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I am writing comments from my experience as the State TRS Contract Administrator for over 20 years and telecommunications consumer for almost all my life. I also want to include disclaimer statement that my comments and responses do not reflect on behalf of the State of Wisconsin.

First of all, I would want to acknowledge and appreciate the FCC for taking time and effort to ensure telecommunications is functional equivalent to all Americans. In responding to Commission's Further Notice of Proposed Rulemaking (FNPRM) in seeking comments on a series of options and proposals to improve the structure and efficiency of the video relay service ("VRS") program, it was very clear that FCC's goal is to ensure that VRS programs provide functionally equivalent communications services to its users – particularly given advances in commercially-available technology – and strengthen immune system from the waste, fraud, and abuse that has threatened its long-term viability and uphold the integrity of the TRS fund. At the same time, the burdens of reducing waste, fraud and abuse should not fall primarily on deaf and hard of hearing consumers with intention that TRS program is expected to improve its service.

Recently FCC has completed its process to certify Internet-based Telecommunications Relay Service (iTRS) providers as eligible for payment from the Interstate TRS Fund (Fund) for their provision of iTRS with its intention, in theory, to reduce waste, fraud and abuse drastically through improved oversight of such providers.

I would want to provide my thoughts, observations and suggestions to FCC to advance even more ideas to increase more immunity against waste, fraud and abuse without disrupting current VRS consumers' daily experience of using telecommunication service. I would also want to additional feedback to seek ways to improve current VRS service beyond what we are currently experience in commercially-available technology to the level of functionally equivalent communications services. Here are my thoughts and suggestions as follows below:

- **Interoperability –**

It is a daunting task to include all video phone including both VRS industry's current video phone and "off-the-shelf" video phone to make it interoperable. Obviously I am not an expertise or telecommunications engineer to have an answer to present a solution. An idea of getting all videophone interoperable-ready & reliable including but not be limited to ease and seamless to connect to any videophones, quality of pictures such as standard minimum latency requirements and standard packet lose requirements, and any other "phone-user" features such as call forward, video/voice message, blockage, one number per household to support all devices and caller ID, would be the ultimate goal.

I would like to reinforce TDI's presentation in Madison Wisconsin early January 2012 that an informal talking proposal to bring all other major companies such as Apple, Google, Microsoft, Yahoo & other work together to establish true interoperability usage. We know the fact that it would not happen overnight. I would like to suggest that FCC could appoint a working committee consisted of various major companies mentioned above including VRS providers to sit down and come up with working solution to propose to FCC a reliable and doable solution to address interoperability issues we have now.

*In addition, I agreed with TDI, NAD & ALDA as stated on their letter to FCC dated March 5, 2012 on the following: "The long term goal must be to make "off the shelf" technology from mainstream companies available and accessible to VRS users, not just for VRS use, but for peer-to-peer video communication. Deaf and hard of hearing consumers should no longer function in silos. Consumers*

*would also like their hearing contacts who use ASL to receive ten-digit numbers. This would permit more peer-to-peer calls, thus reducing the use of VRS-compensated services.”*

This way, it is a win-win situation for both VRS providers and consumers purchasing their own “off-the-shelf” products where it becomes more universal design to use at ease. Consumers would become empowered by having more personal choice of which “off-the-shelf” devices they would purchase with confidence that it will work! Ultimately, VRS providers just simply focus on relay service quality only whereas the consumers purchase their own “off-the-shelf” devices that would easily accommodate with any VRS providers as well as within telecommunications infrastructures.

- **Reimbursement – Per Minute Rate vs. Per User Rate Method**

The per user rate method concept is an interesting and thought-provoking attempt to achieve FCC’s intention to increase immunity defense against waste, fraud and abuse through improved oversight of such providers.

My response to per user rate method is that I have not seen a good business model where we can review and respond accordingly. Based on what I know and seen, I have found that the per user rate method concept appears to be cumbersome, tedious, user-unfriendly, anti-competitive, inefficient, dangerous (non-911 calls) and more expensive.

Yet, newly certified TRS providers with much stringent requirements with clearer intention to eliminate waste, fraud and abuse has not yet been tested. It is still early in the game.

Instead of creating new reimbursement method from scratch, I would suggest to seek ways to find ways to create several proactive measures in place what we have now in order to reinforce immunity system against waste, fraud and abuse even further.

Again, I am not telecommunications engineer by professional, but based on what I have received and reviewed data from TRS contractors, it would make sense to apply to all VRS provider’s data report by employing same reporting software. Here are my thoughts and suggestions as follows:

One possible proactive measure is to have FCC work collaboratively with the Interstate TRS Fund Administrator and VRS providers by deploying **ONE** automatic call distribution (ACD) software to generate Call Detail Report (CDR) on the same page.

As the result, each VRS provider would submit its electronic data to Interstate TRS Fund Administrator including CDR, reimbursement bill including all legitimate calls, “susceptible” calls that are not planned to be billed by them and any other necessary data such as ASA, etc.

When TRS Fund Administrator receives all electronic reporting data from VRS providers, they can purge **all electronic report they have received from all VRS providers** and create an automatic filtering parameter within new report they receive in order to identify and verify possible “red flags” and/or any important data to determine service performance level efficiency on the following prior to processing payment to them if appropriate:

- Any “out of ordinary” or “susceptible” calls that appear to be fraud and/or abuse.
- Any “dial around” calls by calling two or more providers by the same caller to determine the overall service level efficiency of particular providers being used (ASA, queue, blocking, no answer, average minutes per unique phone number, service level),

- Any data that I did not mention could be added to help to determine the overall service level efficiency of a particular provider,
- Occupancy rate on the efficiency of actual Video Interpreter's time within already established working schedule within specific threshold level of acceptable work force without jeopardizing or harming them. This will also give us a measure stick whether reimbursement rate is being justified.
- Any other information that deems necessary to be included in the automatic report that minimize reduce fraud, abuse and waste significantly.

With all reporting data we are to receive, we would get much better picture and help us to make more "intelligent" decisions that we have not acquired in the past to continue to tighten abuse, fraud and waste further.

In closing, I believe that with currently certified VRS providers we have now is an excellent starting point with conditions that we must continue to seek ways to modify, improve, deploy and implement a few more, proactive and reliable measures to minimize abuse, fraud without putting any more burdens on deaf, hard of hearing and hearing VRS callers.

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