

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals	)	
With Hearing and Speech Disabilities	)	
	)	
Structure and Practices of the	)	CG Docket No. 10-51
Video Relay Service Program	)	
_____	)	

**COMMENTS: VIDEO INTERPRETER SURVEY**

The Federal Communications Commission’s (“FCC” or “Commission”) Notice of Inquiry (“*NOI*”) on service quality metrics for Video Relay Services (“VRS”),<sup>1</sup> prompted a survey of VRS Video Interpreters (“VIs”), including the Registry of Interpreters for the Deaf, Inc.’s (“RID”) Video Interpreters Member Section (“VIMS”), about their views on the factors affecting the quality of VRS interpreting. This filing provides the FCC with copies of the survey, attached, and the comments below provide an overview of the survey outcomes.<sup>2</sup>

The principal purpose of the survey is to help inform the *NOI* discussion about the quality of service (“QoS”) for VRS with the VI perspective. The survey is not intended to be a comprehensive or scientific evaluation of the VI experience, but to help orient the direction and future work on QoS in VRS.

The survey questions were crafted under the guidance of Sarah Spencer in her capacity as

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<sup>1</sup> *Structure and Practice of the Video Relay Service Program*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, FCC 17-26, Section III, (“*NOI*”).

<sup>2</sup> The survey and these comments were developed in the co-authors’ personal capacity, independent of the RID and the FCC and its Disability Advisory Committee (“DAC”) including its Relay and Equipment Distribution Subcommittee and VRS Metrics Workgroup. The co-author Jeff Rosen identifies in this filing as the Chair of the DAC VRS Metrics Workgroup to distinguish this activity from his role as the General Counsel of Convo Communications, LLC. These comments do not purport to represent the views of anyone except the survey participants.

an independent VI, whom also serves as the Chair of the VIMS. The questions included choosing from listed factors and an option to respond with “other” information. The survey was released on May 22, 2017 and closed on June 7, 2017.

1,095 people responded to the survey. 98.1% of the respondents indicated that they were VIs. 63.2% of the respondents indicated they had more than 5 years of working in VRS. 84.4% said they held an interpreter certification. 52% said that they worked between 20-40 hours a week in VRS; 29.8% worked between 8-20 hours a week.

In response to the survey question “What specific factors impact the quality and accuracy of VRS interpretation?” 90.5% said “Video/Audio Quality”, 74.1% said “Recovery time in between calls”, 72.1% said “Standard or idiosyncratic language factors of callers (ex. Nonnative ASL user, accents, etc)”, and 58.9% said “Years of experience as an interpreter.”

In response to a posed scenario, “A VI with several years of experience is processing a call with optimum video. What factors will impact the quality and accuracy of the message?” 75.85 responded “Length of “rest time” from the previous call” and 59.6% responded “Length of the interpreter's shift.”

In response to a posed scenario, “A new graduate is hired to work in VRS. The new graduate is processing a call with optimum video/audio quality. What factors would impact the quality and accuracy of the message?” 67.9% said “Length of time without a team to monitor the work and switch in when needed”, 63.9% said “Length of “rest time” from the previous call”, and 62.3% responded “Length of the interpreter's shift.”

When asked “When interpreting a lengthy call with optimum video and audio quality what most affects the quality of the interpretation?” 43.8% responded “Length of processing that

specific call (Mental fatigue)", 25.4% responded "Skill level of the interpreter", and 20.1% responded "Ability of another VI to team the entire call, monitoring the message, and switch as necessary."

88.5% responded "Yes" in response to "Does the number of years of experience a VI has affect the quality and accuracy of the calls they interpret?"

75.8% responded "Yes" in response to "Would quality improve if you were allowed a reasonable amount of "customer service time" to get information from the customer about the call before being expected to dial? (time spent with customer before a call that is not billed to the FCC).

68.3% responded "Yes" to "Do you believe a CDI working in your office, being available to team certain calls, would improve the quality to the consumer?" and 26.4% said "Maybe."

