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December 27, 2013

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte communications on Mobile Video Relay Service interoperability

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program
CG Docket Nos. 03-123 and 10-51.

Dear Ms. Dortch:

In the fall of 2013, the Technology Access Program at Gallaudet University conducted tests on mobile interoperability and battery life of the following six video relay service (VRS) providers: Sorenson, ZVRS, Purple, Convo, CAAGVRS and Global VRS. These tests were a follow-up to the prior round of interoperability tests that we performed in the summer of 2012¹. We chose to focus on mobile devices, in light of the changing communications landscape, now that 4G and 4G LTE services have become pervasive in the United States.

The results were presented at the TDI/ALDA 2013 conference in Albuquerque, NM, on October 18, 2013, and are attached in this letter. The same materials can also be found at the following web address:

<http://tap.gallaudet.edu/Conferences/TDI2013/>

We note that mobile interoperability, while greatly improved since our 2012 tests, still is in no way comparable to the level of voice interoperability seen in the mainstream. Also, there still exists no single VRS-provided app that can successfully

¹ Filed by the Technology Access Program at Gallaudet University, CG Dockets 10-51 and 03-123. August 9, 2012.

interoperate with every other provider for both outgoing and incoming calls; in fact, the provider that tops the rankings for outgoing calls is different from the one that tops the rankings for incoming calls.

As a result, it is still impossible for a consumer to operate only one one ten-digit number and be assured that they can connect with everyone else, no matter whether deaf or hearing. We further note that interoperability across answering machines still is substantially worse than for live point-to-point calls, and essentially unchanged from 2012.

With respect to battery life, we found that, contrary to anecdotal evidence and perceptions, by the community, VRS apps do not (or no longer) drain the mobile devices' batteries to a significant extent while idle on WiFi. However, on Android devices there is still some room for further improvement. It is also not yet clear how much battery drain there would be under a cellular data connection with fluctuating signal strength.

The picture changes when VRS apps are under active use: during video calls – battery drain of approximately 30% per hour is typical of VRS apps, which translates into only 2-3 hours of talking time under a typical day's use. This level of battery usage is comparable to the native video calling apps on phones (FaceTime and Google Talk/Hangouts). However, considering that voice users get 10+ hours of talking time out of their phones while on battery, it is clear that achieving functional equivalence in the area of battery life still has a long way to go. In light of this information, it is also clear that battery life must be a priority for the future VRS reference platform.

Respectfully submitted,

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/s/ Norman Williams
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² The contents of these comments were developed with funding from the National Institute on Disability and Rehabilitation Research, U.S. Department of Education, grant number H133E090001 (RERC on Telecommunications Access). However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

December 27, 2013

Cc (by e-mail):

Karen Peltz Strauss
Gregory Hlibok
Eliot Greenwald
Henning Schulzrinne
Jonathan Chambers

Attachments:

Spreadsheet containing the interoperability testing results
Summary of call interoperability
Summary of battery life tests
PDF of the Power Point presentation at the TDI 2013 conference