

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

COMMENTS OF CONVO COMMUNICATIONS LLC

Convo Communications, LLC (“Convo”) hereby responds to the Report and Order (“*Report and Order*”) and Further Notice of Proposed Rulemaking (“*Further Notice*”) issued by the Federal Communications Commission (“Commission”) in the above-captioned proceeding in which the Commission seeks comments regarding certain proposals to further reform to the video relay service (“VRS”) program.¹

I. INTRODUCTION

Convo commends the Commission for its continued focus on improving the VRS program. Many reforms made in the *Report and Order* have brought significant and long-overdue improvements to the structure of the VRS program that all but eliminate the opportunity for, and incidence of, fraud, waste, and abuse. Convo applauds the Commission for its decisions to establish the Telecommunications Relay Services (“TRS”) user registration database and assign joint oversight of the TRS Fund to the Commission’s Office of the Managing Director. Convo believes that these changes

¹ *Structure and Practices of the Video Relay Service Program; Telecommunications*

enhance the Commission's oversight of the VRS program, which ultimately will provide stability to the program.

II. FURTHER NOTICE

In the *Further Notice*, the Commission seeks comment on a number of new reforms to the VRS program. Although Convo at this time does not offer comments on all such Commission proposals set forth in the *Further Notice*, Convo herein provides input on several reform proposals.

A. The New Speed of Answer Requirement Proposed by the Commission Will Lead to Unnecessary Costs to VRS Providers Without Concomitant Benefits to Users

The Commission proposed to further reduce the permissible wait time for VRS calls by requiring calls to be answered 85% of the time within 10 seconds.² Convo is proud to have among the best speed-of-answer times in the industry, and strives to eliminate all customer-abandoned calls using historical call traffic statistics accumulated since Convo's founding in 2009, as well as intelligent call center scheduling.

However, since the launch of its proprietary in-house ACD platform on June 21, 2012, Convo has averaged an 11-second average answer time. Given the normal fluctuations in traffic experienced by VRS providers, in addition to the Commission's decision to calculate speed-of-answer times on a daily basis rather than a monthly basis, Convo does not believe that it is economically feasible to reduce this answer time an additional 10%—to ten seconds—without significantly overstaffing its call centers. Indeed, doing so would result in additional unnecessary and wasteful labor costs, and labor costs already are the highest component of the cost of providing VRS. In addition,

² *Id.* ¶ 265.

any such additional reduction in the speed-of-answer requirement would be of marginal benefit to users at best, and certainly would not be of sufficient benefit to warrant the additional cost to the VRS program.

Nevertheless, Convo ultimately supports the Commission's goal to reduce speed-of-answer times and believes that the Commission has set a reasonable benchmark that adequately accounts for normal fluctuations in traffic without requiring VRS providers to expend unnecessary financial resources.

B. Convo Supports the Commission's Proposal to Require VRS Providers to Offer Interoperable Point-to-Point Video Mail Capability

The Commission also proposes to adopt a new rule requiring VRS providers that offer VRS Video Mail also to offer interoperable point-to-point ("P2P") Video Mail capability.³ Convo supports this proposal. Convo already offers an interoperable P2P Video Mail capability to its customers. Unfortunately, because certain other VRS providers do not offer interoperable P2P Video Mail, many Convo customers face difficulties leaving video mails for other VRS providers' customers. Further, Convo recommends that the VRS access technology platform enable providers to test the interoperability of their services' P2P Video Mail compatibility.

C. The FCC Should Not Prohibit VRS Providers From Completing Calls of Registrants Prior to Verification

Finally, Convo notes that the Commission proposes to prohibit VRS providers from allowing any nonemergency calls to be made by unverified users.⁴ Convo urges the Commission to continue to retain its current guest user policies until the deployment of the centralized TRS user registration database and the centralization of registrant

³ *Id.* ¶ 275.

⁴ *Id.* ¶ 274.

verification required under the *Report and Order*. At such time and depending on how centralized verification is implemented, VRS providers may be able to verify TRS users' eligibility in an easy and automated manner prior to each call, which ostensibly may prevent any calls by unverified users.

At the current time, however, it sometimes is not possible immediately to electronically verify online the eligibility for VRS of every registrant. Instead, in some instances, providers must verify registrants using a more time-consuming manual process that may take several days. Therefore, in an abundance of caution, Convo urges the Commission to continue to permit VRS providers to complete the non-emergency calls of registered but unverified users during a providers' manual efforts to verify the users at least until such time as the Commission's centralized verification procedures are adopted and effective. This will ensure that VRS users are not deprived of their civil right to access VRS on a functionally equivalent basis during the administrative process of verification of such users.

III. CONCLUSION

Convo supports the continuing efforts of the Commission to improve the VRS program. Specifically, the Commission should require that VRS providers offering VRS Video Mail capability ensure that such capability is interoperable and offered on a P2P basis. Convo also urges the Commission to continue to permit VRS providers to complete non-emergency calls of VRS registrant that have not yet been verified, at least until such time as the Commission implements the centralized TRS user registration database and verification system.

Respectfully submitted,

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