

Angela Packard, M.A., RID  
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Federal Communications Commission  
445 Twelfth Street, SW  
Washington DC 20554

**RE: Docket 03-123 & 10-51**

On February 26, 2018 I had the pleasure of meeting with Deputy Chief Eliot Greenwald and Attorney Advisor Michael Scott both from the Disability Rights Office. Jon Pearson was also in attendance.

**I respectfully request the FCC prohibit the CA non-compete agreements.** Non-compete agreements squelch competition by creating an unnecessary barrier to entry for new businesses. Non-compete agreements also silo interpreter availability, which is a scarce commodity.

In regards to Sorenson's comments to my Ex Parte dated September 22, 2017, offering training to interpreters and professional development programs are not unique to Sorenson and should not be a consideration for deciding if non-compete agreements hurt competition and limit availability. Title IV of the ADA Section 225 allows the FCC to govern the provision of relay services to ensure the availability of relay services to those who need it. If a company practice limits availability the FCC has a responsibility and the authority to restrain that practice.

In regards to the skills based routing trial, I am concerned that, even though consumers and interpreters have passionately advocated for it there seems to be no participation in the trial. **I advocate that a special rate is not necessary for skills based routing.** Some VRS companies, while intentional or not, benefit from billing more minutes because interpreters are used for specialized calls who are not as skilled in the content and therefore take much longer to interpret the call. Frustration is felt by ASL users because they are asked to hold repeatedly and asked to repeat what they have said numerous times. Several interpreters have contacted me over this issue. Skill based routing would solve this issue, though it may be less attractive because routing it to someone already employed by the company with a specific skillset would result in less billable minutes compared to routing the call to someone who does not have that skillset.

Many working for VRS companies are qualified to interpret medical, legal and high level business meetings and would prefer those types of calls over other content. Companies already have legal and medically qualified interpreters working under agreed upon rates and are being used in this capacity by VRS companies. They interpret these specialized calls as they are routed to them randomly. Unfortunately, interpreters who are not as skilled, take longer to process the calls and are likely not paid as well, also get these high register calls.

It is common knowledge when an interpreter has background of the content being interpreted the satisfaction of consumers, as well as the clarity and accuracy of the message is greatly improved.

Calls of this nature, when not routed to appropriate interpreters, take much longer to interpret, costing the TRS fund as well as infringing on the resource of interpreted time. I would also argue that it contributes to interpreter burnout because the perception is that the most taxing calls to interpret are calls with content unfamiliar to the interpreter which can contribute to further depleting the interpreter workforce in VRS and community interpreting.

Respectfully Submitted,  
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