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

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CG Docket No. 10-51
	)	
To: The Commission	)	

Reply Comments by Convo Communications

Convo replies to the Comments submitted on the June 2, 2010 Petition for Clarification or Waiver ("Petition") of FCC Rule 64.613(a) to allow the Petitioner, Purple Communications, LLC, to implement a Point to Point ("P2P") call forwarding service for VRS users.

Convo is a non-certified video relay service (VRS) provider that was registered on September 18, 2009 as an Interexchange Carrier within the State of Texas. Convo has a pending application, filed on October 30, 2009, with the Federal Communications Commission ("FCC") to be certified as a VRS provider. As an applicant for certification, Convo has a vested interest in ensuring its views on matters affecting the provision of VRS services to its customers are made known to the FCC.

I. Call Forwarding Feature Overview

Convo believes that there are several viable and workable solutions to implement a call forwarding feature for VRS users. Convo is proposing a more reliable, less disruptive, and more centralized call forwarding service implementation that can be done at the iTRS level.

First, Convo supports such a call forwarding service only if such service is implemented in a neutral manner that preserves the performance integrity the iTRS database structure currently contains. Convo emphatically believes that a non-proprietary solution is necessary in order to preserve the access benefits currently experienced by VRS consumers.

Second, Convo expects the Video Relay Service to expand in the future as deaf and hard of hearing consumers have expanded opportunities to access broadband services on the Internet, as currently being envisioned under the National Broadband Plan. We believe that by instituting a centralized system to keep all solutions and information, which are necessary to preserve functional equivalency, there is a greater ability for the service itself to grow and truly benefit consumers.

If the Commission chooses a call forwarding implementation solution that allows for varying technical standards among providers, Convo believes this will only lead to even more potentially counter-productive discussions and disagreements between VRS providers, with consequences that are potentially harmful to consumers and which will certainly stunt the growth potential of the Video Relay Service.

Using video connectivity technical standards as a good example, all providers were allowed in the beginning of the Video Relay Service era to determine their own video protocols without interoperability issues in mind. At that time, not many providers thought point to point calls would be a huge part of VRS. Subsequently, when video connectivity standards were established, this resulted in millions of dollars being spent on R&D efforts to ensure device interoperability.

When industry providers are allowed free rein in creating feature protocols without the appropriate regulatory auspices to facilitate the industry's constructive and well thought-out input, it makes it very difficult for actual costs to be predictably forecasted by the industry. Instead, industry providers must later react to uniformity requirements mandated by a regulatory agency, which ultimately negatively impacts the deaf and hard of hearing consumer. Furthermore, it makes it difficult to maintain the reimbursement rate at a reasonable, predictable level. Solutions need to be agreed upon by providers and recommended to the FCC as a group to minimize costs and to avoid compromising the quality of services.

Accordingly, instead of granting approval to Purple's Petition, Convo respectfully requests that the Commission issue a Notice of Proposed Rule Making with Commission comments that encourage all VRS providers to work together on a unified and centralized call forwarding solution.

In the meantime, Convo believes its solution is one possible, non-proprietary solution that can be made available to all providers. By working with Neustar directly to add a new column to the iTRS database fields for the purpose of implementing call forwarding between providers and their products and service platforms, the FCC will have ensured that call forwarding remains a neutral, proprietary free solution and further the goal that the iTRS Database be a centralized and neutral "user bridge" unhindered by a future inability to expand or adapt.

II. Neustar and the iTRS Solution

In the spirit of moving forward towards such a solution, Convo is detailing herein a possible alternative to Purple's iTRS configuration proposal:

As an example of the current iTRS structure, the table below is a snapshot of the iTRS database showing three columns:

Vendor	Phone Number	Destination
ACMEVRS	800-555-1001	12.34.56.78
ACMEVRS	800-555-1002	24.56.78.90
ACMEVRS	800-555-1003	aim:johndoe
ACMEVRS	800-555-1004	98.76.54.32
ABCVRS	800-111-1111	11.22.33.44
ABCVRS	800-222-2222	55.66.77.88
ABCVRS	800-333-3333	99.100.101.102

Column #1: Vendor
This is the name of the certified VRS provider.

Column #2: Phone Number
This is the phone number that is assigned by the certified VRS provider.

