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Via Electronic Comment Filing System

April 6, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, NW
Washington, D.C. 20554

RE: Response to Sorenson Communications, Inc., Notice of Ex Parte: CG Docket No. 10-51

Dear Ms. Dortch:

Healinc Telecom, LLC (“Healinc”) urges the Commission to maintain its current practice of allowing relay providers to deploy remote or “virtual” call centers, including in-home centers, and disregard Sorenson Communications, Inc.’s (“Sorenson”) impassioned and self-serving pleas for their elimination.¹ Sorenson’s position remains unsupported in fact. Sorenson ignores the proven benefits of remote interpreter locations. Its opposition is calculated to protect its own overwhelmingly dominant incumbent provider interests – certainly not the first time witness its past VP100 interoperability impediments - over those of competitors who have contributed to a reduction in relay service costs and increased the pool of professional interpreters through successful deployment of virtual in-home call centers. Decentralized corporate offices and home offices have become the norm in business and should be considered no less effective – or risky - in the provision of VRS than corporate call centers which are not immune to other forms of risk.

Clearly, the issue of interpreters working from home has been an issue of Commission concern.² This concern has focused on two salient issues: 1) safeguarding the confidentiality of calls; and 2) meeting the mandatory minimum standards applicable to the provision of relay services; the ability to process emergency calls in particular.³ Yet these valid concerns do not invalidate the effectiveness of in-home virtual call centers, as CSDVRS and PAH! VRS, among others, have established in this proceeding, and Healinc and others have *proven*. Nor do they add credence to

¹ Sorenson Communications, Inc.’s (“Sorenson”) *Response to CSDVRS Notice of Ex Parte*, CG Docket 10-51 (March 4, 2011).

² See, *Structure and Practices of the Video Relay Service Program*, Declaratory Ruling, Order and Notice of Proposed Rulemaking, 25 FCC Rcd 6012 (2010) (“*NPRM*”).

³ *NPRM* at 19.

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Sorenson's unsubstantiated *opinion* that "'at-home' call centers endanger consumer privacy, reliable access to emergency services, and TRS Fund integrity" and should be banned.

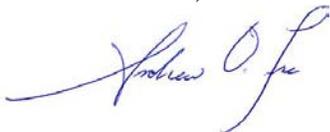
Virtual call centers have indeed enhanced call center capabilities and flexibility, while also enabling interpreters who might not otherwise be able to move to a call center location or work outside the home to still serve as professional interpreters. Virtual call centers contribute to geographic service diversity, offer the added security and privacy of a home-based office, enable interpreters to provide service on short notice during demand spikes, and mitigate interruptions from other call center staff, among other benefits. Today's IP-based technology and platforms readily support transparent, seamless operation regardless of work location, further reducing commuting costs to interpreters, and moreover, reducing "brick and mortar" overhead costs of fixed facilities for providers that ultimately translate into reduced federal Telecommunications Relay Service Fund costs. These benefits have already been proven and are not the simple conjecture and speculation that Sorenson's repeated comments represent in an effort to foreclose virtual call centers to the Deaf Community. Working from a commercial structure is no guarantee that the risks Sorenson accords solely to in-home work locations may not also be present in commercial call centers if not properly deployed and managed.

Healinc readily supports strict, explicit guidelines for the deployment of any virtual call center such as the "secure virtual call centers" ("SVCC") CSDVRS proposes, that ensure call confidentiality, physical security, compliant emergency call processing, and compliance with Mandatory Minimum Standards, subject to direct and continual monitoring and oversight.

Virtual call centers should remain a viable option for serving the Public to the extent that their use is subject to the same obligations, standards, capabilities, and procedures to which any call center must meet, as has been well documented in this proceeding. Sorenson's out of hand dismissal of virtual at-home call centers under any circumstances as too risky remains pure self-serving conjecture, and should be disregarded.

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to
Healinc Telecom, LLC

cc: Mr. Gregory Hlibok (via electronic delivery)
Ms. Diane Mason (via electronic delivery)