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FEDERAL COMMUNICATIONS COMMISSION
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Federal Communications Commission
Office of the Secretary

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

DOCKET FILE COPY ORIGINAL
CG Docket No. 03-123

**SORENSEN COMMUNICATIONS, INC.'S RESPONSE TO STAFF QUESTIONS RE
VRS PROVIDERS' JOINT PROPOSAL FOR IMPROVING FUNCTIONAL
EQUIVALENCE AND STABILIZING RATES**

Sorenson Communications, Inc. ("Sorenson") hereby submits its response to questions posed by the Commission staff at the April 8, 2015 meeting with Video Relay Service ("VRS") providers. In general, Sorenson notes that the 2010 rate cuts and attendant closing of several interpreting centers, followed by the 2013 rate cuts along with the simultaneous adoption of speed-of-answer requirements that caused interpreters to bear the brunt of unpredictable fluctuations in call volumes, have demoralized VRS interpreters and made VRS a less attractive setting for interpreters. The small stream of new interpreting graduates every year is not sufficient to fill VRS openings, especially because many of those new graduates do not yet have the skills to interpret in VRS, which is highly demanding. Further scheduled rate cuts will perpetuate this downward spiral, threatening the ability of VRS providers to provide functionally equivalent service.

REDACTED—FOR PUBLIC INSPECTION

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

The rate cuts adopted by the June 2013 VRS Reform Order have already forced Sorenson to decrease Video Interpreters' compensation. As a result of the rate cuts, Sorenson has

****BEGIN HIGHLY CONFIDENTIAL**** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ****END HIGHLY**

CONFIDENTIAL** In particular, this decrease in compensation makes Sorenson and other VRS providers less competitive in being able to hire from the pool of only 750 potential new RID-certified interpreter graduates each year.

****BEGIN HIGHLY CONFIDENTIAL**** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

****END HIGHLY CONFIDENTIAL****

The rate reductions have also forced Sorenson ****BEGIN HIGHLY**

CONFIDENTIAL** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ****END HIGHLY**

CONFIDENTIAL**

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

The scheduled rate decreases will have drastic negative consequences on Sorenson's ability to continue providing functionally equivalent service because the cuts will make it

****BEGIN HIGHLY CONFIDENTIAL**** [REDACTED]

[REDACTED]

[REDACTED] ****END HIGHLY**

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First, the rate cuts will force Sorenson to reduce ****BEGIN HIGHLY**

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[REDACTED]

[REDACTED]

[REDACTED]

REDACTED—FOR PUBLIC INSPECTION

interpreter efficiency. ****BEGIN HIGHLY CONFIDENTIAL**** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ****END HIGHLY CONFIDENTIAL**** It is therefore not likely that Sorenson can maintain service levels through an increase in interpreter efficiency, and thus further rate cuts are likely to negatively affect service levels.

Third, if rates go down further, Sorenson will have no choice but to cut ****BEGIN**

HIGHLY CONFIDENTIAL** [REDACTED]

[REDACTED]

REDACTED—FOR PUBLIC INSPECTION

It is important for the Commission to keep in mind that few interpreters want to work full-time in VRS, and doing so is not necessarily desirable from the standpoint of providing high quality interpreting on every call. VRS interpreting is physically taxing, requiring intense visual and mental concentration, as well as the ability to deal with stressful situations.

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

This question is addressed in the VRS providers' joint filing.

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?

This question is addressed in the VRS providers' joint filing.

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

This question is addressed in the VRS providers' joint filing.

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

If the Commission requires 80 percent of calls to be answered within 45 seconds, Sorenson expects its average speed of answer would be ****BEGIN HIGHLY**

CONFIDENTIAL** [REDACTED] ****END HIGHLY CONFIDENTIAL****.

April 20, 2015

Respectfully submitted,



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