



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

June 15, 2012

Via Courier and Electronic Filing

Marlene H. Dortch, Secretary
Kris Anne Monteith, Acting Chief
Consumer and Governmental Affairs Bureau
TRS Certification Program
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Internet-Based TRS Certification Application for Renewal by CSDVRS, LLC (d/b/a ZVRS) and Request for Confidential Treatment: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch and Ms. Monteith:

Pursuant to 47 C.F.R. §64.606 (a)(2), CSDVRS, LLC (d/b/a ZVRS, "ZVRS") hereby applies for certification renewal as a provider of video relay services ("VRS") that is eligible for compensation from the Interstate Telecommunications Relay Service ("TRS") Fund. Attached are copies of the application in confidential and redacted forms. The redacted version of the application has been electronically filed in the Commission's dockets.

Pursuant to 47 C.F.R. § 0.459, ZVRS requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in its application and the accompanying exhibits and withhold that information from any public inspection. The confidential information has been redacted from the version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS states as follows:

1. Identification of the specific information for which confidential treatment is sought.

ZVRS requests confidential treatment with respect to the confidential information redacted from the version filed electronically with the Commission.

2. Identification of the circumstance giving rise to the submission.

ZVRS is applying for certification renewal per the requirements of 47 C.F.R. §64.606(a)(2).

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The confidential information in the ZVRS application is highly sensitive commercial information specific to the operational, functional and technological capabilities of ZVRS. This information is therefore safeguarded from competitors and is not made available to the public.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information involves TRS, a highly competitive service.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against ZVRS and undermine the company's position in the VRS marketplace.

6. Identification of any measures taken to prevent unauthorized disclosure.

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

ZVRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to ZVRS.

Sincerely,

/s/

Jeff Rosen
General Counsel

Attachments

cc: Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau
Gregory Hlibok, Chief, Disability Rights Office

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

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals)	
With Hearing and Speech Disabilities)	
)	
Structure and Practices of the)	CG Docket No. 10-51
Video Relay Service Program)	
_____)	

To: Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program

**INTERNET-BASED TRS CERTIFICATION APPLICATION
FOR RENEWAL BY CSDVRS, LLC (D/B/A ZVRS)**

Sean Belanger
CEO
CSDVRS, LLC
600 Cleveland Street -Suite 1000
Clearwater, FL 33755

By:

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

June 15, 2012

TABLE OF CONTENTS

I.	Introduction and Background	4
II.	Qualifications for Certification	5
1.	A description of the forms of TRS to be provided	6
2.	A description of how the provider will meet all non-waived mandatory minimum standards	7
a.	Communication Assistants (“CAs”)/Video Interpreters	7
b.	Confidentiality and Conversation Content	9
c.	Types of Calls	10
d.	Emergency Call Handling	11
e.	Visual Privacy Screens/Idle Calls	13
f.	International Calls	14
g.	Speed of Answer	14
h.	TRS Facilities	14
i.	Caller ID	15
j.	Public Access to Information	15
k.	Rates	16
l.	Data Collection and Audits	16
m.	Whistleblower Protections	17
n.	Eligibility for Reimbursement	18
o.	Call Center Reports	18
p.	Remote Training Session Calls	18
q.	Complaint Procedures	19
r.	End User Information	20

3.	VRS Provider Certification Documentation and Other Requirements	21
a.	Call Center Deeds or Leases	21
b.	Call Center Technology and Equipment	21
c.	Ownership, Control, Management and Employees	25
d.	Sponsorship Arrangements	25
e.	Notification of Substantive Changes	26
f.	Service Interruptions	26
g.	Default Provider	27
III.	Conclusion	28
IV.	Declaration of Corporate Officer	30
V.	Exhibits	31
A.	Call Center Leases	
B.	Network Diagram	
C.	Call Center Technology and Equipment Documentation	
D.	Automatic Call Distribution Documentation	
E.	Ownership and Control	
F.	Organizational Structure Diagram and Executives, Officers and Board Members	
G.	ZVRS' TRS Personnel	
H.	Sponsorship Agreements	

I. Introduction and Background

CSDVRS, LLC (d/b/a ZVRS, “ZVRS”),¹ a Delaware limited liability corporation² with permanent headquarters located at 600 Cleveland Street, Suite 1000, Clearwater, Florida, 33755, received certification to provide video relay services (“VRS”) on September 21, 2007.³ Pursuant to 47 C.F.R. §64.606 (a)(2), ZVRS, by its counsel, hereby submits this application for certification renewal as a provider of VRS that is eligible for compensation from the Interstate Telecommunications Relay Service (“TRS”) Fund.⁴

ZVRS originated from a deaf organization, Communication Service for the Deaf (“CSD”), which was the first national provider of VRS. ZVRS has served as a principal catalyst of consumer choice through the provision of a variety of video communication devices and programs which eligible consumers can independently procure at a time and manner of their own choosing. In implementing its industry-leading innovation, ZVRS was able to bring videophones (“VPs”) and VRS to deaf and hard of hearing employees of numerous Fortune 500 companies and governmental agencies, many of whom previously would not approve access to VRS because of firewall and security concerns. ZVRS implemented the first “soft” videophone for use on a Mac, iPad, iPhone, Android mobile phone and Tablet. From its inception, ZVRS has provided interoperable hardware and software VPs with the existing video products and services

¹ ZVRS respectfully requests the Commission certify it under the name “CSDVRS, LLC (d/b/a ZVRS)” to clearly identify ZVRS as part of the name of the certified eligible VRS provider consistent with 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(ii).

² CSDVRS’ articles of incorporation and its status as a common carrier for the state of South Dakota, produced with the original petition for certification, remains in full effect.

³ See, *Notice of Certification of CSDVRS, LLC as a Provider of Video Relay Services (VRS) Eligible for Compensation from the Interstate Telecommunications Relay Fund (TRS)*, CG Docket No. 03-123 (September 21, 2007).

