



CSDVRS, LLC
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February 8, 2012

Via Electronic Filing

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

RE: Ex Parte Notice: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

Sean Belanger, William Cobb and the undersigned of CSDVRS, LLC (“ZVRS”) met on February 7, 2012 with Sherrese Smith, Chief Counsel and Legal Advisor, and Jessica Almond, Special Counsel, to Chairman Genachowski, Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell, Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis, Nicholas Alexander, Associate Bureau Chief, Wireline Competition Bureau, Karen Peltz Strauss, Deputy Chief, and Robert Aldrich, Legal Advisor, Consumer and Governmental Affairs Bureau, Gregory Hlibok, Chief, and Diane Mason, Attorney Advisor, Disability Rights Office regarding the Commission’s pending VRS Further Notice of Proposed Rulemaking. The discussion covered the points in the attached document distributed to the meeting participants.

Sincerely,

/s/

Jeff Rosen
General Counsel

Attachment

cc: Sherrese Smith

Jessica Almond
Angela Kronenberg
Christine Kurth
Paul de Sa
Nicholas Alexander
Karen Peltz Strauss
Robert Aldrich
Gregory Hlibok
Diane Mason

NPRM

1. CSDVRS believes the pay by customer model will create more fraud and result in discriminatory practices against deaf who need more VRS.
2. CSDVRS supports the collection of data, the broadband plan, and the creation of standards. We believe those 3 things must be in place prior to a change to pay by customer. Once the data is collected the FCC will be in a better position to understand usage by customer in determining rate. The broadband plan and standards will help providers reach scale.
3. CSDVRS supports the transition to off the shelf equipment meeting the Sip standard.
4. We also support the continuation of tiered rates. We believe at scale VRS providers can support lower rates but these new initiatives must be in place and fully executed prior to change. In addition, the tiered rate has promoted innovation and real competition.
5. CSDVRS supports a separate compensation to providers similar to LEC/Long Distance compensation.
6. CSDVRS is supportive of a commitment period and new default selection period.
7. CSDVRS wants to see a profit built into the equation for rate setting. What is the incentive for a provider?