

January 3, 2012

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 wish to echo the comments put forth by Mr. Brandon Arthur in his comment filing. I am a consumer of VRS as my deaf daughter and I use it regularly. While my deaf mother was alive we also used the services. There was a noticeable and precipitous decline in the quality of interpreting in the late fall of 2008 or 2009 when the reimbursement rates were cut and providers began relying on fewer certified interpreters. Where I had never had to request a new interpreter due to inferior interpretation it became a regular occurrence. This remains true today.

The prospect of a new compensation structure, based on active users, runs the risk of furthering the race to the bottom when providers consider cost, not credentials, as the only factor when hiring. Quality VRS can only occur with quality interpreting services. The suggestions below will provide a framework for best hiring practices in the industry.

**Rate Differential for Use of 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.

**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.

The ASL interpreting profession has devoted much time and effort to assuring quality interpreting services to the American deaf community. The FCC can build on this effort by incorporating these suggestions and others that place quality on the same footing as cost. In the long run, instituting measures that assure that VRS interpreters are qualified will result in efficient and cost effective VRS.

Sincerely,

Trudy Schafer  
16 Faribanks Road  
Framingham, MA 01701