

May 12, 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

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Dear Ms. Dortch:

On May 8, 2015, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”); Andrew S. Phillips, Policy Counsel, National Association of the Deaf (“NAD”); Julie Schafer, Director of Public Policy and Advocacy, Registry of Interpreters for the Deaf, Inc. (“RID”) and the undersigned participated in a meeting with Maria Kirby, Legal Advisor to Chairman Wheeler.

The representatives discussed the Consumer Groups’ April 7, 2015 *ex parte* letter in support of the proposals to improve functional equivalency for video relay service (“VRS”) users that are included in the Joint Proposal of All Six VRS Providers<sup>1</sup> (collectively, the “VRS Providers”) for Improving Functional Equivalence and Stabilizing Rates (“Joint Proposal”), filed on March 30, 2015.<sup>2</sup> They encouraged permitting a trial of skills-based routing to collect measurable data such as whether enough interpreters are available with certain skill sets (*e.g.*, medical, legal, IT) and whether skills-based routing results in more efficient calls (*e.g.*, shorter call duration, fewer follow-up calls). The representatives do not believe there is an interpreter shortage or that an interpreter shortage would be created by a skills-based routing trial since consumers would have the choice to stay in the general interpreter pool or wait to be assigned to an interpreter in the

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<sup>1</sup> The “Six VRS Providers” include ASL Services Holdings, LLC, Sorenson Communications, Inc., Convo Communications, LLC, Hancock Jahn Lee & Puckett, LLC (CAAG), CSDVRS, LLC (ZVRS), and Purple Communications Inc.

<sup>2</sup> *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 Nos. 10-51, 03-123, Joint Proposal of All Six VRS Providers for Improving Functional Equivalence and Stabilizing Rates (filed Mar. 30, 2015) (“Joint Proposal”).

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general pool who has skills for a particular call. Consumers have the ability to choose community-based interpreters with particular skill sets and should be able to do the same with VRS to improve functional equivalency. Representatives believe that the use of Certified Deaf Interpreters are an integral component to achieving functional equivalency and the rate should be set in a manner that compensates for their work.

The representatives also raised concerns about the quality of VRS if rate cuts continue and stressed that consumers and interpreters should not have to bear the burden of a rate cut that directly impacts quality. The FCC has implemented rate cuts for two (out of four) years but has not yet implemented reforms adopted in 2013 to support third party outreach and VRS research and development, among other things. The Consumer Group representatives therefore advised the Commission to consider adopting the rate stabilization proposal until such time as the 2013 reforms are fully implemented.

Respectfully submitted,

*/s/ Danielle Burt*

Danielle Burt

Counsel for TDI

cc (by e-mail):

Maria Kirby  
Claude Stout  
Andrew S. Phillips  
Julie Schafer