

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.

Structure

If VRS were to be whittled down to a single provider – for economy of scale purposes as stated in the FNPRM – it would lead to less consumer choice. Sometimes smaller, more flexible companies are better able to meet individual customer needs than larger, less flexible companies. I believe this would be a detriment to the Deaf community.

Also, it limits employment opportunities for interpreters. Currently, there are several options of providers to work for. Some interpreters have issues with some of the employers' work rules. Having options means one could find employment with a provider whose philosophy more closely aligns with the interpreters' professional ethics.

I don't want to make these next comments about me, but will use myself as an example of what else can go wrong with this scenario of having a single provider.

I am currently working as a VI (Video Interpreter). For one reason or another, the larger VRS providers are not willing to hire me, even though I have worked for some of them in the past. From what I'm lead to believe, it is not because of my interpreting skill, and not because of something I did while I was working for them, rather an arbitrary decision not to hire me. I believe I am very effective at interpreting calls, and have had nothing but positive comments from users

with whom I have interacted. I enjoy my work as a VI, and would feel lost if I could not make this part of my work schedule. In a single provider system, the Company would have too much power to select interpreters even if consumers would prefer an interpreter that the provider will not hire.

Repealing the ban on VIs working from home

I believe there would be a cost savings to providers that could be calculated into the reimbursement rate. Savings I would expect are: costs of leasing office space, utility charges for said office space, and interpreter overhead. I think there would be significant savings because providers could reduce staffing at times of lower call volume, with the ability to put out a call for interpreters to log in to handle unexpected volume spikes. Having home stations is more practical than call centers for that scenario. With home stations, interpreters can log in quickly and handle the volume spike more readily. With call centers, interpreters often must travel a considerable distance to get there, and the volume spike may have resolved itself (by calls being abandoned, or connected after an unusually long wait time, or the caller giving up and trying another provider) before the interpreter can log in.

Having to travel to call centers for work also increases the costs for the VIs. There is travel time, gas, wear & tear on the vehicle, and tolls/parking which are not reimbursed by the provider.

As to the question of privacy/security of a home call station, from my experience having worked from a station in my home, I feel they are as secure/private, if not more so, as a call center. If inspected and controlled as they should be, I believe home stations are an effective way to provide service. Along with this, I need to speak to the teaming, support, and supervision of a home center. In my experience, the technology allows for adequate, sometimes even superior, supervision of VIs, as well as the ability to team interpret calls, and to transfer calls to a different VI when appropriate.

Rate/Reimbursement Structure

Speaking to the proposed idea of a per-user reimbursement: I don't know that this would be a fair method to pay providers. Some Deaf consumers have multiple videophones from multiple providers. How would they be "counted"? Having a different default provider for each piece of equipment could lead to multiple providers being paid for that one user. Also, some users may have a default provider, but at times, for whatever reason, choose to call through a different provider. How would the secondary provider be reimbursed for those services rendered?

I still believe per minute of use is still the best and most fair method to reimburse providers for services rendered. I know that this system has been used to defraud the fund in the past, but I also see that controls are in place to prevent that from happening again.

As to the idea of a higher rate, or incentive, for providers using “qualified” (certified?) interpreters, I think this is unnecessary. I do, however, believe providers should be required to have a minimum standard for hiring qualified interpreters. More specifically, I believe that minimum standard should be at least 3-5 years of post-certification interpreting experience. One never knows what type of call will come in. The VI must be able to handle whatever situation comes up. That ability can only come with experience.

General Comments

I know these next comments are not related to this FNPRM, but I believe they are important and should be addressed by the commission as well.

VIs are more than just a 'dial tone'. To become effective in this profession, one must have the trust of the Deaf community. Which is even more important when working as a VI. Having no interaction prior to connecting a call leaves no opportunity for this trust to be developed. I feel the rules for VIs (Video Interpreters – who process calls through Sign Language) should be separated from those of CAs (Communication Assistants – who process calls through typed communication), and reworked to allow VIs the flexibility needed to do the remarkable job we all do each and every day.

I also believe it should be encouraged (mandated?) that providers respect consumer choice as to the interpreter they prefer to interpret their calls. Sometimes, due to frequent calls, a consumer becomes more comfortable with a specific interpreter's style, skill, or familiarity with call content, and if allowed, would request that specific interpreter handle certain calls. Again, this goes back to the – may I coin a word, 'peopleness' - of the work we do.

I thank you for taking your time to read my thoughts and comments,

Respectfully,

CJ Prudhom, CI/CT, NIC-Master, NAD-V, SC:L