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.