

DA 24-1269

Released: December 18, 2024

**COMMENT SOUGHT ON APPLICATION OF ZP BETTER TOGETHER AND  
TELEPERFORMANCE GROUP FOR CONDITIONAL CERTIFICATION AS A PROVIDER OF  
VIDEO RELAY SERVICE**

**CG Docket Nos. 10-51 and 03-123**

**Comments Due: January 8, 2025**

**Reply Comments Due: January 21, 2025**

The Consumer and Governmental Affairs Bureau (Bureau) seeks comment on an application filed by ZP Better Together, LLC (ZP), and Teleperformance Group, Inc., for conditional certification as a provider of Video Relay Service (VRS) supported by the Interstate Telecommunications Relay Service Fund (TRS Fund).<sup>1</sup>

ZP, which is indirectly owned and controlled by Kinderhook Reinvestment Fund IV2, L.P. (Kinderhook), holds a conditional certification to provide VRS under its current ownership.<sup>2</sup> Teleperformance proposes to acquire indirect ownership and control of ZP. Conditional certification would allow ZP, after acquisition by Teleperformance, to remain eligible to receive compensation from the TRS Fund for providing VRS on an interim basis, pending the filing of, and Commission action on, an application for full certification that will be filed after Teleperformance's proposed acquisition of ZP is consummated.<sup>3</sup>

ZP and Teleperformance have redacted portions of their application for which they request confidential treatment. Access to the redacted material is governed by the Third Protective Order in this docket.<sup>4</sup>

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<sup>1</sup> Application of ZP Better Together, LLC and Teleperformance Group, Inc. for Conditional VRS Certification, CG Docket Nos. 10-51 and 03-123 (filed December 9, 2024), <https://www.fcc.gov/ecfs/search/search-filings/filing/120956087893> (Application); Revised Application of ZP Better Together, LLC and Teleperformance Group, Inc. for Conditional VRS Certification, CG Docket Nos. 10-51 and 03-123 (filed December 17, 2024), <https://www.fcc.gov/ecfs/search/search-filings/filing/1217217863051> (removing redactions to the ownership structure of the post-transaction entity).

<sup>2</sup> See *Notice of Grant of Conditional Certification for CSDVRS, LLC to Provide Video Relay Service After Its Acquisition by Kinderhook Capital Fund IV, L.P.*, Public Notice, 29 FCC Rcd 16237, CG Docket Nos. 03-123 & 10-51 (CGB 2014).

<sup>3</sup> Application at 3-6 (detailing the proposal); *Consumer and Governmental Affairs Bureau Clarifies the Transferability of Telecommunications Relay Service (TRS) Provider Certification*, CG Docket No. 03-123, Public Notice, 23 FCC Rcd 10438 (CGB 2008) (clarifying that Commission certifications to provide TRS cannot be transferred, and if an acquiring entity is not already eligible to receive compensation from the TRS Fund, it must be certified before it can offer service for which it seeks compensation from the Fund).

<sup>4</sup> See *Misuse of Internet Protocol (IP) Captioned Telephone Service; Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing*

(continued...)

*Filing Requirements.* Interested parties may file comments on or before the dates indicated above. All filings must reference CG Docket Nos. 10-51 and 03-123. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).<sup>5</sup>

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs/filings>.
- Paper Filers:
  - Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.
  - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any deliveries not by the U.S. Postal Service Express) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - U.S. Postal Service first-class, Express, and Priority mail must be sent to 45 L Street, NE, Washington, DC 20554.

*Ex Parte Rules.* The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>6</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

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*and Speech Disabilities*, CG Docket Nos. 13-24, 10-51, and 03-123, Order and Third Protective Order, 33 FCC Rcd 6802, 6803, para. 4 (CGB 2018).

<sup>5</sup> *Electronic Filing of Documents in Rulemaking Proceedings*, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

<sup>6</sup> 47 CFR §§ 1.1200 *et seq.*

*People with Disabilities.* To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Bureau at 202-418-0530 (voice).

*Additional Information.* For further information regarding this Notice, please contact Ike Ofobike, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-1028 or by e-mail to [Ike.Ofobike@fcc.gov](mailto:Ike.Ofobike@fcc.gov).

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