensure that their receptive and expressive skills meet Convo’s expectations.

- Convo meets the technological performance requirements stipulated in TRS regulations through its partnership with a leading Automatic Call Distribution (“ACD”) provider that enables it to seamlessly connect to callers in a highly efficient manner.
- Emergency calls are being processed in compliance with the Commission’s new ten-digit numbering and E911 requirements.<sup>1</sup>
- Convo intends to form its own ACD to be able to process emergency calls and provide VRS in a manner that enables closer corporate oversight and performance management functions.

In furtherance of the Federal policy of ensuring functional equivalency in telecommunications services, Convo plans to offer technologically innovative VRS features where persons with hearing loss who rely on sign language but wish to use their speech capabilities can take advantage of established Internet programs that have video conference applications, i.e., iChat for Mac users.

Finally, although Convo currently is providing VRS through subcontractors to meet VRS requirements, Convo has undertaken efforts become an independent VRS provider so that Convo will have full control of all aspects of provision of VRS. This is being done so that Convo will be in position to achieve its major corporate values, one of which is ensuring that quality and

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<sup>1</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123, WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591 (June 24, 2008) (*Numbering Order & FNPRM*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123, CC Docket No. 98-67, WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791 (Dec. 19, 2008) (*Second Numbering Order*).

integrity of its services are preserved within federal rules so that the benefits of VRS can continue to materialize.

## **II. Description of Relay Services**

Convo is a Texas limited liability corporation whose business location is at 706 FM 2325, Suite D, Wimberley, Texas 78676. Established in March 2009, Convo is owned in equal partnership by four deaf persons who are well known for their unique skills in the administration of telecommunications relay services, business development, technological applications and research, and public affairs and marketing. Ed Bosson, one of the four partners, who is a Vice President of Regulatory Affairs, is an acknowledged expert on TRS issues and a strong advocate of consumers. He is known as the “Father of VRS” as he first pioneered VRS trials in Texas when he served as Texas Relay Administrator. He has also served on the FCC Interstate TRS Fund Advisory Council for two four-year terms and is well acquainted with TRS Fund issues. The other three partners are Robin Horwitz, Vice President of Business Developments Division; Chad Taylor, Vice President of Technology Division; and Wayne Betts, Vice President of Marketing Division. As a corporate team, Convo is poised to offer unique and high quality relay services for persons with hearing loss who rely exclusively on sign language as well those who prefer using their own expressive speech in conjunction with their receptive sign language needs.

Currently, Convo has established a billing partner arrangement with a certified VRS provider whereby Convo is identified as a subcontractor furnishing video relay call center services. While Convo appreciates the interim arrangement with the certified VRS provider, Convo intends to be a full-fledged VRS provider in its own right and seeks to be so certified by the FCC. Its video platform employs industry-wide video performance standards that preserve

high quality video and voice transmission and connectivity features. Convo offers voice carry over (VCO), and Spanish-to-ASL VRS translation services.

Convo utilizes several call centers located in various cities. One call center is the main call center. Overflow calls and relay calls made at night go to other call centers under subcontract to Convo. With the anticipated growth of its call volume, Convo will expand its services through additional call centers and will form call centers under the full control of Convo.

Convo utilizes both Apple and PC computers at its call stations for the provision of VRS. To serve specific communities of technology users, Convo is developing quite a few features that ultimately will offer specific user platforms unique ways of experiencing VRS.

Through a leasing arrangement with the ACD platform provider, Convo is able to route calls to appropriate stations in a timely manner. Convo has a systematic procedure to track calls for billing where originating and terminating calls are clearly identified for conversation minutes which are billable minutes. The same system tracks answer speed times as well to ensure that relay calls are in compliance with average speed regulation. Report from this tracking procedure also produces data on the length of calls (session and conversation minutes), number of calls, number of calls in queue, and dropped or unanswered calls and their associated minutes.

To ensure that appropriate VRS minutes are processed, Convo employs an in-house Call Integrity Assurance program to identify inappropriate VRS calls. Depending on the situation, call integrity is assured either at the beginning of a call or after a call is completed but prior to billing to the FCC. An example of a program utilized before the calls are processed is one whereby calls from a deaf or hard of hearing person from a foreign country telephone number, which is not allowed by the Federal regulations, are not processed.

