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March 25, 2011

Via Electronic Filing

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

RE: Ex Parte Notice: CG Docket No. 10-51

Dear Ms. Dortch:

On March 22, 2011, the undersigned of CSDVRS, LLC (“CSDVRS”) met with Jennifer Tatel, Legal Advisor to Commissioner Baker regarding the Commission’s pending VRS Report and Order. CSDVRS commended the Commission’s readiness to institute additional operational safeguards and requirements to protect the integrity of the TRS Fund while fulfilling the ADA’s mandates regarding accessible telecommunications. CSDVRS expressed the following views:

- Prohibiting fully secure and compliant virtual call centers would adversely impact the availability of in-person interpreting by making it difficult for interpreters to remain in their local communities and serve consumers, uniquely deny interpreters the ability to telework, and does not serve as a measure to reduce or prevent fraud since the technology CSDVRS uses for its virtual interpreters is identical to that used in its call centers, the security requirements for its virtual interpreters are equivalent or greater, and that to date all reported instances of fraud have taken place exclusively in call centers;
- To ensure their integrity, Call Detail Records (CDRs) should be fully automated in their generation with no manual insertion on or manipulation of the CDRs permitted;
- U.S. residents temporarily traveling outside the country should be allowed to access telecommunications through the use of U.S. VRS. There is clear and ample legal precedent that the civil rights of U.S. citizens does not cease at our borders; and
- With respect to the issue of callers who become non-apparent to the interpreter for a certain length after the call has commenced, the Commission should adopt an approach

which enables a deaf or hard of hearing person to maintain ownership and self-direction of their call - such as advising the interpreter that he or she will be not visible or non-attentive for a period of time while the called party is still connected or indicating his or her presence through technology (tapping keys) or audio (VCO users) – rather than misplacing control of the call by requiring the interpreter to unilaterally terminate the call if the deaf and hard of hearing caller is not visible or inattentive. Furthermore, it would not be functionally equivalent to impose that type of limitation on deaf and hard of hearing consumers but not require the same of hearing telephone users, whether they are using relay or not.

Sincerely,

/s/

Jeff Rosen
General Counsel