

To Whom It May Concern:

I believe that the FCC is looking for venues to improve the VRS service and prevent fraud and other issues that might, negatively, affect it. On the other hand the FCC has the responsibility to make good decisions in terms of what, how and time frame to establish and apply changes in order to not cause more damage than good.

To prevent that from happening I ask the FCC to carefully study what we are aiming for and what it means to be “Certified”. I am RID – NAD NIC certified and I believe it is a great certification and believe in the organization as well. But I still understand that the RID national certification shouldn’t be the only credential to be used to decide who is qualified to work as a VRS interpreter. I believe there are other certifications that have proven they deserve the respect and value as much as the RID – NAD national certification. I believe that by acknowledging those other credentials we will guarantee that the service is not dwindled so much it creates chaos for both the Deaf and Interpreting communities.

Now I’m going to talk on behalf of my Latino community of interpreters who have **no other credential to prove their qualifications than the screenings that VRS providers or interpreting agencies gives us to be able to work for them.** In my personal experience I have 10 years of interpreting experience, 6 years since I began working as a Video Interpreter and 3 different providers. Even though I have only being RID – NAD certified for two short years, I understand I’ve been more than qualified for a lot longer than that to work in the **Spanish Platform**, since Spanish is my mother tongue.

There is a big pool of ASL/Spanish **perfectly qualified interpreters**, like me but who speak little to almost no English. Especially those interpreters who were born and raised in PR, like I did. It took me a long time to get my English to a level where I felt comfortable enough to take the national certification. I made my dream come true but the truth is that even though I have it, that only qualifies me to work in ASL/English settings not to work in the ASL/Spanish setting. There is another certification named the BEI Trilingual Certification, which is a good one and I encourage anybody who has the skills in ASL/English/Spanish to take it. I believe that the FCC should recognize that certification as well. Now, sadly, even that certification requires to be either BEI Certified or Nationally RID Certified. Which are both ASL/English bilingual certifications and leave one component behind or absent, the ASL/Spanish bilingual component.



Some of my questions are:

1. Since the FCC approved the ASL/Spanish services: Is the FCC willing to provide **monetary support**, to help develop an ASL/Spanish Certification?
2. Which organization(s) would be responsible for that?
3. If the FCC sanctions the RID certification as the only acceptable credential to work in VRS, and since there is PRRID chapter affiliated to the RID: will the FCC require the RID to develop a national ASL/Spanish certification that actually qualifies an interpreter to work in such platform? Or, would the FCC be willing to give special consideration to qualified PR interpreters who does not have a testing tool yet?
4. If we develop a test in PR, are you willing to accept it as a credential considering our cultural and language differences, meaning that most of us are not raised in an English speaking household?

I have to remind to the FCC, RID, and any other organization dealing with interpreters in the ASL/Spanish settings, that the same way English consumers deserve the respect of receiving qualified services, you are all obliged to provide the same quality of interpreters for the Spanish consumers.

I'm tired of companies and the government being very strict when hiring and requiring qualifications to be able to work in the English setting but accepting anybody who speaks two sentences in Spanish as a qualified interpreter while not respecting really qualified ASL/Spanish interpreters for not having an ASL/English certification.

I'm willing to work cooperatively to find solutions to this matter. Feel free to contact me anytime.

Sincerely yours,

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