Additionally, Convo uses Structured Query Language (SQL) applied to raw data to red-flag any inappropriate users or calls; one example is the capability to query for patterns that reveal abnormal, excessive minutes generated by callers or an employee of Convo. While utilized after the calls are processed, this ensures that Convo will not inadvertently submit any inappropriate call minutes to the Interstate TRS Fund and to take corrective measures with existing technological solutions to prevent such inappropriate calls from happening in the future.

### **A) Common Carrier Requirement**

The Texas Public Utility Commission has approved Convo as an interexchange reseller (See Attachment A), which means that Convo falls within the TRS definition of a “carrier engaged in interstate communication by wire or radio”.<sup>2</sup>

### **B) Operational Standards**

#### **1) VRS Communications Assistants**

Currently, Convo contracts with existing call centers to provide VRS Communication Assistants (CAs). These call centers and Convo work together to ensure FCC regulations are met. Current Convo VRS CAs (hereinafter referred as “video interpreters” or “VIs”) are proficient in receptive and expressive American Sign Language (ASL) skills and have been trained in Deaf Culture and related issues. Additionally, video interpreters are able to interpret either verbatim or translate from signed language to conventional English according to the unique communications needs of deaf or hard of hearing caller. They thus are fully qualified to perform VRS interpreting functions pursuant to FCC rules.

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<sup>2</sup> 47 C. F. R. §64.601 (a) (6)

Video interpreters have been trained to process emergency calls in an appropriate manner that meets federal regulations. This includes training on how to handle a VRS emergency call if a VRS user collapses and covers video interpreter should do and the kind of call-related information the video interpreter can impart to an emergency dispatcher.

Convo VIs are required to stay with a call for a minimum of ten minutes. The training curriculum also consists of procedural guidance in accommodating user's request for VI's gender when a call is initiated and to stay connected until the call is transferred to an appropriate VI.

Convo's video interpreter hiring policy will become a systematic procedure for use prior to hiring video interpreters. Candidates will be interviewed and screened for quality interpreting as well their understanding of deaf culture and their ability to provide voice interpreting in a clear and articulate manner. Adherence to a VRS interpreter code of ethics will be required as an employment condition for Convo VIs. VIs are also trained to know when to refuse further processing of a VRS call when subjected to abuse by a VRS caller.

Convo maintains periodic meetings with each call center's management team to ensure that new federal regulations or issues germane to Convo are conveyed, understood, and, if necessary, acted upon or modified.

## **2) Confidentiality and Conversation Content**

Video interpreters are trained not to disclose contents of any relayed conversation regardless of content, with possible exceptions currently under review. These exceptions, Convo believes, are necessary due to the visual nature of VRS whereby video interpreters can see VRS users and thus may be required to as compliance with existing federal laws the reporting of abuse observed by the VI. Nonetheless, the importance of confidentiality is strongly stressed to video

interpreters. Whenever there may be issues that may require a deviation from normal relay procedures, the call center supervisor is sought for advice, and, if necessary, the matter may escalate to the call center and Convo management team for final decision and appropriate action.

As a way of ensuring the accuracy and efficiency in the provisioning of call content, Convo's platform enables users to convey text-based information with VIs to easily communicate detailed information, such as an account number or social security number, etc. This minimizes misunderstanding and enhances natural relay communication. However, pursuant to FCC rules, no record of call content is preserved in any manner, shape, or form by the VI after the conclusion of the call.

Finally, Convo call centers have strict rules regarding entering its contracted call centers. Security measures are in place to ensure that only authorized persons have entrance privileges to call centers so as to preserve call confidentiality and the safety of VIs.

### **3) Types and Length of Calls**

In accordance with the FCC regulations, Convo handles any type of call normally provided by TRS, that is, normal and typical calls. Calls that may be construed as "manufactured minutes" are either technically blocked or refused further handling through systematic call integrity assurance processes utilized by Convo's video interpreters.

Convo handles any type of calls that have not been waived by the FCC. Convo will not block any calls of any length of time. Convo provides VCO, speed dial functionality, and three-way calling functionality. Other types of calls such as text to voice, VCO to TTY, VCO to VCO, HCO, HCO to HCO, and call release functionality are waived.

VRS in itself is a real-time relay service, thus the relay calls involving an answering machine, voice mail, or interactive menu are responded in a real time just like normal voice calls. Video interpreters are able, all in one call, to retrieve, convey the answering machine message, and then leave VRS user messages, unlike text-based relay calls which require subsequent calls to complete.

