



April 7, 2015

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *Ex Parte* Letter in CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

The Registry of Interpreters for the Deaf, Inc. (RID) respectfully submits this *ex parte* letter in support of the Joint Proposal of All Six VRS Providers (collectively, the “VRS Providers”) for Improving Functional Equivalence and Stabilizing Rates (“Joint Proposal”), filed on March 30, 2015. RID has reviewed the document and urges the Federal Communications Commission (“FCC” or “Commission”) to take swift action to adopt the trial outlined in the Joint Proposal.

RID’s mission of excellence in interpreting is integral in the Commission’s work to fulfill its mandate of providing a functionally equivalent VRS. To that end, RID has raised concerns with the Commission about the quality of interpreting services in VRS stemming from 1) a lack of minimum standards for video interpreters, 2) a prohibition on skills-based routing, 3) underutilization of Certified Deaf Interpreters (CDIs) in VRS, and 4) practices in VRS that adversely impact the health and safety of video interpreters. We are encouraged that the Joint Proposal takes steps to address some of these issues without further endangering video interpreters.

**I. Freeze in Key Performance Standards**

RID is very encouraged by the considerations afforded to interpreters in the Joint Proposal, specifically, “the providers also intend to work through the DAC to study the effects on video interpreters of the rate decreases that have occurred and the value-added services that providers propose to implement, and they support regulatory change to ensure that interpreters do not bear additional burdens.” We strongly support the VRS Providers’ request that the FCC “prohibit providers from increasing the provider-specific key performance standards that interpreters must meet.” We believe that this is a critical piece to assessing the viability and sustainability of the measures outlined in the Joint Proposal and urge the Commission to adopt the prohibition as part of any order resulting from the Joint Proposal.

**II. Skills-Based Routing**

RID strongly supports skills-based routing in VRS. The NAD-RID Code of Professional Conduct (CPC) requires that interpreters “accept assignments using discretion with regard to skill, communication mode, setting, and consumer needs.” In VRS, this is made more feasible with skills-based routing. The implementation of skills-based routing to connect consumers with interpreters who best match their needs or who have experience with specialty language or topics helps to ensure the needs of consumers are accommodated.

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However, we do have concerns about what skills-based routing looks like in an industry that has no uniform minimum standards, such as national certification, for video interpreters. We encourage the FCC to closely examine how skills are assessed and the impact skills-based routing has on the interpreters in the “skilled” pool to ensure there is no degradation in the quality of interpreting service in VRS.

Again, we support skills-based routing and want to emphasize that it is not a “bonus feature.” Instead, it is a necessary component of VRS that will support the Commission in fulfilling its mandate of providing a functionally equivalent VRS.

### **III. Deaf Interpreters**

Deaf interpreters are largely underutilized in interpreted interactions, including in VRS. Deaf interpreters should be available and utilized when needed to ensure the overall success of a call. We are encouraged that providers are cognizant of this and are considering trials with Deaf interpreters to support a functionally equivalent VRS. The FCC should take necessary action to not only encourage the use of Deaf interpreters in VRS, but to ensure the viability of using Deaf interpreters in VRS. We want to emphasize again that the availability of Deaf interpreters to support successful VRS calls is not an “add-on” but an integral piece to a functionally equivalent VRS.

### **IV. Rates**

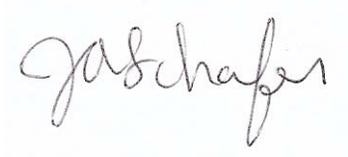
While RID is not in a position to say whether any given rate is too high or too low, we strongly believe that the reimbursement rate should be guided by what Consumer Groups recommend and what video interpreters are able to reasonably support. We believe that setting a rate without considering the position of Consumer Groups and recommendation of RID is antithetical to the Commission’s work to improve VRS.

### **V. Conclusion**

The Joint Proposal works to balance the needs of Deaf consumers with the needs of the interpreters, who often end up unduly burdened by regulatory changes. We are optimistic that the proposed trial periods for the service offerings will be helpful in developing permanent rules that protect interpreters as well as the Deaf consumers we serve.

RID looks forward to meeting with Commission staff in person to discuss further the VRS Providers’ Joint Proposal and RID’s ongoing involvement in the effort to develop permanent new rules.

Sincerely,



Julie Anne Schafer  
Director of Public Policy and Advocacy