December 30, 2011

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

RE: The Matter of the Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Ms. Dortch,

In response to the FNPRM (11-184) that was released on December 15, 2011, I put forward what follows for consideration as the FCC continues to evaluate the actions necessary to protect and reorganize the structure and practices of the nation's Video Relay Program.

Rate Differential for Use of Certified Interpreters

In the recent FNPRM, the FCC is seeking comment on how to increase points of competition among VRS providers for "new-to-VRS" users. To that end, I would urge the Commission to consider the establishment of a rate differential for a provider's when using nationally certified interpreters. This differential, folded into the proposed monthly rate paid providers per active user, would be paid according to the percentage of nationally certified interpreters who provided service during a given month. An example,

Provider A:

Active Users the Previous Month:	10	
Monthly Rate per User:	$175.00	
Certification Differential:	$5.00	(potential per user)
% of Interpreters Certified:	80%	
Differential Compensation:	$40.00	(8 x $5)
Monthly Total Compensation:	$1790.00	($175 x 10 + $40)

This differential would serve to protect the functional equivalency of the service, by incenting providers to continue to use trained, nationally credentialed professionals as they consider measures to reduce costs and gain economies of scale. Further, it adds to the point of competition for "new-to-VRS users" to consider when making a Default Provider decision.

Reporting Transparency - Interpreter Compensation & Benefits

The FCC further stated in the recent FNPRM that there has been and still remains a lack of clarity related to the costs necessary to employ sign language interpreters across the VRS Program. To that end, I would encourage the Commission to consider the concept of requiring providers to specifically outline the direct cost of interpreter wages and benefits.

Institution of this type of a line item in provider reports would improve clarity for the FCC relative to the employment costs sign language interpreters and what is necessary to support the VRS program longer-term. Further, the employment costs reported and the percentage of nationally certified interpreters working monthly would be an important indicator as to the continued functional equivalency of VRS program.

New-to-VRS Interpreter Qualification Process

Should the Commission move to a contract model for the deliver VRS services, I believe it well positioned to institute a qualification process for new-to-VRS interpreters working in support of the VRS program. I would urge the Commission to consider instituting the following requirements for providers as they engage interpreters new to the provision of video relay services,

- -Minimum of 3 years of professional experience
- -Credential validation
- -40 hour mandatory training on the provision of VRS

  Topics might include:

  - -History of VRS
  - -Effective provision of service
  - -Regulatory compliance
  - -Cultural sensitivities
  - -Whistleblower Policies

Further, to address the continued qualification of interpreters working in VRS settings, I would encourage the Commission to consider requiring providers to offer annual refresher trainings on the points listed above for all interpreters in their employ.

The implementation of a qualification process by the FCC would prevent the use of unqualified interpreters working in support of the communication needs of Deaf Americans. Further, it ensures that the economies of scale providers seek in order to be eligible to successfully secure one of few contracts will come from legitimate interpreter resources.

Repeal the Ban on Working from Home

In an effort to encourage the containment of the costs of the TRS Fund and to create additional options for providers to reduce costs and achieve sufficient economies of scale, I would urge the Commission to consider repealing the prohibition preventing providers from delivering services from an at home solution.

Repealing this ban, gives providers an opportunity to reduce infrastructure and reimbursement costs, while supporting their ability to work within the new model being proposed. Equally important to the cost containment of the TRS Fund, repealing this ban supports the expansion of VRS by increasing the supply of available interpreters.

How to Work with Sign Language Interpreters

As the FCC is also seeking comment on the concept of their supplementing provider's outreach activities by campaigning to educate the public on VRS, I would put forward that the Commission consider including how to work with sign language interpreters as part of these outreach activities. This will reinforce the functional equivalency of the service while working to reduce the overall costs of the service by making interactions more efficient.

At the end of the day, while sign language interpreters may not be viewed as the direct responsibility of the FCC, it is easily concluded that they are at the center of the provision of the nation's Video Relay Program. By instituting a rate differential for use of nationally certified interpreters, implementing a qualification process for "new-to-VRS" interpreters, and repealing the ban on working from an at home solution, the FCC will continue to ensure the functional equivalency of the VRS program while supporting VRS providers to achieve the necessary economies of scale to operate within the new model.

Sincerely,

Brandon Arthur

Concerned Citizen
Child of a VRS user
Sign language Interpreter