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To:Fcc

Subject: VRS

Hello. I hope you are doing fine. Recently came to me the information about a possibility of establishment of a new requirement to interpreters working on Vrs. I am talking about require certification to work as interpreter on vrs. That requirement to work in English-asl interpretation is completely reasonable because for years they have had tests and evaluations to obtain certification.

But what about Spanish-asl interpretation? Organizations like RID have had the idea (and just recently) that by covering "certains" needs of the trilinguals interpreters, they are doing their job about Spanish. But that's not true. In the universe of interpreters working here in Puerto Rico, MOST of us work only Spanish-asl with no English included at all. And in the growing latino population in the US that is happening for sure too. Us Rid have been noticed about this and at least to my knowledge, they have done nothing so far for the only Spanish-asl community of interpreters.

It would be TOTALLY UNFAIR to require certification to work as Spanish-asl interpreters knowing that at this time is impossible to obtain it. At the same time, it would be totally unfair too, to apply the same requirements that English-asl has for certification to Spanish-asl from the very beginning. For example, for A LOT OF YEARS English-asl interpreters took tests to obtain certification. Just recently was added the associate or bachelor degree. The fair thing to do, if you gonna BEGING NOW to regulate Spanish-asl interpretation is to provide tests to the interpreters that are already working (and you are able to know who are right now the vrs companies staff employes) ensuring with this quality, and applying the associate or bachelor degree requirement to everybody else that comes after that.

Imagine, years ago, when the authorities begun for the first time to regulate the electricians, for example. They required from that very moment a year or two of studies causing that all of them had to stop working go study and then retuned to work? Of course not. The studies requirement was for the new ones. They surely provide some test to the ones already working and then planned training every year or something like that.

Me and a lot others Spanish-asl interpreters have been working on Spanish-asl vrs calls without certification because there is no certification available to us. Rid established some requirements along the years to English-asl interpreters. I did not follow them because IT NOT APPLIES TO ME. I work SPANISH-ASL. I only hope that you will do the right and fair thing to do.