

For many years, the FCC has allowed VRS services to lack functional equivalency for consumers who:

- Are native users of foreign sign languages;
- Exclusively use idiosyncratic sign/gesture systems;
- Are emerging sign language learners;
- Have cognitive or developmental challenges;
- Display a great deal of variation in ASL, perhaps due to the use of a regional dialect;
- Are dependent on culturally-appropriate information to access meaning through interpreters when this information is not generally known to second-language learners of ASL;
- Are DeafBlind or deaf with limited vision.

In the recent proposal filed March 30th, 2015 "JOINT PROPOSAL OF ALL SIX VRS PROVIDERS FOR IMPROVING FUNCTIONAL EQUIVALENCE AND STABILIZING RATES", the six certified VRS providers have proposed a solution to this functional equivalency problem. They propose an eight-month trial where services of Certified Deaf Interpreters (CDIs) will be available upon request, either remotely or in-person.

I urge the FCC in the strongest terms possible to grant this petition. For many years, the FCC has failed to adequately address the need for CDIs within the rate structure in a way that allows for reimbursement of these critical services. This is an injustice to currently working VRS interpreters, most of whom are second-language learners of ASL, myself included. We are on the front lines, trying our best to provide services, yet we are denied access to needed specialist services.

As an analogy, this would be like Medicare telling general practitioners that if a specialist referral was necessary due to needs outside the scope of the general practitioner, the specialist services were either unavailable or did not qualify for reimbursement. It is heart-wrenching as an interpreter and as a human being to make your best attempt to provide service knowing that, in the current situation, your skill set is inadequate.

When providing in-person services, I often request that a CDI be secured to work as the lead interpreter. When I see the "before" and "after" results in comprehension, it is unquestionable that the clients' needs are much better served by these skilled specialists. In fact, there are many times that this is the only way their needs are addressed at all.

By refusing to reimburse these services appropriately, the FCC mandates that those of us who are certified interpreters to violate our Code of Professional Conduct that says:

"2.3. Render the message faithfully in the language most readily understood by consumers..." and

"2.4 Request support (e.g. certified deaf interpreters, team members, language facilitators) when needed to fully convey the message or to address exceptional communication challenges..."

Please do not continue to place interpreters between a rock and a hard place by denying us the ability to call upon the resources, skill and experience that CDIs possess. Please provide functional equivalent access to an important group of citizens as well.

Thank you,  
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