June 21, 2010

Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket No. 10-51

Dear Mr. Chairman:

I am writing to protest a recent proposal by the United States Federal Communications Commission ("FCC") that would prohibit United States providers of Video Relay Service ("VRS") from locating call centres staffed with American Sign Language ("ASL") interpreters in Canada. Canada is the only country in the world where ASL is the recognized language for deaf individuals and is the primary language of deaf individuals who live in Canada, as well as the first language of deaf Americans. Accordingly, Canada has a large number of experienced ASL-to-English interpreters. The FCC's proposal would penalize these qualified Canadian interpreters and would harm deaf Americans.

In the United States, Video Relay Service ("VRS"), which allows the deaf to communicate over distance using ASL, is becoming increasingly popular. Naturally, this rise in popularity has resulted in an increased need for VRS providers to employ skilled ASL interpreters. Because of the unique skill set involved and the extensive training required, I understand that there is a short supply of qualified interpreters.

Sorenson Communications established itself in Canada to lighten the stress on an already strained profession in the U.S. All training, software and security implementations are equal in all call centres in a company; therefore, the location of the centre (example: located in Canada where ASL and English are used for CAs) does not have any relevance to instances of fraud.

It is the responsibility of the VRS Company to ensure fraudulent minutes are not billed to the FCC regardless of the location of call centres. Those providers that do not have call centres outside of the U.S. have participated in billing the FCC for minutes where neither leg of the call was on U.S. soil. Again, the emphasis is these providers do not have VRS call centres outside of the U.S.

Highly-skilled Canadian interpreters have helped to prevent the significant negative consequences that would flow from a substantial shortfall in interpreters. Currently, more than three hundred Canadian interpreters work in VRS call centres established and operated by United States providers. These interpreters consistently live up to the highest professional and legal standards, and their employer represents that the Canadian call centers are among the most efficient and cost-effective of all their call centers.

As interpreters, we have patiently waited for the opportunity to service Canadian callers and have respected our ethics, our employer, and the FCC by not processing Canada to Canada calls from the centres in Canada.

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VRS is a vital lifeline for the deaf and hard of hearing. Because of regulatory delays, the service is not provided in Canada. 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.

Arbitrarily prohibiting the use of Canadian call centres and Canadian interpreters is ill-advised. Not only would such a decision hurt the Canadian interpreters who will lose their jobs, but such a drastic reduction in the VRS labor force will make VRS both more expensive and less effective in the United States. In the short term, VRS providers will have to increase call hold times to account for a lower number of interpreters. In the long term, VRS providers will have to incur the significant expenses associated with hiring and training new interpreters, and these new interpreters will be less skilled than the Canadian interpreters who lost their jobs. Moreover, such a decision would likely violate trade treaties between the United States and Canada, and certainly would suggest to the Canadian government that if we begin a service like VRS we should prohibit the use of interpreters and call centers based in the United States.

I urge you to reject any proposal to prohibit the use of Canadian call centres and interpreters. There is no justification for such a decision, and pursuing this course of action will harm the deaf community.

Sincerely,

Spring Herold

cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker