

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

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

**ANNUAL REPORT OF CSDVRS, LLC FOR CONTINUED
CERTIFICATION AS A VIDEO RELAY SERVICES PROVIDER**

1. Introduction

Pursuant to 47 C.F.R. §64.606(g), CSDVRS, LLC (d/b/a ZVRS, "CSDVRS") hereby submits its annual report ("Report") as a certified provider of Video Relay Services ("VRS"). CSDVRS received full certification to provide VRS on November 20, 2012.¹ CSDVRS continues to (1) meet or exceed all non-waived operational, technical, and functional mandatory minimum standards contained in the Commission's rules; (2) does not differ from the mandatory minimum standards; and (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. CSDVRS has timely and consistently submitted reports and other information required of it under the TRS rules and attests that it will continue to timely file all of the required reports and other information in full compliance with the TRS rules.

CSDVRS hereby incorporates into this document its application for renewal of

¹ *The Consumer and Governmental Affairs Bureau Grants CSDVRS, LLC. Full Certification as a Provider of Video Relay Services Eligible for Compensation from the Interstate Telecommunications Relay Services (TRS) Fund, Public Notice, DA 12-1886, CG Docket No. 10-51 (November 20, 2012).*

certification² (“Application”), its exhibits and its supplement to its application³, and asserts that all statements made in its application, exhibits and supplement remain true and accurate unless otherwise noted in this Report. CSDVRS attaches to this Report the updated portions of the exhibits submitted with its application for recertification, these application exhibits otherwise remain true and accurate.

2. Continued Qualifications for Certification

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:

A. Communication Assistants (“CAs”)/Video Interpreters. All CAs at CSDVRS continue to meet the same service level standards, receive the same training, and enjoy the same high quality working conditions and employment practices described in CSDVRS’ application. All CSDVRS CAs are qualified interpreters capable of interpreting effectively, accurately and impartially, both receptively and expressively, using any required specialized vocabulary.⁴ All CSDVRS 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.⁵ All CAs continue to receive training to ensure that they effectively meet the specialized communication needs of deaf and hard of hearing individuals.⁶ CSDVRS CAs are continued to be required to stay on each call for a minimum of ten minutes

² *Internet-Based TRS Certification Application for Renewal by CSDVRS, LLC (D/B/A ZVRS)*, CG Docket Nos. 10-51 and 03-123 (June 15, 2012).

³ *Supplement to the Internet-Based TRS Certification Application for Renewal by CSDVRS, LLC (D/B/A ZVRS)*, CG Docket Nos. 10-51 and 03-123 (August 27, 2012).

⁴ 47 C.F.R. §64.604(a)(1)(iv).

⁵ 47 C.F.R. §64.604(a)(1)(ii).

⁶ 47 C.F.R. §64.604(a)(1)(i).

(unless the CA and the VRS user are not able to communicate effectively)⁷ and transmit conversations in real time.⁸ CSDVRS 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.⁹ 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.¹⁰ All CSDVRS CAs are employees of the company.

B. Confidentiality and Conversation Content. CSDVRS continues to prohibit its CAs from disclosing the contents of any relayed conversation and keeping records of the content of calls beyond the duration of the call.¹¹ CSDVRS also continues to prohibit its CAs from intentionally altering a relayed conversation and requires that conversations are translated verbatim unless directed otherwise by the callers.¹² CSDVRS also continues to maintain strict confidentiality of all VRS calls by limiting access to its call centers only to authorized personnel.

C. Types of Calls. CSDVRS continues to prohibit its CAs from refusing single or sequential calls or limiting the length of calls.¹³ CSDVRS continues to be capable of handling all types of calls that have not been waived by the FCC.¹⁴ CSDVRS CAs alert callers when they

⁷ 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).

⁸ 47 C.F.R. §64.604(a)(1)(vii).

⁹ 47 C.F.R. §64.604(a)(1)(vi).

