

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

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

To: The Chief, Consumer and Governmental Affairs Bureau, and Chief, Wireline Competition Bureau

**MINIMUM STANDARDS WAIVER REPORT**

Convo Communications, LLC (“Convo”) submits this report in accordance with the Commission’s directive that providers of video relay services (“VRS”) and IP Relay Service (“IP Relay”) detail their progress towards meeting certain waived minimum standards.<sup>1</sup> On June 30, 2011, the Commission, through the Chief of the Consumer and Governmental Affairs Bureau (“CGB”) and the Chief of the Wireline Competition Bureau (“WCB”), extended waivers of certain mandatory minimum standards until July 1, 2012.<sup>2</sup> The extension was conditioned upon VRS and IP Relay providers filing a status report by April 16, 2012 detailing the progress made by providers 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 available to hearing users; (6) equal access to interexchange carriers; and (7)

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<sup>1</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 26 FCC Rcd 9449, ¶ 1 (CGB/WCB 2011) (“2011 Waiver Order”).

<sup>2</sup> *Id.*

Speech-to-Speech (STS).<sup>3</sup> As detailed below, Convo is working toward complying with the waived requirements and continues to focus on improving its VRS products to further enhance service quality and functionality.

#### **I. ONE-LINE VCO, VCO-TO-TTY, AND VCO-TO-VCO**

Convo currently provides two-line VCO service, as required by the Commission.<sup>4</sup> In the near term, Convo is working to provide one-line VCO service for its SIP-based products and expects to offer this service to its customers by the end of 2012. Convo requests that the Commission extend this waiver for an additional year to allow Convo sufficient time to fully deploy this service to its SIP-based products. At this time, however, Convo does not have a feasible one-line VCO solution for its non-SIP based products, including its H.323 products. Therefore, Convo requests that the Commission continue to waive this requirement for non-SIP based products.

#### **II. ONE-LINE HCO, HCO-TO-TTY, AND HCO-TO-HCO**

Convo currently provides two-line HCO service, as required by the Commission.<sup>5</sup> Similar to one-line VCO, Convo is currently working on providing one-line HCO service for its SIP-based products and expects to offer this service to its customers by the end of 2012. Convo requests that the Commission extend the waiver for an additional year to allow Convo sufficient time to fully deploy this service to its SIP-based products. At this time, however, Convo does not have a feasible one-line HCO solution for its non-SIP based products. Similar to one-line

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<sup>3</sup> *Id.*

<sup>4</sup> 47 C.F.R. § 64.604(a)(3)(v).

<sup>5</sup> *Id.*

VCO, Convo requests that the Commission continue to waive this requirement for non-SIP based products.

### **III. CALL RELEASE**

Call release functionality allows a communications assistant (“CA”) to sign-off from a call between two TTY users.<sup>6</sup> This functionality is inapplicable in the VRS context. VRS users can communicate directly with each other by making point-to-point calls utilizing their assigned ten-digit numbers. There is, therefore, no need for communication assistants (“CAs”) to participate in calls between VRS users, which eliminates the need for “call release” functionality. Accordingly, Convo requests that this waiver be extended permanently.

### **IV. PAY-PER-CALL (900) CALLS; TYPES OF CALLS**

The Commission requires that TRS providers handle “any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so.”<sup>7</sup> Convo has been, and remains, unable to process calls that require its users to be billed for the service, such as operator-assisted calls, 900-number calls, and long-distance calls. Convo has no method by which to pass through to its customers the charges associated with 900-number calls and operator-assisted calls, and therefore Convo does not currently process such calls. However, Convo currently processes long-distance calls free of charge to its users. In the case of certain high-cost international calls, Convo requires the VRS user to make the call as a collect (or reverse charge) call or to use a calling card. Accordingly, Convo requests that the Commission continue to waive this minimum standard for VRS.

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<sup>6</sup> *2011 Waiver Order* ¶ 12.

<sup>7</sup> 47 C.F.R. § 64.604(a)(3)(ii).

## **V. EQUAL ACCESS TO INTEREXCHANGE CARRIERS**

The Commission requires that TRS users have the ability to access their chosen interexchange carrier (“IXC”) through TRS to the same extent that such access is provided to voice users.<sup>8</sup> At this time, it is technically infeasible to provide users with their choice of IXC, and such choice would provide little, if any, benefit to VRS users because long-distance service uniformly is provided by VRS companies without charge. Moreover, it would be impractical and inefficient to require each VRS provider to establish a relationship with each and every possible IXC that a user might choose. Accordingly, Convo requests that the Commission to permanently extend this waiver.

## **VI. SPEECH-TO-SPEECH**

Convo supports the Commission’s continued indefinite waiver of the speech-to-speech (“STS”) service requirement for VRS.<sup>9</sup> VRS users overwhelmingly use American Sign Language to communicate, and those customers who prefer to use VCO services are able to do so. Convo has not been asked by any VRS user to provide this service and does not believe that STS services would benefit VRS users.

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<sup>8</sup> *Id.* § 64.604(b)(3).

<sup>9</sup> *See, e.g., 2011 Waiver Order* ¶ 20.

**VII. CONCLUSION**

For the foregoing reasons, the Commission should extend the waivers as discussed above.

Respectfully submitted,

CONVO COMMUNICATIONS, LLC

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