

November 9, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: The Matter of the Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Ms. Dortch,

In response to the FNPRM (11-184) that was released on December 15, 2011, I put forward what follows for consideration as the FCC continues to evaluate the actions necessary to protect and reorganize the structure and practices of the nation's Video Relay Program. I am a CODA (child of Deaf adults) who uses Video Relay Services (VRS) for my communication with family and friends and a current VRS interpreter. I am concerned about the recent proposals to make changes to the system of VRS and have included some areas that I would like you to examine to continue to provide functional equivalency for all people.

I am concerned that a pay rate cut will affect the quality of services which may result in longer hold times, less interpreter training, and lack of quality services. Also, the Deaf community will not have an opportunity to choose their VRS provider—they need to have a choice in who their provider preference is and not have all calls routed through a central database.

Reporting Transparency – Interpreter Compensation & Benefits

The FCC further stated in the recent FNPRM that there has been and still remains a lack of clarity related to the costs necessary to employ sign language interpreters across the VRS Program. To that end, I would encourage the Commission to consider the concept of requiring providers to outline the direct cost of interpreter wages and benefits.

Repeal the Ban on Working from Home

In an effort to encourage the containment of the costs of the TRS Fund and to create additional options for providers to reduce costs and achieve sufficient economies of scale, I would urge the

Commission to consider repealing the prohibition preventing providers from delivering services from an at home solution.

Repealing this ban, gives providers an opportunity to reduce infrastructure and reimbursement costs, this supports their ability to work within the new model being proposed. Equally important to the cost containment of the TRS Fund, repealing this ban supports the expansion of VRS by increasing the supply of available interpreters.

At the end of the day, while sign language interpreters may not be viewed as the direct responsibility of the FCC, it is easily concluded that they are at the center of the nation's Video Relay Program. By instituting a rate differential for use of nationally certified interpreters, implementing a qualification process for "new-to-VRS" interpreters, and repealing the ban on working from an at home solution, the FCC will further ensure the functional equivalency of the VRS program while supporting VRS providers to achieve the necessary economies of scale to operate within the new model.

Sincerely,

Sarah Wheeler

Concerned Citizen
Child of a VRS user
Sign language Interpreter