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

¹¹ 47 C.F.R. §64.604(a)(2)(i).

¹² 47 C.F.R. §64.604(a)(2)(ii).

¹³ 47 C.F.R. §64.604(a)(3)(i).

¹⁴ 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, Order, 27 FCC Rcd 7113 (CGB 2012); *Report on Waivers by CSDVRS, LLC*, CG Docket Nos. 03-123 and 10-51, WC Docket No. 05-196 (April 15, 2013).

have dialed a number answered by a recorded message and interactive menu.¹⁵ CSDVRS 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. CSDVRS supports speed dialing and three-way calling functionalities.¹⁶ When requested to do so, CSDVRS interpreters can also leave voice messages on voice mail systems and retrieve voice messages for callers.¹⁷ CSDVRS also continues to provide video mail service so that hearing callers may leave messages when the recipient is unavailable. Notwithstanding the Commission's waiver of certain TRS mandatory minimum standards for VRS, CSDVRS 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, CSDVRS has handled and will continue to handle domestic long distance calls at no charge to its users.

D. Emergency Call Handling. An inbound 911 call continues to be prioritized by CSDVRS ahead of all incoming VRS calls and is automatically and immediately connected with the appropriate Public Safety Answering Point ("PSAP").¹⁸ The emergency call handling process remains the same as described in CSDVRS' application. For a dialed around emergency call, the CA collects the name and location information of the caller to connect with the appropriate PSAP.¹⁹ CSDVRS 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

¹⁵ 47 C.F.R. §64.604(a)(3)(vii), codified for TTY users, has been implemented by CSDVRS to the extent practicable for VRS.

¹⁶ 47 C.F.R. §64.604(a)(3)(vi).

¹⁷ 47 C.F.R. §64.604(a)(3)(viii).

¹⁸ 47 C.F.R. §64.604(a)(4) applies to TTY-based TRS providers, 47 C.F.R. §64.605 provides the additional emergency calling requirements for internet-based TRS providers.

¹⁹ 47 C.F.R. §64.605(a)(2)(iii).

purpose of identifying the caller's location or for some other emergency or law enforcement purposes.²⁰ CSDVRS obtains from all of its customers prior to initiation of service a registered location²¹ and provides them with several methods of updating their registered location at will, in a timely manner, and including the use of iTRS access technology.²² For each 911 call, CSDVRS transmits to the PSAP or appropriate local emergency authority information from or through the appropriate automatic location ("ALI") database²³ 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.²⁴ All 911 calls are routed by CSDVRS through the use of ANI via the dedicated Wireline E911 Network.²⁵ CSDVRS 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.²⁶

E. Visual Privacy Screens/Idle Calls. CSDVRS continues to prohibit 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.²⁷

F. International Calls. CSDVRS continues to prohibit 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 CSDVRS verifies the

²⁰ 47 C.F.R. §64.605(a)(2)(vi).

²¹ 47 C.F.R. §64.605(b)(4)(i).

²² 47 C.F.R. §64.605(b)(4)(ii).

²³ 47 C.F.R. §64.605(b)(2)(iv).

²⁴ 47 C.F.R. §64.605(b)(2)(ii).

²⁵ 47 C.F.R. §64.605(b)(2)(iii).

²⁶ 47 C.F.R. §64.605(a)(2)(v).

²⁷ 47 C.F.R. §64.604(a)(6).

identity and location of such callers.²⁸

G. Speed of Answer. CSDVRS continues to meet or exceed the FCC's requirement for at least 80 percent of all VRS calls to be answered within 120 seconds, calculated on a monthly basis.²⁹ CSDVRS will ensure adequate staffing so that it will consistently meet the new speed of answer requirements effective on January 1, 2014 and July 1, 2014. CSDVRS will also ensure adequate call center staffing to ensure that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.³⁰

