Honorable Julius Genachowski and Commissioners Copps, McDowell, Clyburn, and Attwell Baker :

VRS Interpreters are a diverse group with very different and specific needs. Having a one-size-fits-all system of certification through a single certifying body (RID) for such a heterogeneous group will prohibit the overall goal of achieving functional equivalence for the Deaf community.

A one-size-fits-all approach through a single accrediting body is also likely to result in unintended consequences:
1. The FCC mandates a one-size-fits-all approach for VRS minimum proficiency standards and identifies RID National Certification as the sole vehicle through which interpreters may demonstrate minimum VRS proficiency.
2. A significant percentage of the highly skilled and qualified VRS workforce will become unemployable with their respective VRS provider.
3. VRS providers will be unable to keep pace with the rapidly growing demand for services.
4. A significant loss of the VRS workforce and/or inability to keep pace with the rapidly growing demand for services will result in VRS providers becoming unable to meet maximum established wait time limits.
5. Becoming unable to meet maximum established wait time limits will result in the withholding of funds from VRS providers.
6. The withholding of funds from VRS providers will result in potentially catastrophic unintended consequences for the VRS industry.
7. Unintended consequences for the VRS industry will inhibit Deaf consumers from attaining functional equivalence.

Additional points to consider:
1. Ms. Janet Bailey - The Senior Vice President of Community Interpreting for Purple VRS- is also the Government Relations Representative for RID. As the sole beneficiary of mandatory one-size-fits-all national certification for VRS interpreters, RID's position as articulated by Ms. Bailey represents a significant conflict of interest.
2. Each State has established its own minimum proficiency standards and/or guidelines as each State has determined appropriate.
3. On the job training within the interpreting profession is how skills are developed in this field; to pretend otherwise is disingenuous. Can RID identify an interpreting context which does not "require a high level of skill that is only obtained through years of experience and education"? Within which interpreting context does RID suggest newly graduated interpreters gain their "years of experience"?

What may not be recognized is that responsible VRS providers have established effective quality assessment screening tools, a process through which consumers are empowered to switch interpreters, and created an oversight, management, training, and mentoring framework within which

the profession has experienced significant growth and development. These processes reflect the very mission of RID.

Thank you for your consideration. I am confident the FCC can find a way to support VRS interpreter minimum proficiency standards without adversely impacting the VRS industry, inhibiting Deaf community functional equivalence, or overriding minimum proficiency standards and/or guidelines established at the State level.

Sincerely,

John Pippin-Mandley