

I am writing to express my concerns regarding the proposal requiring all VRS interpreters hold RID certification.

- o If approved this would create a monopoly for RID bringing in huge financial gain

- o The FCC would be sanctioning one agency over others who offer the same if not better testing methods.

- o The state testing modules in some states are far more rigorous and have lower pass rates than the national certification test.

- o National certification is not necessarily a true picture of ones skills. It is only a snapshot on a given day.

- o The loss of highly skilled VRS interpreters will create many problems for the deaf consumers who have come to depend on VRS.

- o Working as a VRS interpreter requires much more than basic knowledge of sign language—it requires the ability to manage technology, phone culture, good attitude, the ability to get along with people, patience in working between deaf and hearing callers to name a few and to my knowledge there is not a test available for testing these skills.

As an employee in VRS, my employer screens all applicants for a minimum skill level, monitors the work of all employees to ensure the company standards are being met. Management carefully monitors consumer feedback on interpreter skill and customer courtesy. They provide ongoing opportunities to attend workshops and in-service training. VRS companies uphold the highest standards in fulfilling FCC requirements as well as meeting the needs of VRS consumers.

Certification is just one tool used to assess an interpreter's skills. However RID cannot be the only answer. One organizations measure of proficiency should not be blindly accepted as the only accurate measure.