



March 4, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, NW
Washington, D.C. 20554

RE: Response to CSDVRS Notice of Ex Parte: CG Docket No. 10-51

Dear Ms. Dortch:

Sorenson Communications, Inc. (“Sorenson”) submits this letter in opposition to the February 18, 2011, ex parte letter and presentation that CSDVRS, LLC (“CSDVRS”) filed in docket CG 10-51.¹ In that submission, CSDVRS presents a case study and recommendations regarding its reliance on VRS interpreters working out of their homes through so-called “secure virtual call centers” (“SVCC”). Sorenson opposes CSDVRS’s recommendations and urges the Commission to bar VRS providers from using interpreters working out of their homes.

Sorenson agrees that, in the case of weather events, such as “Snowpocalypse 2011,”² VRS customers should not experience degraded service simply because some interpreters cannot travel to a call center. Indeed, Sorenson avoids this problem through its nationwide network of call centers, which allows it to shift call volumes around the country when weather impacts service in any particular geographic area.

“At-home interpretation” is not an acceptable alternative solution. “At-home” call centers endanger consumer privacy, reliable access to emergency services, and TRS Fund integrity.³ Privacy concerns arise with the possibility that an off-site interpreter could be interrupted by unauthorized parties, such as family members, neighbors, or repairmen. Further, at-home interpretation (including the SVCC approach CSDVRS describes) threatens to endanger the reliability of emergency services capabilities, as off-site environments could lack infrastructure such as redundancy and emergency power backup. Off-site environments also make it much less likely that the VRS provider can assign two interpreters to emergency calls—

¹ *Structure and Practices of the Video Relay Service Program*, CSDVRS, LLC Notice of Ex Parte, CG Docket No. 10-51 (Feb. 18, 2011) (“Presentation”).

² *See id.* at 4.

³ For additional commentary on the danger of virtual call centers, *see Structure and Practices of the Video Relay Service Program*, Comments of Sorenson Communications, Inc., CG Docket No. 10-51, at 3-7 (Sept. 7, 2010); *Structure and Practices of the Video Relay Service Program*, Reply Comments of Sorenson Communications, Inc., CG Docket No. 10-51, at 3-7 (Sept. 16, 2010).

as Sorenson currently does to ensure absolute precision in interpretation—or to provide back-up during an emergency should interpreters become exhausted or overstressed. Finally, unsupervised off-site interpreters threaten to undermine Fund integrity, both through the potential for unscrupulous practices such as minute-pumping, as well as through inadvertent inefficiencies that could arise, such as the inaccurate minute totals that could result when at-home interpreters rely on their own methods of recording call start and stop times (as opposed to using automated methods available at call centers).

CSDVRS provides a list of “parameters” that would govern SVCC operations, presumably to address these concerns. These parameters, however, do not sufficiently mitigate the substantial risks posed by SVCC, for several reasons. First, CSDVRS seems to suggest limiting the size and scope of SVCC.⁴ But CSDVRS’s suggestion implicitly acknowledges that at-home operations create risks that require some sort of limit. Moreover, Sorenson finds it unacceptable to expose any number of consumers to privacy breaches or the inability to reliably access emergency services. For this reason, Sorenson’s call centers are locked facilities with highly restricted access and white noise generators to prevent sound from carrying across a facility. The same will not necessarily be true in a home, and will in any event be difficult to monitor. Without the kind of constant real-time security and supervision provided at a call center, both consumer privacy and Fund integrity will remain at risk.

Second, CSDVRS suggests a set of various interpreter qualification and supervision standards.⁵ However, no set of written standards, nor remote supervision, nor oversight committee can substitute for the effectiveness of in-person, on-site supervision, and the availability of other colleagues to assist with interpreting, particularly in an emergency. Sorenson assigns two interpreters to a 911 call because these are high-stress, potentially life-threatening events, in which accuracy is critical. Moreover, if additional interpreters are needed to assist with any call, emergency or non-emergency, other interpreters are readily available in a call center. The same is not true for a work-at-home environment.

Finally, CSDVRS suggests a set of SVCC technical requirements.⁶ These suggestions fall short of addressing the technical concerns that would likely plague any at-home interpretation arrangement. Notably, CSDVRS does not suggest any minimum infrastructure standards. Without adequate redundancy and power backup, at-home interpreters would be at the mercy of equipment failure, endangering the safety of customers attempting to make

⁴ Presentation at 10, 12 (suggesting that SVCC be a “supplement to provider’s existing call centers” and that SVCC supplemental percentage does not “exceed 10% of workforce”).

⁵ *Id.* at 10-12 (suggesting that interpreters “must meet minimum standards,” that providers have the “ability to monitor environment [sic],” and that providers be required to “provide supervision,” create a “compliance committee,” obtain the ability to “remotely monitor all desktop activity,” install and use “cameras to remotely monitor all environments,” and engage in “[a]nonymous third-party quality assurance testing”).

⁶ *Id.* at 11-12 (suggesting that SVCC call centers be “part of ‘round robin’ call routing pattern,” that “SVCC calls must be fully transferrable,” and that providers engage in “[a]utomatic collection of billing data”).

emergency calls at the time of the failure, as well as the quality of service for customers making any other types of calls.

For these reasons, Sorenson urges the Commission to bar VRS providers from using any kind of at-home interpretation in the provision of VRS service. The substantial risks posed by off-site interpreters far outweigh any benefit gained, and CSDVRS's suggested "parameters" fall far short of mitigating those risks.

Sincerely,

_____/s/_____

John Nakahata

Counsel for Sorenson Communications, Inc.