

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Structure and Practices)	CG Docket No. 10-51
of the Video Relay Service)	
Program)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for)	
Individuals with Hearing and Speech Disabilities)	
)	
E911 Requirements for IP-Enabled Service)	WC Docket No. 05-196
Providers)	
_____)	

REPORT ON WAIVERS BY CSDVRS, LLC

I. Introduction

On June 30, 2011, the Federal Communications Commission (FCC or Commission) released an Order extending until July 1, 2012 various telecommunications relay service (TRS) waivers for video relay service (VRS) and Internet Protocol (IP) relay providers conditioned on the filing of a status report on the progress made in complying with the requirement to provide the following services: (1) one-line Voice Carry Over (VCO), VCO-to-TTY, and VCO-to-VCO; (2) one-line Hearing Carry Over (HCO), HCO-to-TTY, and HCO-to-HCO; (3) call release; (4) pay-per-call (900) calls; (5) types of calls; (6) equal access to interexchange carriers; and (7) Speech-to-Speech (STS).¹ Accordingly, CSDVRS, LLC, d/b/a ZVRS, (“ZVRS”) submits this report on waivers.

¹ *Telecommunications Relay Services, and Speech-to-Speech for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Order, CG Docket No. 03-123 and WC Docket No. 05-196, DA 11-1159, 26 FCC Rcd 9449 (June 30, 2011).

II. Waivers Contingent Upon Filing of Annual Reports

A. One-line Voice Carry Over (VCO)

VCO is a feature that allows individuals who are deaf (or hard of hearing) to communicate using their voices directly to another party, and to have that party's responses relayed back (in the case of VRS in sign language by an interpreter). To effectively complete a one-line VCO call over the Internet, the customer premises equipment (CPE) and VRS platform must support the capability to have both an audio and video session on the same VRS call. ZVRS is able to handle single line VCO calls in situations where the relay user's CPE is provided by ZVRS. ZVRS distributes hardware and software based CPE that has this functionality and also will support other CPE that can negotiate both video and audio sessions at the initiation of the call, in accordance with the H.323 standard.

Until such time all VRS CPE can negotiate both video and audio sessions at the initiation of VRS calls, as an alternative to one-line VCO, ZVRS will continue to offer all VRS users the ability to use VCO by using a second (analog) line, wherein the video interpreter (VI) will communicate with the video relay caller using an IP connection for the interpreted portion of the call, and the public switched telephone network (PSTN) for the leg from the voice user. This will continue to be accomplished by having the VI ask the caller for a second number to call back, so that the VI can use the three-way calling feature. The procedure is similar to two-line VCO calls made over the PSTN.

B. VCO-to-TTY

ZVRS supports VCO-to-TTY service, which is designed to connect an inbound VCO caller to a called party that is a TTY user. To achieve this, the conversation will be relayed

through two relay operators. Although this may significantly degrade the real time communication of the relay call, at this time, ZVRS does not need a waiver of this relay feature.

C. VCO-to-VCO

VCO-to-VCO calling is supported by ZVRS. This type of calling requires a VRS provider to support on-demand multi-party videoconferencing, to allow the VI to have simultaneous video sessions with both VCO parties. Such conferencing is needed to properly interpret the voice portion of the conversation between the two parties. The ZVRS platform can support two simultaneous video sessions, one from the first VCO user and the other from the second VCO user, and is also capable of bridging the audio path between the two VCO callers.

ZVRS does not believe that the waiver for the VCO-to-VCO feature should be continued as it is feasible for providers to implement a cost effective technology to support VCO-to-VCO calling.

D. One-line Hearing Carry Over (HCO)

HCO is a feature that allows individuals who have speech disabilities, but can hear, to hear what the other party is saying and use a relay service to convey their messages. The handling of HCO calls over VRS is extremely rare because most individuals who have speech disabilities but who can hear do not use sign language.

ZVRS supports one-line HCO with some minor limitations. To effectively complete a one line HCO call over VoIP, the CPE equipment and VRS platform must support the capability to have both audio and video sessions on the same VRS call. As holds true for one line VCO calls, ZVRS can handle single line HCO calls in situations where the deaf user's CPE supports the capability for both video and audio sessions on the same VRS call. As noted above, the CPE

distributed by ZVRS has this functionality. ZVRS also will support other CPE that negotiate both video and audio sessions at the initiation of the call, in accordance with the H.323 standard.

E. HCO-to-TTY

ZVRS supports HCO-to-TTY service, which is designed to connect an inbound HCO caller to a called party that is a TTY user. Although the use of two interpreters to relay the conversation may significantly degrade the extent to which the call can be conducted in real time, ZVRS does not need a waiver of this relay mandate.

F. HCO-to-HCO

As is true for VCO to VCO calls, support of HCO-to-HCO calling requires support for on-demand multi-party videoconferencing because the VI must be able to have simultaneous video sessions with both HCO parties to properly interpret the voice portion of the conversation between the two parties. The platforms used by VRS providers cannot support on-demand multi-party videoconferencing at this time because they use video call distribution units which are not designed to allow VIs to make two simultaneous video calls; rather these are only designed to allow an inbound video call to be connected to an outbound audio call.

The waiver for the HCO-to-HCO mandate should be continued because there is no indication that cost effective technologies will be available to support HCO-to-HCO calling in the foreseeable future.

G. Call Release

The full implementation of ten-digit numbering has rendered this feature unnecessary. If a deaf user dials a ten-digit number of another deaf user, the call is completed across the internet because the iTRS database provides a mapping of the ten-digit number to IP address for the deaf user's videophone. The result is that deaf users can make point-to-point calls utilizing ten-digit

numbers on any registered CPE. ZVRS therefore submits that this waiver should be discontinued.

H. Pay-Per-Call (900) Calls

Under the ten-digit numbering system, ZVRS may know the number and location of the caller if ZVRS is the default provider for the relay user making the call. However, the relay user and ZVRS do not have a financial or contractual relationship. Where ZVRS is not the default provider and is merely providing dial around services for the caller, ZVRS has even less of a relationship with that individual. In either of these scenarios, the lack of any user-provider relationship, automated knowledge of ANI location, and no ANI to charge back means that there is no mechanism to charge relay users for pay-per-call services. Without the means to bill relay users for 900 calls, ZVRS and other relay providers cannot process these calls. Until relay users assume financial responsibility for their ten-digit numbers and can be directly billed for pay-per-call services, the waiver for this minimum standard should be continued.

I. Types of Calls (Operator-Assisted Calls and Long Distance Calls)

As noted above, there is no financial or contractual relationship between ZVRS and the individuals who use its relay services. The lack of such a relationship creates technical difficulties that make charging the relay user for operator-assisted calls or billing for long distance calls technically infeasible. Accordingly, ZVRS currently provides most long distance, operator-assisted and directory assistance calls free of charge to relay users. ZVRS also accepts the use of calling cards to place long-distance and/or operator-assisted calls to certain high cost international locations.

ZVRS requests the FCC to continue the waiver for this minimum standard.

J. Equal Access to Interexchange Carriers

For the same reason that pay per call services and long distance billing is not currently technically feasible, providing users with their choice of interexchange carriers is similarly not possible. Without a financial or contractual relationship with relay users, there is no way for ZVRS to offer users a selection of their underlying telephone carrier. As noted above, ZVRS continues to absorb the cost of most long distance calls, therefore eliminating the need for equal access to interexchange carriers.

ZVRS requests the FCC to continue the waiver for this minimum standard.

Respectfully submitted,

CSDVRS, LLC

Jeff Rosen
General Counsel
(240) 560-4396
jrosen@zvrs.com

April 16, 2012