

Consumer Perspective: VRS Quality Issues

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Disclaimer

- Ed Bosson – clarifying role as presenter

Role of VRS

- Signing deaf and hard of hearing (D/HOH) communities depend on VRS for daily functions such as:
 - Employment
 - Family Relations
 - Professional Services
 - Lawyers
 - Medical professionals
 - Engineers
 - Ordering food
 - Many aspects of daily lives

Importance of VRS

- VRS is supposed to provide telecommunications access for D/HOH functionally equivalent to what hearing persons enjoy
- Quality of VRS is critical and if poor:
 - Breakdown of communication
 - Misdirection/misunderstanding of intention
 - Conveys bad impression of the VRS caller
 - Not just bad impression but also economic impact for deaf-owned businesses

Impact of Rates on Quality

- As a result of the reduction in the glide path rates, the average speed of answer has declined.
 - The more interpreters there are, the faster the response (more \$\$)
 - The less interpreters there are, the slower the response (less \$\$)
- Interpreters overworked (understaffed and less breaks) and paid lower = lower quality

Quality Issues

- Lack of skills-based routing for specialized interpreters/better accuracy
 - Medical, legal, technical, CDIs, etc
 - Many D/HOH users feel the need to “dumb down” the conversation so that the video interpreter (VI) can follow what is being said
 - Causes incorrect impression on the hearing caller’s end; makes deaf caller look incompetent (especially for D/HOH professionals)
 - Many D/HOH users often ask to switch interpreters = delay
 - Grassroots D/HOH callers may not understand VIs alone and need CDI as part of the team

Logical?

- Illogical to expect VRS providers to maintain/improve the level of services with less money
- Cost of training the interpreters affects the quality of interpreting
 - Not enough funds, then training aspect is minimized and quality suffers

Problems with Porting

- Process to port a telephone number from one VRS provider to another not functionally equivalent
- The delay in the process exceeds the delays by other telephone users
- Transfer of VRS user's address book problematic
- The potential of RUE standards
- It is part of the funding issue

Need for Metrics

- Need metrics to verify quality of VIs:
 - Script testing (done by video, for voicing and signing)
 - Script cannot be known to VRS providers
 - To be conducted by third-party entity – and developed by acknowledged test experts and consumer advocates
 - To ensure appropriate test scripts are used
 - Test scripts follow a natural telephone conversation
 - Funding necessary
 - User quality rating of each call
 - Option to select 1 to 5 stars at the end of the call

GAO Report

- Supports what we have urged all along
- Lack of specific TRS performance goals
 - Extremely difficult to do in an objective, quantifiable way
 - Difficult for FCC to manage the program in a proactive, result-oriented manner
 - Such performance cannot be mandated on top of cuts with already low rates
 - Only with a rate freeze - can take stock of performance goals

Conclusion

- GOAL is improvement, not deterioration

VRS Rate Cuts & Impact

Last 3 Years and
Projection for the Next 3 Years

Last Three Years

- Reduction in glide path rates impacted and weakened the following:
 - ADA mandate of functional equivalence became problematic
 - Longer average Speed of Answer due to less availability of VIs
 - Stresses on interpreters increased
 - Quality of communication with inferior VIs
 - D/HOH users look incompetent
 - # of Complaints from DHOH users increased
 - Based on feedback from consumers/NAD members

Projection of Future if Rates Continue Downward

- Will continue to worsen if rates continue to be reduced
 - Decreasing quality of VIs
 - Decreasing number of innovations
 - Both in products and services
- Problematic tunnel vision on cutting costs
 - Impacts ALL aspects of VRS providers = quality directly affected

Possible Solutions?

- Fiscal efficiency is important BUT other factors to consider
- Re-visit allowable and non-allowable expenses of VRS to be included in the calculation of VRS rates such as:
 - R&D in:
 - New products
 - New services
 - Better & improved system/programming
 - Etc
 - Outreach

Possible Solutions? (cont.)

- Realize that TRS is not same as mainstream telecommunications services because of:
 - Labor-intensive
 - Involves D/HOH = at a disadvantage
 - ADA mandated
 - Telecommunications ACCESS
 - Functional equivalence
- Need to put **incentives** in the rates
 - E.g. compensate VRS companies based on metrics

Questions

- Consumers do not have access to financial data = unable to determine specific appropriate rates
- Instead, we urge the Council to have better access to data provided by VRS providers and query the fund administrator on various calculation formulas:
 - Where did the determination to draw the tier line at 500K minutes per month come from?
 - What is the formula to determine the average cost per minute? (ordinary average or weighted average?)

Conclusions

- Quality and innovative products/services dependent on ample funds
- VRS industry needs competition – must have enough funds to support that
 - Rates should be attractive enough for new companies to join in
 - Allow more choices and foster competition
- Rates should reward quality service and features (tied to metrics).