



January 24, 2011

Disability Rights Section
Civil Rights Division
U.S. Department of Justice
P.O Box 2885
Fairfax, VA 22031-0885
Submitted on line – www.regulations.gov

Re: ANPRM 28 CFR Part 35 [CRT Docket No. 111]
“Nondiscrimination on the Basis of Disability in State and Local Government Services; Accessibility of Next Generation 9-1-1”

Dear Sir or Madam:

The Registry of Interpreters for the Deaf, Inc. (RID) and its 15,000 members, are pleased to be able to respond to the Department of Justice ANPRM [CRT Docket No. 111/RIN 1190-AA62 “Nondiscrimination on the Basis of Disability in State and Local Government Services; Accessibility of Next Generation 9-1-1”]. We thank the Department for reviewing current regulations and for allowing us to share our views on current practices. We are specifically interested in speaking to you about VRS access to E911 emergency services.

Many deaf and hard of hearing persons have embraced Video Relay Services (VRS) which have allowed them unprecedented access to the nation’s telephone system. E9-11 services, which traditionally have accepted calls from deaf and hard of hearing persons through TTY systems, have tried to modify their systems to allow direct calls through the VRS systems. Our members largely make up the army of sign language interpreters required to provide this access.

The Federal Communication Commission (FCC) requires that, “911 emergency calls made through VRS or IP Relay ... receive priority attention so that they will be answered by the first available communication assistant (CA) ahead of all other non-emergency calls. “

This makes sense in theory. In practice, however, VRS providers share E911 call answering responsibilities among their entire VRS CA/interpreter resource.

It takes a very special person to be an emergency first responder. Individuals who train and work in our nation’s Public Safety Answering Points (PSAPs) face life and death situations on a daily basis. These courageous persons receive specialized in-depth training so that they will be ready to *answer the call* – literally. They are also provided personal support and assistance should they be involved with a highly emotional or tragic experience.

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VRS Interpreters face the same emergency situations. One PSAP staff member pointed out to me that interpreters are **watching** the drama unfold instead of listening over a phone; and yet they are not provided with the same level of training and support.

RID believes and strongly suggests that these calls be handled by an 'Emergency call CA team' that has specific experience, credentials, and training.

RID interpreters have shared with us that they are fearful, unsure and hesitant about accepting emergency calls.

Not all VRS interpreters are:

- Certified;
- Experienced - many new interpreters have been recruited directly into VRS centers and do not have knowledge or direct experience about community interpreting in doctor's offices, hospitals, or with police or emergency personnel;
- Trained – Most feel that they do not have adequate training; and the training they receive is focused on corporate procedures and not about handling emergency situations.

Interpreters have shared with RID their fear and hesitancy about having to accept emergency calls. They are unsure and less than confident.

Interpreters must be supported in this very special work that they provide. All of this leads to job stressors for these interpreters. Most tell us that they are not being supported by EAPs; support protocols (teaming, breaks, outcomes); and there needs to be more counseling support available.

Limited experience & insufficient training can negatively affect the interpreter's ability to appropriately process an emergency call.

Therefore, RID strongly recommends:

1. **Minimum standards** for all CA/interpreters hired to handle E911 Calls including:
 - a. National Certification
 - b. Years of Experience
 - c. Specialized Training
2. **Required Introductory and On-going Training** which must include:
 - a. Big Picture Understanding (E911 & VRS System History, Legal Mandates, Goals, Roles and Responsibilities of each group and how they fits into the system);
 - b. Standards and protocols (NENA, RID, Corporate), on how to handle and cope with potential scenarios; and how to take care of themselves in these highly emotional settings
 - c. Curriculum equivalent to the training given to PSAPs.
3. **Interpreter Support** must be offered to interpreters handling E9-1-1 calls (such as EAP or on-site counseling, teaming protocols, and basic training on how to cope with trauma.

4. **Consumer Education** must be offered because many deaf callers don't understand the system, nor the role of the interpreters. Callers will be tempted to want to explain their emergency to the first person who can sign with them, when, in fact, they need to be connected to the PSAP to get the help they need.

E9-1-1 services are new to many deaf and hard of hearing users; new to the VRS systems; and the advent of VRS is new to the PSAPs. Therefore we have made one final suggestion about the relationship of VRS to E9-1-1 communications:

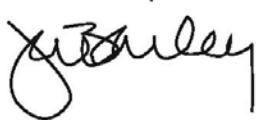
Emergency (E911) calls should be separated from Regular VRS calls; with special rules for the interpreters; OR, if necessary, exceptions to VRS rules that can support this very special setting:

- a. As often as possible - One interpreter (team) should stay with the consumer throughout the call; and if a call is dropped that interpreter should be re-connected to save time and provide a more successful experience.
- b. Interpreters should be allowed (and trained) to assist the communication to assist in timely connection to the PSAP and ultimate help. As a result of this exception, protections will need to be in place to assure that the interpreter is protected for 'doing the right thing;' and lastly, that
- c. VRI (Video Remote Interpreting) be allowed as an exception reimbursed through regular VRS funding, to allow interpreters to provide remote interpreting services until such time as a covered entity (hospital, police station) takes over and provides interpreting services under other legislative mandates to provide their own interpreters.

Emergency situations are frightening for everyone involved. We must provide not only equal access but an EFFECTIVE experience that will lead to the most positive outcomes.

Thank you for your work and the opportunity to share our comments.

Sincerely,



Janet L. Bailey
Government Relations Representative
Registry of Interpreters for the Deaf