

ASL SERVICES HOLDINGS, LLC.

3700 Commerce Boulevard
Kissimmee, Florida 34741

Via Electronic Comment Filing System

September 5, 2014

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

RE: *In the Matter of Structure and Practices of the Video Relay Service Program Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, *Notice of Ex parte Meeting*

Dear Ms. Dortch,

On September 3, 2014, Angela Valcarcel-Roth, Managing Member, President and Chief Executive Officer of ASL Services Holdings, LLC (“ASL/Global VRS”) and Gabrielle Joseph, Vice President of ASL/Global VRS met with Karen Peltz Strauss, Federal Communications Commission (“Commission”) Deputy Chief, Consumer and Government Affairs Bureau (“CGB”), Gregory Hlibok, Chief, Disability Rights Office, CGB, Caitlin Vogus, Disability Rights Office, CGB, and David Schmitt and Andrew Multz, Commission Office of the Managing Director, to address considerations associated with Internet-based Telecommunications Relay Service provider Speed of Answer (“SoA”) requirements, the default provider registration process under Telecommunications Relay Service – User Registration Database (“TRS-URD”), and a Deaf Blind initiative that ASL/Global VRS has undertaken in addition to additional enforcement-related matters.

Participants briefly addressed the U.S. Court of Appeals for the District of Columbia Circuit September 2, 2014 decision regarding SoA. Ms. Roth and Joseph generally discussed the Company’s approach for collecting and analyzing SoA and staffing data to ensure compliance while considering the impact of staffing costs to comply. Ms. Roth and Joseph raised a number of additional considerations that should be made in TRS-URD design including factors unique to the Spanish speaking community, the level of detail associated with public disclosures required under the amended registration rules, obligations on providers to verify user identity, and third party verification options. Ms. Roth and Joseph next provided information regarding expanding capabilities for Deaf/blind users through video relay services. Ms. Roth and Joseph then raised concern over the future of “dial around” user options, on Program compensation rates particularly under a competitive bidding process, and on the disproportionate financial impact of Commission penalties on smaller companies. They stressed the need for the Commission to enforce interoperability requirements.

Ms. Marlene H. Dortch
September 5, 2014
Page 2

Ms. Roth and Joseph concluded by expressing their support for skill-based call routing and recommended implementation of a mentor program for providers to gain skilled interpreters while also satisfying the needs of the Deaf Community as expressed by the Consumer Groups.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). Questions may be directed to the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Angela Roth".

Angela Roth
Managing Member, President and
Chief Executive Officer

cc: Karen Pelz Strauss (via electronic delivery)
Gregory Hlibok (via electronic delivery)
David Schmitt (via electronic delivery)
Caitlin Vogus (via electronic delivery)
Andrew Mulitz (via electronic delivery)