⁴ ZVRS is submitting its application for the renewal more than 90 days prior to the expiration of its current certification consistent with 47 C.F.R. §64.606(c)(2).

of the other VRS providers. ZVRS in servicing thousands of VRS calls daily employs only high quality certified video interpreters (“VIs”).

In its original petition for certification and its subsequent annual reports for continued certification filed in CG Docket Nos. 03-123 and 10-51,⁵ ZVRS demonstrated that it was fully compliant with the Commission’s TRS rules and guidance. In a regulatory environment of rigorous scrutiny and reform, ZVRS has never been sanctioned for a violation of any law or rule. ZVRS has consistently been actively involved in virtually all FCC proceedings affecting VRS, offering extensive feedback on ways to improve this service for consumers. Recertification of ZVRS is in the public interest because it: (1) meets or exceeds all non-waived operational, technical, and functional mandatory minimum standards contained in the Commission rules; (2) does not differ from the mandatory minimum standards; (3). makes available adequate procedures and remedies for ensuring ongoing compliance with the Commission’s rules, including informational materials to VRS users on complaint procedures sufficient for these users to know the proper procedures for filing complaints; and (4) provides the highest quality interpreting services and the greatest variety of interoperable and innovative video products for VRS consumers. ZVRS will continue to file annual compliance reports demonstrating continued compliance with TRS rules.⁶

II. Qualifications for Certification

Section 47 C.F.R. §64.606(a)(2) sets out the specific information required by the FCC to

⁵ See e.g., *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Annual Report of CSDVRS, LLC for Continued Certification as a Video Relay Service Provider, CG Docket Nos. 10-51 and 03-123 (September 15, 2011).

⁶ 47 C.F.R. §64.606(a)(2)(iv); 47 C.F.R. §64.606(g).

be granted a renewal of its certification. In response thereto, ZVRS provides the following:

1. A description of the forms of TRS to be provided

By this application, ZVRS seeks renewal of its certification for the provision of VRS which is compensated directly by the Interstate TRS Fund.⁷ ZVRS currently offers VRS at all times each day of the year. ZVRS offers English-speaking sign language interpreters for eligible relay customers, tri-lingual interpreters for Spanish users, and voice carry over (“VCO”) technologies for those who choose to use their voice in telecommunicating. ZVRS also offers video mail allowing callers to leave messages for customers which are also available through an automatically generated email.

All of ZVRS’ relay calls are conducted with the use of the Internet, a high-bandwidth redundant private network, standards-based signaling and video compression, an automatic call distributor and interactive video and voice response unit, and quality hardware and software. Additionally, ZVRS has installed a high speed redundant private network interconnecting its call centers to conduct multiple concurrent relay calls simultaneously. ZVRS’ centers are designed for the video call to be transmitted at speeds up to ██████████ per station. ZVRS users can make relay or point-to-point video calls through interoperable video devices – hardware, software, or mobile – and can connect directly by dialing a ten digit number entered in the iTRS numbering database or by dialing around to ZVRS using a toll free number or URL.

ZVRS has developed an extensive database system that allows the tracking of calls for billing, FCC reporting, and quality assurance. This system automatically generates start time and end time reporting for, among other things, call session, duration, and agent work time. This

⁷ 47 C.F.R. §64.606(a)(2)(i).

allows the accurate and effective tracking of the length of calls, as well as the number of calls at any time of the day, the number of calls waiting in queue and the number of dropped or unanswered calls.

2. A description of how the provider will meet all non-waived mandatory minimum standards

ZVRS describes below how it currently meets or exceeds and will continue to meet all non-waived mandatory minimum standards for VRS provided in 47 C.F.R. §64.604.⁸

a. Communication Assistants (“CAs”)/Video Interpreters

ZVRS employs all of its interpreters for its VRS interpreting staffing needs.⁹ All of ZVRS’ CAs must have one of the following certifications: RID: CSC/CI/CT; NAD level IV /V; or NIC, NIC Advanced, and NIC Master; or BEI III and higher. ZVRS also prefers that its CAs have at least three years of community-based interpreting experience. All ZVRS CAs are required to pass internal skill level assessments prior to being hired. These assessments are intended to ensure that all of the CAs at ZVRS are qualified interpreters capable of interpreting effectively, accurately and impartially, both receptively and expressively, using any required specialized vocabulary.¹⁰ All ZVRS CAs are required to have competent skills in grammar, spelling, and familiarity with deaf, hard of hearing and other disability cultures, languages and etiquette, and possess clear and articulate voice communications.¹¹ They must also be sensitive to customer needs and be able to work well under pressure. The failure to meet these skill levels will result in a CA being deemed unqualified to work at ZVRS.

⁸ 47 C.F.R. §64.606(a)(2)(ii).

⁹ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(iii).

¹⁰ 47 C.F.R. §64.604(a)(1)(iv).

¹¹ 47 C.F.R. §64.604(a)(1)(ii).

Prior to being offered a CA position with ZVRS, an interested candidate must successfully meet the qualification criteria established by ZVRS. The qualified candidate CA is interviewed by [REDACTED]

[REDACTED] All CA candidates must successfully pass the company’s background check and submit a sample of their work to be reviewed by upper management. Once hired but before being assigned calls, new CAs receive training to ensure that they effectively meet the specialized communication needs of deaf and hard of hearing individuals.¹² During the CAs’ initial training they receive orientation containing basic information about ZVRS and its origins, a TRS timeline/history, a description of VRS, an overview of all the FCC rules and orders applicable to TRS, and the basics of the technology involved. All new CAs receive [REDACTED] [REDACTED] of hands-on training (which follow a set training syllabus) provided by an experienced ZVRS interpreter. ZVRS allocates a significant amount of time explaining the process of 911 calls via VRS in the initial training session. The “training” environment utilized by ZVRS provides the CA with a simulation platform and tools that he or she will utilize once he or she goes “live.” This ensures a safe learning environment that does not jeopardize or degrade any customer’s individual ZVRS experience, yet enhances the CA’s skills. At the completion of the initial training, a team evaluates the processes of the newly trained CA by running them through comprehensive VRS call scenarios. Once the evaluation is completed, the trainer is notified in writing whether the CA is ready to take calls. The CA is then either moved to the “live” environment or asked to continue to work on the specific skills noted in the evaluation.

