

FCC Consumer Advisory Committee

Recommendation: Support of Petition for Rulemaking Filed by Rebecca Ladew,
June 26, 2006
In the Matter of
Telecommunications Relay Services And Speech- To- Speech Services)
For Individuals With Hearing And Speech Disabilities
CG Docket No. 03- 123

The Consumer Advisory Committee (CAC) offers these comments in support of a Petition for Rulemaking filed by Rebecca Ladew in docket No. CG 03-123 on June 26, 2006.

On March 6, 2000 the FCC released a report and order stating that a Speech to Speech communications assistant (CA) must remain on a call for a minimum of 15 minutes.² At that time, the FCC explained that the requirement, “reduces potential disruption and will make the call more functionally equivalent to voice telephone calls.”

The Consumer Advisory committee (CAC) respectfully requests that the FCC extend the minimum time on a Speech-to-Speech call to twenty (20) minutes for the following reasons:

1. It takes enormous concentration for many persons with speech disabilities (PSDs), in contrast to people without a speech disability, to perform the following tasks, all at the same time:
 - a. Begin speaking,
 - b. Think and form their response, and
 - c. Listen with intent to their caller.
2. The interruption caused by the change of agents disrupts the PSD’s concentration on each of these activities. Example from STS user, “Sometimes I am so flustered by that interruption that I forget what I am going to say. Other STS users have reported the same concern.”

² *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, CC Dkt. 98-67, FCC 00-56, 15 FCC Rcd 5140 (March 6, 2000), ¶168.

3. It generally takes a few minutes for a CA to begin to maximize his or her understanding of the speech patterns of a particular PSD. Once this understanding of the PSD is maximized, the speed of the conversation can increase. Unfortunately, when agents change, this process of maximizing conversation pace must begin again.
4. CAs often have trouble understanding people's names and unusual technical words spoken by the PSD. This results in the PSDs being required to spell out these words. After a change of CAs, the PSD must repeat this entire process again. This results in slowing down the conversation considerably.
5. Reducing the frequency of CA change increases the fluidity of the call. The result is a call that is more functionally equivalent to a call between two non-speech disabled callers.
6. Reducing the frequency of CA change will also save relay costs because calls will be processed more efficiently, without the need to ask the PSDs to unnecessarily repeat words and phrases.

At the time that the FCC adopted this rule, it explained that this amount of time made sense in part because most traditional TRS calls lasted for less than ten minutes.³ Given their nature, however, STS calls often last longer than text-to-voice calls; changing CAs on these calls prior to 20 minutes can seriously disrupt their flow and impair functionally equivalent telephone service. Accordingly, the CAC requests that the FCC extend the time a CA remains on a call to 20 minutes.

We further request that the FCC specify that the 20 minutes on a call requested above begins when effective communication begins. Effective communication is achieved when the CA is able to relay the communications between the parties accurately and impartially, and interpret for the PSD both receptively and expressively, using any necessary specialized vocabulary. Whether or not effective communication has been achieved should be determined on a case by case basis. What this means is that although the CA may generally be qualified to handle STS calls in most situations, he/she may come upon a call that requires specific skills that he/she does not have; in this case, he/she will not be qualified to provide effective communication and an alternate CA must be obtained. The period of time allowed before a call can be transferred to another CA should begin only after the new CA is secured, and the caller is able to achieve effective communication.

³ Id. at ¶69.

Adopted: April 7, 2006