Column #3: Destination

This is the IP-addressable connection location behind the assigned phone number. Today it currently accepts six entities: IP Address, AIM, Yahoo, MSN, XMPP and Private.

A. Convo's Proposed Call Forwarding Solution

Convo asserts that the call forwarding feature can be implemented on the iTRS level. The only functional iTRS configuration change needed is to create a seventh entity into the destination field, namely the phone number of the end point the call is to be forwarded to.

Vendor	Phone Number	Destination
ACMEVRS	800-555-1001	800-111-1111
ACMEVRS	800-555-1002	800-222-2222
ACMEVRS	800-555-1003	800-333-3333
ACMEVRS	800-555-1004	98.76.54.32
ABCVRS	800-111-1111	11.22.33.44
ABCVRS	800-222-2222	55.66.77.88
ABCVRS	800-333-3333	99.100.101.102

In order to find the original location of the forwarded number, a recursive "look-up" step would be required that identifies the "entity" of the forwarded number. The sequence of events portrayed below is an example of what would happen when the customer dials the called party's phone number into a videophone device:

1) Caller dials "800-555-1001"
2) Caller's Videophone checks the dialed phone number against the iTRS database to receive the destination data.

3) iTRS database responds with "800-111-1111" as the destination data.

4) The videophone must check against the iTRS database again to do a recursive look-up for 800-111-1111.
5) iTRS database responds with “11.22.33.44” as the destination data.
6) The videophone receiving the IP address then processes the call forward to the destined endpoint.

B. Call Forwarding Business Rules

There should be some business rules to determine the validity of phone numbers inserted into the destination field:

1) The destination field must show a phone number that is already registered to the caller by a provider and represented in the phone number column.

   The reason why a number such as “855-123-4444”, which is not shown, would be invalid is because it is not listed in the iTRS database table as shown above and thus has no “entity” location/destination. Any destination number would need to be registered in the iTRS database for this call forwarding function to work.

Vendor	Phone Number	Destination	
ACMEVRS	800-555-1001	800-555-1002	**VALID**
ABCVRS	800-555-1002	855-123-4444	**INVALID**

2) The destination field should not have data duplicating the phone number field.

Vendor	Phone Number	Destination	
ACMEVRS	800-555-1001	800-555-1002	**VALID**
ABCVRS	800-555-1002	800-555-1002	**INVALID**

3) The forwarded phone number can’t loop back to itself.

Vendor	Phone Number	Destination	
ACMEVRS	800-555-1001	800-555-1002	**VALID**
ABCVRS	800-555-1002	800-555-1001	**INVALID**

On other hand, Convo has received feedback from government entities, deaf schools, non-profit organizations and private business regarding the firewall issue. Convo is also aware of a certified provider offering a Server based routing solution and supports SnapVRS’ position. Convo believes this solution is an excellent one specifically for organizations or businesses with large amount of deaf employees - not just one consumer.

The server based routing system is generally preferred by all IT Administrators and places the burden of implementing a friendly system for organizations on the providers.

Convo desires to clarify its position regarding Purple's petition. If the solution is proposed for each single consumer, it believes a more centralized solution needs to be implemented. Convo believe all interested parties should have an opportunity to review Purple's technical proposal with details before offering any further comments on their proposal. Currently Convo does not take the position of commenting on Purple's technical proposal because there's not **a** great amount of technical detail available to Convo on which to opine.

However a server based routing system should be offered for organizations with large amount of deaf employees.

III. Conclusion

The above-suggested approach is a conceptual framework for the implementation of the Call Forwarding feature, which can be appropriately implemented at the iTRS level. This will also require all providers to enhance their device functionality in order to implement call forwarding, which can be implemented cost-effectively through firmware upgrades that can be easily downloaded.

Convo continues to believe this solution is more effective and less costly compared to what Purple is proposing. In addition, it ensures continued user connectivity to other devices they own so that users have a safe and reliable means of receiving calls if their default provider should experience catastrophic server failure.

At the same time, Convo believes issuing a NPRM with 30 day comment window is an option that is reasonable and fair. This will allow the providers to work together and submit a proposal that is neutral, efficient and fair to all parties involved. Any other proposals from providers should include great detail of technical information, allowing providers an option to agree on one proposal and for FCC and Neustar to agree on as well.

Respectfully Submitted,

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