

The Registry of Interpreters for the Deaf, Inc. (RID) respectfully submits the following comments for consideration and review by the Federal Communications Commission (FCC). The RID is the professional association of Sign Language Interpreters and Transliterations, hereafter referred to as Interpreters, and represents a membership of over 11,000 professionals actively engaged in the provision of interpretation and transliteration services for Deaf/Hard of Hearing and Hearing persons. The membership and Board of Directors encourage the FCC to continue laying the groundwork for functionally equivalent telecommunications through Video Relay Services (VRS). The membership and Board of Directors are concerned by the downward trend in quality and availability of VRS over the last few months. Regrettably, the FCC has determined that non-shared language (i.e. Spanish/ASL) services are non-reimbursed. There significant number of Deaf citizens who regularly use the services of bi-lingual Interpreters between Spanish and American Sign Language.

The RID places Interpreters' health, welfare and professional standards as a top priority in the establishment of regulations governing the provision of VRS. The Association asks that the FCC develop a separate set of regulations designed to meet the unique challenges which VRS Interpreters face. For example, the RID offers a generalist certification test (Certificate of Interpretation [CI] & Certificate of Transliteration [CT]) which establishes a minimum level of competency. While the FCC does not currently require a VRS Interpreter to be certified, the de facto industry standard used by VRS providers is RID CI or CT, NAD IV or V. The RID also offers a specialist certificate for Legal Interpreting [SC:L]. Current regulations require the VRS Interpreter to accept all incoming calls. If the callers need to discuss topics of a legal nature, an Interpreter who holds either the CI or CT, NAD IV or V may not by definition be qualified to accurately and effectively relay the content of the call as required by the Americans with Disabilities Act (ADA). The deaf and hearing callers may be placed in a situation which is far from functionally equivalent. The point is subtle, however the ramifications are far reaching when child custody, parental rights, felony charges, or prison term may be at stake.

Additionally, the RID stands with the other members of the National Video Relay Service Coalition by recommending against adoption of the reimbursement rate for VRS proposed by the National Exchange Carriers Association (NECA) on May 3, 2004. The workplace has dramatically changed for Interpreters. Once out in the field, Interpreters are now finding themselves in less than ergonomically effective office environments facing repeated injuries due to overuse and fatigue caused by eye strain and high-demand performance situations. As the industry matures and adapts to the needs of the workforce these issues will be resolved. However, there is an ongoing need for research and development in technology, ergonomics and improved quality of service. Currently, many VRS calls are low resolution causing significant eye strain on the Interpreter. These issues require adequate funding both internally at the provider level and potentially at the Federal level for motion study grants and the imperative need

to train a new generation of Interpreters as the need for video interpreters continues to grow.

At the current rate of growth, VRS will hit a workforce supply ceiling. The shortage of Interpreters has been a national crisis for several years as identified by the RID and the National Association of the Deaf (NAD) (Views, 12/95). This shortage will only be exacerbated if recruitment, training and retention efforts are not fully funded by the appropriate governmental agency. The RID encourages the FCC to work with other Federal agencies and lawmakers to appropriate sufficient training monies to recruit, train and retain adequate numbers of skilled professional Interpreters to meet the demand. The RID and NAD are currently developing a joint testing system which will test and certify Interpreters at a minimum generalist level of competence.

There are many issues to be resolved; the RID membership, 11,000 strong, understand the complexities before of the Commission. The RID respectfully and adamantly encourages the FCC to involve Interpreters, the engine of the VRS machine, in every way possible. The RID has established a working Video Interpreting Committee (VIC) which is available for consultation to the FCC. The VIC is currently drafting a Standard Practice Paper (SPP) which will outline a national best practices model for the delivery of interpreting services via video. The VIC strongly encourages the FCC to seek guidance from the RID in the coming months.

The above comments are respectfully and duly submitted, August 24, 2004, by the Video Interpreting Committee of the Registry of Interpreters for the Deaf, Inc.

/Daryl Crouse, CI, CT/
Video Interpreting Committee Chair
Registry of Interpreters for the Deaf, Inc.