#### **4) Provisioning of 10-Digit Numbering and Emergency Call Services**

##### **(a) 10-Digit Local Telephone Number**

Currently Convo assigns to users a unique 10 digit local telephone number obtained from its technical platform provider authorized to issue and record local numbering assignments. As Convo is maturing, it will become engaged in a direct contact with the authorized numbering database service provider in order to directly assign numbers to users and to access the database.

When a subscriber request a 10 digit local telephone number, Convo employs a verification process. When a subscriber registers for a 10 digit local telephone number, the information captured includes an Internet Protocol address or user contact number. This enables a Convo technician to call the subscriber. The technician will engage in subscriber verification to ensure the authorized use of VRS. The Convo technician will be able to provide a 10-digit telephone number at the conclusion of temporary verification. Up to two weeks, further verification will be made via an email of which subscriber will need to “activate” to keep the 10-digit telephone number permanent.

##### **(b) Emergency Call Procedure**

Convo, through its contracted ACD provider, is automatically capable of identifying an emergency caller’s physical location (ALI) by accessing the NeuStar Registered Location

database and is able to route emergency calls to the most appropriate Public Safety Answering Point (PSAP). The ALI procedure makes it possible for the system to pass vital location information pertaining to the emergency caller to the PSAP. Also, the contracted ACD platform can transmit the assigned ten-digit telephone number automatic number identification (ANI) information to the PSAP, thereby enabling call re-connectivity in the event of call disruption. VIs are trained to use the system's capability to re-connect immediately. Convo's system capability to transmit ALI and ANI information makes it possible for an emergency dispatcher properly handle VRS emergency calls. Convo's Emergency Call Procedure is displayed in Convo's website.

### **C) Technical Standards**

#### **1) Speed of Answer**

FCC rules require that 80 percent of all VRS calls be answered within 120 seconds, calculated on a monthly basis and includes abandoned calls. Convo uses historical data to calculate call volumes and to provision for the number of stations needed to ensure that speed of answer requirements are consistently met. The average speed of answer has consistently been less than 30 seconds.

#### **2) Facility Operations**

Convo provides its services 24 hours a day, 7 days a week. Due to the number of call centers being geographically dispersed, Convo's VRS services can be maintained at projected levels if one or two call centers are inoperable due to severe weather events or technical failures.

### **3) Redundancy and Uninterruptible Power**

Convo's technical platform at each call center utilizes an uninterruptible power supply ("UPS") to furnish emergency backup power to maintain its servers and infrastructure system for up to 24 hours after a power failure. Emergency generators are utilized in case of an area-wide catastrophic event. Vital call and traffic data are backed up on a daily basis.

### **4) Choice of Long Distance Calling Carrier**

In view of the waiver of access requirements to interexchange carrier services, Convo does not provide a Carrier of Choice option. Accordingly, pursuant to FCC rules, Convo handles long distance calls at no charge to its users.

## **D) Functional Standards**

### **1) Consumer Complaint Report**

Convo has a sophisticated way to capture all customer correspondence (feedback, compliments and complaints) into a centralized location.

Each consumer communication or correspondence is assigned a unique case number and contains, but is not limited to, the following information:

- Customer's email
- Customer's Video Phone Number
- Convo staff/person assigned to resolve problematic cases
- Correspondence history and details
- Date case opened
- Date case closed/resolved
- Category assigned (i.e., technical bug, complaint, compliment, VI conduct or service, etc)

The system has a way to organize all cases opened by a specific customer, enabling the review of relevant case histories in order to provide an effective customer service experience and problem resolution. Lastly, Convo has a procedure where all complaints, compliments, and any

issues raised by VRS users can be compiled into an annual report as required by the TRS regulation. The data required by the FCC is readily available anytime and the reporting format is customizable by Convo to meet FCC inquiries.

## **2) Public Access to Information**

Convo provides informational services through various technologies and media to enhance public awareness of the availability of Convo services and to convey to the public the availability of and requirements surrounding the provision of VRS. Convo has endeavored to reach all segments of the public. Convo utilizes its website and has an advantageous online presence through social networking programs such as Facebook, Yahoo, Twitter, and internet blogs help promote the availability and benefits of VRS to the general population. Convo intends to do a “Convo Tour” of various cities all over the USA on a periodic basis. Convo has and will continue to participate at a wide variety of deaf and hard of hearing events, conferences, exhibits, etc., to do promote Convo VRS services. People who register with Convo are eligible to receive information regarding VRS through online newsletters and other media.

