

It is the opinion of 258 Communications (A subcontractor with LifeLinks) Management that the location of a call center, be it in the US or beyond its borders, has less to do with legitimacy of minutes coming from such a call center, than the climate of the management team overseeing the call center. Likewise, the concerns pertaining to quality are best looked after by the company in question, not the FCC. It behooves the VRS provider to ensure quality is upheld for fear of losing customers. There is currently no mandate to use only certified interpreters. Therefore if the VRS company finds qualified interpreters willing to work from beyond the borders, Management at 258 Communications believes that company should be free to engage the interpreters as it sees fit.

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With respect to the use of interpreters at home, Management finds security and privacy to be enhanced by the at home arrangement. Traditional call centers allow for interpreters to peer in on one another during calls, and the security of individual calls to be compromised as a matter of course. The system that 258 Communications has in place allows for transfers and for calls to be monitored by members of management. It provides for the support needed and privacy required without creating unnecessary expenses. Furthermore, it allows interpreters who would otherwise be unable to work, due to geographic limitations, the chance to do so thereby mitigating the impact of interpreter scarcity.

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The topic of "White Labels" is one that many larger companies take exception with because of the significant appeal that local organizations have. In communities across the US, small boutique VRS companies are starting up, through subcontractor agreements with licensed VRS providers, and the Deaf community responds. As this plays out it has eroded the competitive position of the larger VRS players. While the concern over legitimacy of minutes persists, it is incumbent upon licensed provider to be vigilant and to ensure that abuses are curtailed and abusers are shut down.

Management at 258 Communications views "White Labels" as a key link to smaller groups of Deaf consumers. The poor decisions made by select groups of individuals should not be used to substantiate biases against an otherwise effective method of conducting business.