H. TRS Facilities. CSDVRS continues to provide VRS in real-time 24 hours a day, 7 days a week, offering English-speaking sign language interpreters for deaf customers, tri-lingual interpreters for Spanish users, and voice carryover technologies for hard of hearing users.³¹ The CSDVRS network continues to incorporate redundancy as described in its application 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.³² CSDVRS continues to ensure that its CAs do not relay calls from a location primarily used as a residence.³³ CSDVRS continues to independently own and operate its automatic call distribution ("ACD") platform.³⁴

I. Caller ID. CSDVRS continues to automatically transmit to the called party the ten

²⁸ 47 C.F.R. §64.604(a)(7).

²⁹ 47 C.F.R. §§64.604(b)(2)(iii).

³⁰ 47 C.F.R. §64.604(b)(2)(i).

³¹ 47 C.F.R. §64.604(b)(4)(i).

³² 47 C.F.R. §64.604(b)(4)(ii).

³³ 47 C.F.R. §64.604(b)(4)(iii).

³⁴ 47 C.F.R. §64.604(b)(4)(iv).

digit number of the calling party, when available, or the CSDVRS' facility number.³⁵

J. Public Access to Information. CSDVRS continues to engage 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 and use of VRS and ten-digit numbering.³⁶ This is accomplished through attendance at deaf conferences and gatherings, providing an educational website, distributing e-mails containing information and updates about VRS, and working through affiliate state associations to educate their communities.

K. Rates. CSDVRS continues to handle long distance calls at no charge to its users.³⁷

L. Data Collection and Audits. CSDVRS continues the same procedures for tracking and reporting true and accurate call data as well as other historical and projected information as described in its application.³⁸ CSDVRS continues to employ an automated record keeping system to capture call record and speed of answer compliance data³⁹ and submits such data electronically, in a standardized format, without allowing human intervention during the call session for either conversation or session time.⁴⁰ A CSDVRS' senior executive with first-hand knowledge always certifies the accuracy and completeness of the information provided.⁴¹ CSDVRS' reporting has proven complete, reliable and effective for the TRS Fund Administrator with consequentially minimal or no withholdings. CSDVRS has always submitted to Commission audits and commits to continuing to do so in the future.⁴² CSDVRS retains all of its call detail records and other substantiating information reported, in an electronic format, for a

³⁵ 47 C.F.R. §64.604(b)(6).

³⁶ 47 C.F.R. §64.604(c)(3).

³⁷ 47 C.F.R. §64.604(c)(4).

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

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

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

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

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

minimum of five years.⁴³

M. Whistleblower Protections. CSDVRS continues to provide an accurate and complete description of the TRS whistleblower protections to all employees and contractors in writing, including in its employee handbook.⁴⁴

N. Eligibility for Reimbursement. CSDVRS continues to offer without fail its services in a manner which clearly identifies it as the provider of such service (“ZVRS”) and always clearly identifies itself as the eligible VRS provider when it utilizes a sub-brand (e.g., HolaVRS).⁴⁵ CSDVRS continues not to contract with a third party to provide interpretation services or call center functions.⁴⁶ 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.⁴⁷

O. Call Center Reports. CSDVRS 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.⁴⁸

P. Remote Training Session Calls. CSDVRS continues not to arrange, schedule, sponsor, host, conduct or promote remote training sessions or comparable activity which involve VRS calls.⁴⁹

Q. Complaint Procedures. All complaint procedures described in the application

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

⁴⁴ 47 C.F.R. §64.604(c)(5)(iii)(M).

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

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

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

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

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

remain in effect, including those for the handling of complaints. CSDVRS remains prepared to comply with all procedures and time frames specified in the Commission's rules for the resolution of consumer formal or informal complaints filed against CSDVRS.⁵⁰ CSDVRS has without fail timely submitted consumer complaint logs. CSDVRS' designated agent for receiving complaints, inquiries, orders, decisions and notices from the Commission continues to be Jeff Rosen, General Counsel, 600 Cleveland St., Suite 1000, Clearwater, Florida 33755, 240-560-4396, jrosen@zvr.com.

