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

14-June-2010

In regards to CG Docket 10-51, and the filing by the FCC of 11-Jun-10, number FCC 10-88, I would like to pose the question:

If all training, software and security implementations are equal in all call centres in a company, how does the location of the centre (example: located in Canada where ASL and English are used for CAs) have any relevance to instances of fraud?

As a manager of a Sorenson VRS Centre, I find your comments of fraud highly insulting. As Sorenson Employee's and as Canadians we take great pride in what we do! We have high regard for our employer and the FCC. We comply with your regulations every day! We emphasize to our staff the importance of following these regulations and make it abundantly clear of the consequences if they do not comply. So when you assume that the centres can only be located in the States to prevent the processing of fraudulent minutes/calls you are sadly mistaken. It can happen in any VRS centre regardless of location. It is about being an ethical interpreter and an ethical company, and that is not defined by location it is defined by individuals!

One telephone company is about to embark on a much needed 1-year trial of the service. Sorenson Communications established itself in Canada to lighten the stress on an already strained profession in the U.S. To shut down the centres in Canada would mean that interpreters in Canada would have to go to work in a U.S. centre, thus putting added stress on the profession in Canada. We have been able to strike a balance over the last three years to where we can envision VRS in Canada with a balance between VRS work and community work. Canada is the only country in the world where ASL is the recognized language for deaf individuals. We are now, finally on the on the brink of being able to serve Canadian callers for a 1-year pilot but the decisions you make will have a direct impact on the success of the service in this country.

The decision to close call centres in Canada would result in hundreds of lost jobs and would have a direct impact of the service levels that American deaf callers have come to rely upon.
I encourage you to reconsider your decision. It appears to be nothing but a personal attack on one VRS provider and is founded on the fears of the propagation of fraud when the one provider with call centres in Canada has not seen any fraud in its Canadian call centres.

Respectfully,

Mary C. Paré