ZVRS is dedicated to maintaining the highest level of service through the provision of on-going CA training, competitive compensation, and measures designed to maintain high

¹² 47 C.F.R. §64.604(a)(1)(i).

employee morale. CA workstations are designed to deliver performance and flexibility, and provide our CAs with an ergonomic environment which enhances the quality of TRS. For example, the chair and the desk at each CA's workstation have the flexibility to allow the interpreter to adjust his or her height from a range of sitting to standing modes.

Finally, ZVRS staffs its call centers with floor supervisors, or lead CAs who are available to assist or relieve interpreters when the physical or mental demands of interpreting so require, or when clarification is needed during a conversation. This support person is also available to offer employees breaks throughout their shifts, subject to the rules concerning in-call replacement of CAs. ZVRS CAs are required to stay on each call for a minimum of ten minutes (unless the CA and the VRS user are not able to communicate effectively)¹³ and transmit conversations in real time.¹⁴ ZVRS makes its best efforts to accommodate requests for CAs of a specific gender when a call is initiated or during a transfer to a new CA.¹⁵

CAs are strictly compensated on an hourly basis and are not compensated, given a preferential work schedule or otherwise provided a benefit based upon the number of VRS minutes or calls that the CA handles, either individually or as part of a group.¹⁶

b. Confidentiality and Conversation Content

Consistent with the Commission's rules, ZVRS prohibits its CAs from disclosing the contents of any relayed conversation and keeping records of the content of calls beyond the

¹³ 47 C.F.R. §64.604(a)(1)(v). See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CG Dkt. No. 03-123, FCC 06-81, ¶¶1, 9 (June 16, 2006).

¹⁴ 47 C.F.R. §64.604(a)(1)(vii).

¹⁵ 47 C.F.R. §64.604(a)(1)(vi).

¹⁶ 47 C.F.R. §64.604(c)(5)(iii)(N)(3).

duration of the call.¹⁷ ZVRS also ensures the confidentiality of VRS calls by strictly limiting access to its call centers. Access to all centers is controlled via a secured door system that requires either an access code or magnetic key card. Where access codes are used, the codes are changed on a monthly basis to further ensure a secure environment. Additionally, each CA station consists of a private cubicle that utilizes a unique walled structure to ensure private communication between the interpreter and the customer. ZVRS also prohibits its CAs from intentionally altering a relayed conversation and requires that conversations are translated verbatim unless directed otherwise by the callers.¹⁸

c. Types of Calls

In accordance with the Commission’s rules, ZVRS prohibits its CAs from refusing single or sequential calls or limiting the length of calls.¹⁹ ZVRS does not impose, nor will it impose any limits on the type, length, number or content of calls. ZVRS is capable of handling all types of calls that have not been waived by the FCC.²⁰

ZVRS CAs alert callers when they have dialed a number answered by a recorded message and interactive menu.²¹ ZVRS does not impose any charges for additional calls, which may be made by the relay user in order to complete calls involving recorded or interactive messages.

¹⁷ 47 C.F.R. §64.604(a)(2)(i).

¹⁸ 47 C.F.R. §64.604(a)(2)(ii).

¹⁹ 47 C.F.R. §64.604(a)(3)(i).

²⁰ 47 C.F.R. §64.604(a)(3)(ii). *See 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 (extending various VRS waivers until July 1, 2012) (“Waiver Order”)(June 30, 2011). *See also Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Report on Waivers by CSDVRS, LLC, CG Docket Nos. 10-51 and 03-123, WC Docket No. 05-196 (April 16, 2012).

²¹ While 47 C.F.R. §64.604(a)(3)(vii) was codified for TTY users, ZVRS has implemented the rule for VRS to the extent practicable.

ZVRS supports speed dialing and three-way calling functionalities.²² When requested to do so, ZVRS interpreters can also leave voice messages on voice mail systems and retrieve voice messages for callers.²³

Notwithstanding the Commission’s waiver of certain TRS mandatory minimum standards for VRS,²⁴ ZVRS has enabled the following functionalities: 1) single line VCO in situations where the relay user’s CPE is provided by ZVRS; 2) two-line VCO; 3) VCO-to-TTY service; 4) VCO-to-VCO calling; 5) single line hearing carry over (“HCO”) where the relay user’s CPE is provided by ZVRS; and 6) HCO-to-TTY service. In lieu of providing equal access to interexchange carriers, ZVRS has handled and will continue to handle domestic long distance calls at no charge to its users.

d. Emergency Call Handling

ZVRS is capable of processing emergency and enhanced 911 (e911) calls through its platform in full compliance with the Commission’s rules.²⁵ An inbound 911 call is prioritized ahead of all incoming VRS calls.²⁶ When an inbound 911 call arrives at the CA station, the call banner, in red, identifies the call as a 911 call. This allows the CA to immediately recognize the call as a 911 call. The CA also sees the caller’s name and registered address. The CA notifies the floor supervisor that they are handling a 911 call. The outbound call to 911 is sent out over [REDACTED], ZVRS’ E911 provider. If the [REDACTED] connection is unavailable, there is an automatic failover to dial the [REDACTED]

²² 47 C.F.R. §64.604(a)(3)(vi).

²³ 47 C.F.R. §64.604(a)(3)(viii).

