



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

September 16, 2013

Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Sir/Madame:

The American Speech-Language-Hearing Association (ASHA) is pleased to have the opportunity to respond to the Federal Communications Commission's (FCCs) invitation to comment on possible actions to enhance the knowledge and use of Speech-to-Speech (STS) relay service by persons with speech disabilities. ASHA is the national professional, scientific, and credentialing association for more than 166,000 members and affiliates who are audiologists, speech-language pathologists, speech, language, and hearing scientists, audiology and speech-language pathology support personnel, and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing disorders.

ASHA is providing comments on the following issue areas for which the Commission seeks comments:

**Possible reasons that STS has not been more widely utilized, including ways to improve outreach to increase awareness and utilization for STS and whether the Commission should contract with a single entity to educate potential users about the services availability.**

### **Utilization**

#### *Comments:*

Today, there are numerous modes of communication that require typing but do not require voicing, such as text messaging, online chats, and e-mail. However, there are situations when a phone call is the preferred way to communicate. Individuals who have conditions like ALS, Parkinson's, Cerebral Palsy, or stroke, may have both disordered speech and paralysis or limitations in the motor skills necessary for typing. These individuals would benefit from the STS relay service. In addition, others who would benefit from STS include individuals with a speech disorder who may lack access to technologies like smart phones, computers, or internet services. Just like individuals who have the ability to speak and make voiced calls, they may also prefer to use the telephone for particular purposes.

#### *Recommendation:*

ASHA recommends that the Commission conduct a survey of professionals working with potential STS users in order to obtain utilization information and an estimate of the number of persons who could benefit from STS services.

*Rationale:*

This survey could be distributed through online communications (e.g., e-mail lists and forums) of relevant professional organizations. This may be more successful than surveying potential users, who are more difficult to identify. Such a survey should include questions about whether patients with speech disorders have problems on the telephone, what types of systems they use to make calls, and perhaps how many of them would be likely to use the STS service. In addition to collecting information about utilization, a survey of this nature would also serve the purpose of educating professionals about STS services.

## **Improving Outreach**

*Comments:*

ASHA suggests that the Commission consider reaching out to consumer groups that advocate for individuals who are at risk for speech disorders (e.g., United Cerebral Palsy Association, the ALS Association, American Parkinson's Disease Association) to educate users about the availability of this service. Additionally, outreach to professional organizations whose members provide services to individuals with speech disorders may be helpful in increasing the awareness and utilization of STS. The Commission should reach out to professional organizations like ASHA, American Occupational Therapy Association, American Physical Therapy Association, and American Medical Association. Speech-language pathologists are uniquely qualified to serve individuals with severe speech disabilities. Therefore, it would be important to target them in any outreach efforts.

## **Single Coordinated Entity to Provide Outreach**

*Comments:*

ASHA suggests that a single entity provide outreach for the promotion of STS to persons with communication disorders. This would be a more efficient way to promote STS to consumers and professional groups.

*Recommendation:*

Consider the feasibility of contracting with a single call center in order to maintain a level of oversight, training, and support needed for the Communication Assistants (CA).

*Rationale:*

Contracting with a central call center would yield the following benefits:

- The FCC will only need to pay for one set of administrative functions.
- A single entity contractor would yield consistent messaging and promotional information about STS services since it will be responsible for all media outreach efforts.
- The FCC would gain efficiency in its oversight of a single contractor rather than multiple contractors.
- The FCC would be able to build requirements into the bidding process to identify the most qualified contractor.

**Should the Commission bundle STS outreach promotions/messaging into the Internet based Relay Service National Outreach Program (iTRS-NOP) for internet protocol relay service (IP Relay) and video relay service (VRS)?**

*Comments:*

ASHA believes that the STS program, which primarily serves persons with speech disabilities, will require its own outreach and promotions. While the deaf population has taken great advantage of internet and video based relay services, ASHA believes that many individuals with speech disorders could also benefit from information about the spectrum of available relay services. These two populations will likely be reached by different avenues and approaches. Each group requires communication and information targeted to its unique needs. A qualified speech-language pathologist can assist in educating and making recommendations to meet the individual telecommunication needs of the person with speech difficulties.

**The Commission seeks comment on whether it should adopt consumer eligibility, registration, and verification requirements to ensure that only individuals with speech disabilities who need the service can use it.**

*Comments:*

1. Due to the underutilization of this service, ASHA questions whether an eligibility and registration process for STS users is necessary. ASHA affirms the notion that caller profiles may be sufficient documentation about STS user needs. In addition, developing such eligibility and registration criteria could limit access to the service for those who have not yet received a diagnosis by a professional or for those who cannot afford medical care. However, if certain callers raise suspicions or doubts for the CA, ASHA supports requesting that the callers be asked to provide written documentation of a speech disorder and/or have their profiles flagged in some way to alert other CAs of potential misuse. Also, information about STS user legitimacy could be included in the caller profiles.
2. If the application/registration/eligibility process is implemented to reduce fraud and misuse, it is hoped that this process will not create barriers or limitations for use by those who need STS services.

**The Commission seeks comment on whether certain mandatory minimum standards are inapplicable to STS including:**

- a. **CA competency in typing and spelling**
- b. **Transmission format of TTY**
- c. **Call release of the CA from a call with only two TTY users and**
- d. **Voice carry over—where a person with a hearing loss speaks to the other party on the call but receives the other party’s spoken words as text from the CA**

*Comments:*

ASHA agrees with these minimum standards being proposed.

**The Commission seeks comment on whether to adopt requirements for STS providers to facilitate the ability of STS users to create caller profiles.**

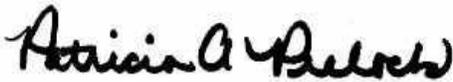
**The Commission tentatively believes that these proposed rule changes may be necessary to improve the efficiency of the STS program and to ensure effective, quality STS services so that users receive functionally equivalent telephone services as mandated by Title IV of the ADA Act.**

**COMMENTS:**

ASHA agrees with the adoption of requirements for STS providers to create caller profiles. If the application/registration/eligibility process is implemented, creation of the caller profiles could be built into this system. Otherwise, ASHA supports the development of caller profiles as these provide a way for CAs to record notes or information about user needs that could improve the efficiency and utility of STS for individuals.

Thank you for the opportunity to share our comments and recommendations. Should you have questions about our comments, please contact Catherine D. Clarke, ASHA's director of education and regulatory advocacy, at 202-624-5953 or by e-mail at [cclarke@asha.org](mailto:cclarke@asha.org).

Sincerely,



Patricia A. Prelock, PhD, CCC-SLP  
2013 ASHA President