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March 3, 2011

**VIA ELECTRONIC MAIL
and ECFS**

Joel Gurin
Chief - Consumer Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Pending VRS Order

Dear Mr. Gurin,

CSDVRS is submitting this correspondence to your attention as the final ruling and order associated with the Notice of Proposed Rulemaking released May 27, 2010 is likely imminent. CSDVRS understands that the Commission wants to effectuate this order in the best interests of the consumers and following the intent and spirit of the law.

In light of the pending order, CSDVRS would like to emphasize the following points and submits that if these matters are thoroughly addressed in the next order, that the Commission will have met its goal of protecting consumer interests, as well as adhering to its mandate of protecting the integrity of the Interstate TRS Fund:

1. Automation of a call in creation of call detail records (“CDR”). Providers should be mandate to completely automate the process of creating CDRs for all of their VRS calls whether they are inbound deaf, inbound hearing, outbound deaf, or outbound hearing. In no call type should any manual intervention for call tracking, call start or stop, or logging of the call be permitted. The process used to create the CDR should be subject to periodic or annual audits by the FCC.
2. CDRs from certified providers. The CDR must be created by a certified provider. Historically, “white labels” in the VRS industry have used non-certified VRS providers to

create the CDR and parties that are certified to bill the fund. The critical piece of VRS is the platform that both distributes the calls with a sophisticated automatic call distribution (“ACD”) system and an automated platform for the creation of the CDR. It is critical that the CDR is produced by a system owned and operated by a certified provider.

3. Call Centers. CSDVRS has provided and presented information to the Commission concerning how call centers should be set up and monitored. These recommended items would eliminate concerns surrounding those who utilize interpreters in a virtual manner. The CSDVRS recommendations, in conjunction with existing general call center limitations, would more than adequately address any Commission concerns regarding virtual centers. CSDVRS reiterates that it would be a disservice to the community and the interpreting field to eliminate legitimate virtual call centers that meet and exceed the FCC standards. Additional benefits of the program include increased safety, lower costs, disaster recovery, eco-friendly “green” work environment, and interpreter availability in the local community. CSDVRS submits that there should be a 10% cap on the total number of virtual interpreters by provider, and is supporting of a separate certification process for virtual interpreting with an interim period where we can operate while we seek this certification.
4. Additional fraud prevention. CSDVRS has emphasized the need for statistical analysis, and undertook considerable analyses of its own to come up with this proposal. CSDVRS has submitted in presentations and ex-parte a simple concept to help detect and eliminate fraud that could occur through the fraudulent extension of calls. Essentially, providers would be compensated on a per minute basis, as they are today, or an average call length of 4.3 minutes multiplied by the number of calls multiplied by the per minute rate. This could be done on a monthly basis.

For Example:

If a provider had 500,000 minutes with an average call length of 4.2 minutes processing 119,048 calls, the provider would be compensated exactly as they are today.

If a provider had 500,000 minutes with an average call length of 4.7 minutes processing 106,382 calls the provider would be compensated for 106,382 calls at 4.3 minutes per call and therefore only be compensated for 457,442 minutes.

CSDVRS submits that this methodology should only apply to VRS providers with billable minutes of over 50,000 minutes per month as a logical statistical sample or through an annual adjustment based on a full year of average minutes per call for smaller providers.

CSDVRS understands and appreciates the work and dedication the Commission has put forth in reviewing and considering the plethora of information and petitions before it. To this end, CSDVRS believes that giving due consideration to that above-referenced points will further enhance the stated goals of the Commission and provide for a better industry moving forward.

Sincerely Yours,

/s/

Sean E Belanger

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