

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

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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  
CG Docket No. 03-123

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**CSDVRS'S RESPONSE TO STAFF QUESTIONS RE  
VRS PROVIDERS' JOINT PROPOSAL FOR IMPROVING FUNCTIONAL  
EQUIVALENCE AND STABILIZING RATES**

CSDVRS, LLC. "ZVRS" hereby submits a response to questions posed by the Commission staff at the April 8, 2015 meeting with Video Relay Service ("VRS") providers. In addition, to this filing, which contains provider-specific proprietary information, the providers are submitting a joint response addressing a number of the questions below.

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

[REDACTED]

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

ZVRS has already found it difficult to maintain function equivalence with the most major emphasis on our ability to hire and retain qualified interpreters (see response 3 below). This is largely due to increased stress within VRS and the fact that VRS is competing with community work for qualified interpreters. In many cases, the community work pays significantly higher when compared to VRS. See "Attachment A" for emails received by Call Center Managers around the nation. This has been a reoccurring theme being confronted by our Call Center Managers all over the nation.

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

[REDACTED]

[REDACTED]

[REDACTED]

In short, the declining rates and the increased service level requirements in place during a majority of 2014 are driving interpreters away from VRS and making it more and more difficult to recruit qualified interpreters. Whether it be in the form of turnover rates, moving from full-time to part-time positions, or reducing the hours they are willing to work, qualified interpreters are going to be harder and harder to source within this industry. In ZVRS's opinion, there is no functional equivalency without qualified interpreting. Asking ZVRS to identify how the rate

cuts will impact our ability to provide functional equivalency, the answer is simple, qualified interpreters will become a thing of the past when it comes to VRS.

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

[REDACTED]

**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, ZVRS expects the average speed of answer would be 20 seconds. For more information, see VRS providers' joint response.

Respectfully submitted,

/s/ \_\_\_\_\_  
Mike Strecker  
Compliance Officer

Date: 4/21/2015

**ATTACHMENT A**  
**[7 pages- Redacted ]**