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ASL Services Holdings/Global VRS

Federal Communications Commission
Internet-based Telecommunications Relay Service National Outreach Program

Observations and Recommendations

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Observations and Recommendations

Introduction. The following are ASL Services Holdings/Global VRS' ("ASL/Global VRS") observations and recommendations regarding establishment of a Federal Communications Commission's ("Commission") Internet-based Telecommunications Relay Service National Outreach Program (iTRS-NOP) for video relay service ("VRS") and Internet protocol relay service ("IP Relay") as discussed during the Commission's January 17, 2014 stakeholder meeting in Washington, D.C.

ASL/GlobalVRS supports the Commission's assignment of a pilot outreach program to a designated entity. It is vital that this entity collaborates with all stakeholders to gain a comprehensive understanding of the outreach opportunities and then formulate clear objectives on how to apply funding appropriately and most effectively. It is recommended that the party responsible for the outreach program be required to establish an ongoing Outreach Advisory Board.

ASL/Global VRS is a federal Telecommunications Relay Service Fund-eligible provider of video relay services ("VRS") to the public. Our Company focuses on the provision English and Spanish language VRS that endeavors to be not only linguistically accurate, but reflects the cultural nuances of our subscribers. We come from a long-standing background of providing multi-cultural video interpretation, and are particularly attuned to our VRS subscribers' linguistic sensitivities. This has shaped our view of how outreach to the Deaf and Hard of Hearing Community can be effectively conducted.

ASL/Global VRS appreciates the Commission's solicitation of stakeholder comment regarding the development and deployment of an Internet-based Telecommunications Relay Service National Outreach Program ("iTRS-NOP"). The need for such a program is clear. Based on ASL/Global VRS' long-standing interpreting experience, we offer the following observations and recommendations.

Advisory Board. ASL/GlobalVRS feels that it is imperative to require the chosen entity to create and communicate with a VRS and IP Relay Outreach Advisory Board. Recommendations for members of this board include, but are not limited to:

- Hearing and Deaf individuals who have well-credentialed experience in providing services to the Deaf population;.
- Consumer Groups Leaders representing:
 - VRS Consumers
 - Deaf with Special Needs
 - Hispanic Population
- An Educator/Teacher or Superintendent experienced in educating in Deaf schools, who can recommend how to educate the targeted Deaf audiences (Deaf children vs. Deaf adolescent vs. Deaf Adult);
- A member of National Associate of the Deaf (NAD) in order to give support and recommendations on historical outreach methods that have proven effective whether national or to a target audience.
- A qualified government representative that can provide insight to the regulatory framework/limitations when using government entities to distribute information.

Establishing clear and concise messaging about the purposes, functions, and benefits of IP Relay and VRS.

As addressed in the Stakeholder meeting, there is a need to establish clear and concise messaging regarding the purposes, functions, and benefits of IP Relay and VRS education. With limited Outreach pilot program funding funding should be segmented into 2 categories: 1) Deaf Outreach; and 2) Hearing Outreach:

1. Recommendations for outreach messages to the Deaf population:

Broadband Services: However outreach is conducted, information must be available to that segment of the public without Internet or mobile telecommunications access. The biggest hurdle for many Deaf individuals is not being able to afford Internet access or mobile service, even if these services are available where they live. This is particularly true in underserved or unserved areas.

Target Remote/Rural Areas: Special focus should be made for to locations where statistically VRS is virtually unused/unavailable, including the Virgin Islands, Guam, Spanish-speaking communities, Tribal areas, and other rural areas such as the Appalachian mountain areas.

Special projects and contracts/compensation incentives should be made for VRS providers that make special effort to reach smaller, rural, and more isolated communities with specialized needs.

Outreach for the hearing community also requires specific considerations. The hearing community responds to visual messages and “inclusion.” The Commission should pursue inclusion of interpreting in commercials, programing, and movie media as a natural part of communication. The public should be informed of VRS availability, how to use it, and that VRS is a government regulated service that should be used.

Reaching the Hispanic Community: Additional linguistic and cultural consideration must also be incorporated into any iTRS-NOP. For the Spanish-speaking community, information must be tailored to reach the three primary Latino groups:

- 1) Mexican/Central - South American
- 2) Puerto Rican/Caribbean
- 3) Cuban

Each group has unique linguistic and cultural differences that require a nuanced communication. This is not a “one size fits all” communication.

Phraseology varies sufficiently and needs to be adjusted accordingly to effectively communicate with more local groups. Representatives should be Spanish Deaf Representatives known and respected by the Spanish community, *e.g.* local Deaf leaders, working for the Commission, rather than a single specific contracted provider.

Reaching Special Needs Deaf Population: It is imperative to team up with organizations specialized in servicing the Deaf population with specialized needs such as Deaf/Blind, Cerebral Palsy, etc. as proposed by Mark Hill during the stakeholder Meeting.

Reaching Late Deafened Adults: Individuals that become Deaf later in life generally will go to various entities to get tools to assist the hearing loss process. It is our opinion that reaching out to Audiologists is too broad of a scope to reach this population. It is recommended that education on VRS and IP Relay begins before the hearing loss has occurred. Outreach could be targeted to companies that distribute hearing aids and be included in overall education from the beginning stages.

2. Recommendations for outreach messages to Hearing population:

ASL/GlobalVRS agrees that educating the Hearing entities, such as telemarketing companies that are continually hanging up on VRS calls must be the first line of strategy for the Outreach program. These entities must be targeted, reported and given specific periods of time to train their employees to be in compliance or face swift and severe penalties.

