



April 28, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Notice of *EX PARTE* presentation
DOCKET NO. CG 03-123, CG 10-51

Dear Secretary Dortch:

On April 27, 2010, Clay Nettles, Executive Director; Janet L. Bailey, Government Affairs Representative; and Tina Schultz, Director of Communications, from the Registry of Interpreters of the Deaf (RID) met with the following FCC representatives: Karen Peltz Strauss, Deputy Chief; Greg Hlibok Attorney-Advisor; Traci Randolph, Interpreter; and Michael Jacobs, Legal Advisor of the Consumer and Governmental Affairs Bureau (CGB); Diane Mason, Disability Rights Office; and Jay Keithley and Sharon Diskin from the Inspector General's Office.

The purpose of the visit was to introduce RID's new Government Affairs Program (GAP) and outline some of the issues and concerns that have been brought to our attention by the RID membership working in the video relay service (VRS) industry. RID explained that we are a professional organization of sign language interpreters with over 15,000 members nationwide. RID seeks input from our members; a Video Interpreter Members Section, and special content experts to gather up-to-date information. Recent surveys (2010) show that 25% of respondents currently do more than 50% of their work in VRS settings; and that our members are concerned about 'occupational safety issues' in VRS settings and a desire for RID to assure an 'interpreter voice' at the FCC administrative level.

We noted that while interpreters consider themselves linguistic professionals, VRS providers often consider them labor. Interpreters feel as if they have been marginalized and ignored in the process of establishing the VRS system.

While RID applauds VRS reform, we expressed concern that the vendors may look to interpreters to enforce FCC regulations; which is a difficult expectation when finding the balance that is inclusive of functional equivalence and transparency. We asked that the FCC put this task on the vendors, requiring that they come up with methods and strategies to monitor and enforce regulations WITHOUT placing the interpreters in the role of policing the calls.

Interpreters wish to be fully informed on FCC regulations and guidelines, VRS reform, and whistleblower protections. It was suggested that the FCC share clear 'plain English' guidelines for interpreters to be distributed through the RID.

On the topic of rate setting, RID expressed concern that a reduction in rate could adversely affect the occupational safety of video interpreters in areas of utilization and occupancy rates as well as reduce the focus on training and continuing education for quality interpretation services. Qualified interpreters should not be sacrificed because of the rate reduction.

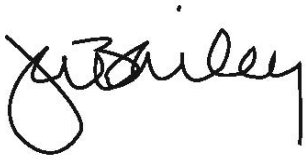
RID also discussed the handling of emergency calls through the VRS system and recommended that a system be devised to point calls to a select group of trained and experienced video interpreters in a structured manner. In addition to on-going, in-depth training, support systems for these professionals should be in place to address vicarious trauma issues.

RID also expressed member concerns over decisions to restrict 10-digit numbers to deaf callers. RID believes that functional equivalence should include a deaf person's ability to use the telephone system with or without interpreters. Point-to-point calls should be supported between deaf and hard of hearing citizens and hearing family members, friends and service providers who can sign through videophones.

RID reiterated with the FCC that we are a professional interpreter organization that is ready and willing to serve as a source of the interpreter's voice for the FCC and plan to frequently provide information regarding interpreters to the FCC as well as work with the FCC to provide a conduit of information to interpreters.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), a copy of this letter is being filed electronically today. If you have any questions, do not hesitate to contact me at 703-838-0030.

Sincerely,



Janet L. Bailey
Government Affairs Representative

- cc: Greg Hlibok
Karen Peltz Strauss
Jay Keithley
Sharon Diskin
Traci Randolph
Diane Mason
Michael Jacobs