

Report on Speech-to-Speech to the TRS Council
October 2010 from Rebecca Ladew

Because I cannot attend the meeting in Durham, North Carolina, I wanted to bring you up to date on consumer impressions of Speech-to-Speech (STS). Because I am a consumer, I lack access to either proprietary information from providers or non-published documents from either the FCC or the PUCs. If you see errors in this letter, please let me know or tell Bob Segalman, when you see him in Durham. Our concerns relate to:

1) Provider profit:

We were told that one serious problem preventing the growth of STS is the lack of profit in most situations. It is our understanding that almost all the states reimburse providers less than it costs the providers to make STS available to consumers. For STS to succeed, providers must make sufficient profit to be motivated to provide a high quality of service and increase usage. Video Relay Service (VRS) is a good example of how adequate reimbursement can motivate providers to increase relay use and provide quality service. Similarly, in the speech disabled community manufacturers of voice output computers have insured the growth of sales by insuring that the devices are reimbursable by private and public insurance. Those manufacturers also employ many Speech Language Pathologists (SLPs) to provide free testing of potential users and provide consultation to family members and other SLPs who train consumers. Thus, SLPs as a group have a vested interest in increasing the number of device users. We need to reconfigure STS consumer training so that SLPs develop a vested interest in the growth of STS.

In recent years, the FCC annually has included in its per minute STS reimbursement funds for outreach which bring the reimbursement enough above cost to hopefully give providers profit for calls between states. None of the states, besides California, provide reimbursement above cost for calls within states. Currently the TRS Council recommends that the outreach money that the FCC now reimburses individual providers be pooled into one account to be awarded to a contractor to provide national outreach. We support such action provided that the FCC adequately monitors expenditures because STS consumers lack the ability to be "watch dogs." Such monitoring is beyond the capacity of our community and that increases the likelihood of both unintentional mismanagement and greed. Such problems have occurred before in STS outreach projects.

When setting per minute reimbursement, rate setters must determine what reimbursement level will provide a good quality of service, including adequate CA training and outreach. It would be helpful if providers could identify for us what reimbursement level will fulfill this goal is and provide enough outreach to substantially increase usage. Is there a reimbursement level which will justify provider expenditure for large scale outreach to the potential one million users?

2) Increasing consumer advocacy:

SLPs have the potential to become strong advocates for STS. We were told by a well respected SLP that they can be reimbursed by public and private insurance for training consumers. These SLPs would need easy, online access to information about how to find such consumers and how to obtain reimbursement. If SLPs developed a vested interest in the success of STS, they would lobby governmental bodies and providers to ensure STS's growth and increased quality of service. SLPs could compensate for the current lack of an effective consumer political lobby to accomplish this end. Such a lobby would come from those SLPs who treat consumers who are potential STS users.

3) Underutilization of STS:

There appear to be well under 1,000 users. This estimate is similar if the projection comes from California STS data or from NECA data. Over the years, agreement has developed that there are potentially 1,000,000 STS users. This number assumes that there would be extensive STS training programs to help potential users make the necessary lifestyle changes prerequisite to becoming on-going STS users.

4) Ensuring proper use of STS:

One STS provider notes an on-going, serious problem in the operation of STS and in measuring usage has been the misuse of STS by penal institution residents. Such people have access to telephones that dial only toll free numbers or collect calls, and they use STS to avoid paying for calls. One way to curb this abuse would be to require anyone who made more than 10 STS calls from a particular telephone number to register as an STS user. While such registration would be unacceptable to the deaf community, most STS users might not object. In support of this suggestion, we note that users appear to have better access and use of STS if they have registered a profile. The recent significant rise in interstate STS calls needs to be studied to be sure that some of that rise does not come from prisoner abuse.