R. End-User Information. Any customer information that CSDVRS acquires is used only for the purpose of connecting TRS users with called parties, and is not sold, distributed, shared or revealed in any other way.⁵¹ As further provided below, CSDVRS will fully comply with the new rules pertaining to the handling of customer proprietary network information ("CPNI").

S. Discrimination and Preferences. CSDVRS has not and will not: (i) directly or indirectly, by any means or device, engage in any unjust or unreasonable discrimination related to practices, facilities, or services for or in connection with like relay service; (ii) engage in or give any undue or unreasonable preference or advantage to any particular person, class of persons, or locality, or (iii) subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.⁵²

T. Unauthorized and Unnecessary use of VRS. CSDVRS has not and will not engage in any practice that causes or encourages: (i) false or unverified claims for TRS Fund

⁵⁰ 47 C.F.R. §§64.604(c)(6).

⁵¹ 47 C.F.R. §64.604(c)(7).

⁵² 47 C.F.R. §64.604(c)(12).

compensation; (ii) unauthorized use of VRS; (iii) the making of VRS calls that would not otherwise be made; or (iv) the use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner.⁵³ CSDVRS will not seek payment from the TRS Fund for any minutes of service it knows or has reason to know are resulting from such practices. If CSDVRS becomes aware of such practices being or having been committed by any person, CSDVRS will, as soon as practicable, report such practices to the Commission or the TRS Fund Administrator. CSDVRS requires their CAs immediately terminate any call which does not involve an individual eligible to use VRS or, pursuant to the TRS rules and/or the provider's policies, the call does not appear to be a legitimate VRS call; CSDVRS will not seek compensation for such calls.

U. Notification of Substantive Changes. CSDVRS has always and confirms that it will continue to notify the FCC of substantive changes within 60 days of the time that such changes occur, and to certify continued compliance with the FCC's minimum standards after such changes are implemented.⁵⁴

V. Service Interruptions. CSDVRS commits to providing VRS without unauthorized voluntary service interruptions.⁵⁵ If for some reason CSDVRS seeks to voluntarily interrupt service or in the event of an unforeseen service interruption due to circumstances beyond its control, CSDVRS will seek advance authorization or timely provide information to the Commission via written notice and to the public through an accessible web site as prescribed in the TRS rules.⁵⁶

⁵³ 47 C.F.R. §64.604(c)(13).

⁵⁴ 47 C.F.R. § 64.606(f)(2).

⁵⁵ 47 C.F.R. §64.606(h)(1).

⁵⁶ 47 C.F.R. §64.606(h)(2) and (3).

W. Default Provider. CSDVRS continues the registration process described in its application for VRS users to obtain geographically appropriate North American Numbering Plan telephone numbers prior to service.⁵⁷ CSDVRS continues to require its customers to self-certify in accordance with the TRS rules as part of registration, maintains the confidentiality of the registration and certification information and verifies that the location provided by the customer in registering is complete, accurate and in the United States or its territories. CSDVRS continues to provide the required user notifications to VRS users through its website and customer support.⁵⁸ CSDVRS continues to obtain and handle routing information compliant with the TRS rules as described in its application.⁵⁹ CSDVRS does not provision proxy numbers.⁶⁰ CSDVRS continues not to assign or issue VRS users toll free numbers, linking any VRS user's subscribed toll free number from a toll free service provider with a geographically appropriate NANP number in the TRS Numbering Directory.⁶¹

Upon receiving notice that the TRS User Registration Database ("TRS-URD") is ready to accept information, CSDVRS will timely submit the required information for each of its users, their certifications and consent to transmit the information to TRS-URD. CSDVRS will not register those whom do not pass the identification verification check conducted through the TRS-URD. CSDVRS when registering a user that is transferring service from another provider will submit a properly executed certification if a query of the TRS-URD shows a certification has not been filed. Except for 911 calls, CSDVRS will validate during the call setup process, prior to call placement, the eligibility of the party on the video side of each call by querying TRS-URD on a per-call basis. CSDVRS will request the removal from TRS-URD user information for any

⁵⁷ 47 C.F.R. §64.611.

