

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	CG Docket No. 03-123
Individuals with Hearing and Speech)	
Disabilities)	
)	
Petition for Clarification on Spanish VRS)	
By Communication Service for the Deaf)	

COMMENTS OF SORENSON COMMUNICATIONS, INC.

Sorenson Communications, Inc. (“Sorenson”) submits these Comments in response to the Federal Communications Commission’s (“FCC’s” or “Commission’s”) Public Notice¹ seeking comment on Communication Service for the Deaf’s (“CSD’s”) Petition for Clarification (“Petition”) filed in the above-captioned proceeding.²

I. INTRODUCTION

Section 225 of the Communications Act of 1934, as amended, requires the FCC to ensure that 100 percent of deaf and hard-of-hearing individuals have access to relay services that are “functionally equivalent” to voice communication services provided to hearing users.³ Today less than ten percent of deaf people have access to Video Relay

¹ *Federal Communications Commission Seeks Comment on Petition for Clarification Concerning the Provision of ASL-to-Spanish Video Relay Service (VRS)*, Public Notice, 21 FCC Rcd 1656 (2006) (DA 06-387).

² Communication Service for the Deaf, *Petition for Clarification on Spanish VRS*, CG Docket No. 03-123 (Feb. 6, 2006) (seeking clarification that providers of American Sign Language-to-Spanish Video Relay Service are not required to offer the service 24 hours a day, seven days a week to be eligible for compensation from the Interstate TRS Fund).

³ 47 U.S.C. § 225(a)(3); 47 U.S.C. § 225(b)(1).

Services (“VRS”). As the Commission recognized, there is a clear demand for American Sign Language (“ASL”)-to-Spoken Spanish VRS, which is a key part of meeting the statutory requirement of providing access to 100 percent of deaf and hard-of-hearing individuals.⁴ The statute also requires efficient implementation of ASL-to-Spoken Spanish VRS, directing the Commission to ensure that relay services are available “in the most efficient manner.”⁵

Sorenson strongly supports access to ASL-to-Spoken Spanish VRS and is committed to offering such service in an efficient manner, without sacrificing quality of service. Sorenson is acutely aware of the need for skilled American Sign Language interpreters who also speak fluent Spanish and recognizes that it will take time to build the pool of interpreters needed to meet the demand for ASL-to-Spoken Spanish VRS.

Sorenson proposes that the industry work together with consumer groups and deaf advocates to develop a consensus plan for providing ASL-to-Spoken Spanish VRS, in a manner that is efficient and that ensures high quality of service. Sorenson will work to convene an industry meeting and will report back to the Commission once a consensus plan has been achieved.

II. DISCUSSION

Sorenson and other VRS providers will need some time to ramp up provision of ASL-to-Spoken Spanish service. Sorenson is currently working on an ASL-to-Spoken Spanish offering and is already running a trial of the service. Through the trial, Sorenson

⁴ See, e.g., *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67 and CG Docket No. 03-123, Order on Reconsideration, 20 FCC Rcd 13140, ¶ 19 (2005) (explaining that ASL-to-Spanish VRS furthers the “goal of universal service”).

⁵ 47 U.S.C. § 225(b)(1).

is gaining valuable information about the demand for ASL-to-Spoken Spanish service. Sorenson plans to use this information to tailor its service to meet the needs of its customers.

Over time, Sorenson will hire and train interpreters who are proficient in both spoken Spanish and ASL. This combination of skills is relatively rare and it will take a significant amount of time for Sorenson to build up a team of trained interpreters capable of providing high-quality ASL-to-Spoken Spanish VRS.

As ASL-to-Spoken Spanish VRS grows and matures, the FCC should work with VRS providers to educate consumers about the availability of this new service. Providers should also be required to post information about this new service on their websites, including the hours of operation. In addition, the Commission should ensure quality of service by requiring ASL-to-Spoken Spanish calls to be included in the monthly speed-of-answer calculations that apply to all VRS calls. Finally, the FCC should ensure that any rules governing access to emergency services for VRS apply equally to ASL-to-Spoken Spanish calls. Specifically, providers should not be permitted to offer ASL-to-Spoken Spanish VRS unless they can comply with the generally-applicable rules the Commission establishes as part of its current proceeding on access to emergency services.⁶

III. CONCLUSION

Sorenson fully supports the Commission's efforts to expand the availability of VRS by providing reimbursement for ASL-to-Spoken Spanish calls. Sorenson will invite

⁶ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Access to Emergency Services*, Notice of Proposed Rulemaking, 20 FCC Rcd 19476 (2005) (FCC 05-196).

other providers and deaf advocacy groups to develop a consensus plan for providing ASL-to-Spoken Spanish VRS without sacrificing efficiency or quality of service. The Commission should further protect deaf consumers by making clear that providers choosing to offer ASL-to-Spoken Spanish VRS are required to provide mandated E911 capabilities and meet the speed-of-answer requirements that apply to all other VRS calls.

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Certificate of Service

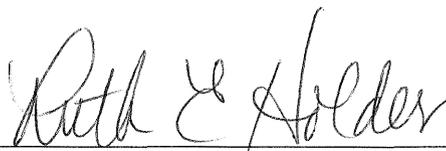
I, Ruth E. Holder, hereby certify that on this 7th day of April, I caused a true and correct copy of the foregoing Comments of Sorenson Communications, Inc. to be mailed by first-class mail to:

Karen Peltz Strauss
KPS Consulting
3508 Albemarle Street NW
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Consultant to Communication Service for the Deaf

Ben Soukup
Communication Service for the Deaf
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Sioux Falls, ND 57103

Additionally, I caused a true and correct copy of the foregoing Comments of Sorenson Communications, Inc. to be mailed by electronic mail to:

Dana Jackson
Consumer and Government Affairs Bureau
Disability Rights Office
Federal Communications Commission
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Ruth E. Holder