

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

15-June-2010

RE: CG Docket 10-51, and the filing by the FCC of 11-Jun-10, FCC 10-88

I am an employee of Sorenson Communications and work from a call centre in Canada. Your recent proposal to close down VRS call centers outside of the United States is unfair and I feel that the arguments presented in this proposed rule change call my ethics into question.

I am a professionally trained American Sign Language (ASL)/English Interpreter who lives outside of the United States. American Sign Language is the primary sign language used by Canadians and is recognized as the "official language" for Deaf persons in Canada. I am fully capable to interpret effectively, accurately and impartially both receptively and expressively using any necessary specialized vocabulary, therefore I am fully qualified as a VRS Communications Assistant. Where I reside or the location from which I provide services has no bearing on these qualifications.

I am also a member of both the Registry of Interpreters of the Deaf (RID) and the Association of Visual Language Interpreters of Canada (AVLIC). As a member, I uphold the Code of Ethics of both professional associations and adhere to the strict policies enforced by my employer, Sorenson Communications.

Your statement that call centers outside of the U.S. may lack appropriate supervision is incorrect. Our centre has the same supervisory structure as our counterparts in the United States. Our training, software, supervision and security measures are standard for all Sorenson centers no matter where they are located. We are updated regularly on company and FCC policy changes and are in constant communication and contact with our supervisors and managers.

The location of a call center also has no relevance to instances of fraud. Your comments imply that interpreters outside of the United States do not hold to the same ethics as those who reside there. As mentioned previously, I adhere to the ethics of both my professional associations, Canadian and American. The location of my physical body does not play a role in my ethical decision making process. I would never work for a company that I felt was dealing with fraudulent

calls or collecting monies that were not rightfully due to them.

I have never processed a call in which none of the participants were located in the United States or one of its territories. I have refused to make connections for callers when I have noticed Canadian area codes in both the incoming and outgoing call boxes, citing FCC policies and those of Sorenson Communications.

Sorenson established call centres in Canada in order to meet the demands of VRS consumers as well as to meet the FCC's required time limits to answer calls. If you go ahead with these closures it will seriously impact the level and quality of service that is currently being provided. Our community has finally struck a balance of services provided to our own consumers as well as to those of the American VRS consumer base and we are on the verge of offering comparable services to Canadian consumers. Closing Canadian centres will have a seriously negative impact the provision of VRS services to Canadians in the future.

I also oppose the closure of any call centres located in Puerto Rico. This will have a severe impact on our consumers who rely on Spanish speaking interpreters to communicate with family and friends who use one of the Official Languages of your country.

I urge you to reconsider your proposed closures of VRS centres outside of the United States as this will have a profoundly far-reaching effect on all Deaf persons who reside in North America.

Sincerely,
Caroline Tetreault