5) Consumer identification and training (outreach) is listed here in order of the groups most likely to increase call volume. The upcoming national STS outreach project would include an understanding that there are 3 categories of potential users (not yet identified by number of people in each category):

(A.) People who just need to know that STS exists and how to use it. These are the people who will benefit from a media campaign and an STS training line such as is being tried in California. That group includes potential users who utilize voice output devices (Augmentative and Alternative Communication, also known as AAC). Many of them would benefit from an online video showing an AAC user utilizing STS, similar to the current video on Youtube showing a non-AAC user using STS.

Many members of category "A" do not use the telephone because their sole income is a disability check which will only cover the cost of food and rent. They are too poor to afford the low income telephone plans currently available. A demonstration project financed by a U. S. Health and Human

Services (HHS) grant could determine if paying all residential telephone cost for these people would lead to regular STS use.

(B.) This group of potential users need about 3 hours of face to face training with a SLP, likely reimbursable by public and private medical insurance. SLPs who already have such consumers in their case load would be most likely to be interested in doing this training. Previously, one state's Department of Vocational Rehabilitation (VR) was a good source to locate potential STS users, but replicating that program would require budgeting funds to provide adequate motivation for VR to cooperate.

(C.) Potential users who need long term help overcoming the economic, physiological, and social barriers to utilize STS. Initially, a demonstration project would need to be done to determine the best way to accomplish this goal. STS training would need to be part of a larger project aimed at improving many aspects of these people's lives. Perhaps a HHS grant carried out in cooperation with the FCC could be used to determine the viability of such training.

6) Consumer motivation to use STS:

We need more strategies for consumer motivation. We know that SLPs have succeeded in developing incentives for STS use that are acceptable to consumers, families, and caretakers. SLPs may also succeed in training AAC users who are familiar with technological advances and would be likely to use STS if their SLP trainers had adequate reimbursement from insurance. Free telephone service, from a HHS grant, may help potential STS users who live on less than one thousand dollars per month and cannot afford installation or monthly telephone fees. The same problem will face Internet Protocol (IP) STS, as many potential users cannot afford personal computers.

7) Outreach methods:

We do not know how successful particular STS outreach strategies are. We do know that several one-to-one training projects have worked, but they are not cost effective in increasing call volume significantly. We do not know if media promotion would work, given that only one percent of the population are potential users. Good market research should be done first.

8) Quality of service:

Providers and users do not appear to be in consensus on what quality of STS service is required by the FCC or is required for most consumers to continue to use STS. What is adequate Communication Assistant (CA) performance and who is to determine that? There is such a wide variety of STS service needs among people with various speech disabilities and social abilities that developing a model of adequate CA performance would be a significant challenge.

Quality of service appears to be hindered by both the lack of profit to providers and the inability of many consumers to file complaints. Consumers have complained to Bob about problems far beyond the capacity of this service. Consumers with legitimate complaints over the years have on-going problems communicating with customer service and most do not know how to file complaints with providers, PUCs, or the FCC. Many others do not have the capacity to benefit from training on how to file complaints.

9) Consumer leadership:

There are less than a handful of STS users willing to provide leadership at the FCC. Because of lack of communication between people with speech disabilities and the lack of effective organizational structure to unite them, we do not know the status of STS consumer leadership in various states, but no such leadership outside California has been communicated to either Bob or myself. I encourage relay contract administrators and providers to urge all STS users to join the STS Google group at: <http://groups.google.com/group/speech-to-speech> as a first step toward recruiting more leaders.

10) Promoting consumer advocacy:

Speech Communication Assistance By Telephone, Inc. (501c3), for which I run the East Coast office, is the only known organization of STS consumers. We monitor FCC regulations and ensure that FCC outreach funding continues. STS users lack the organizations that the deaf have to protect Telephone Relay Service (TRS) and VRS. Our organization exists primarily on private donations (at www.speechtospeech.org). Small annual donations from STS providers would ensure our ability to continue our work. It is primarily our agency's efforts that lead to the annual renewal of the FCC's STS outreach funding to providers.

11) Conclusion:

I urge you to consider these issues and to work with Bob and myself to improve STS. Please contact me, or talk to Bob in Durham, about how we can work together.

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