



RSA MID-AMERICA
REGIONAL INTERPRETER EDUCATION CENTER

UNC @ Lowry Campus - 1059 Alton Way, Box 7 - Denver, Colorado 80230 - www.unco.edu/marie - 1-866-885-6087 x4

January 4, 2015

Via Electronic Filing

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

Re: Reply Comments to CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

The Mid-America Regional Interpreter Education Center ("MARIE Center"), a resource center on interpreting and interpreter education housed at the University of Northern Colorado's Distance Opportunities for Interpreter Training Center, and the Collaborative for the Advancement of Teaching Interpreting Excellence at St. Catherine University ("CATIE Center") respectfully submit the following reply comments in response to the Federal Communications Commission's ("FCC") Further Notice of Proposed Rulemaking ("FNPRM") in the above proceeding on the FCC's proposal to modify the Video Relay Service ("VRS").

The MARIE and CATIE Centers are not in a position to comment on rate increases; however, we do express support for the comments filed by the Consumer Groups of VRS and the Registry of Interpreters for the Deaf ("RID"). Our comments are specific to proposals intended to increase the functional equivalence of VRS calls.

I. Skills-Based Routing

The MARIE and CATIE Centers are in strong support of skills-based routing in the provision of VRS services. As regional centers for the National Consortium of Interpreter Education Centers ("NCIEC"), we are leading the effort to provide specialized trainings in healthcare, legal and other specialized settings because consumers have indicated that specialized interpreters provide better access and interpreters have indicated that specialized training creates a more equivalent interpretation.

The VRS setting requires specific expertise to ensure meeting the Commission's mandate of providing a functionally equivalent VRS. Skills-based routing *should* be a basic feature of the VRS service to ensure consumers are connected with interpreters who best match their needs. Resources such as the ones we offer are already providing skill-specific training for interpreters that can carry over to the VRS setting. In light of what we know about skill specific training options available to interpreters, we recommend the FCC carefully and thoughtfully address *how* skills are to be assessed among interpreters to ensure adequate skills-based routing while still maintaining quality among all VRS services.

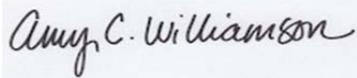
II. Deaf Interpreters

Deaf interpreters are a key feature to ensuring functionally equivalent VRS. The MARIE and CATIE Centers support the use of Deaf interpreters in VRS. NCIEC studies have found that the use of a Deaf interpreter provides for a level of cultural and linguistic bridging that is not always possible when hearing interpreters work alone. Deaf interpreters are able to combine their formative experience with their training, ensuring that the Commission's mandate of providing functionally equivalent VRS is achieved.

III. Conclusion

The MARIE and CATIE Centers support the request from Consumer Groups to address the quality of VRS services. A trial that includes the provision of skills-based routing and Deaf interpreters will be beneficial in determining how these services should be provided. The MARIE and CATIE Centers believe these should be a basic feature of VRS to ensure functional equivalence for VRS consumers. We ask that the FCC respectfully consider these reply comments when identifying actions to improve the functional equivalence of VRS.

Sincerely,



Amy Williamson, M.A., CI, CT, SC:L, Ed:K-12
Instruction Coordinator, UNC-MARIE Center



Richard Laurion, M.A.
Director of Programs and Operations, CATIE Center