²⁴ See Waiver Order.

²⁵ 47 C.F.R. §64.604(a)(4) which covers TTY-based TRS providers is now complemented by additional emergency calling requirements applicable to internet-based TRS providers as set forth at 47 C.F.R. §64.605.

²⁶ 47 C.F.R. §64.605(a)(2)(ii).

which is reachable over ZVRS' connection to [REDACTED]. The call is automatically and immediately connected with the appropriate Public Safety Answering Point ("PSAP").²⁷ In the case of a caller which has registered with ZVRS as his or her default provider, the CA verifies with the caller their name and location information which has populated on the CA's screen along with the caller's profile. When the PSAP operator picks up, the CA verifies that the operator has the transmitted information and states the relay provider's name, the CA's call back number, the CA's identification number and the call back number of the inbound caller. The call is interpreted to completion. The CA also will remain online if requested to continue interpreting beyond the call until no longer needed. The telephone number associated with the emergency call becomes internally flagged for a period of twenty four (24) hours for a "possible 911 call back." A caller may manually request a CA to call 911 after the CA has answered the call. This may be a registered ZVRS user or a non-registered user. In this case, the CA will click the 911 button to flag the call as a 911 call and dial out to 911.

The above process is the same for a dialed around emergency call, however the CA must collect the name and location information of the caller to connect with the appropriate PSAP as determined through the [REDACTED] database.²⁸ ZVRS ensures that any information obtained as a result of handling an emergency call is made available only to PSAP or law enforcement personnel and is used for the sole purpose of identifying the caller's location or for some other emergency or law enforcement purposes.²⁹

ZVRS obtains from all of its customers prior to initiation of service a registered location³⁰

²⁷ 47 C.F.R. §64.605(b).

²⁸ 47 C.F.R. §64.605(a)(2)(iii).

²⁹ 47 C.F.R. §64.605(a)(2)(vi).

³⁰ 47 C.F.R. §64.605(b)(4)(i).

and provides them with several methods of updating their registered location at will and in a timely manner, and may do so from the ZVRS website, via using Z4 Mobile products, or by contacting authorized ZVRS personnel.³¹ Each time a user’s registration location is created or modified, it is validated against the Master Street Address Guide (“MSAG”) database. MSAG validation is done via the [REDACTED]

For each 911 call, ZVRS transmits through [REDACTED] to the PSAP or appropriate local emergency authority information from or through the appropriate automatic location (“ALI”) database³² and ensures that the PSAP has the Automatic Number Identification (“ANI”), the caller’s registered location, the name of the VRS provider and the CA’s identification number.³³

If a valid ALI entry is not found, the call is delivered to the [REDACTED]. The [REDACTED] then determines the appropriate PSAP and routes the call to the correct PSAP. All 911 calls are routed by ZVRS through the use of ANI via the dedicated Wireline E911 Network.³⁴ ZVRS also can immediately re-establish contact with the TRS user and the appropriate emergency authority and resume handling the call in the event one or both legs of the call are disconnected.³⁵

e. Visual Privacy Screens/Idle Calls

ZVRS prohibits its CAs from using privacy screens and requires the disconnection of a VRS call if a party enables a privacy screen or similar feature or is otherwise unresponsive or unengaged for more than 5 minutes, unless it is an emergency call or is legitimately on hold and is present and waiting for active communications to commence.³⁶ ZVRS requires its CAs to announce to both parties the intent to disconnect a call and may refrain from doing so if a party

³¹ 47 C.F.R. §64.605(b)(4)(ii).

³² 47 C.F.R. §64.605(b)(2)(iv).

³³ 47 C.F.R. §64.605(b)(2)(ii).

³⁴ 47 C.F.R. §64.605(b)(2)(iii).

³⁵ 47 C.F.R. §64.605(a)(2)(v).

³⁶ 47 C.F.R. §64.604(a)(6).

indicated continued engagement with the call.

f. International Calls

ZVRS prohibits VRS calls which originate from an international IP address with the exception of calls made by customers who have pre-registered with ZVRS specified time periods and regions of their travel and ZVRS verifies the identity and location of such callers.³⁷ In order to be able to pre-register for the use of VRS from abroad, the user must complete an international travel request. The user must provide the date they are departing, the date they are returning, and the reason for the request. The requested time period cannot exceed 25 days at a time.

g. Speed of Answer

The Commission rules require at least 80 percent of all VRS calls to be answered within 120 seconds, calculated on a monthly basis including abandoned calls³⁸ ZVRS has always met or exceeded the speed of answer mandate in its VRS offering,

h. TRS Facilities

ZVRS operates every day twenty-four hours a day, seven days a week.³⁹ The ZVRS network incorporates redundancy in every single aspect, throughout its data processing and storage facilities, hardware, software, public and private networks, and connections, to ensure reliable and continuous service for the deaf and hard of hearing community.⁴⁰ All redundancy features are functionally equivalent to the equipment in local exchange central offices, including uninterruptible power for emergency use. ZVRS uses multiple points to the public Internet and

³⁷ 47 C.F.R. §64.604(a)(7).

³⁸ 47 C.F.R. §64.604(b)(2)(iii).

³⁹ 47 C.F.R. §64.604(b)(4)(i).

