



September 7, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CG Docket No. 10-51
“Structure and Practices of the Video Relay Service Program”
Declaratory Ruling, Order and Notice of Proposed Rulemaking

Dear Secretary Dortch:

The Registry of Interpreters for the Deaf (RID) appreciates the opportunity to submit comments on behalf of our more than 15,000 membership in response to the Notice of Proposed Rulemaking (NPRM) released by the FCC on May 27, 2010, concerning proposed rules for the video relay service (VRS) program.

1. **Location of VRS Call Centers:** RID has long worked closely with our sister organization, the Association of Visual Language Interpreter of Canada (AVLIC). AVLIC and RID share a commitment to standards in the field not only through certification but through continued education and adherence to a code of professional conduct. While RID understands the concerns expressed by the Commission regarding a federal program being managed beyond the United States borders, RID has strong opposition to any government action that would result in the displacement of qualified interpreters. We understand that there are approximately 300 interpreters working in call centers in Canada, of which all are members of AVLIC. Of those 300, nearly 50 are RID members. We further understand that most AVLIC members, 98 percent, work between ASL and English. RID stands strong next to AVLIC and the standards they have set for the sign language profession in Canada. Their commitment to quality interpretation from its members can more than adequately provide the level of service from Deaf consumers in the United States.
2. **VRS CAs Working from Home and Compensation:** RID members, like most other professional sectors working with the ability to telecommute, have looked forward to the day when technology would allow them to provide their services from home offices. Our members understand the need for specific regulations regarding the set-up and operation of these offices. They look forward to the day when regulations and protocols are established to allow home offices to provide efficient and effective services in safe, confidential and supportive work environments. We would emphasize the need for systems that will enable these remote employees to be able to easily transfer calls or to access another interpreter for support. This capability is especially important for qualified interpreters living in rural communities. By enabling CAs to work from home under strict guidelines and protocols, the pool of qualified interpreters expands greatly to meet the growing demand for VRS.

The practice has worked well in other industries, and with technological advances, regulatory adherence and oversight by management, it could benefit consumers by expanding options to allow interpreters to stay in local community areas and still be able to share their skills within both the community and VRS.

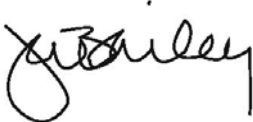
On August 18, 2010, RID offered comments to the FCC Notice of Inquiry (CG Docket No. 10-51) in support of specialized rules and regulations for Emergency (E911) services. Based on the recommendations to separate emergency services from regular VRS program, RID would be opposed to E911 services being provided in home offices where one interpreter works alone and has no support to assure prompt and effective service.

3. **Detecting and Stopping the Billing of Illegitimate Calls: 5: Whistleblower Protections for VRS CAs and Other Provider Employees:** RID supports the conclusions of the Commission and recommends that the FCC make available any such Whistleblower rule in clear language to assure that all CAs have a thorough understanding of their rights and responsibilities. We further recommend that the FCC disseminate this information to the CAs through both the provider companies that they work for and through RID, their professional association. This will assure that information will be shared with current, past and future CAs.

In summary, RID understands the concerns expressed by the Commission in regard to VRS centers located outside of the United States but believes that there are sufficient, qualified ASL interpreters available to staff the Canadian call centers. We believe that CAs can successfully provide relay services from well-equipped and supported home offices with appropriate regulation to assure a secure workplace. In addition, allowing this practice will expand the supply of qualified interpreters for VRS. Finally, RID supports Whistleblower rules and encourages the FCC to assure wide-spread distribution of clearly articulated explanations for such rules.

Thank you for your time and consideration of our comments. Should you have any questions or need clarification, please do not hesitate to contact me at govtaffairs@rid.org.

Sincerely,



Janet L. Bailey
Government Relations Representative