

# ASL SERVICES HOLDINGS, LLC.

3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

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Via Electronic Comment Filing System

February 23, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: *Structure and Practices of the Video Relay Service Program* CG Docket No. 10-51, Notice of Ex Parte Presentation

Dear Mrs. Dortch,

On February 13, 2012, Angela Roth, President & CEO of ASL Services Holdings, LLC (brand name "GraciasVRS") and Gabrielle Joseph, Vice President Operations of ASL Services Holdings, LLC, met with Gregory Hlibok, Karen Peltz Strauss, Robert Aldrich, Eliot Greenwald, Susan McLean, Paul de Sa, Nicholas Alexander, Henning Schulzrinne, Richard Hovey, Andrew Multz, Heather Hendrickson, Diane Griffin Holland, Sharon Diskin, Diane Mason, Sean Lev, Sharon Lee, and Richard Hindman of the Commission, members of the industry, and consumer groups, at the invitation of the Commission, to address issues associated with the Commission's pending *Further Notice of Proposed Rulemaking* in the above-referenced matter. Mrs. Roth commented on issues that impact services to Spanish Deaf and Hard of Hearing communities, though stressed that GraciasVRS' comments should not be deemed as solely representing the Hispanic communities' relay service issues. Mrs. Roth stated that Gracias VRS intended to comment on behalf of all video relay service ("VRS") callers in both English and Spanish communities, as the issues raised by the Commission affect all communities.

Mrs. Roth specifically commented on the following topics:

Regarding Broadband access, ASL Services Holdings LLC expressed its support and echoed comments by Commission, TDI, and Video Relay Services Consumer Association that broadband needs to be made available to individuals who already know about VRS but cannot afford it, and to individuals who do not have broadband services available and have no concept of what value VRS may provide. Ms. Roth stated that GraciasVRS had made attempts to secure services at a lower cost, for example in Puerto Rico, with limited success. In order address high-cost broadband access for subscribers, GraciasVRS followed an older teletype community access as a model that had been used within Deaf and Hard of Hearing community entailing the provision of public access relay sites, while absorbing Internet costs to make it possible for individuals who could not afford internet to make calls. Mrs. Roth noted that even when there were prices within a range for more Deaf individuals to afford, the quality of lower cost service did not permit sufficient bandwidth [speed] to support clear video .

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picture connections. Mrs. Roth urged the Commission to establish affordable internet rates that would support quality video relay service.

On the matter of the Commission's proposed conversion to compensation by person, Mrs. Roth stressed that provider interoperability and other more immediate issues had to be addressed first before a conversion could be undertaken. She noted that a per person compensation approach was virtually as susceptible to fraud and abuse as is the current compensation methodology.

Mrs. Roth also addressed the issue of Commission-established technical standards. Mrs. Roth commented on the dominant carrier's virtual control of the market and ability to maintain subscribers through its equipment and in some instances limited interoperability with other providers. Mrs. Roth stated that because of certain equipment features available exclusively through the dominant provider's proprietary equipment, Deaf callers are reluctant to change providers for fear of losing those features if attempting to change to a different service provider of choice. Ms. Roth questioned how the industry had been allowed to evolve to a point where interoperability might no longer be possible if equipment using "special features" precluded it.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). ASL Services Holdings, LLC regrets the late filing of this notice, precipitated by an emergency medical situation. Questions may be directed to the undersigned.

Sincerely,



Angela Roth  
President /CEO

Cc: Gregory Hlibok, Karen Peltz Strauss, Robert Aldrich, Elliot Greenwald, Susan McLean, Paul de Sa, Nicholas Alexander, Henning Schulzrinne, Richard Hovey, Andrew Multz, Heather Hendrickson, Diane Griffin Holland, Sharon Diskin, Diane Mason, Sean Lev, Sharon Lee, and Richard Hindman (via electronic delivery)