⁴⁰ 47 C.F.R. §64.604(b)(4)(ii).

provides each VRS center with redundant connections to all access points. These access points are connected to the Internet through [REDACTED] Internet Service Providers (“ISPs”). If any of these ISPs experience an outage, service is automatically routed around the outage. In addition, automated monitoring can detect a partial or total loss of network at any of the TRS centers at all times. In the event of a network loss, CAs at the affected call center will be logged out of the platform and traffic will route to the next available interpreter located in a different call center. ZVRS also has adequate network facilities so that under projected calling volume, the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

ZVRS CAs do not relay calls from a location primarily used as a residence.⁴¹ ZVRS independently owns and operates its automatic call distribution (“ACD”) platform.⁴² Call routing is done utilizing [REDACTED]. The [REDACTED] supports skills and queue based routing. The [REDACTED] performs all ACD functions.

i. Caller ID

When available, ZVRS automatically transmits to the called party the ten digit number of the calling party or ZVRS’ facility number.⁴³

j. Public Access to Information

ZVRS engages in vigorous outreach efforts to all segments of the public through various print and internet media to ensure that callers throughout the country are aware of the availability

⁴¹ 47 C.F.R. §64.604(b)(4)(iii).

⁴² 47 C.F.R. §64.604(b)(4)(iv).

⁴³ 47 C.F.R. §64.604(b)(6).

and use of VRS.⁴⁴ ZVRS conducts outreach and education to ensure that the deaf and hard of hearing community is informed about TRS in a number of ways. A primary method is through personal contact; ZVRS employs a number of individuals who actively participate at a wide variety of deaf meetings, conferences and gatherings regularly scheduled in communities across the United States.

k. Rates

ZVRS does not charge for its VRS and thus is compliant with the Commission rule prohibiting relay providers from charging consumers rates that are any greater than rates paid for functionally equivalent voice communications services with respect to the duration of the call, the time of day, and the distance from the point of origination and point of termination.⁴⁵

l. Data Collection and Audits

ZVRS has in place comprehensive procedures for tracking and reporting true and accurate call data as well as other historical and projected information as detailed in the Commission’s rules.⁴⁶ ZVRS’ reporting has proven complete, reliable and effective for Rolka Loube Saltzer Associates (“RLSA”) with consequentially minimal or no withholdings. ZVRS employs an automated record keeping system to capture call record and speed of answer compliance data⁴⁷ and submits such data electronically, in a standardized format, without allowing human intervention during the call session for either conversation or session time.⁴⁸

ZVRS automatically transitions the data from the [REDACTED] platform [REDACTED]

⁴⁴ 47 C.F.R. §64.604(c)(3).

⁴⁵ 47 C.F.R. §64.604(c)(4).

⁴⁶ 47 C.F.R. §64.604(c)(5)(iii)(C) and (D).

⁴⁷ 47 C.F.R. §64.604(c)(5)(iii)(D)(4)(i).

⁴⁸ 47 C.F.R. §64.604(c)(5)(iii)(D)(4)(ii).

[REDACTED] which stores all call data. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The primary table for reporting to RLSA is the Call Detail Table. ZVRS prepares the call detail records (“CDR”) text file [REDACTED]

[REDACTED] Once the data is validated [REDACTED]

[REDACTED] Additional queries are run to generate the data required for the Minutes and VRS Service-Oriented Architecture (“SOA”) tabs of the RLSA workbook.

A ZVRS’ senior executive with first-hand knowledge certifies the accuracy and completeness of the information provided.⁴⁹ ZVRS has always submitted to Commission audits and commits to continuing to do so in the future.⁵⁰ ZVRS retains all of its call detail records and other substantiating information reported, in an electronic format, for a minimum of five years.⁵¹

m. Whistleblower Protections

ZVRS has provided an accurate and complete written description of the TRS whistleblower protections to all employees and contractors, both in the employee handbook and posted on its internal websites.⁵²

⁴⁹ 47 C.F.R. §64.604(c)(5)(iii)(D)(5).

⁵⁰ 47 C.F.R. §64.604(c)(5)(iii)(D)(6).

⁵¹ 47 C.F.R. §64.604(c)(5)(iii)(D)(7).

⁵² 47 C.F.R. §64.604(c)(5)(iii)(M).

n. Eligibility for Reimbursement

ZVRS always offers its services in a manner which clearly identifies it as the provider of such service and always clearly identifies itself as the eligible VRS provider when it utilizes a sub-brand (e.g., HolaVRS).⁵³ Customers almost always direct dial the person they are calling, or if using dial around to get to ZVRS, they use the toll free number. On the rare occasion that a customer wishes to place a call to ZVRS using an URL, all such calls are routed either through a single URL for ZVRS (www.zvrs.tv) or a single URL for its sub-brand (www.holavrs.tv for Spanish). ZVRS does not contract with a third party to provide interpretation services or call center functions.⁵⁴ All third-party contracts to provide ZVRS with services or functions related to the provision of VRS other than interpretation services or call functions are in writing and available to the Commission or the TRS Fund Administrator upon request.⁵⁵

o. Call Center Reports

ZVRS has without fail timely filed written reports with the Commission and the TRS Fund Administrator providing the required call center information and at least 30 days advance notification of any change of call centers.⁵⁶

p. Remote Training Session Calls

ZVRS does not arrange, schedule, sponsor, host, conduct or promote remote training sessions or comparable activity.⁵⁷

⁵³ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(ii).

⁵⁴ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(iii).

⁵⁵ 47 C.F.R. §64.604(c)(5)(iii)(N)(1)(v).

⁵⁶ 47 C.F.R. §64.604(c)(5)(iii)(N)(2).

⁵⁷ 47 C.F.R. §64.604(c)(5)(iii)(N)(4).

q. Complaint Procedures

ZVRS is committed to providing the highest quality customer service for all its service offerings. ZVRS's users can contact customer service live and directly by video calling 866-932-7891 or via the web (www.zvrs.com), voice, e-mail, or be transferred from a ZVRS call center to customer service. Voice callers can reach customer service by dialing 800-216-9293. ZVRS provides below a description of its comprehensive complaint handling procedures in place.⁵⁸ When a user has a complaint, ZVRS' Customer Service Division identifies the nature of the complaint and documents the issue in the ZVRS Trouble Ticketing System which is a part of ZVRS' customer relationship management ("CRM") system. If Customer Service is unable to resolve the issue live, a uniquely identifiable ticket is forwarded to the appropriate ZVRS department for further assistance. If a customer complains directly to a CA, the CA or the supervisor in the call center is able to log the complaint in the trouble ticket system and will log the complaint. All complaints regarding CA concerns are immediately forwarded to Operations' upper management and to the corresponding call center's manager. The call center manager must address the complaint with the CA and the CA must acknowledge receipt of complaint and respond. The call center manager then puts together a plan of action for the CA, and submits to Operations' upper management. If the resolution of the complaint is satisfactory the ticket is closed. All complaints and commendations are attached to the CA's employment record for use in performance reviews.

