

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CG Docket No. 03-123
	)	
Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services	)	CG Docket No. 08-15
	)	

**COMMENTS OF SPEECH COMMUNICATIONS  
ASSISTANCE BY TELEPHONE, INC.**

**Introduction**

Speech Communications Assistance by Telephone, a 501c3, promotes telephone access for people with speech disabilities nationwide. This document addresses issues presented to the FCC during the STS Roundtable on December 4, 2013.

**1. Outreach**

- a. The FCC asked if a lack of outreach or of effective outreach is one reason why STS is not more widely used?"

SCT Response: Lack of effective outreach is one reason why STS is underutilized, but to be effective outreach requires different methods to reach the three types of perspective users.

Type 1: The easiest type of perspective users to reach are those who simply need to be told about it. These people will figure out how to use it themselves. We have met many of them who do not use STS either because the quality of the CA is not adequate or they are used to other communication methods and don't want to change.

Type 2: One of our outreach projects shows that some perspective users could be comfortable making STS calls after 3 home visits by an SLP who works one on one with potential users, family and caretakers.

Type 3: We have no data on how much training is needed to reach perspective users who need to make lifestyle changes because of social and cognitive deficits. We have no information about the size of each of the three groups. It would be logical that perspective users with less severe speech disability, more education and with job experience would fall into Type 1.

Within this population, an individual's ability to produce understandable speech may vary over time, or often during the course of each day. This variability is particularly common among people with degenerative muscle disorders.

- b. The FCC asked what outreach methods are currently used to inform potential STS users of the availability of STS?

SCT Response: The outreach done by providers is difficult to track because of proprietary issues. Hopefully, the STS providers on the conference call will have that information. Some state PUCs have done STS outreach. It would be helpful if they would make the results public. The most successful outreach that we were involved in was in the mid-90s. Working full time for 18 months, two outreach workers recruited 55 regular users in California. We used traditional techniques such as, giving talks, sending out flyers, and asking every user if they could recommend others. Every time we found someone who could benefit from STS, we would call them over and over again until we got them to start using STS regularly. We were relentless, but most of these people ended up finding STS useful and it improved their quality of life.

- c. The FCC stated that it has been suggested that STS is not more widely used because providers do not have an incentive to increase the number of STS users. Is this correct?

SCT Response: Reports in the FCC showing the reimbursement rates and the cost of providing STS, confirm that providers take a loss on STS.

- d. The FCC Stated that only one STS provider commented on the FNPRM's proposal to centralize STS outreach efforts in a single, coordinated entity to implement a national STS outreach effort. Do other providers support or oppose nationwide STS outreach, and why?

SCT Response: Besides the provider's concerns, there are not enough activist consumers in most states to ensure that adequate money is spent on outreach. For the same reason, intrastate reimbursement money will remain below the provider's cost. This is why we need a national outreach program; such a program could contract with people in each state to do the outreach, but without a national program taking responsibility, outreach will not be adequate.

- e. The FCC states that some commenters suggest that more information about the potential STS user population is needed before funding, criteria for selecting a nationwide outreach program coordinator, and outreach activities can be decided.
  - i. What is the best way to obtain information about the potential STS user population? Could this research be part of the national outreach effort?

SCT Response: To obtain information about the potential STS user population, a demographer specialized in speech disabilities would need to design either a survey or some other mechanism. It is difficult to envision how one would combine an outreach effort with that research.

- ii. Are there general criteria for the selection of a nationwide outreach program coordinator that could be established without additional information?

SCT Response: It would be questionable if someone could do outreach to a population that has never been clearly defined. Perhaps, a speech pathologist who had significant experience with this

population could work together with someone with extensive outreach experience to put together a workable program. These people would have to be extremely dedicated and very knowledgeable in their area of expertise.

- iii. Similarly, are there general categories of outreach activities that could be established without additional information?

SCT Response: Earlier we described the three categories of potential users. We do not know if a successful outreach project aimed at the first category could be done without research on the population. It might be possible if the project manager knew enough about the population to begin with. But again, we do not know if such knowledge exists.

- f. The FCC asked if the current amounts of compensation to providers for STS outreach sufficient for effective STS outreach? In total, the Commission provided \$394,000 in outreach funding to STS providers through supplements to the STS interstate per minute rate from 2008-2010.

SCT Response: We cannot determine how far that \$394,000 will go until we know the size of the potential user population. We also need to know a cost effective way of reaching that population before we can estimate costs. Rather than using the current FCC STS outreach program, it would be wiser to utilize a single entity to conduct that outreach. Contracting with a single entity has advantage of: 1) requiring the FCC to pay for only one set of administrative functions rather three, as happens now; 2) Providing that the contractor not expend resources that promote the contractor's own company, as often happens with multiple contractors; 3) Enables the contractor to conduct a nationwide media outreach program; 4) Enables the FCC to monitor the contractor more closely than with multiple contractors and 5) Enables the FCC to build requirements into the bidding process that only the one most qualified contractor can meet. However, we do believe that the provider(s) selected to do nationwide STS service be allowed to engage in marketing efforts for its brand name STS service, and be reimbursed for related expenses.

