

Exhibit I

Compliance Plan



**CSDVRS, LLC's Compliance Plan
November 19, 2013**

CSDVRS, LLC (d/b/a ZVRS, "ZVRS") is a video relay service ("VRS") provider. This Compliance Plan provides a description of ZVRS' policies, procedures and practices for complying with the Federal Communication Commission ("FCC") telecommunications relay service ("TRS") rules and requirements applicable to VRS providers, including those which prevent the unauthorized and unnecessary use of VRS.¹

The Compliance Plan will be provided to all ZVRS personnel, new hires, agents and contractors ("Covered Personnel") carrying out duties for ZVRS related to the provision of VRS. The Compliance Plan is included in the ZVRS annual report as a certified VRS provider.²

1. Compliance Officer

ZVRS has designated Michael Strecker as its Compliance Officer. Mr. Strecker is a senior corporate manager with the requisite corporate and organizational authority to serve as Compliance Officer. Mr. Strecker has the general knowledge of the Communications Laws necessary to discharge his duties under the CD. Mr. Strecker possessed specific knowledge of the TRS Rules prior to assuming his duties as a Compliance Officer.

The Compliance Officer has responsibility for implementation of this Compliance Plan. The Compliance Officer's specific responsibilities include: oversight of compliance training for all ZVRS' officers, employees and contractors; monitoring and responding to changes in the ZVRS' business that may impact compliance issues, including review and evaluation of programs and activities to ensure that ZVRS' activities are consistent with applicable laws, regulations and contracts to which ZVRS is subject, and policies ZVRS has adopted. The Compliance Officer shall promptly report to the Board any non-compliance issues, remedial actions taken and recommendations for further remedial action. The Compliance Officer shall have authority to monitor ongoing ZVRS activities and have access to all ZVRS files and documentation relevant to his duties. The Compliance Officer oversees procedures to screen out any internally generated relay minutes of use and prevent such minutes of use from being included in billings made to the TRS Fund. The Compliance Officer reports to the CEO and the Board.

¹ <http://www.fcc.gov/encyclopedia/telecommunications-relay-services-rules>; 47 C.F.R. §64.604(c)(13).

² 47 C.F.R. §64.606(g)(3).

2. Corporate and Regulatory Compliance Committee

The ZVRS Corporate and Regulatory Compliance Committee regularly reviews all ethical and regulatory matters pertaining to the company including, but not limited to the following:

- regulatory matters affecting the provision of VRS as promulgated by the FCC, the TRS Fund Administrator, or any associated federal governing body;
- any and all anomalous issues arising in the ZVRS call detail records;
- any and all ethical matters pertaining to company operations;
- any and all complaints or instances of “whistleblowing” in the company;
- operating procedures to ensure compliance with the applicable ADA and TRS rules;
- a comprehensive VRS Compliance Manual which explains the TRS Rules related to VRS; and
- oversight over the implementation of any FCC requirements including consent decrees.

The Committee recommends and/or implements company-wide compliance policies in regard to corporate ethics and federal and state regulatory issues. It is chaired by the Compliance Officer.

The following individuals are currently members of ZVRS’s Corporate and Regulatory Compliance Committee:

- Michael Strecker – Compliance Officer
- Lydia Runnels – Vice President of Engineering
- Aaron Wegehaupt – Vice President of Interpreting Operations
- Chris Wagner – Vice President of Marketing and Operations
- Christine Valdez – Controller
- Jeff Rosen – Corporate Counsel

3. Compliance Plan

ZVRS established a central database accessible to ZVRS managers Operating Procedures that ZVRS, the Compliance Officer and all covered personnel must follow these procedures to ensure ZVRS’s compliance with the TRS Rules. ZVRS’s Operating Procedures include internal procedures and policies specifically designed to ensure that its operations are in compliance with Section 225 of the Act and the TRS Rules applicable to VRS. In addition, the Operating Procedures include procedures for conducting annual compliance training and documenting covered personnel participation in compliance training, procedures for conducting and maintaining documentation of FCC compliance assessments for all new products, and procedures for reviewing requests for reimbursements from the TRS Fund prior to submissions to the TRS Fund administrator. ZVRS’ Compliance Officer, Compliance Committee and management

regularly reviews the Operating Procedures to ensure that it is up to date, reflects all the necessary information and is implemented without fail.

ZVRS procedures ensures that: 1) all new products meet the necessary compliance assessments and are approved by the Compliance Officer as such prior to launch; 2) submissions for payment to RLSA have been reviewed for accuracy by the applicable departments; and 3) emergency advisories are reflected accurately within all product literatures provided to the public as well as tracks and records when any product literatures was modified and used. Additional procedures ensures that the applicable compliance training is provided to all new Covered Personnel within thirty (30) days, and work numbers are accurately tracked for all Covered Personnel and added to ZVRS's non-billable list.

ZVRS assigns all Covered Personnel a work number and instructed all Covered Personnel in writing that they must use the work number whenever they access or use VRS for a business purpose, whether or not at the workplace. ZVRS implemented an operating procedure to segregate and keep the call detail records for all work numbers to ensure that calls made by Covered Personnel in connection with business activities are identifiable as such and are not submitted to the TRS Fund administrator for compensation from the TRS Fund.

ZVRS's Compliance Committee reviews monthly CDR data looking for anomalies in the data that might reflect abuse and/or fraud. If anything is identified as a possibility, the Committee does further investigation and if necessary will ensure ZVRS does not bill RLSA for minutes that would constitute fraud or abuse.

ZVRS's website advises consumers about how to make emergency calls using any VP product offered by ZVRS. ZVRS established procedures for modifying or adding emergency calling advisories to all product literature provided to the public. ZVRS maintains a record of when product literature was modified and used.

ZVRS established procedures for documenting and retaining compliance assessments with FCC rules and requirements for new products.

4. Compliance Training

ZVRS developed a compliance training program for covered personnel. Employees and for a specific set of Independent Contractors used by ZVRS to perform presentations, customer installs, and general outreach ("ZAs") are required to view a training video in ASL with voice over and captioning to ensure all representatives of ZVRS fully understand the material being presented. To ensure these individuals are properly tracked, ZVRS requires that the individual first register to watch the video. Once the individual finishes their training video, they are required to provide an electronic signature confirming they understand the material as well as the date they finished the training. In addition, all such individuals are provided a link where they can download ZVRS' VRS Compliance Manual. As part of the compliance training program, ZVRS advised covered personnel of ZVRS's obligation to report any noncompliance with the TRS Rules and provided information about how to disclose noncompliance to the Compliance Officer.

Compliance Training as it applies to all other Covered Personnel (i.e. vendors, independent contractors, and agents of ZVRS who perform, supervise, oversee, or manage duties related to VRS), is performed via a written document which covered the applicable training material. ZVRS implemented policies that require any new vendor to go through a validation process with the Compliance Officer within thirty (30) days of utilizing the vendor, and if deemed necessary, must be trained on Compliance within the thirty (30) day window. If it is deemed that the vendor does require training, the vendor must sign-off on its training document and provide ZVRS with all applicable work numbers that the vendor will be utilizing in its efforts to meet the terms of its agreement with ZVRS. ZVRS adds these numbers to its list of non-billable phone numbers in accordance with the CD and the TRS rules. In addition, all employees of said vendors, if they would be performing work in accordance with the vendor's relationship with ZVRS, were required to provide their signature and work phone numbers as well.

5. Internal Audit of Submitted VRS Minutes

- 1) Process used to manage the security of systems related to call detail records.

Data is first collected in a series of log files. The data is written to the log files automatically and is read only. At regular intervals throughout the day, the information is collected from these log files using a Logging Server. The information is gathered from the logs and inserted into the database. While the data is on the ACD, the logs are read only. The log files are archived and stored daily where System Administrators have access.

- 2) Internal audit work performed related to call detail records (CDR) and the systems used to process this information.

Throughout the process outlined above, there are daily checks that occur to ensure the integrity of the data. In addition, there is a check to compare the data from the ACD agent activity logs to the data from the call detail logs where we look for discrepancies.

The first step of preparing the monthly reports for RLSA is to run a series of scripts to look for and mark non-billable any calls that might have incomplete or invalid data. Once the CDR table has been prepared, another script is run by the database administrator for another series of checks to look for things like an internal system prefix added to a number or a number where they dialed extra digits. These numbers are truncated or adjusted to the appropriate ten-digit number.

ZVRS additionally validates the IP Addresses for the video phones by evaluating them against the video gateway records and records from our servers. This information is checked monthly, prior to submitting the CDR records to RLSA.

- 3) Description of system and processes used to assign and verify CA information to CDR data.

The agent is assigned to a call using the VCC and the process that records and assigns the agent to the call is fully automated and outside of ZVRS's control. We compare the call data from the MS to the time the agent is recorded as being in-call from the VCC. This allows us to compare that the time the MS reports the agent as being in call aligns with the time the VCC reports the agent as being in call. This check is run on a daily basis as part of the routine for evaluating the previous day's activity.

6. Additional Compliance Measures

Any suspected violations are required to be reported to ZVRS' Compliance Committee, which has the responsibility to investigate all reported suspected violations. The Compliance Committee may be reached by U.S. Mail using ZVRS' corporate address or by emailing compliancedirector@zvrs.com. Such consultations will be treated confidentially. The Compliance Committee will maintain a means whereby employees may anonymously report matters that may raise compliance issues. ZVRS will not retaliate against any employee or contractor raising a compliance issue, nor tolerate retaliation against an employee or contractor raising a compliance issue.

Waste, fraud or abuse may also be reported to the FCC's Office of Inspector General at (202) 418-0473, toll free at (888) 863-2244 or by e-mailing hotline@fcc.gov (for more information, see: www.fcc.gov/oig).

The information about how Covered Personnel may report waste, fraud, or abuse through the general hotline number and website address for the FCC's Office of the Inspector General is included in ZVRS' Compliance Manual which is distributed to all covered personnel, provided to new hires and trainees and made available online. A complete description of ZVRS' Whistleblower Policy and contact information is also included in ZVRS' Employee Handbook.

BY:

Michael Strecker
Compliance Officer
727-254-5614
mstrecker@zvrs.com