



May 21, 2010

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

Re: CG Docket No. 03-123

Dear Secretary Dortch:

The Registry of Interpreters for the Deaf (RID) submits the following reply comments in response to the National Exchange Carrier Association's (NECA) recent payment formula and fund size estimate for the Interstate Telecommunications relay services fund for the July 2010 through June 2011 fund year (Public Notice DA 10-761A1.doc). Our comments refer specifically to the May 14, 2010, comments filed collectively by the "Consumer Groups," comprised of the Telecommunications for the Deaf and Hard of Hearing, Association of the Late-Deafened Adults, Inc., National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), California Coalition of Agencies Serving the Deaf and Hard of Hearing, American Association of the Deaf-Blind, and Hearing Loss Association of America.

As a supporting member of DHHCAN, RID whole-heartedly supports the comments submitted by the Consumer Groups, in particular the comments on page 3 which state, "For Consumer Groups, functional equivalence is the standard by which every action proposed by the Commission and TRS providers should be assessed."

RID contends that the employment of qualified video interpreters is one of the key factors in achieving functional equivalence. Assuring access to the highest quality services requires investment in the professional development for both skill-based training as well as continuing education regarding trends in the field, federal rules and regulations and technical advances affecting the provision of services. Additionally, access to qualified interpreters requires a commitment to their occupational health and safety; assurance of a working environment which offers support for vicarious trauma, implementation of preventative efforts against repetitive motion injuries, adequate access and utilization of certified deaf interpreters and more.

We believe that there must be equal investment in technological development AND the professional interpreters who support the VRS industry. This investment will assure a strong interpreter base equipped to provide the interpretation required to attain functional equivalence.

RID echoes the sentiments of the Consumer Groups when they express their, (page 7), "... strong desire for high quality VRS technology, highly qualified and certified interpreters, improved speed of answer requirements, consumer marketing and outreach, customer service and training, technical assistance, research and development, and other activities necessary to continue moving towards functional equivalency."

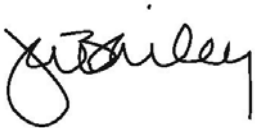
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Functional equivalence requires that all aspects of the VRS system be considered when measuring success. RID recognizes that any rate structure must allow for technology research and development and increased and improved access to VRS. We also believe that we must provide equal support and development to the professional interpreters who make up the composition of the VRS workforce and provide crucial communication access by bringing their linguistic, cognitive and technical skills to bear simultaneously with every call they answer. RID is very concerned about safe working conditions for video interpreters. We ask that the FCC set guidelines that will require that standards for speed of answer will not sacrifice the occupational safety of the workforce.

Lastly, RID is concerned that the FCC consider the ramification of rate setting should providers change their expectations as a result of the demand to meet these requirements. Video interpreters cannot solely be responsible for doing more with less if they do not have the supportive environment to effectively allow them to meet the demands of a quality interpretation. A supportive environment would include an adequate number of interpreters in the workforce to meet the needs of the consumers and the requirements set by the FCC for functional equivalence along with the procedures in place that account for breaks, teaming, turn-taking and more.

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](mailto:govtaffairs@rid.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Janet L. Bailey". The signature is fluid and cursive, with the first name being the most prominent.

Janet L. Bailey  
Government Relations Representative