

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS**

Re: *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51;  
*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

I support today's item because it advances our important responsibilities under Section 225 of the Act to ensure that persons who are deaf, hard of hearing, deaf-blind, or have speech disabilities can communicate in a manner that is functionally equivalent to persons without such disabilities. Transitioning the pilot program to a permanent option to allow communications assistants (CAs) to work from their homes reflects the kind of innovation we will need to embrace a flexible workforce necessary for the Future of Work. This means more highly-skilled interpreters who don't live near a call center, or for any reason cannot commute to one, will be available to relay video conversations in a manner that for many best achieves our goal of functional equivalence.

I am pleased that the item retains safeguards that were required for the pilot program. These measures will help ensure that CAs are well-trained and qualified, and ensure that VRS providers can maintain adequate oversight and supervision of those CAs working remotely. The technical and environmental safeguards we retained will ensure that home workstations are secure and adequately equipped to provide call center-equivalent functionality and technical capabilities, including the ability to seamlessly handle 911 emergency calls.

I did raise a concern with my colleagues about the missed opportunity to engage in meaningful economic analysis regarding the costs of at-home call handling as compared to call center costs. To be sure, the item points to benefits such as increased customer loyalty, and improved productivity and reduced stress for CAs who work at home. But then it concludes, without specific analysis, that those benefits outweigh the associated costs of at-home call handling. Raising cost-benefit analysis without showing your work is not a sound practice.

I thank the Disability Rights Office and their colleagues in the Consumer and Governmental Affairs Bureau for their work on this item.