



CSDVRS, LLC
600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755
VideoPhone: 727-431-9692 Voice: 727-254-5600 Fax: 727-443-1537

March 29, 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:

The undersigned of CSDVRS, LLC (“CSDVRS”) met on March 28, 2011 with Margaret McCarthy, Policy Advisor to Commissioner Copps, Angela Kronenberg, Legal Advisor to Commissioner Clyburn, Gregory Hlibok, Chief, and Diane Mason, Attorney Advisor, Disability Rights Office and on March 29, 2011 with Christine Kurth, Wireline Counsel to Commissioner McDowell 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 and uniquely deny interpreters the ability to telework. CSDVRS’ technology in its virtual call centers is identical to that used in its traditional call centers and its privacy and security requirements for its virtual call centers are equivalent or greater. Each CSDVRS virtual video interpreter receives specific training in processing 911 calls, are tested and proven to be able to handle emergency calls, and CSDVRS’ technology allows for the virtual interpreter to get immediate remote assistance without delay. CSDVRS pointed out that many traditional call centers are very thinly staffed on overnight or weekend shifts (sometimes with only one video interpreter present), thus training, technology and remote assistance are the keys to consistently

reliable emergency call handling, not reliance on their processing by traditional call centers. A blanket prohibition against virtual call centers should not be viewed as a measure to prevent or reduce fraud since, to the best of our knowledge, the reported incidents of VRS fraud including the indictments took place through traditional call centers.

CSDVRS has proposed that the Commission consider adopting the following requirements to ensure that TRS privacy and confidentiality requirements are fully met at virtual call centers:

1. The virtual call centers must be a supplement to a provider's existing traditional call centers and may not be used in their stead.
 2. Video interpreters involved in at-home interpreting, in addition to meeting standard certification requirements, must have a minimum of three years interpreting work experience and be bound by the provider's code of ethics.
 3. The at-home location must be secure (locked and isolated from outside noises and distractions), and in a separate room within the home. Additionally, the location must exactly mimic the environment of the provider's traditional call centers (i.e. color and lighting must be identical).
 4. The provider must be able to remotely monitor calls for anomalous calls inclusive of a blind inclusion into a call for direct monitoring of call.
 5. The at-home interpreting call routing must be in a "round robin" pattern to ensure calls are not directed to a specific CA/at-home location
 6. At-home calls must be fully transferrable in a seamless manner equivalent to a transfer in a multi-person call center;
- 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 by registering with their default provider the dates and locations of their temporary travel. There is clear and ample legal precedent that the civil rights of U.S. citizens does not cease at our borders. With respect to emergency call handling, there are challenges in a highly mobile environment regardless of whether someone is in the country or traveling abroad. Providers should already have in place a process and trained interpreters fully capable of handling emergency calls from people away from their registered locations or dialing around to them and the ANI/ALI does not automatically appear; 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. Requiring interpreters to terminate relay consumers engaged in a call but legitimately temporarily away or inattentive for a period of time could potentially provoke misunderstandings among consumers about the role of interpreters in handling their call, cause adverse or hostile reactions by the consumer towards the interpreters, and unnecessarily place interpreters in conflict situations where there are solutions independent of the interpreters. Furthermore, it would not be functionally equivalent to impose that type of limitation on deaf and hard of hearing consumers but not require the interpreter to provide the same treatment for non-apparent or inattentive hearing individuals on the call.

Sincerely,

/s/

Jeff Rosen
General Counsel