Comments re: CG Docket No. 10-51 and CG Docket No. 03-123

Esteemed Members of the FCC:

I work part-time as a VRS CA. My parents were Deaf, and I have had many Deaf relatives. For thirty years, I worked at a large metropolitan program for students who are Deaf or Hard-of-Hearing, first as a teacher of the Deaf, then as an administrator of interpreters, and later as the administrator of the entire program which serves approximately 500 students who are Deaf/Hard-of-Hearing. My comments below respond to specific topics in the R&O and FNPRM as noted.

CA Qualifications

VRS CAs should be required to have Certification by the National Registry of Interpreters for the Deaf (RID). Since certification alone does not guarantee skill, however, the quality of every VRS CA should also be measured on an ongoing basis through language and interpretation assessments. Ongoing, face-to-face training, either in person or through video conferencing, should be provided by VRS providers to their interpreters regarding technological aspects of the job, interpretation skills, and fluency. Particular focus should be paid to cultural competencies. In addition, Certified Deaf Interpreters should be available to work as team interpreters with non-deaf CAs, ensuring that message accuracy is paramount. VRS providers should be required to evaluate and monitor their video interpreters on language fluency, cultural competencies, and interpretation skills. The FCC's mandate for functional equivalence is not supported if VRS providers focus primarily on numerical efficiency standards when evaluating their interpreters rather than on qualitative measures.

It is inaccurate to equate the scarcity of complaints from VRS consumers with a high quality of service provided by the majority of VRS CAs. Instead, the lack of complaints illustrates the need for the FCC to solicit input from consumers in a manner and language that is accessible to them.

Skill-Based Routing

Skill-based routing of VRS calls is a topic that merits considerable attention. Functional equivalence would improve if consumers were given the option to choose specific interpreters based on (1) fluency and (2) knowledge of subject. Consumers might very well accept a longer speed of answer if it resulted in improved functional equivalence during calls. It might be wise to begin by

offering callers the option to select their preferred VRS CAs based on overall fluency. Certified interpreters vary as to ability and proficiency. Just as any group of certified professionals can be depicted using a bell-shaped curve, so too can certified interpreters. Some are subpar, many are average, and some are exceptional. Certification alone does not guarantee an interpreter's ability to provide functional equivalence in the unique and especially challenging environment of video relay. Later, an option could be phased in for callers to select specific call topics such as legal or medical. Skill-based routing should be a voluntary feature of VRS. It would enhance a competitive marketplace.

Disaggregation of Emergency Calls to 911

Emergency 911 VRS calls should be handled by VRS CAs who have been screened and evaluated to determine (1) who have the greatest language fluency, (2) who have the best interpretation skills, and (3) who wish to work as VRS 911 CAs. These interpreters would work in teams of two during their entire shifts. Such teams would be available in all regions to provide redundancy should there be a technical outage in one region, for example. Currently, there is great disparity in skill level among video interpreters. This fact makes the specialized routing of 911 calls a necessity. Once a 911 call has been placed, a VP caller is unable to indicate a preference for a different CA. If a CA does not readily understand a VP caller or if a VP caller does not readily understand the CA, the only option for the VP caller is to hang up and try to call again. Such a delay can mean the difference between life and death.

To avoid missteps and delays, VRS 911 CAs should be required to have specialized training for the unique needs of consumers in emergency situations. Currently, the routing of emergency 911 VRS calls seems to be dictated solely by the principle of "which interpreter has been idle the longest?" The 911 call then goes to that interpreter. This type of routing decreases the frequency with which any one interpreter encounters incoming 911 calls. With decreased frequency comes decreased familiarity with the protocol and decreased proficiency in handling these emergency calls.

It might be advisable to create Media Communications Line Service centers which could be funded by local and state governmental programs supporting emergency 911 services. Such a system could support uniform standards for relay service providers in terms of training protocols and performance criteria. For functional equivalence, there should be consistency in the content, format, depth, and length of training that is provided to all VRS CAs who handle 911 calls, regardless of

provider. Additionally, vicarious trauma support for CAs would be specifically geared toward 911 calls. An option for 911-designated CAs would be that they return to regular CA status should the need arise.

Non-Competition Agreements in VRS CA Employment Contracts

Non-competition agreements in VRS CA employment contracts severely limit the ability of VRS CAs to work elsewhere after leaving their current employer. Although the training of a workforce requires an investment, that investment is common to all VRS providers. Such training does not justify having non-competition agreements which, in turn, unnecessarily and artificially limit the pool of VRS CAs. Removing non-competition agreements from the employment contracts of VRS CAs would be good for the marketplace and especially good for consumers. This is a supply-and-demand issue that cannot be ignored.

CAs Working from Home Environments During Overnight Hours

Since onsite supervision of CAs is not always present in VRS call centers and since CAs sometimes work entirely alone within call centers, the argument that the unsupervised home environment is more prone to fraudulent activity and problems with service quality is rendered moot. Traveling to and from a VRS call center during overnight hours does compromise the safety and security of CAs, thereby making it more difficult to recruit interpreters for overnight shifts.

Thank you for the opportunity to provide input on the crucial service of Video Relay.

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