Reinforce Americans with Disability Act (“ADA”) VRS and IP Relay requirements with public entities responsible for compliance:

IRS: Use the annual Internal Revenue Service updates to Accountants to incorporate compliance laws within the company.

SHERM: Society for Human Resources Management (SHERM) would serve as an excellent resource to disseminate relay service requirements to human resource facilitators within businesses.

Establish penalties for non-compliance:

Hotline: ASL/GlobalVRS urges the Commission to create a Hotline dedicated to reporting non-compliance situations experienced by Deaf Consumers.

Enforcement: Swift and severe enforcement standards must be implemented and enforced in order to be effective in finding change towards how organizations treat the Deaf population.

Outreach: Three General Principles for effective communication

Outreach should be guided by three broad principles:

- 1. Outreach must be linguistically and culturally accessible**
- 2. Informational materials should be easily understandable and accessible by the Deaf community.**
- 3. Outreach must be done in Deaf/Hearing Teams**

1. Outreach must be linguistically and culturally accessible.

Videos should be presented in ASL: Information should be presented in video American Sign Language (“ASL”) format; both English and Spanish written text should be done to support all videos.

- a. In video ASL format**
- b. Communication must be in English to accompany the videos**
- c. Communications must be in Spanish to accompany the videos**

Videos should be creative to retain interest and be informative: Videos should be short, topic-specific sessions done in an “interview,” question and answer presentation;

Written information should to accompany every video: Printed information should be presented in English and Spanish to accompany and reinforce videos;

Written information should be developed at an appropriate reading level: All printed information should be presented at a reading level not to exceed the average deaf population reading level, typically Fifth to Eighth grade).

2. Informational materials should be easily understandable and accessible by the Deaf community.

Webpage: A specific on-line information page should be available on the Commission’s web site with frequently asked questions with updates in video and text form; Information in English *and* Spanish to accompany the videos

Social Media: The Commission should establish a Face Book and Twitter page and actively engage in social media; Interested individuals should be able to sign up for text/Twitter, Face Book VRS updates coming directly from the Commission;

Videos/DVDs: Videos and DVDs offer an inexpensive medium for explaining Commission’s responsibilities, functions, plan, and regulations. Video/DVDs’ should be distributed to every attendee at Deaf events.

Information materials should be developed in conjunction with a panel comprised of individuals who are familiar with the language and cultural way to access deaf community such as Deaf educators. These individuals are perhaps most closely in touch with the Deaf.

The Commission should endeavor to actively conduct outreach at Deaf events: Securing a booth designated for the outreach initiative at both national tours (ie. Deaf Nation) and local events (ie. Regional or State Conferences)

Deaf Periodicals and online news: Identify Establish the leaders within the Deaf news media and use their resources for information distribution.

Information must be distributed at government social service offices: Many Deaf do not choose to go to Deaf events and do not participate in Social Media. It is vital to reach this population another way. Distribution of information via Social Services is a key way in reaching this group. Information should be made available to organizations engaged in rehabilitation and federal Social Security offices, among other social organizations that may serve the Deaf Community, so that information is available to any Deaf individual that comes to their offices.

Social Security Offices: Information should be available through mailings/pick up of items such as Social Security checks and food stamps.

Vocational Rehabilitation: Require that materials be distributed during appointments.

Target underserved areas: Special focus should be made for to locations where statistically VRS is virtually unused/unavailable, including the Virgin Islands, Guam, Spanish-speaking communities, Tribal areas, and other rural areas such as the Appalachian mountain areas. Global VRS has documented how it has provided VRS in underserved/unserved areas at great unrecoverable cost. These are locations that other providers initially ignored. ASL/Global VRS reiterates its continued commitment to working with the Commission and Deaf Consumers in ensuring the effectiveness and success of the Commission's iTRS-NOP.

Libraries/Schools: The Commission should ensure ALL public government locations provide access to VRS via a neutral platform, including libraries and schools with deaf students that receive federal funds.

Town Hall Meetings: Meetings must be held in smaller municipalities where VRS access is limited;

Service Providers: Outreach materials should be sent to all **Deaf AND Interpreting organizations and VRS Providers**. Interpreting organizations and agencies work closer with a larger segment of Local Deaf individuals who often are NOT connected to organized Deaf associations. These individuals may miss information or obtain information third hand and often inaccurately; all VRS providers should be required to make all the material available on their websites by linking/listing the Commission's web pages, through Face Book, and Twitter, among other social media;

3. Representatives at Deaf events should comprised of deaf-hearing teams.

Outreach must be done for both Deaf and hearing consumers. It is critical to have teams that are comprised of Deaf and Hearing individuals to effectively facilitate communication with all parties.

Alternatively, the Commission should contract/hire Deaf representatives to perform outreach functions using Commission-developed materials, and then contract ASL/Spanish/English interpreters to team and work with Deaf representatives as needed to distribute information into the targeted audiences remote areas.

By bridging the cultural understanding of Deaf and Hearing individuals it will result in a more effective message to any of the targeted audiences whether in rural territories, urban areas, social media platforms or corporate entities.

ASL Services Holdings LLC/Global VRS is ready to actively work with whatever entity the Commission chooses for the Outreach initiative. Education to the English/Spanish Hearing Population and the English/Spanish Deaf population is critical. ASL Services Holdings LLC/Global VRS will fully support all efforts to accomplish this goal.