



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

February 15, 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 and the undersigned of CSDVRS, LLC (“ZVRS”) participated in a roundtable discussion on the VRS FNRM with Commission staff, stakeholder groups and VRS providers on February 13, 2012. ZVRS expressed concern about the impact of the per user proposal on the access and quality of VRS for consumers. ZVRS expressed the need for the collection of consumer data, the implementation of a broadband plan, and the creation of VRS technology standards prior to any consideration of a change of compensation methodology. Once the data is collected the Commission will be in a better position to understand usage by customer in determining a rate which sustains progress towards functional equivalency in telecommunications and promoting innovation and consumer choice through vigorous competition. The adoption of a broadband plan and standards will help VRS providers reach scale.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Paul de Sa  
Nicholas Alexander

Karen Peltz Strauss  
Robert Aldrich  
Gregory Hlibok  
Henning Schulzrinne  
Richard Hovey