

I do not believe that it is in the FCC's best interest to require CAs (VIs) to be nationally certified for a number of reasons. First, I am concerned about the implied message that will be sent. By requiring only National Certification the FCC will be sending the message that State Certification Testing and the QA Testing are not "good enough" to evaluate an interpreter's skills. In the state of Missouri, a Level 4 interpreter (we have 5 Levels) can interpret in any and all medical and mental health settings. These are settings that require a high level of skill and can even be life or death, and often times the interpreter is working alone. What message does it send to say that the same interpreter that is qualified to work in medical or mental health by themselves can suddenly no longer interpret phone calls, especially in a setting where we can call for a team interpreter to assist us if need be? My second concern as a professional is the perceived conflict of interest on the part of RID and NAD. RID and NAD jointly formed the NCI (National Council on Interpreting), which developed our current National Test, the NIC. By RID and NAD encouraging the FCC to require their test as the only legitimate way of assessing an interpreter's skills for VRS settings, they are going to force many interpreters who are already recognized as being highly skilled by their own state certifications to pay more money to take their test. This is an added burden to many interpreters to pay for all the test preparation materials, not to mention the expense and travel involved for taking the test itself. Then once the interpreter passes the NIC test, they must then pay for the added expense of the workshops to get the CEU's in order to maintain their National Certification. For many interpreters, this is something that will deter them from working in the VRS setting, in turn, decreasing the number of interpreters available for an area that is expanding exponentially.