Registry of Interpreters for the Deaf, Inc.

August 30, 2014

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, Dc 20554

RE: Notice of *Ex Parte* Meeting
Structure and Practice of Video Relay Service Program, GC Docket No. 10-51; Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG No. 03-123

Dear Ms. Dortch:

On August 28, 2014, Shane H. Feldman, Executive Director, Julie Anne Schafer, Director of Public Policy and Advocacy, and Judith Kroeger, Video Interpreter Member Section Chair from the Registry of Interpreters for the Deaf, Inc. (RID) met with Gregory Hlibok, Chief, Disability Rights Office, Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau, Robert Aldrich, CGB Attorney Advisor, Eliot Greenwald, DRO attorney advisor, Caitlin Vogus, DRO attorney advisor, David Schmidt, TRS Fund Program Administrator, Office of Managing Director, and Andrew Mulitz, attorney advisor, Office of Managing Director.

RID discussed the June 24, 2014 Report and Order, which said:

> We also invite providers and others to submit information on the extent to which other factors, such as changes in providers' work rules, are affecting the supply of interpreters and whether improvements in working conditions and employment practices could alleviate some of the problems reported by providers in maintaining staffing levels.

RID explained that we look at the profession broadly and specifically and identify changes that are both positively and adversely impacting our ability to achieve our mission, "excellence in interpreting". This holds true in the field of VRS. The RID mission supports the FCC in its efforts to fulfill its mandate to provide a functionally equivalent VRS by enhancing the quality of interpreting services in the industry. RID is also cognizant of the impact VRS has on the profession – both specific to VRS and in the broader profession and the Deaf community.

RID also explained that as a professional association, we are limited by federal antitrust law as to what we can discuss related to what is called working conditions. However, RID endeavors to advocate for standards while also functioning as an information clearinghouse on the interpreting profession and, as such, both collect and conduct research about standard practices in the profession. During the meeting, RID shared two articles from our magazine, *VIEWS*, related to VRS interpreters. One article focuses on stress and burn out and the other focuses on injuries. (attached) RID also discussed and will share our standard practice papers (SPPs) on professional interpreting and teaming, which explain industry standards in interpreting. (attached) RID encouraged the FCC to consider the SPPs and their application to VRS. We also referenced research by Barbara Moser-Mercer, which

addressed remote interpreting and its impact on psychological and physiological stress and fatigue. That article is also attached.

RID shared anecdotal evidence of standard practices in VRS. For example, prior to the VRS "boom" in 2008, there were more opportunities for peer-to-peer support, including teaming for calls. Since that time, the demands on video interpreters have changed. Interpreters who once worked in community settings for 25-30 years and have switched to VRS have had to leave the profession entirely after a few years in VRS because of injury, stress, and burn out.

RID also acknowledged that we can do more and that in light of June 24 FCC R&O. RID is currently developing a survey that asks interpreters about their day-to-day work in VRS to ascertain standard practices in the industry. RID described three broad categories of questions:

1. Demographics – FT/PT, certified, hours worked, etc
2. Work as an interpreter – performance standards/measures, injuries, etc
3. Policy questions – For examples, should the FCC be involved in regulating employment practices?

RID asked the FCC for input to guide its survey questions– including what information would be helpful to the FCC when making decisions and regulations related to VRS. The dialogue focused on questions about how FCC regulations impact interpreters' ability to provide functionally equivalent service, trends in the supply and demand of interpreters (RID referenced the 2012 study from the National Consortium of Interpreter Education Centers (NCIEC) and have included it as an attachment), and how interpreters' effectiveness is measured and evaluated.

RID also restated our position on non-competition agreements, which we believe artificially limit the pool of qualified interpreters working in VRS. RID also reiterated that if the Commission reconsidered its position on video interpreters working from home, then appropriate safeguards would have to be in place to protect the integrity of the calls. Specifically, 9-1-1 calls should be routed to call centers where there is more opportunity for support and teaming during a difficult call. RID also discussed the feasibility of having separate centers for 9-1-1 calls in VRS and agreed to survey our members about their position on the subject.

Respectfully Submitted,

Shane H. Feldman
Executive Director

Attachments (6)

CC: Gregory Hlibok, Chief, Disability Rights Office
Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau
Robert Aldrich, CGB Attorney Advisor
Eliot Greenwald, DRO attorney advisor
Caitlin Vogus, DRO attorney advisor
David Schmidt, TRS Fund Program Administrator, Office of Managing Director
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