

To whom this may concern,

Hello, my name is Edwin Fernandez and I am a Spanish - ASL Interpreter in Puerto Rico. My reason for communicating with you is because of recent FCC rule (10-51) that will require all VRS Interpreters to be nationally certified mentioning RID recommendations. I myself believe that it is a wonderful idea although I also believe that things have to be considered before this should become possible. These are some of my questions and concerns:

1. As I mentioned before, I am a Spanish - ASL Interpreter. I work for a SPANISH VRS provider. My customers are Spanish - ASL, NOT English - ASL. A National Certification for Spanish - ASL does NOT exist. National RID does not provide a Spanish - ASL Assessment Testing. What will happen with me and many other Spanish - ASL Interpreters?
2. Most of my Spanish - ASL Interpreter Colleges cannot take the RID National certification because they don't speak English. Many of my Spanish - ASL colleges that have taken the exam, failed because of lack of English proficiency.
3. What good will the RID National certification do for Spanish - ASL Interpreters if the assessment evaluates English - ASL Interpreting skills. Do you know that Spanish and English are two different languages with very different of cultural boundaries? If so, why do you want to force me to take an English - ASL Assessment that will do no good for me in the Spanish VRS setting? I don't interpret in English! I don't even speak English! (I had to find a translator to help translate this letter) I interpret between families that speak Spanish and deaf family member.
4. Did you know that there is a difference between Trilingual Interpreters (English - Spanish - ASL) and Spanish Interpreters (Spanish - ASL)?
5. Trilingual Interpreters can take a Trilingual Interpreter Test offered in Texas but before taking it they need to have been certified at National Level (NIC, NAD, RID CI & CT). What about Spanish - ASL Interpreters? We can't even take the Trilingual Test!
6. Why is Spanish not taken into consideration for decisions as important as the ones you are about to make?
7. Why did RID say NO to creating a Spanish - ASL certification test? Are we not that important?
8. Why are Spanish - ASL Interpreters paying expensive RID membership if Spanish is not taken into consideration?
9. Why can't FCC trust VRS providers to use their own Interpreter assessment for VRS settings?

I really wish you revise your decision and consider my concerns. On the downside, your decision will lead to Hundreds of Spanish speaking families who will not be able to communicate with their deaf family member because there will not be enough interpreters to take their calls. There aren't many certified Trilingual Interpreters working for VRS settings and there won't be because VRS does not pay as well as community interpreting does. More than half of the Spanish VRS industry is ran in Puerto Rico by qualified Spanish - ASL interpreters who do not hold national certification but have their hopes up and are waiting for RID to re-consider creating a Spanish - ASL Testing system. In the meanwhile, VRS Providers have done their part by creating their own Assessment Testings that determine if the Interpreter is qualified to work for Spanish - ASL VRS setting or not because they have their eyes opened and understand that a person who holds an RID NIC Certification is not necessarily qualified for VRS Interpreting. They also understand that Spanish - ASL service is important and does not have the respect they deserve from RID.

Thank you.

Sincerely,

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