



May 17<sup>th</sup>, 2011

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Notice of Ex Parte Meeting  
Structure and practices of the Video Relay Service Program  
CG Docket No. 10-51**

Dear Ms. Dortch:

On May 11<sup>th</sup> Angela M. Roth, President/CEO of ASL Holdings/GraciasVRS; Gabrielle Joseph, Vice President of ASL Holdings/GraciasVRS met with Diane Griffin Holland, General Counsel Office; Sharon Diskin, General Counsel Office; Diane Mason (“DRO”), Raelyn Remy, Laurence Schecker, Administrative Law; Gregory Hlibock, Chief, Disability Rights Office (“DRO”); Belford Lawson (“OCBO”).

The purpose of the meeting was to discuss the impact of the current and proposed rulings from the Report and Order and Further Proposed Rulemaking released April 6<sup>th</sup>, 2011 on small businesses, specifically those servicing the Spanish VRS market.

Angela M. Roth expressed that the need to eliminate fraud within the industry is understood and warranted, however, additionally expressed concern that the 3<sup>rd</sup> party agreement allows mega sized VRS companies to continue doing business yet impedes smaller businesses from entering the market particularly when there are legitimate small businesses that service a much needed public interest , such as within the Spanish market.

Due to the fact that the new rulings could potentially restrict small businesses from entering into the market, discussion ensued from the various parties on what recourse a company would have to take in order to request the Commission to re-address specific areas of the current ruling and give more attention to small businesses in the proposed rulings.

Comments from Mrs. Roth also included the concern in regards to the 3 month timeframe given to come into compliance with an approved action plan, specific to development and ownership of an independently run platform to provide VRS services.

Mrs. Roth expressed additional concern that there is little to no evidence that the needs and issues within the Hispanic VRS market had been brought to the forefront or taken into consideration with the recent rulings or companies who have put forth public comments. Consequently, the concern that the recent and proposed rulings could eliminate small businesses servicing the Hispanic communities and subsequently have a detrimental effect by eliminating a “voice” for such communities and their needs was emphasized.

The meeting concluded with the parties expressing the need to take the formal steps through the processes outlined within the Commission to further bring these concerns to light.

Sincerely,  
Gabrielle Joseph