

**Persis Bristol**

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Comments on CG Docket No. 10-51

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

Re: ¶ 19-21 I can attest that security and privacy of the deaf and hearing individual is enhanced by utilizing the at-home call center. These call centers are typically staffed by one CA, which drastically diminishes the possibility of overhearing/watching confidential 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. Home based call centers support the family and thus our future generations. We now have technology that allows for telecommuting in the VRS industry. This has a positive impact on our environment and again supports future generations.

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. I am able to handle all calls, including emergency calls, with a proper management support structure in place. I am 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. In the event of emergencies, technical or otherwise, escalation procedures are clear and concise. I have immediate access via cell phone, telephone, video phone, instant messaging, remote access, and email.

Working from home does not make it any easier for CAs to initiate or participate in fraudulent VRS calls compared to any traditional call center where the management has turned a blind eye to such activities. The companies I work with are ethical and invested in the service for the good of all involved. 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 VRS Company in which I work has ethical agreements in place and a zero tolerance policy for any fraudulent behavior. Call activities are monitored for our safety and quality of service.

Eliminating home based call centers will do nothing to decrease or prevent fraud within the VRS industry. It will only serve to hurt families by removing a source of income. It will serve to negatively impact our children by taking mothers and fathers out of the

home. It will serve to increase the carbon footprint in our environment by forcing qualified interpreters to seek work outside of the home to support their families. It will only increase the disservice being done to the Deaf community and spit in the face of the American with Disabilities Act by denying the community the freedom of choice.

Re: ¶ 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. Subcontracted VRS companies are the specialized arm of Video Relay Service. One company can not be all to all people. Some people shop at the specialized “stores” depending on their needs. Large companies are forced to focus on more grand outcomes and bottom lines while the smaller companies are able to provide more personalized service and attention to detail. Just as a boutique salesperson has more time than a worker bee at the large department store. Small VRS companies deserve the opportunity to grow and thrive while providing consumers with a choice in products and services.

I work for a subcontracted VRS company that displays the licensed VRS provider openly. The licensed provider does an exceptional job of supporting and fostering growth in a symbiotic relationship. If the concern is accountability to the FCC, one 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 for your consideration. I hope that these comments and others will serve to shed light on the true areas in need of reform.

Persis Bristol  
RID- CI/CT and NAD-Master level 15 years experience  
VRS Interpreter 6 years experience  
Home based VRS interpreter 3 years experience.