

November 14, 2012

To Whom it may Concern:

As a Video Interpreter, I respectfully offer the following comments to the Federal Communications Commission (FCC) request for additional comment released on October 15, 2012 regarding the structure and practice of the Video Relay Service (VRS) program and on proposed VRS compensation rates, from CG Docket No. 03-123 and CG Docket No. 10-51

Summary:

I, as a Video Interpreter, respectfully request:

- 1. A review of RSLA's cost analysis in light of interpreter credentials*
- 2. Consideration of a two tier reimbursement structure based on these credentials*
- 3. Consideration of a cap on interpreter workloads in light of its effect on the interpreted message.*

Video Interpreters agree with The Commission's current stance on no longer tolerating the large discrepancy between actual costs and provider compensation. Systems should be established to eliminate waste, fraud and abuse. VIs also agree that customer service is and should continue to be a priority for The Commission and that to accomplish this, a full review of current reimbursement rates is necessary.

However, in performing a full review of current reimbursement rates, FCC must consider the credentials of the interpreters utilized by providers. A two-tiered reimbursement is appropriate; one for providers employing nationally certified interpreters and one for those employing un-qualified or under-qualified interpreters. Also, FCC must consider capping interpreter workloads to ensure that providers streamline costs in ways that DO NOT effect customer service in the form of mal-interpreted or skewed messages.

Review of cost analysis based on interpreter credentials:

Registry of Interpreters for the Deaf (RID) is a national certifying body that assesses and maintains continued educational requirements for sign language interpreters. These interpreters have post-high school education and displayed a minimum standard of skill, ethics and professionalism. The current analysis does not consider the cost difference in providing this quality of service. We are requesting a reevaluation of the cost analysis to include the impact on provider operational costs. In short, providers who provide a higher quality interpreting experience should be rewarded.

Two reimbursements tiers; certified and pre-certified:

The cost to the provider increases when they opt to provide the higher level of customer service inherent in providing qualified (RID certified) interpreters. We ask that the current tier structure be reevaluated in light of this cost and that those providers utilizing qualified interpreters be reimbursed at a higher level than providers who hire un-qualified or under-qualified interpreters.

Cap interpreter workloads to ensure effective interpreted messages:

Knowing the potential of a possible rate cut from The Commission, many providers have opted not to cut profits or waste as intended by The Commission. Instead, they are trimming costs in ways that impact customer service by lowering the standards for hiring interpreters and increasing workload expectations.

Research demonstrates the quality of an interpreted message degrades after twenty minutes of continued interpreting. When interpreters are expected to interpret continuously with minimal breaks (latest policies are for an interpreter to be logged on taking calls 80-85% of the time), customer services sharply declines. Basically, when an interpreter gets tired, they cannot effectively produce a quality interpretation, which negatively affects both Deaf and Hearing customers. Capping interpreter log on at 66% would prevent this from occurring and force providers to cut profits, waste, and fraud in ways The Commission expects.

It is the goal of Video Interpreters to continue to maintain customer service and that our current insights into the provision of this quality service may be at odds with providers. While we understand that The Commission is seeking rate reductions in order to eliminate fraud and waste, providers are threatening the quality of the service we provide by threatening pay cuts, reducing benefits, increasing workload expectations, and utilizing under-qualified interpreters. We know what The Commission expects of us, but we will not accept our providers choosing profits over quality of service; not for our users, not for our profession, and not for The Commission.

Thank you in advance for your time and consideration of my comments. I look forward to The Commissions ultimate decision.

Sincerely,

Jennifer Ballew, NIC, A:EI