ZVRS is committed to providing resolution on all issues within 24 hours, if not sooner, depending on the severity of the issue. If the user making the complaint has included an email address, a follow-up message is sent providing results of the complaint investigation and the

⁵⁸ 47 C.F.R. §64.606(a)(2)(iii).

actions taken to solve the problem at issue. ZVRS makes available to TRS users through its web site, disseminated materials and direct communications in ASL information about the procedures to express and file complaints.⁵⁹

ZVRS maintains a log of all consumer complaints received. These logs contain the date and time of the complaint, the problem raised, the resolution, and the date that the resolution has been reached. ZVRS submits to the Commission an annual summary of its complaint log for the 12 month period preceding May 31 of that year for VRS.⁶⁰

ZVRS also recognizes that the FCC may receive either informal or formal complaints about its relay service.⁶¹ ZVRS is prepared to comply with all procedures and time frames specified in the Commission’s rules for the resolution of consumer complaints filed against ZVRS.

Commission rules require every TRS provider to designate an agent who is principally responsible for receiving complaints, inquiries, orders, decisions and notices from the Commission.⁶² ZVRS’ designated agent for this purpose is Jeff Rosen, 600 Cleveland St., Suite 1000, Clearwater, Florida 33755, (240) 560-4396 (phone), (727) 443-1537 (fax), jrosen@zvrs.com.

r. End-User Information

While FCC rules governing the treatment of TRS customer information are primarily directed to the transfer of TRS customer profile data from one TRS vendor to another when a

⁵⁹ 47 C.F.R. §64.606(b)(2)(ii).

⁶⁰ 47 C.F.R. §64.604(c)(1)(ii).

⁶¹ 47 C.F.R. §64.604(c)(5)(iii)(N)(6)(v).

⁶² 47 C.F.R. §64.604(c)(2).

state relay program changes vendors,⁶³ ZVRS wishes to assure the Commission that any TRS customer information it acquires will similarly be used only for the purpose of connecting TRS users with called parties, and shall not be sold, distributed, shared or revealed in any other way, unless compelled to do so by lawful order.

3. VRS Provider Certification Documentation and Other Requirements

ZVRS provides information below regarding the certification documentation and other requirements which demonstrates, among other things, that ZVRS has acquired and operates its own TRS facilities and employs its own CAs, as required by 47 C.F.R. §64.606.

a. Call Center Deeds or Leases

ZVRS has attached deeds or leases for five representative call centers, together with a list of all other call centers including the street address of each call center, the number of individual CAs and CA managers employed at each call center, and the name and contact information (phone number and email address) for the managers at each call center (Exhibit A).⁶⁴ ZVRS does not operate any call centers outside of the United States.

b. Call Center Technology and Equipment

The following is a description of the technology and equipment used to support ZVRS call center functions-including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration.⁶⁵

A network diagram of the ZVRS platform is attached (Exhibit B). The core components

⁶³ 47 C.F.R. §64.604(c)(5)(iii)(N)(7).

⁶⁴ 47 C.F.R. §64.606(a)(2)(ii)(A)(2).

⁶⁵ 47 C.F.R. §64.606(a)(2)(ii)(A)(4).

of the video call platform are the [REDACTED] and the [REDACTED]. Call routing is done utilizing [REDACTED]. The [REDACTED] supports skills and queue based routing. With the exception of 911 calls, all inbound calls are given equal priority and target quality of service (“TQOS”) to ensure that calls are answered in the order that they are received by the CA that has been available the longest. A special provision is made for 911 calls, where they are set to the highest TQOS. This ensures that 911 calls are immediately placed at the front of all other calls and will be answered by the next available CA. The ZVRS platform supports call transfer and requeue to ensure customers’ needs and requests are met. If a customer requests a specific gender CA or needs a Spanish CA, the call can be requeued with the requested gender or skill to be answered by the next available CA whom meets the criteria.

Video calls are delivered via the public Internet and terminate on one of ZVRS’ [REDACTED]. The [REDACTED] is the video gateway into ZVRS’ call centers. Audio calls to local telephone numbers are delivered via the [REDACTED] networks. Audio calls via toll free numbers are delivered via [REDACTED] network. All audio calls are then delivered to the [REDACTED] for call routing.

When a call arrives on the ZVRS platform, the telephone number is validated against the iTRS database. If the telephone number is not found or a telephone number is not presented to the CA, the IP address of the inbound call is checked against the iTRS database. If a telephone number is still not found, the call is delivered to the CA as unregistered. If the user cannot provide the CA a registered telephone number, which can be validated against the iTRS database, the caller is transferred to Customer Service.

The core routers and firewalls are from [REDACTED]. All Call Centers are connected via a

private Multiprotocol Label Switching (“MPLS”) network, operated by [REDACTED] to connect to [REDACTED] fully redundant data centers which are located in [REDACTED]. The entire platform is located in these data centers. Access gateways are utilized to connect to the VoIP and PSTN network for the audio call legs.

When a user signs-up with ZVRS, they select if they want their calls to default to an English or Spanish speaking CA. The default choice is to route VRS calls to English speaking CAs. The caller may also request a Spanish CA at the time of call and will be transferred to a Spanish CA. When a call arrives with Spanish selected, it will be delivered to the Spanish CA whom has been available the longest.