⁵⁸ 47 C.F.R. §64.611(g).

⁵⁹ 47 C.F.R. §64.611(a)(1),(c)(1),(2), and (f).

⁶⁰ 47 C.F.R. §64.611(d).

⁶¹ 47 C.F.R. §64.611(e); 47 C.F.R. §64.613(a)(3).

registered user: (A) who informs its default provider that it no longer wants use of a ten-digit number for TRS services; or (B) for whom the provider obtains information that the user is not eligible to use the service.

CSDVRS commits to strict compliance with the TRS rules on changes to default TRS providers.⁶² CSDVRS, either directly or through its numbering partner, will not port a number prior to obtaining verified authorization from the user by a written or electronically signed authorization. CSDVRS will maintain for at least 5 years all records of the verified authorization. CSDVRS will implement the port within 60 days of verification. During the port, CSDVRS will not (i) reduce the level or quality of service, or (ii) reduce the functionality of VRS access technology. CSDVRS' letter of authorization is a separate document, located on a separate screen or webpage and is titled "Letter of Authorization to Change my Default Provider." CSDVRS requires that the letter of authorization be signed and dated. CSDVRS' letters of authorization submitted with an electronically signed authorization includes the consumer disclosures required by Section 101(c) of the Electronic Signatures in Global and National Commerce Act. CSDVRS' letter of authorization is printed with a type of sufficient size and readable type to be clearly legible and must contain clear and unambiguous language that confirms: (1) the user's registered name and address and each telephone number; (2) the decision to change the default provider; (3) that the user designates CSDVRS to act as the iTRS user's agent and authorizing the new default provider to implement the default provider change; and (4) that the user understands that only one iTRS provider may be designated as the TRS user's default provider for any one telephone number. CSDVRS does not and will not effect freezes which prevent a change in a user's default provider selection unless the user provides express

⁶² 47 C.F.R. §64.631 through 64.636.

consent.

When informed by a user or original default provider of an unauthorized default provider change, CSDVRS will (i) notify the FCC's Consumer and Governmental Affairs Bureau (CGB) and (ii) shall inform that iTRS user of the right to file a complaint with the CGB. CSDVRS will also inform the iTRS user that they may contact and file a complaint with the alleged unauthorized default provider. Not more than 30 days after notification, CSDVRS will provide to the CGB a copy of any valid proof of verification of the change. CSDVRS will identify to RLSA all minutes associated with the user after the date of the alleged unauthorized change.

X. Interoperability and Portability. All VRS users are able to place a VRS call through any of the CSDVRS' products. CSDVRS is able to receive calls from, and make calls to, any VRS user. CSDVRS does not and will not take steps that restrict a user's unfettered access to another provider's service, such as providing degraded service quality to VRS users using VRS equipment or service with another provider's service. CSDVRS will ensure that its VRS access technologies and their video communication service platforms are interoperable with the VRS Access Technology Reference Platform, including for point-to-point calls. CSDVRS will ensure that their VRS access technologies and their video communication service platforms are interoperable with the Neutral Video Communication Service Platform, including for point-to-point calls.

