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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

Re: SignOn Petition for Waiver; CG Docket No. 10-51

Dear Ms. Dortch:

I am writing as the CEO of the Hearing, Speech and Deafness Center in Washington State to support of the Petition for Waiver filed by SignOn: A Sign Language Interpreting Resource, Inc. on May 9, 2011. Under the circumstances, good cause exists to grant SignOn's Petition and we encourage the Commission to do so before June 1, 2011.

SignOn is a women-owned, small business organized to provide experienced, certified interpreters (*i.e.*, Registry of Interpreters for the Deaf) to facilitate communications access between deaf, hard-of-hearing, deaf-blind, and hearing people. SignOn provides a variety of services including: in-person sign language interpretation, video remote interpreting, including interpretation via videoconferencing, coordination of access services for conferences and other events, interpreter training and apprenticeships. In addition, in partnership with Purple Communications Inc., Convo Communications, Inc., and others, SignOn supports the provision of video relay services ("VRS"). Thus, even though VRS constitutes a substantial component of its overall business, SignOn fulfills a much greater role within its local community and serves a larger purpose, both locally and nationally, for the deaf, hard-of-hearing, and deaf-blind community.

SignOn's Petition was a direct response to the Commission's Report and Order issued on April 6, 2011, implementing new rules governing the use of subcontractors by VRS providers. Specifically, the new rules prohibit a VRS provider eligible for reimbursement from the Telecommunications Relay Service ("TRS") Fund from contracting or authorizing a third party to provide interpretation services or call center functions, unless that third party is also a certificated VRS provider. See 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(iii).

SignOn provides critical video interpreting services to VRS providers throughout the country. As you are no doubt aware, VRS providers are required by the Commission's rules to have an appropriate level of staff available at all times to minimize wait times for VRS callers. Because the level of VRS call volume can vary from day-to-day, during the course of a day, or as a result of seasonal variables, the most cost-effective way for

Susie Burdick, CEO

Hearing, Speech & Deafness Center

Artz Communication Center / 1625 19th Avenue / Seattle, WA 98122

Phone 206.323.5770 / Videophone 206.452.7953 / TTY 206.388.1275

Fax 206.328.6871 / sburdick@hsdc.org / hsdc.org



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VRS providers to meet these fluctuating demands is by contracting with video interpreting providers like SignOn to provide qualified, professional Communications Assistants and video interpreters on an "as needed" basis. The only other alternative is for VRS providers to maintain a full complement of interpreters at all times in order to satisfy the periodic peak VRS demand. Maintaining this level of interpreters is neither a viable nor cost-effective option for most VRS providers. Therefore, by eliminating the ability of VRS providers to utilize video interpreters, like SignOn, could ultimately result in a higher-than-necessary demand for federal and state TRS funding than the alternative offered by SignOn.

SignOn operates a fully-functional call center that complies with the Commission's rules for interpreter qualification, training and supervision; back-up power and redundancy; 9-1-1 capability; and confidentiality, safety and service quality. In addition, SignOn's contracts with its VRS partners require SignOn to remain in compliance with the Commission's mandatory requirements for VRS providers, including call handling, average speed of answer, and call center management. Finally, in its Petition, SignOn volunteered to make certain modifications to its operations to eliminate the per-minute pricing structure of its existing contracts. In our view, SignOn has demonstrated both a history of full compliance and a commitment to remain in compliance with the Commission's rules.

Nonetheless, once the Commission's rules go into effect on June 1, 2011, VRS providers will no longer be able to use the services of SignOn or any other non-certificated video interpreting company absent a waiver of those rules. We urge the Commission to grant SignOn's waiver expeditiously so that VRS providers can continue to utilize SignOn's valuable, high-quality video interpreting services without interruption or disruption.

SignOn represents one of the most important contributors to the Deaf Community and those agencies like ours who serve them. It is a professional, well-respected company that extends itself frequently in their services to provide equal and effective access to all citizens. For the Hearing, Speech & Deafness Center this is evident as we serve 5,000 people annually and have a staff that is 30% Deaf. SignOn is perhaps our most critical partner and we encourage you to support their petition.

We understand and appreciate the Commission's goal of eliminating opportunities for fraud and abuse within the TRS Fund and among its recipients. However, in the case of an organization, like SignOn, that provides a critical component of VRS, complies with the Commission's existing rules, and has indicated its intent to obtain certification under the Commission's new certification rules, it is undeniably in the public interest to grant a temporary waiver. The Commission's failure to grant the requested waiver expeditiously would reduce the availability of highly-qualified, professional video interpreters and increase the burden on VRS providers to meet the demands of VRS users without any appreciable reduction in vulnerability of the TRS Fund.

Sincerely,

A handwritten signature in cursive script that reads "Susie Burdick".

Susie Burdick, CEO

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