ZVRS supports two options for VCO, single-line and dual-line VCO. Single line VCO is accomplished by bridging the audio of the deaf caller with the audio of the hearing party. This allows the deaf caller to use their own voice over the video/audio connection that is already open to their videophone. Dual-line VCO is accomplished by placing an audio-only call back to a phone at the deaf customer’s location. The audio is then bridged to the outbound audio-only phone of the hearing party.

ZVRS continues to introduce innovative systems, VRS features, employ the best interpreting services available, and utilize cutting edge relay technology as part of its efforts to achieve functional equivalency in the delivery of communications services to the user community. Over the past 5 years, ZVRS added the following VRS innovations to its services:

New [REDACTED] Platform – In December 2008, ZVRS updated its call processing platform with a new server provided by [REDACTED]. The new platform supports already installed SIP videophones and supports H.263 and H.264 protocols. This enhanced video quality for ZVRS

users and was needed in order to support ten-digit numbering and E911.

New Products And Features - In 2009, ZVRS introduced its new Z line of videophones including the Z-340 Wi-Fi phone manufactured by Creative Labs, the Z-150 desktop videophone manufactured by Tandberg Cisco, and the Z-Ojo desktop videophone from Worldgate. ZVRS also internally developed and has put to market a host of other products, including the ZPC100 soft client VP for personal computers, the Z-Connect system for connections behind firewalls, Z-Contacts for instant uploading of customer “phonebooks,” and ISDN support for government customers. Additionally, with the advent of the [REDACTED] platform, ZVRS supports single line voice carry over (VCO). In 2010, ZVRS introduced the new Z20 video phone, Z4 software video phone for PC, Mac, Android and iOS (iPhone 4 and iPad 2) devices. ZVRS provided video mail support for all Z video phones. ZVRS supports flashers for the Z340 and ZOjo. ZVRS doubled its call volume capacity. In 2011, ZVRS continued to add to the list of Android smartphones and tablets supported with the Z4 software video phone, added the zoom feature to the Z340 video phone, and added the eZcall capability to allow users to dial a telephone number from a website. In addition, ZVRS introduced 1 Number which allows a user to have multiple videophones ring simultaneously. In 2012, ZVRS introduced caller-ID, call blocking, encryption support and additional enhancements for firewall traversal.

ZVRS has provided copies of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for a representative sampling (taking into account size by number of communications assistants and location) of five call centers (Exhibit C).⁶⁶ A complete copy of each lease or license agreement for automatic call

⁶⁶ 47 C.F.R. §64.606(a)(2)(ii)(A)(6).

distribution is provided. (Exhibit D).⁶⁷ ZVRS will retain for at least three years from the date of its application proofs of purchase for all technology and equipment used to support call center functions for all of their call centers, and to furnish such documentation to the Commission upon request.

c. Ownership, Control, Management and Employees

ZVRS has attached a list of individuals or entities that hold at least a 10 percent equity interest in ZVRS, have the power to vote 10 percent or more of the securities of ZVRS, or exercise *de jure* or *de facto* control over ZVRS (Exhibit E).⁶⁸ ZVRS has provided in Exhibit F a description of its organizational structure and the names of its executives, officers, members of its board of directors and the managing member of its limited liability company. ZVRS has also provided in Exhibit G a list of numbers of full-time and part-time employees involved in TRS operations, which included and is divided by the following positions: the executives and officers; video phone installers; CAs; and persons involved in marketing and sponsorship activities.⁶⁹

ZVRS will retain for at least five years from the date of its application copies of employment agreements for all of the ZVRS' employees directly involved in its VRS operations, including its executives and CAs, and a list of names of employees directly involved in its VRS operations and to furnish such documentation to the Commission upon request.⁷⁰

d. Sponsorship Arrangements

ZVRS has attached a list of all sponsorship arrangements related to its provision of VRS

⁶⁷ 47 C.F.R. §64.606(a)(2)(ii)(A)(8).

⁶⁸ 47 C.F.R. §64.606(a)(2)(ii)(B).

⁶⁹ 47 C.F.R. §64.606(a)(2)(ii)(C).

⁷⁰ 47 C.F.R. §64.606(a)(2)(ii)(D).

and a description of associated written agreements, including those providing financial support or in-kind interpreting or personnel service for social activities in exchange for brand marketing (Exhibit H).⁷¹ Copies of all such arrangements and agreements will be retained by ZVRS for at least three years from the date of the application, and submitted to the Commission upon request.

e. Notification of Substantive Changes

FCC rules require certified internet-based relay providers to notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of the time such changes occur, and to certify that they will continue to meet federal minimum standards after implementing any substantive changes.⁷² ZVRS has complied with this rule since its inception and hereby confirms its intent to so notify the Commission of substantive changes within the specified time period as well as certify the continued compliance with the FCC's minimum standards after such changes are implemented.

f. Service Interruptions

ZVRS commits to providing VRS without unauthorized voluntary service interruptions.⁷³ If for some reason ZVRS seeks to voluntarily interrupt service or in the event of an unforeseen service interruption due to circumstances beyond its control, ZVRS will seek advance authorization or provide information to the Commission via written notice and the public through an accessible web site as prescribed in the TRS rules.⁷⁴

⁷¹ 47 C.F.R. §64.606(a)(2)(ii)(E).

⁷² 47 C.F.R. §64.606(f)(2).

⁷³ 47 C.F.R. §64.606(h)(1).