In response to "What do you believe would improve the quality of your interpretation in the VRS setting if video was already optimal?" 63.5% said "Standard system controlled time in between calls increased to 1 minute", 57.7% said "longer "customer service time" (time spent with the caller getting information before actually dialing. Time not billed to the FCC)", and 52.2% said "The availability of a CDI."

When asked "What applicable standards should be considered towards improving the quality and accuracy of video interpretation?" 74% responded "Implementing a system controlled "x minute(s) rest time" before another call is sent to your station (current systems typically send calls again between 7-13 seconds)" and 58.1% responded "Less "log in" expectations of the VI, ensuring mental and physical breaks away from the screen."

In response to “If only allowed one, what applicable standards would you choose to implement to improve the quality and accuracy of video interpretation?” 48.6% said “Implementing a system controlled “x minute(s) rest time” before another call is sent to your station” and 14.5% said “Interpreters working in VRS required to have a minimum of 3 years experience interpreting.”

When asked “What methods should be used to evaluate the quality and accuracy of video interpretation so that the VRS industry can improve quality as a whole rather than being used as a tool to evaluate specific video interpreters?” 47.5% said “‘Secret Shoppers’ from a 3rd party company. (Mock unknown calls to the interpreter to test the quality and report results to the FCC aggregated as a company average, not specific to VI)”, 42.2% said “Company operated quality assurance departments” and 39.7% said “Customer satisfaction surveys.”

When considering “What Demands impact the quality of service in VRS” under the Demand Control Schema,<sup>3</sup> 83% responded “Video/Audio”, 75% responded “Specific Language Content (world knowledge)”, 70.8% responded “KPI expectations (log in requirements, answer time, time spent with the customer before and after the call)”, and 59.1% responded “Vicarious Trauma.”

In response to “What controls are relevant to meeting the needs in VRS?” 88.4% said “Breadth of world knowledge”, 78.9% said “Length of interpreting experience”, 37% said “Certifications” and 22.2% said “Specialty Certifications (not necessarily interpreting related).”

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<sup>3</sup> The survey provided four demand categories: 1. Environmental; 2. Interpersonal; 3. Paralinguistic; and 4. Intrapersonal based on Dean and Pollard’s identification of three critical points during which time the interpreter is called upon to make key control decisions: 1. Preassignment - education, vocabulary, subject competence; nutrition; health; 2. Assignment - interpretive choices; relationships with other; ethical integrity and decisionmaking; and 3. Postassignment - reflection and analysis; professional development activities; continued ethical and professional integrity.

Finally, VIs provided a broad array of comments to “Is there anything we haven't asked about that you feel impacts the quality of interpretation in the VRS setting? If so, what?” Categorical representative samples of the VI comments in response are as follows:

### **Ergonomic/Environment:**

“We need to remember that interpreting is not only physical requiring appropriate ergonomics, but interpreting also requires the focus of one’s eyes. Staring at a bright monitor with bad lighting in the office has an affect, especially if there is a glare coming from some light in the office. These are all factors that affect quality for an interpreter.”

“Allowing sufficient time and opportunity to ergonomically set up a station before a shift begins. Currently, using the 5 minute window at the beginning of your shift then cuts into a VI's break time later when it is need to recover from processing calls. In order to not have our logins affected, VI's must set up their stations off the clock. Also, having adjustable overhead lighting that does not cause a glare, having more standing stations available, having a more sound proof barrier between vi's stations so as not to impact other vi's processing a call. It is not always possible to keep a low voice when processing calls (hard of hearing callers, elderly, angry callers, etc.)”

“VRS is physically and mentally more demanding than other interpreting fields. Which impacts the quality of the interpreting as well as the overall health of the interpreters, particularly full-time VRS employees. It potentially puts them at greater risk for health issues such as headaches, carpal tunnel syndrome, being sedentary due to sitting in a chair during most of their shift, etc”

### **Stress and Demand from the Company:**

“In my opinion, the main reasons for poor quality of interpretation are the lack of "rest time" in

between calls, lack of world knowledge/maturity, interpreters who were not trained properly, and the general lack of skill of some interpreters who are hired. The log in requirements and general monitoring of break minutes etc. cause fatigue and burn out very quickly. This might cause a rapid decline in the amount of interpreters, which does an disservice to our deaf and hard of hearing consumers who need us.”