Y. CPNI. CSDVRS does not and will not track, use, disclose or permit access to CPNI related to a customer call to a competing provider. By the effective date of the new requirements, CSDVRS will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. CSDVRS shall provide access to and shall require

all personnel, including any agents, contractors, and subcontractors, who have contact with customers to initially verify the status of a customer's CPNI approval. CSDVRS will require and provide CPNI training, maintain a record of CPNI use, establish a supervisory review process, certify compliance on an annual basis, and notify CGB if the opt-out process fails. By the effective date of the new requirements, CSDVRS will provide individual notice including all the required information to customers when soliciting approval to use, disclose, or permit access to customers' CPNI. CSDVRS will follow the limits on the permissible use, disclosure and access to CPNI. CSDVRS understands that it may obtain opt-in approval to use CPNI through written, oral, electronic, or sign language methods and that such approval or disapproval must remain in effect until the customer revokes, whether in written, oral, electronic, or sign language methods. CSDVRS will maintain records of approval during the time period that the approval or disapproval is in effect and for at least one year thereafter. CSDVRS will provide notification to obtain opt-out approval through electronic or written methods, but not by oral or sign language communication (except to obtain limited, one-time use of CPNI for inbound and outbound customer telephone, TRS, or point-to-point contacts for the duration of the call). CSDVRS will wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. CSDVRS will authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, TRS call, point-to-point call, online account access, or an in-store visit. CSDVRS will notify law enforcement of a breach of its customers' CPNI as provided in the TRS rules, and will not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement.

3. Certification Documentation

CSDVRS provides the following summary updates to the documents it provided the Commission with its application:

- Exhibit A – “Call Center Leases” (updated to reflect opened call center locations since last filing);
- Exhibit B – “Network Diagram” (updated to reflect opened call center locations since last filing);
- Exhibit C – “Call Center Technology and Equipment” (no change);
- Exhibit D – “Automatic Call Distribution” (updated with changes to services and equipment purchased);
- Exhibit E – “Ownership and Control” (updated to reflect current owners);
- Exhibit F – “Organizational Structure Diagram” (updated to reflect current organization);
- Exhibit G – “ZVRS’ TRS Personnel” (updated count of TRS staff for company); and
- Exhibit H – “Sponsorship Agreements” (updated listing of sponsorship activities).

The updated portions of the Exhibits are attached to this Report. The Exhibits submitted with its application for recertification otherwise remain true and accurate.

4. Procedures for Ensuring Compliance

In order to ensure compliance with all of the FCC’s rules governing VRS providers, CSDVRS continues to train all employees when they are hired and covered contractors when they are engaged. In addition, CSDVRS makes available online to all covered personnel a regularly updated VRS Compliance Manual which provides information on TRS rules and FCC guidance. CSDVRS continues to be informed about FCC decisions, actions and policies by its

in-house counsel, and regularly studies all rule changes as they are effected. CSDVRS instituted a Corporate and Regulatory Compliance Committee in 2010. It is a cross sectional team to review, recommend and implement company-wide compliance policies in regard to corporate ethics and federal and state regulatory issues. CSDVRS has also designated Michael Strecker, a senior corporate manager with requisite authority and specific knowledge of TRS rules, as its Compliance Officer. CSDVRS has established a compliance plan describing its policies, procedures and practices for complying with the TRS rules including preventing the unauthorized or unnecessary use of VRS, attached as Exhibit I. ZVRS also has a corporate Code of Ethics, published on its website at <http://www.zvrs.com/company/the-z/our-code-of-ethics>, which is mandatory for all ZVRS personnel, agents and contractors to follow.

5. Conclusion

CSDVRS has provided and remains committed to providing VRS fully compliant with the Commission's rules and guidance. CSDVRS will continue to file annual compliance reports demonstrating continued compliance with these rules. CSDVRS appreciates the opportunity to provide high quality, innovative services and products for VRS users.

Respectfully submitted,

Sean Belanger
Chief Executive Officer
CSDVRS, LLC

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

November 19, 2013

CERTIFICATION

I swear under penalty of perjury that I am Sean Belanger, Chief Executive Officer, an officer of the above-named reporting entity, 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.

A handwritten signature in black ink, appearing to read 'S. Belanger', written over a horizontal line.

Sean Belanger, CEO

Date: 19 November 2013