November 14, 2012

Re: CG Docket Nos. 03-123 and 10-51

Ladies and Gentlemen of the FCC:

As a Professional Video Interpreter (VI) I respectfully offer the following comments in response to the October 15, 2012 FCC request for additional comments regarding the structure and practice of the Video Relay Service (VRS) program and on proposed VRS compensation rates.

As a VI, I agree with The Commission's current position on the following:
To no longer tolerate the large discrepancy between actual costs and provider compensation; Systems should be in place to eliminate waste, fraud and abuse; And customer service is and should continue to be a priority.

This VI understands that a full review of current reimbursement rates was necessary in order to accomplish these objectives. As the Commission moves forward in this task, I along with fellow VIs would ask for (1) a review of cost analysis based on interpreter credentials, (2) consideration of two reimbursement tiers; one for nationally certified interpreters and one for pre-certified interpreters, and (3) considering capping interpreter workloads in order to ensure effective interpreted messages.

(1) Review of cost analysis based on interpreter credentials:

Registry of Interpreters for the Deaf (RID) is a national certifying body that assesses skills and maintains continued educational requirements for sign language interpreters. Certified interpreters have demonstrated a minimum standard of skill, ethics and professionalism. The current analysis does not consider the cost difference in providing this quality of service. For this reason, we VIs are requesting a revaluation of the cost analysis to include the impact on provider operational costs.

(2) Two reimbursement tiers; certified and pre-certified:

Provider costs differ when they opt to deliver a level of customer service inherent in a nationally certified interpreter. We VIs ask that the current tier structure be reevaluated in light of this cost, and it be considered that those providers providing certified interpreters and quality service be able to compete with those providers who opt not to consider the quality of the message.

(3) Cap interpreter workloads to ensure effective interpreted messages:

Aware of The Commission's probable rate cut, many providers have opted not to cut profits or waste as intended by this action. Instead, providers are cutting quality by disregarding the importance of interpreter qualifications and increasing workload expectations.

Research indicates the quality of an interpreted message degrades after twenty minutes of continued interpreting. When interpreters are expected to interpret continuously with minimal breaks, the quality of the message user's experience is impacted. We VIs ask that The Commission consider capping the amount of time an interpreter be available to take a call to 66% whereby an interpreter has an opportunity to maintain the quality of a message for twenty minutes and recover for ten minutes before being expected to continue to provide a quality service.

It is the Video Interpreters' goal to continue to maintain quality customer service. I understand that our current insights into the provision of this quality service may be at odds with providers. While I understand that The Commission is seeking rate reductions in order to eliminate fraud and waste, providers are putting at risk the quality of service interpreters provide by threatening pay cuts, acceptance of colleagues who are less than qualified to work in the VRS setting, and increasing workload expectations.
It is our goal as VIs to continue to provide the quality of service we know The Commission expects of us. However, 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.

In Summary:

We Video Interpreters are respectfully requesting:
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.

Thank you for your time and consideration of these comments.

Sincerely,
Beth Golden, CI/CT