



CSDVRS, LLC
600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755
Voice: 727-254-5600 Fax: 727-443-1537 Toll Free: 888-927-3877

April 25, 2014

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

Dear Ms. Dortch:

On April 23, 2014, Lydia Runnels, Mike Strecker and Aaron Wegehaupt of CSDVRS, LLC d/b/a ZVRS (“ZVRS”) participated in a meeting (either in person or by phone) with FCC attendees Karen Peltz Strauss (Deputy Chief, Consumer and Government Affairs Bureau (“CGB”)), Robert Aldrich (Attorney-Advisor, CGB), Gregory Hlibok (Chief, Disability Rights Office, CGB), Eliot Greenwald (Attorney-Advisor, Disability Rights Office, CGB) and Roger Holberg (Attorney-Advisor, Disability Rights Office, CGB).

In the meeting ZVRS presented its company’s performance in regard to the Speed of Answer (“SoA”) requirements of 85% of calls being answered in less than 60 seconds on a daily basis and what it would take for the company to meet or exceed the forth coming SoA requirement of 85% of calls being answered less than 30 seconds daily. The company shared its talking points from the previous days’ “VRS Providers” joint meeting with FCC personnel.

Talking points included:

Proposed change to the Speed of Answer requirement of 85/30 is not in the best interest of the community or the FCC. ZVRS cannot support an 85/30 daily or monthly measurement without a dramatic increase in interpreters and expense in the wake of lower rates. We believe that no VRS Provider, if measuring consistent with the intended SoA formula, would be able to meet the forthcoming service level change. Consumers have choice in providers and can choose who to use to make their calls.

- Service level has already received a dramatic change with the “measured monthly” 80/120 SoA being reduced to a daily 85/60 measurement. The FCC needs to monitor for complaints and effectiveness of this already drastic change.
- ZVRS believes there may be inconsistent measurement across the industry. No clear definition of “call start time”, different providers using different start times or formulas. . Until there is a consistent and audited standard for Average Speed of Answer (“ASA”) and SoA measurement, the FCC cannot implement this change.
- We understand the Commission is trying to model VRS SoAs after the TRS industry. The Commission needs to understand that not only are TRS and VRS completely different in terms of the types of calls they might receive and/or place, but we believe there are also varying formulas/methodologies used across the TRS industry in regards to SoA. In fact, one TRS provider mentioned there is no true service level measurement in TRS, but more of a weighted average service level.
- Consumer Groups Support the providers.
 - The market gets to choose the best ASA. Consumers support publishing ASA. With multiple options in VRS, the market has moved providers to support better ASA.
- SoA Exemptions are necessary. The reasons for exemptions can be many (i.e. National emergencies, severe widespread weather, overflow from another provider having a network outage, bad flu season, etc...)
- Penalty modification is a MUST.
- Impact to Interpreters and Functional Equivalence
 - THE NEW ECONOMIC MODEL: The combination of faster ASA with lower rates will have the following effect. 1. Must have very low cost therefore very low skill labor.(similar to TRS economic model) 2. Calls will be answered on time. 3. Lack of Certified/skilled Vis will lead to longer calls (i.e. I’m sorry, please hold while I clarify something with the caller). Quality interpreting leads to more natural conversation flow, which results in shorter calls.

ZVRS reiterated the need to waive the July 1, 2014 SoA requirement of 30 seconds for 85 percent of calls, measured daily. ZVRS recommends a SoA requirement of 85/60 measured on a monthly basis, with clearly defined and audited start times and end times required for reporting purposes. Moving back to a monthly calculation will also provide some relief if a provider is hit with higher than expected call volume due to unforeseen issues. The FCC could share provider results with consumers thus educating users of the options available to them. ZVRS reiterated the difference between the SoA and ASA metrics.

In the meeting, ZVRS stated the benefit of at-home interpreting and the recommendation that the Commission institute an at-home interpreting certification.

In the meeting ZVRS also shared its serious concerns regarding another VRS provider violating posted FCC rules, specifically the June 2013 Report and Order. Paragraph 142 of the June Order makes known the FCC’s position on Slamming by stating “In the context of VRS and IP Relay, slamming occurs when a provider changes a user’s default provider selection without

that user's knowledge or explicit consent." Furthermore, ZVRS feels this same provider utilizes misleading information as well as bully tactics in order to manipulate the Deaf Community. ZVRS is outraged and greatly concerned by the tactics being utilized by this provider and expect immediate action as our concerns were well heard.