“The requirement that training videos have to be viewed during our break time has a negative impact on the quality of interpretation. At the company where I work, we are rarely allowed additional "off call time" to complete required trainings. When your breaks consist of completing required trainings, catching up on VRS work emails, reading VRS company-related materials such as information about new technology or policies and procedures, then you don't have much time left for a true break, which contributes to mental and physical fatigue and reduced performance.”

“I believe the biggest obstacle VIs experience is the length of expected login and time between calls. If the login expectation could be reduced and time between calls could be increased, I believe there would be less burnout, fatigue and trauma, and a higher quality of interpretation would result.”

“The VRS industry ignores most best practices some of us have fought for years to establish. I have paid for my 2 full-time years in VRS with my physical and mental health and with my relationships with family and friends. The stress has been incalculable. The endless games and incentives to increase speed of answer in the face of ZERO focus on quality caused me such grief that I could barely stand it. Some VIs are fantastic and the service is so important but my company's business practices are abusive to both interpreters and deaf callers.”

“Burn out and fatigue seem to be swept under the carpet. I'm generally certified in critical stress

management and even i can not get time away from the phone for mental rest without facing losing my job. Strong tones of can't stand the heat get out of the kitchen prevail”

“We need more time between calls during the busy times of the day. They need to have more VIs in the center so that we wont have such busy times. I wish you could survey all the interpreters that have quit video relay to find out why they quit or work a lot less hours now. That would give you a good idea on why this job is too demanding.”

“Research on what working VRS has done to interpreters physically & psychologically over the years. Are we seeing increased repetitive motion injuries? Are we seeing increased stress levels due to vicarious trauma?”

"Solo VIs": For approximately six years, many VRS calls have been processed by VRS interpreters working completely alone in call centers, without any on-site or remote supervisors present and without any other interpreters working in the call center at the same time, without any of the "rigorous safeguards" that the FCC is now requiring for the trial period of at-home VRS interpreters.

“A required proportion of certified interpeters to non-certified would bring up skill levels. More CDI usage.”

“Cuts in rates paid by the FCC result in diminishing time between calls, lowered minimum quality standards so greater numbers of "less expensive" unqualified interpreters are hired to be VIs, increasingly draconian and inhumane "efficiency" requirements are heaped on VIs so service providers can maximize cashflow, and substandard services provided to consumers!”

### **Consumer Education and Technology:**

“Mobile devices are becoming a larger percentage of calls being processed and the majority have poor quality visual. This increases the stress and pressure of trying to accurately interpret calls. I believe there should be a minimum internet speed required to be able to access VRS.”

“Your questionnaire assumes that the deaf callers are signing accurately: with complete thoughts and with both hands - they are not. For VIs to be the most successful, there needs to be an understanding that carrying a mobile device in one hand while signing with one hand will never deliver an cohesive communication to the VI to be able to sustain the quality everyone desires. VRS is NOT a normal customer service scenario. It takes BOTH the deaf caller and the VI working in a partnership to create a quality interpretation. So complaints cannot just fall onto the interpreter.”

“You assume that there is optimal video/audio when that is not the case in most calls. It does affect the ability to do a quality interpretation. Pixilation and frozen screens and other visual interference definitely affects what the interpreter can see. It can be very challenging.”

We appreciate the VIs’ time in responding to the survey. The high number of participants in the survey in a short time indicates VIs desire to make their perspectives known in the important discussion about VRS interpreting standards. We look to continuing to collaborate with the FCC and VRS stakeholders in making the VIs a critical part of the work related to the *NOI*.

Respectfully submitted,

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Attachments:

VRS VI Survey Regarding Quality Questions  
VRS VI Survey Regarding Quality Responses