



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

June 1, 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, William Cobb and the undersigned of CSDVRS, LLC (“ZVRS”) met on May 30, 2012 with Commissioner Pai, Matthew Berry, Chief of Staff and Gene Fullano, Acting Legal Advisor to Commissioner Pai, Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell, Sean Lev, Nick Bourne and Marcus Maher, Office of General Counsel, Karen Peltz Strauss and Robert Aldrich, Consumer and Governmental Affairs Bureau, Gregory Hlibok and Eliot Greenwald, Disability Rights Office.

The discussion with FCC personnel centered on the Commission’s pending VRS Further Notice of Proposed Rulemaking (“FNPRM”). ZVRS included in its presentation analyses of its customer data and the financial impact of the proposed per-user methodology using call detail information ZVRS provided to the Commission as part of the monthly filings. The written presentation is being submitted for Commission review for its highly confidential treatment pursuant to the Commission rules and the Protective Orders issued by the Consumer and Governmental Affairs Bureau. This Ex Parte Notice will be supplemented with the written presentation as soon as we receive approval from the Commission for its highly confidential designation.

We discussed the importance of the separation of VRS access technology and interpreting services to make the market more contestable and rebalance the effects of the anti-competitive

use of videophones by the monopoly provider. Consistent with the Commission's FNPRM proposal to fully transition to off-the-shelf CPE for use to access VRS, we discussed the changing landscape of video technology - such as iPads, iPhones, Samsung and other Android tablets and phones, and the emergence of Google and Apple TV - and how these and other off-the-shelf video technology options are becoming more available to VRS users at lower prices. We believe that these products will replace hard or fixed videophones in the future. To promote the transition to readily available, low cost, and off-the-shelf video technology, ZVRS proposed the Commission issue a Request for Proposal (RFP) for vendor(s) to provide subsidized VRS video connectivity software which would operate across off-the-shelf technology as a downloadable app. Within a transition period, the Commission would eliminate from the VRS compensation rate the tacit costs of uniquely built-for-VRS hardware-based videophones and take other measures to phase them out entirely. This transition to off-the-shelf technology would end issue of the non-interoperability of VRS provider distributed video technology which has frustrated and stymied deaf and hard of hearing individuals and create a more contestable market. This transition would also require providers to emphasize service rather than locking in VRS users through technology and lead to higher quality interpreting. ZVRS also recommends that a stipend become available under the TRS Fund for eligible VRS users to purchase an approved off-the shelf video device once every 3 years. Finally, ZVRS recommends that the appropriate structure during the transition period would be the hybrid model proposed in our response to the FNPRM which would compensate providers per-user for providing customers the technology to access VRS and per-minute for the interpretation of VRS calls.

ZVRS reiterated its strong view that the Commission first enhance its consumer database to get accurate information about, among other things, their number and use of VRS, prior to making any change to the compensation methodology to ensure that the Commission has the information critical to making data-driven decisions. ZVRS also reiterated the importance of maintaining an appropriate tiered rate to sustain competition and innovation.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Commissioner Pai  
Matthew Berry  
Gene Fullano  
Angela Kronenberg  
Christine Kurth  
Sean Lev  
Nick Bourne  
Marcus Maher

Karen Peltz Strauss  
Robert Aldrich  
Gregory Hlibok  
Eliot Greenwald