

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Structure and Practices of the Video Relay
Service Program

Telecommunications Relay Services and
Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities

CG Docket No. 10-51
CG Docket No. 03-123

**JOINT RESPONSE OF ALL SIX VRS PROVIDERS TO STAFF QUESTIONS RE
VRS PROVIDERS' JOINT PROPOSAL FOR IMPROVING FUNCTIONAL
EQUIVALENCE AND STABILIZING RATES**

1) Is there evidence that lower rates have contributed to lower interpreter salaries or higher interpreter stress?

Each provider is addressing this question in an individual response.

2) Is it possible to achieve functional equivalence at upcoming rates?

Each provider is addressing this question in an individual response.

3) What is the turnover rate for interpreters today versus 2 years ago?

Each provider is addressing this question in an individual response.

4) How long do positions stay open today versus 2 years ago?

Each provider is addressing this question in an individual response.

5) What do you hope to learn from the trial?

Providers

Providers hope to learn the following information:

- What skills does the market demand most? How, if at all, should those skills be defined?
- What skill sets are actually available in the current labor pool?
- Is the labor pool sufficiently large to support customer demand for particular skills?

- What, if any, additional training will providers need to provide to Video Interpreters (“VI”) in order to implement skills-based routing?
- What type of screening will be necessary in order to ensure that a skill-based VI can do the job?
- What are the logistics for managing skills-based calls? For example, what hours of operation are the most needed? What is the optimal shift for a skilled interpreter? What is the process for transferring a call when it becomes apparent that the call does not require the interpreter’s specific skill? Can these questions be adequately resolved by market competition?
- Will there be sufficient demand for skills-based routing, and does skills-based routing solve the problems that consumers believe it will solve?
- How will costs, including the salaries of interpreters, change for skills-based routing, as compared with general VRS interpreting?
- How will skills-based routing affect the length of calls?
- How prevalent are attempts at fraud (for example, using VRS as a substitute for in-person interpreting)?
- How will increased use of deaf interpreters affect costs of VRS?

Consumers

Providers hope that consumers will learn the following:

- What sorts of calls benefit most from skills-based routing?
- What are the most important skills?

Interpreters

Providers hope that interpreters will learn:

- How does skills-based routing affect the work environment?
- How does skills-based routing affect the ability to provide functionally equivalent interpreting?

6) What is the market rate for interpreters with various skills versus generalist interpreters? How much will the trial of skills-based routing increase costs?

The providers do not know how much skills-based interpreting will cost. One of the purposes of the trial of skills-based routing is to determine how much it will cost.

Nevertheless, the providers can make a number of observations about the cost. First, a number of the interpreters that already work in the VRS industry possess specific skills, and skills-based routing would let providers match callers who need those skills with those interpreters at little or no additional cost. Second, to the extent that providers need to hire additional skilled interpreters in order to meet demand for a particular skill, these interpreters will likely be more costly than the average generalist interpreter. Indeed, some skills and geographies could command particularly high premiums. Although some publicly available resources may indicate that interpreters with special skills do not carry a high premium relative to generalist interpreters, for purposes of these surveys Sign Language interpreters are often grouped with Spoken language interpreters, improperly skewing the data.

7) What percent of calls would be skills-based routed?

The providers do not know what percent of calls would be routed through the skills-based queue. One of the goals of the trial is to answer this question.

8) What does the 80/45 proposal mean in terms of an average?

Some providers will submit provider-specific data in their individual filings under the Second Protective Order. In addition, the providers jointly emphasize that under a requirement that 80 percent of calls be answered within 45 seconds, the *average* speed of answer would be substantially less than 45 seconds. And while some providers have previously communicated that it would be possible to meet a requirement that 80 percent of calls be answered in 30 seconds, that response was based on the then-existing rates without necessarily factoring in

future rate cuts. However, what was achievable at past or even current rates does not indicate what would continue to be achievable in the face of further scheduled rate reductions. Taking this into account is consistent with the D.C. Circuit ruling that any future reductions in Service Level need to factor in the cost impact to the providers.

The providers jointly proposed 45 seconds based on several key factors. First, the Registry of Deaf Interpreters (“RID”) communicated to the providers that a 30-second requirement would not be acceptable to interpreters because it would create unacceptable working conditions. Secondly, the providers feel that with a rate freeze in place, the 80/45 service level is achievable without driving any significant increase in their current cost structure (*i.e.*, the current rates). After extensive discussions with the Consumer Groups and RID and analyzing their current operating expenses, the providers determined that a 45-second requirement was acceptable to both consumers and RID and therefore proposed a 45-second requirement rather than a 30-second requirement.

Respectfully Submitted,

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