

## **CSDVRS, LLC follows up on request from Karen Peltz Strauss and Gregory Hlibok from the FCC**

During the 3/14/2014 videoconference, CSDVRS, LLC (“CSDVRS”) was asked to supply the 30 second Speed of Answer (“SoA”) result as a percentage measured over the period of a month versus the currently measured SoA based on a daily result. Based on the requested scenario, CSDVRS’s SoA results for the months of January, February and March 2014 are as follows:

- January 2014 – **(CONFIDENTIAL)** of calls answered less than 30 seconds
- February 2014 – **(CONFIDENTIAL)** of calls answered less than 30 seconds
- March 2014 – **(CONFIDENTIAL)** of the calls answered less than 30 seconds

In addition, at the videoconference, CSDVRS also agreed to provide information and analysis in regards to what it would take for CSDVRS to meet the impending service level requirements compared to existing staffing levels.

In an effort to identify what CSDVRS’s scheduling requirement would have been to meet the 85/30 SoA for the month of January 2014, CSDVRS revisited the original schedule for that time period and increased staffing where necessary to meet the forthcoming 85/30 requirement. Table 1, listed below, factors into consideration the following: 1) **(BEGIN CONFIDENTIAL)...**(END CONFIDENTIAL) Again, we would like to reiterate, this is based on us knowing the actual call volume vs. having to predict it in advance. In a real world application, forecasting to meet an 85/30 could result in an even larger discrepancy between the two.

**CSDVRS response to FCC regarding what would it have taken to meet a daily 85/30 service level requirement for the month of January 2014.**

**(TABLE 1 – CONFIDENTIAL)**

**CSDVRS's increased costs as a result of running the "85/30 schedule"  
(BEGIN CONFIDENTIAL)...(END CONFIDENTIAL)**

**CSDVRS response to FCC regarding challenges of meeting service level  
requirement**

CSDVRS expanded its geographic locations, see attached "CSDVRS Call Center Locations" map in anticipation of the new January 1, 2014 service level requirements. Since September 2013, CSDVRS added four new locations to its network; Mesa, AZ, Albuquerque, NM, Spokane, WA, and Colorado Springs, CO. We intentionally diversified to the Southwest and West regions to further spread time zone coverage and to forge service provision in the case of weather emergencies potentially effecting our current, predominately Midwest locations.

The process of setting up a new location from scouting, lease negotiation, building, and equipping the site, to screening, onboarding, training and evaluating of interpreters on average takes approximately six months. CSDVRS LLC has committed to utilizing only certified interpreters to provide video interpreting; believing certification protects the rights of the consumers because certified interpreters are bound by a code of professional conduct. VRS interpreting is a unique assignment; fast paced, low context, multimodal, linguistically diverse which requires a high degree of experience and skill; much greater demands than that of traditional TRS agents. The caliber of staff employed by CSDVRS to provide its Video Relay Services is closer to achieving functional equivalence than hiring staff un-prepared for the task at hand, just to answer calls in a manner that exceeds the anticipated Speed of Answer requirement of 85/30. CSDVRS agrees with the Registry of Interpreters for the Deaf's (RID) assertion on record in regards to this topic.

Therefore our *minimum* requirements for employment consideration at CSDVRS are one or more of the following certifications; National RID Certification, BEI advanced or above, or NAD level 4 or above. Other *minimum* requirements for employment include having at least 3 to 5 years of community interpreting experience and recommendation by three professional references. Candidates must also attain

favorable marks on our skill sample evaluation, peer review, and background check. After meeting the minimum requirements, candidates are then vetted for amiable disposition, customer service aptitude, and solid work ethic.

Furthermore, once the interpreting candidate has gone through training, they then must pass an evaluation demonstrating they are ready and equipped to go live. This rigorous process aligns with our philosophy; hire deliberately and prudently. Rather than deterring quality people from applying to work at CSDVRS, the rigors of this process actually motivate professional interpreters; many report feeling pride in achieving the high standard. We have often heard that CSDVRS is known as the place for the best video interpreters to work; we believe it is because of the high bar we set and that competent interpreters want to work on a team of other competent interpreters.

We are proud of these stringent quality expectations although the tradeoff is the challenge of *quickly* recruiting and hiring enough of these quality professionals meeting the criteria.

The benefits of investing in this front end qualification process are many, not limited to but including greater retention and lower staff turn-over.

We also believe in building smaller call centers, averaging six seats, to avoid any adverse impact on community interpreting needs. We encourage part time employment so interpreters continue to be available to their communities.

Another consideration is to allow for at-home interpreting. As previously commented and presented to the FCC, a stringent at-home interpreting program would allow for companies like CSDVRS to expand recruiting, hiring and training of interpreters to locations outside of areas where existing call centers are located. This would not only allow for a greater pool of skilled and passionate professionals to participate in providing excellent VRS services to our customer base, but also allow for increased flexibility by adjusting schedules on a half hour by half hour basis. The use of at-home interpreters is something that could greatly assist CSDVRS in meeting SoA service levels. Enabling at-home interpreting will not be the cure that enables CSDVRS to meet the forthcoming 85/30 SoA, but it is something that not only allows

for more flexibility with call volume that is abnormally high during a short stint and greatly assist CSDVRS to meet even the current SoA if there were to be weather or other related incident that caused call center closures on a significant geographical impact. At-home interpreting also provides a lower-cost solution and enables CSDVRS to be much more dynamic in its pursuit to expand our operational foot print, especially in consideration of continued drastic rate cuts and potential draconian penalties.

In summary, CSDVRS is committed to providing Video Relay Services utilizing staff qualified to provide the service in the most functional equivalent manner possible, and answering calls in the order they are received in the timeliest manner. We object to sacrificing quality over quantity. As seen in the analysis performed, the SoA will result in significant increase costs for CSDVRS and the industry as a whole.