Due to the unique nature of VRS such that it processes the visual portrayal of language, emotions and voice inflections through auditory and visual means in real time using sign language and voice, the opportunity for effective public outreach regarding VRS to the general hearing public takes on a different direction. Convo believes that effective awareness of VRS will ultimately be realized best through the dissemination of 10-digit telephone numbers by the deaf or hard of hearing person. Because the local number provided by a VRS user to a hearing party connects to VRS automatically when the call is initiated by hearing person, there comes with it a built-in educational opportunity. Furthermore, when deaf or hard of hearing persons

give their 10-digit local telephone number, the hearing person likely gets educated on how VRS works. Convo understands that this will be a slow process and is developing informational marketing projects directed to companies, state agencies, and similar established institutions to help ensure that their deaf or hard of hearing workers have access to VRS by educating management about availability of VRS. Informing agencies and companies of the need for VRS by deaf or hard of hearing employees and customers in itself educates hearing persons who work there about VRS calling processes.

### **3) Contact Person**

All correspondences from the Commission shall be sent to:

Ed Bosson  
Madrone Office  
706 FM 2325  
Wimberley, Texas 78676  
Video Phone and Voice: 512-410-1751  
FAX Number: 510-372-0431  
Email Address: [ed@convorelay.com](mailto:ed@convorelay.com)  
AIM: wimberleyed

### **4) Rates**

Convo does not charge subscribers any rates for VRS and does not plan to.

### **5) Jurisdiction Separation of Costs**

Convo is well acquainted with the cost recovery procedure administered by Interstate TRS Fund Administrator. Convo receives raw data from ACD administrator for tracking and reporting required data as contained in the Commission rules for the accurate submission of appropriate conversation VRS minutes to the Interstate TRS Fund Administrator.

## **6). Declarations**

Convo hereby declares its intentions to further comply with FCC rules, through the following actions:

### **(a) Annual Complaint Report**

Convo intends to file the required annual complaint report as specified by FCC regulation no later than July 1 of each year for the applicable reporting period.

### **(b) Annual Compliance Report**

Convo intends to file the annually-required FCC compliance report.

### **(c) Five Year Reporting for Re-Certification**

Convo intends to file documents showing compliance with FCC VRS regulations 90 days prior to expiration of its VRS certification.

### **(d) Ownership and Management of a Call Center**

Convo is undertaking strategic measures and processes to either purchase an existing call center operations complex or to implement pursuant to specifications an operable call center for the provision of VRS services.

### **(e) Notification of Substantive Changes**

Convo will comply with FCC reporting requirements pertaining to any substantive changes in program, service and features offered by Convo within 60 days after such changes occur and to certify that these changes comply with FCC regulations.

### III. Conclusion

Convo is uniquely qualified to provide innovative video relay service thus it is in the public interest that Convo be granted certification for provision of VRS and be reimbursed directly from Interstate TRS Fund.

With all four co-founders being deaf and having TRS background, Convo understands the deaf culture as well as video interpreter culture. Convo intends to meet all the requirements specified in TRS regulations in order to provide what a true telephone interpreting should be, that is, to provide organic VRS calls that ensure to the greatest extent possible the best functionally equivalent telephone communications experience.

Thus based on the rationales for being eligible for VRS certification pursuant to FCC rules and as conveyed in this application, Convo Communications LLC respectfully requests that the Commission grant to it certification for the provision of VRS.

Respectfully Submitted,

Handwritten signature of Ed Bosson in black ink.

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## Exhibit A

**Barry T. Smitherman**  
Chairman

**Donna L. Nelson**  
Commissioner

**Kenneth W. Anderson, Jr.**  
Commissioner

**W. Lane Lanford**  
Executive Director



**Rick Perry**  
Governor

### *Public Utility Commission of Texas*

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September 18, 2009

Mr. Roy E. Bosson  
Convo Communications LLC  
706 FM 2325  
Suite D  
Wimberly, Texas 78676

Subject: IXC Registration

As of September 10, 2009, Convo Communications LLC is registered as an Interexchange Carrier (IXC) within the State of Texas subject to the applicable rules and regulations of Public Utility Regulatory Act and the PUC Texas Substantive Rules. The IXC Registration Number is IX090029 and the registered name on IXC #IX090029 is "Convo".

Sincerely,

A handwritten signature in blue ink, appearing to read "N.V. Srinivasa".

Nara V. Srinivasa, P.E.  
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