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March 31, 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 and Sean Belanger, CEO, of CSDVRS, LLC (“CSDVRS”) met on March 30, 2011 with Diane Griffin Holland, Assistant General Counsel, Raelynn Remy, Attorney Advisor, Office of General Counsel, and Gregory Hlibok, Chief, Disability Rights Office. The undersigned met on March 31, 2011 with Sherrese Smith, Legal Advisor to Chairman Genachowski and Marilyn Sonn, Assistant General Counsel. CSDVRS commended the Commission’s readiness to institute through its pending VRS Report and Order 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. Virtual call centers are a critical means for smaller, non-dominant providers like CSDVRS to adequately cover its customers’ interpreting needs and manage its interpreting services in synchronization with customer demand in a fiscally prudent manner. 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.

CSDVRS has proposed that the Commission consider adopting the following requirements as fraud prevention measures and 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 virtual call center 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 virtual call center 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 provide immediate remote support, remotely monitor calls and remotely have a 360 degree view of the virtual call center;
 5. The call routing must be in a "round robin" pattern to ensure calls are not directed to a specific interpreter at a virtual call center; and
 6. Calls handled at virtual call centers must be fully transferrable in a seamless manner equivalent to call transfers handled at a traditional call center.
- 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.

- Participants on a relay call should be permitted to legitimately not be visible, audible or attentive for a temporary period of time without being disconnected from the call.

In our March 30th meeting, we also discussed the importance of interoperability for products exclusively offered by VRS providers and reiterated our support and the general consensus for continuing a tiered rate compensation structure.

Sincerely,

/s/

Jeff Rosen
General Counsel