June 16, 2015

Via Electronic Filing

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

RE: Ex Parte Notice: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On June 12, 2015, Mike Strecker, Vice President of Logistics and Telesales and Compliance Director of CSDVRS, LLC. (“ZVRS”), communicated with Gregory Hlibok, Chief of Disability Rights Office, Karen Strauss, CGB Deputy Chief, Eliot Greenwald, DRO Attorney Advisor, Caitlin Vogus, DRO Attorney Advisor, Darryl Cooper, DRO Attorney Advisor, and Roger Holberg, DRO Attorney Advisor, the following information on ZVRS’s behalf.

ZVRS presented to the CGB its support for what’s termed “At-Home Interpreting”, or “Secure Remote Interpreting”. ZVRS wanted to make sure the FCC was aware that several consumer groups support the concept of At-Home Interpreting if handled and managed in the correct way. Furthermore, ZVRS wanted to emphasize with the FCC that At-Home Interpreting is an approach that can be used by providers to help recruit qualified interpreters that do not live near a call center, may only want to work during limited hours, as well as be used as a team by providers to handle sudden surges in call volume. Additionally, it’s important to note that ZVRS only supports the concept of At-Home Interpreting in VRS “IF” it’s done in a secure manner as previously presented by ZVRS. ¹

During the meeting, ZVRS also asked for guidance on handling individuals that are violating the terms governing VRS (for example, a hearing individual falsely representing themselves as non-hearing).

¹ See Petition for Temporary Waiver of CSDVRS, LLC., CG Docket No. 10-51 (August 12, 2011).
Additionally, ZVRS discussed an April 2014 letter submitted to the CGB, OIG, and the EB regarding Sorenson "soliciting" our clients to modify and illegally disable and circumvent access control on iPads provided by ZVRS, and in some cases, reformattting the devices themselves. This included Sorenson posting videos within their Media Center on the ntouch device educating consumers on how to do it as well as to have them call Sorenson customer service for further assistance. Sorenson’s tactics violated several laws: Slamming and Unlawful Circumvention, the Digital Millennium Copyright Act Violations, and Computer Fraud and Abuse Act Violations. On April 10th, 2014, ZVRS sent a Cease and Desist letter to Sorenson demanding that they immediately stop these tactics. On April 16th, 2014, Sorenson responded claiming that ZVRS “may not take…steps that restrict a consumer’s unfettered access to other providers’ service.” Sorenson further stated “VRS users may ‘choose a different default provider, without changing the VRS access technology they use to place calls.’” Based on Sorenson’s response to our Cease and Desist letter, we are asking the Commission to begin a rulemaking procedure allowing all VRS providers to enable customers to “choose a different default provider” while using their existing CPE without the need to place dial-around calls to do so. Furthermore, all features and functionality should remain in place on these CPEs even after the change in default provider has taken place. For example, a Sorenson customer currently using an ntouch videophone could switch default providers and their ntouch videophone would now point to the new default provider. Again, based on Sorenson’s response to our Cease and Desist letter, dated April 10th, 2014, they are already in support of this concept and have taken steps with ZVRS’s CPE showing their unilateral support.

In closing, ZVRS advised the Commission to strongly consider rule changes based on the prior paragraph. We wanted to emphasize how ZVRS will soon be launching another piece of Customer Premise Equipment (“CPE”) and if the Commission does not enact the suggested rule changes, we request the Commission’s support to immediately put a stop to any of the previously mentioned illegal tactics used by Sorenson if they attempt to repeat historical behavior.

Respectfully submitted,

/s/

Mike Strecker
Vice President of Telesales and Logistics and Compliance Director
CSDVRS, LLC.

---

Cc:

Karen Strauss
Gregory Hlibok
Eliot Greenwald
Caitlin Vogus
Darryl Cooper
Roger Holberg