It is difficult to envision a successful program run by the providers until the reimbursement rate is high enough for them to be motivated to increase STS usage.

## **2. Video-Assisted STS (VA-STS)**

The FCC asked the following:

- a. What states and providers currently offer VA-STS? Are there additional states that intend to offer this in the future?
- b. What is the potential user population of VA-STS and to what extent is VA-STS being utilized in states that are now offering this service – for example, what percentage of STS users have opted to use this method?
- c. What are the benefits of VA-STS?
- d. How is VA-STS currently funded and are there differences in cost between providing VA-STS and STS? If so, to what are these differentials attributed?
- e. Does VA-STS require an additional or a distinctive set of skills for CA training (e.g., lip reading skill)?

The DDTP staff on the conference call will be much better to answer questions about VA-STIS than we are.

### **3. Consumer Eligibility, Registration, and Verification**

- a. The FCC stated that the Commission recently directed the creation of a user registration database for VRS users. Should STS providers be required to use this database to register STS users and verify their eligibility for STS? To what extent has STS been subject to fraud?

SCT Response: Registration must be voluntary; its purpose should be to identify legitimate users and encourage them to work together in cooperation with providers and government relay administrators to build an active consumer base to improve quality of service and increase usage.

Due to the small current and potential population of legitimate users, it is important that such rules do nothing to discourage their use of STS. CAs can easily identify fraudulent STS calls so that preventing fraud is not a good reason for mandatory registration. Once a user has been identified, there is no need to repeat the process, because the likelihood that someone would recover from a speech disability and misuse STS is almost zero. Eligibility, registration, and verification should be as easy as possible. Many legitimate users have limited dexterity and should not be required to use a computer or the US mail to complete these processes. The verification process used for VRS or any other mandatory program would be counterproductive to the goals of the STS service. Many users already have serious barriers to using STS and it is crucial to not increase those barriers.

One of the big problems in STS is that, unlike the other relay users, STS users often don't know each other. They need to be able to identify each other and work together to promote STS. Users should only be required to self-identify as having a disability in order to register for STS and never should medical documentation be required.

### **4. Caller profiles**

The FCC asked the following:

- a. What providers, if any, already offer STS users the option to create caller profiles?
  - i. What has been the experience of providers and users with the utility of caller profiles?
  - ii. Have caller profiles increased the efficiency of STS calls by reducing set up time or otherwise?
- b. If the Commission requires providers to allow STS users to create caller profiles, what information should be included in caller profiles?
- c. If the Commission requires providers to allow STS users to create caller profiles, how and when should providers be allowed or required to inform users of the availability of caller profiles and/or facilitate the creation of caller profiles?

SCT Response: Caller profiles would be useful to STS users if they eliminate the need to repeat information.

## **5. Mandatory Minimum Standards for Training CAs**

- a. The FCC asked what are the skills are necessary for STS CAs?

SCT Response: The criticism that we most often receive about CAs is that some of them don't revoice when they are asked to. We did receive an email recently from a SLP/teacher who reported "... recently, we have had several operators tell our students that the system is to call people with speech disabilities, not for people with speech disabilities to make phone calls. We have also had operators tell students that the service is only for people with speech disabilities, implying that they should not be using the service." The STS CA needs to be someone motivated to help consumers make phone calls. The lack of quality in CA performance might reflect a management attitude stemming from STS not producing a profit.

- b. The FCC asked what training standards for STS CAs do providers currently use?
- c. The FCC asked what, if any, specific training should the Commission require for STS CAs?

SCT Response: There needs to be independent surveys of STS users to identify areas of training needed.

## **6. Compensation of STS calls**

- a. The FCC stated that one provider has suggested that the Commission change the compensation methodology for STS providers from conversation to session minutes. Do participants agree or disagree with this suggestion, and if so, what are the unique features of STS that justify the use of session minutes for compensation?

SCT Response: We agree that compensation by session minutes is best. It takes a longer time to set up a STS call than most other relay calls; providers need to be compensated for that time. Such increased compensation could easily have a positive impact on CA performance. Setting up a TTY call is a routine process, but setting up a STS call can be challenging especially if the CA is not used to the consumer's speech.

## **7. Termination of Calls**

- a. The FCC asked if there is a need for FCC action to prevent the early termination of calls – e.g., where the user has not said “good-bye or otherwise indicated he or she wishes to terminate the call?”

SCT Response: Consumer surveys and spot monitoring of STS calls may best provide that information.

This document is signed by Dr. Bob Segalman, the founder of STS and Dr. BJ Gallagher of McDaniel College. Dr. Gallagher has a background in speech pathology. She has experience training consumers to use STS and educating Speech Language Pathologists about STS.

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