

Federal Communications Commission  
Regarding Video Relay Services  
Hearing #03-123  
August 25, 2008

At the 2008 APCO Conference in Kansas City, MO I sat in on a presentation from Mike Maddix. He is a representative of Sorenson Communications in Salt Lake City and provides video relay services (VRS) for the hearing impaired. The system, as I understand it, enables a hearing impaired person to make a telephone call to another person who is either hearing impaired or not. A call is made via their VRS service provider using a camera that is mounted over their TV set (provided by the company).

The call goes to the VRS service, their operator/ translator can see the person and can translate the call for a non-VRS equipped person. In the event of a call to 9-1-1, Entrado routes the call to the appropriate PSAP and a three-way conversation is established. The VRS translator and caller can see each other and the information is passed along verbally to the 9-1-1 dispatcher, and visa-versa, by the VRS employee.

I am a lieutenant in charge of our local public safety answering point (PSAP). I have worked in law enforcement for the past 28 years and the current policy regarding VRS causes me to have public safety concerns. Such as the following:

1. The VRS translator does not “interpret” what they see or hear. For example, if the hearing impaired caller is reporting Crime “A” but the VRS translator sees Crime “B” in progress, only what is signed to the VRS translator will be relayed to the 9-1-1 call taker. This could be a safety issue for police, fire or EMT responding to a situation that is not what they were dispatched to.
2. By law, the VRS companies only have to maintain these tapes (audio and video) for 30-days. These could be of great evidentiary value in the event of a domestic violence or other crime against a person.

The reason I was told this occurs is because the VRS translator is the “functional equivalent of a dial tone.” However, if a hearing person called 9-1-1 and our dispatcher could hear that there was a difference from what was being said and what the background sounds indicated, this information would be relayed to the responders.

Please consider these comments in your decision making process.

Sincerely,

Walter G. Krumbach, Lieutenant  
PSAP Manager