

Comments on CG Docket No. 10-51

Re: Structure and Practices of the Video Relay Service Program.

19-21: Security and privacy of the deaf individual is enhanced by utilizing the at-home call center. These call centers are typically staffed by one CA, which completely mitigates the possibility of overhearing/watching other calls. In addition, a home-based call center allows CAs to work in the VRS setting regardless of their geographical location, physical ability to commute, or inclement weather conditions. It also provides additional flexibility for working parents to balance childcare needs. Technology allows for telecommuting in the VRS industry, which has a positive impact on the environment.

As a home based CA, I follow the same FCC Regulations as the traditional call center. I am required to have all my equipment running through a back up battery in the event of a power failure. My office has a locking door separating it from the remainder of the house. Thus, I am able to handle all calls, including emergency calls, with a proper management support structure in place. I am also able to transfer a call to another CA with the simple click of a button, in the same manner that a transfer would occur in a traditional call center.

Working from home does not make it any easier for CAs to initiate or participate in fraudulent VRS calls. Again, I follow the same FCC Regulations as a traditional call center. I take calls in the order they are received. There are no bonuses or incentives provided for interpreting calls of any kind. The company in which I work has ethical agreements in place and a zero tolerance policy for fraudulent behavior.

45-48: Small business commerce is an integral part of the American economy with competition being a positive element for the consumer. Wiping out White Label providers would be akin to shutting down small boutiques and allowing only large companies to hold an economic monopoly. Small VRS companies need an opportunity to grow while providing consumers with a choice in products and services.

Once consideration might be that White Label companies are given the opportunity to be provisionally licensed with the FCC within a specific operational period of time, based on standardized criteria provided by the FCC and a recommendation from the affiliated licensed VRS provider.

Thank You