



**CSDVRS, LLC**  
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December 13, 2010

***VIA ELECTRONIC FILING***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

**RE: Notice of Ex Parte: CG Docket 10-51**

Dear Ms. Dortch:

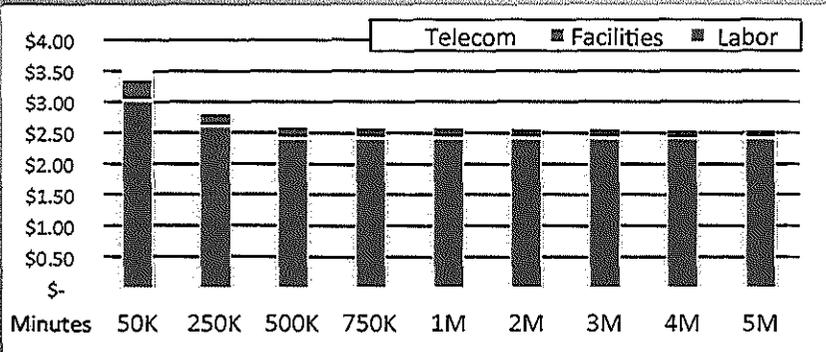
On December 10, 2010, Sean Belanger, CEO, Stacy Wagner, CFO, John Harris, CTO and William Cobb, VP, Marketing, all of CSDVRS, LLC. ("ZVRS") met with Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis, and Nicholas Alexander of the Wireline Competition Bureau. During the meeting, CSDVRS provided the FCC attendees with the attached diagram, which summarizes the discussions about many of the key costs associated with providing VRS services at various minute volumes. CSDVRS further discussed the economies scale achieved by VRS providers as minute volume increases and the critical role of innovation of new video phones, services and VI center staffing methodologies play in achieving significant economies of scale. Additionally, CSDVRS discussed with the Commission members the importance of competition among VRS providers, providing consumer choice, in ensuring that deaf and hard-of-hearing Americans have high-quality, reliable VRS services, and that those services continue to evolve to in the same rapid manner as mobile communications is today. Finally, the need for detailed technology standards to ensure realistic interoperability for videophones was discussed with the Commission attendees.

This letter is being filed for inclusion in the public record of the Commission's docket CG 10-51.

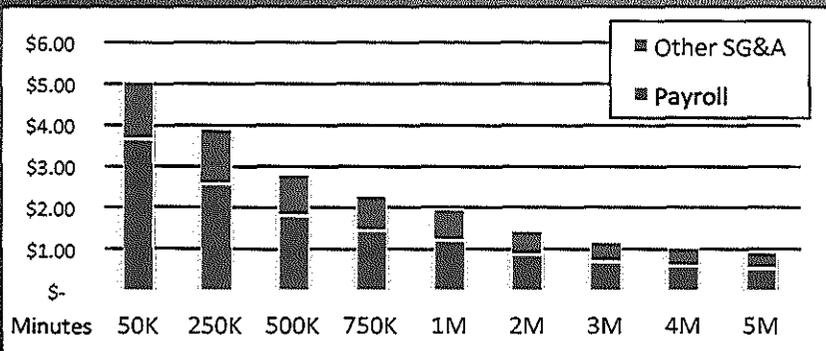
Sincerely Yours,

William Banks  
General Counsel  
CSDVRS, LLC

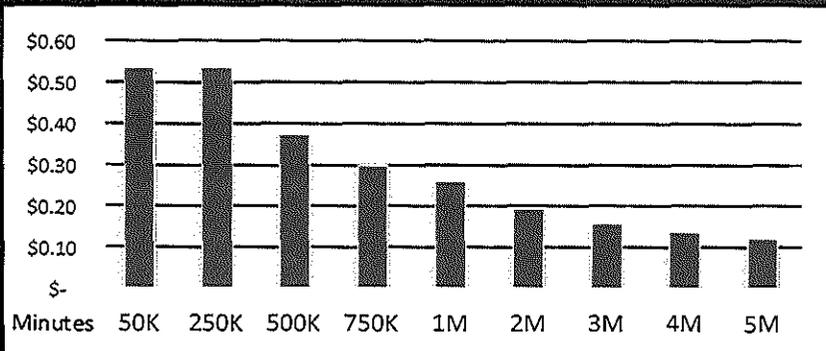
VI Cost per Minute at Various Volumes



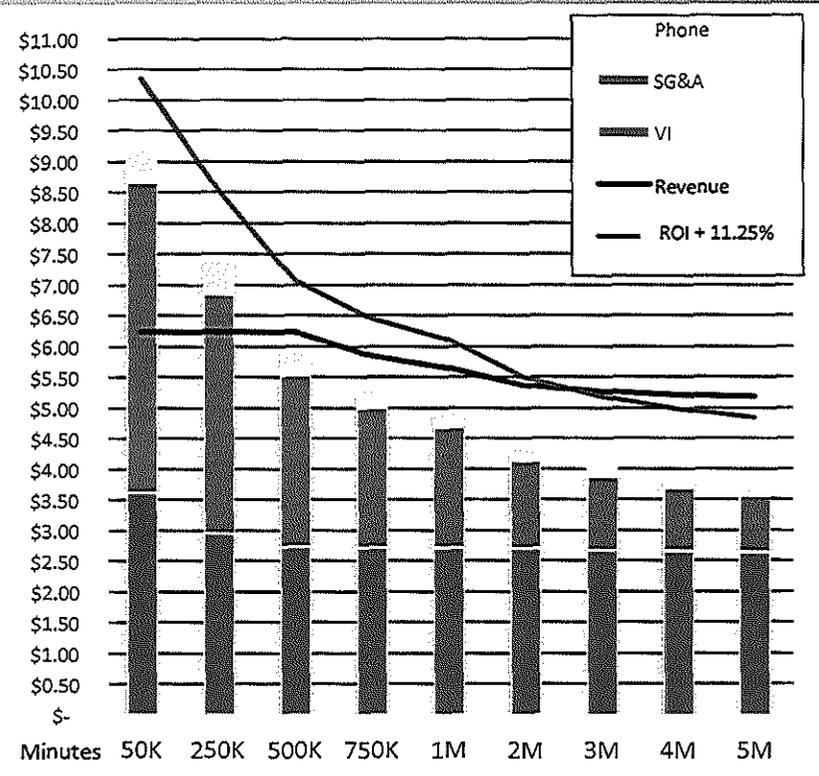
SG&A Cost per Minute at Various Volumes



Phone Cost per Minute at Various Volumes



Monthly Revenue & Costs per Minute at Various Volumes



SG&A Costs at Various Minute Volumes

