



CSDVRS, LLC
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February 28, 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”) met on February 27, 2012 with Sean Lev, Deputy General Counsel and Special Advisor to the Chairman, Karen Peltz Strauss, Deputy Chief, and Robert Aldrich, Legal Advisor, Consumer and Governmental Affairs Bureau, and Gregory Hlibok, Chief, Disability Rights Office regarding the Commission’s pending VRS Further Notice of Proposed Rulemaking (“FNPRM”). ZVRS discussed a hybrid approach which would compensate providers per user for providing customers access to VRS and per minute for the interpretation of VRS calls. ZVRS will continue to work on the details of the hybrid proposal as part of its FNPRM comments to be filed next week. ZVRS looks to contributing specific ideas to the dialogue about VRS reform and urged the Commission to utilize a consensus driven process to accomplish solutions which fulfill stakeholder objectives for the VRS program.

Sincerely,

/s/

Jeff Rosen
General Counsel

cc: Sean Lev
Karen Peltz Strauss

Robert Aldrich
Gregory Hlibok

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?