⁷⁴ 47 C.F.R. §64.606(h)(2) and (3).

g. Default Provider

ZVRS has timely developed, procured and installed the systems needed to fully implement the TRS requirement to distribute to VRS users 10-digit telephone numbers linked to the North American Numbering Plan (NANP).⁷⁵ ZVRS complies with the TRS rule mandating VRS users to register prior to service, and for each initial VRS call verifies that the customer either has directly registered with ZVRS or where the customer has dialed around, has a number in the iTRS Numbering Directory.⁷⁶ ZVRS provides VRS users through its website and customer support the capability to register with ZVRS as a “default provider.” ZVRS requires its customers to self-certify that they are deaf or hard of hearing and require VRS to telecommunicate. ZVRS verifies that the location provided by the customer in registering is complete, accurate and in the United States or its territories. ZVRS advises VRS users through its website and customer support about the following: 1) the process of obtaining 10-digit telephone numbers; 2) the portability of the numbers; 3) the process of submitting, updating and confirming receipt by ZVRS of their registered location information; 4) an explanation of the importance of maintaining accurate and up-to-date registered location information; 5) the process of obtaining or transferring a toll free number; and the process of linking their toll free number to their 10-digit number in the iTRS Numbering Directory.⁷⁷

ZVRS either assigns its registered customer a geographically appropriate NANP number (wherever possible and if not, the closest geographically available number) or ports in a valid number and then routes all of the customers’ inbound and outbound calls unless the customer

⁷⁵ 47 C.F.R. §64.611.

⁷⁶ 47 C.F.R. §64.611(a) and (b).

⁷⁷ 47 C.F.R. §64.611(g)

makes or receives a dialed around call.⁷⁸ ZVRS numbering provider is [REDACTED] ZVRS obtains from their registered customers their current routing information, provisions such information to the iTRS Numbering Directory and maintains such information in its internal database and the iTRS Numbering Directory.⁷⁹ All ZVRS videophones provided to VRS users route calls only to the user's default provider (currently only ZVRS for ZVRS videophones) and based either on the dialed 10-digit telephone number and IP address within the iTRS database (including dialed around calls) or the information obtained within the ZVRS dial plan.⁸⁰

For VRS users, ZVRS never acquires routing information from any source other than from the iTRS database and when a customer ports from ZVRS to a different default provider, ZVRS no longer provisions routing information to the iTRS database.⁸¹ ZVRS no longer provisions VRS users a proxy or alias for a NANP telephone number.⁸² ZVRS will be transitioning a modest number of its customers with a provisioned toll free number. They may transfer their toll free number to a toll free provider and have a local NANP number associated with it when the functionality is available within the iTRS database. ZVRS will remove all customer toll free numbers from the iTRS Numbering Directory prior to the deadline.⁸³

III. Conclusion

ZVRS remains committed to providing the highest quality service and a variety of innovative product which supports the needs of relay consumers. ZVRS meets all unwaived mandatory minimum standards for TRS and does not differ from these standards in any manner.

⁷⁸ 47 C.F.R. §64.611(a)(1).

⁷⁹ 47 C.F.R. §64.611(c)(1).

⁸⁰ 47 C.F.R. §64.611(f).

⁸¹ 47 C.F.R. §64.611(c)(2).

⁸² 47 C.F.R. §64.611(d).

⁸³ 47 C.F.R. §64.611(e).

In order to ensure compliance with all of the FCC's rules governing ZVRS, all ZVRS employees receive training when they are hired and are notified when rule changes are adopted. ZVRS has developed a comprehensive VRS Compliance Manual made available to all of their employees and videophone installers which details the application of TRS rules FCC guidance on VRS. ZVRS' Corporate and Regulatory Compliance Committee regularly meets to review all ethical and regulatory matters and to recommend and/or implement company-wide compliance policies in regard to corporate ethics and federal and state regulatory issues. In addition, ZVRS is consistently apprised of Commission decisions, actions and policies by its legal counsel.

It is in the public interest to grant a renewal of ZVRS's federal certification to receive direct compensation from the Interstate TRS Fund for the provision of VRS. ZVRS consents to any Commission on-site visits it may wish to undertake as part of its assessment of ZVRS' application for renewal. ZVRS stands ready to supplement any of the answers provided in this application should the Commission so request.

Respectfully submitted,

Jeff Rosen
General Counsel
CSDVRS, LLC (d/b/a ZVRS)
(240) 560-4396
jrosen@zvrs.com

IV. Declaration of Corporate Officer

I swear under penalty of perjury that I am Sean Belanger, Chief Executive Officer, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.



Sean Belanger
Chief Executive Officer
CSDVRS, LLC (d/b/a ZVRS)

Date: 6/15/2012

V. EXHIBITS

Exhibit A

Call Center Leases

[REDACTED]

Exhibit A.1

Call Center Leases

1 of 5

[REDACTED]

Exhibit A.2

Call Center Leases

2 of 5

[REDACTED]

Exhibit A.3

Call Center Leases

3 of 5

[REDACTED]

Exhibit A.4

Call Center Leases

4 of 5

[REDACTED]

Exhibit A.5

Call Center Leases

5 of 5

[REDACTED]

Exhibit B

Network Diagram

[REDACTED]

Exhibit C

Call Center Technology and Equipment Documentation

[REDACTED]

Exhibit C.1

Call Center Technology and Equipment Documentation

1 of 5

[REDACTED]

Exhibit C.2

Call Center Technology and Equipment Documentation

2 of 5

[REDACTED]

Exhibit C.3

Call Center Technology and Equipment Documentation

3 of 5

[REDACTED]

Exhibit C.4

Call Center Technology and Equipment Documentation

4 of 5

[REDACTED]

Exhibit C.5

Call Center Technology and Equipment Documentation

5 of 5

[REDACTED]

Exhibit D

Automatic Call Distribution Documentation

[REDACTED]

Exhibit E

Ownership and Control

[REDACTED]

Exhibit F

Organizational Structure Diagram and Executives, Officers and
Board Members

[REDACTED]

Exhibit G

ZVRS' TRS Personnel

[REDACTED]

Exhibit H

Sponsorship Agreements

[REDACTED]