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The American Speech-Language-Hearing Association (ASHA) is pleased to have the opportunity to respond to the proposed regulations for Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities. ASHA is the national professional and scientific association that represents nearly 93,000 audiologists, speech-language pathologists, and speech, language, and hearing scientists, who research the acoustic, physiological, and linguistic aspects of communication and provide rehabilitation and rehabilitation services to children and adults with speech, language, and/or hearing disabilities. As part of these services, our professionals increase communication skills in a broad range of everyday life activities, including telephone use. =20

ASHA has a long history of involvement in federal initiatives that promote communication access for people with disabilities. ASHA participated in the Hearing Aid Compatibility (HAC) Act negotiated rulemaking process, attended the 1996 Wireless Telephone Summit, was a member of the subsequent hearing aid compatibility working group, and served as a member of the Telephone Access Advisory Committee (TACC) of the Architectural and Transportation Advisory Board (the Access Board). Through a grant from the Department of Justice, ASHA also developed communication-specific accessibility guidance for the Americans with Disabilities Act.=20

Telecommunications are an essential component of how we work, do business, socialize, take care of basic needs, and, in general, live safely and independently. Telecommunications are especially critical for people with disabilities since they are a means of preventing, reducing, and even eliminating the social and physical isolation for which people with disabilities are highly at risk.

ASHA's specific comments to the proposed rule are attached. Thank you for considering our recommendations as you prepare the final regulation. If you need additional information, please feel free to contact Charles Diggs, Ph.D., (301) 897-0151, at our National Office. If you prefer, his electronic mail address is CDiggs@asha.org.

Sincerely,  
Nancy B. Swigert  
President

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Response of the American Speech-Language-Hearing Association Re:=20  
CC Docket No. 98-67; FCC 98-90  
Telecommunication Relay Services and Speech-to-Speech Services  
July 20, 1998

The American Speech-Language-Hearing Association (ASHA) supports the =  
FCC's  
decision to require all common carriers to provide speech-to-speech (STS) =  
relay services for  
callers with speech and language disabilities throughout their service =  
areas. ASHA agrees that  
Congressional intent in passing Title IV of the Americans with Disabilities =  
Act was to make wire  
or radio communication services accessible to all people with disabilities =  
so that communication  
could occur between such people and people without disabilities. ASHA, =  
however, wishes to  
comment on certain aspects of the proposed rulemaking as detailed below.

#### Definition of Communication Assistant (CA)

The FCC's proposal to amend the definition of Communication Assistant =  
(CA) by deletion  
of "from text to voice and from voice to text:" implies that all CA's will =  
have the necessary  
training and skills to handle STS calls effectively. To provide STS =  
services, the CA must be able  
to:

- o listen to a wider range of sound productions than that typically =  
associated with a class of sounds=20  
(phonemes) and still identify those productions as part of the phoneme =  
class;
- o interpret sound substitutions, omissions, and distortions that may be =  
idiosyncratic to the caller;
- o identify sounds at a rate of speech that may be faster or slower than =  
rates within normal limits, =20  
or identify utterances that may be produced at irregular rhythms, with =  
inappropriate pauses, and =20  
with repetitions and prolongations;
- o understand sentences that may be telegraphic or ungrammatical, contain =  
incorrect words, and/or=20  
unrelated to the topic of conversation;
- o understand the message even though voice quality may be harsh, nasal, =  
breathy, soft, or a =20  
combination of these attributes;
- o provide this service to a broad range of callers with speech and =  
language disabilities that may =20  
(1) include multiples of the above symptoms; (2) include individual =  
inconsistencies even within =20  
the same call; and, (3) be superimposed on regional dialectical patterns =  
or patterns that are =20  
characteristic of other languages.

All of this must be done without the benefit of the visual cues and =  
the full set of acoustic  
information that is present in face-to-face oral communication and for a =

population whose speech intelligibility ranges from mild to profound impairment. In cases where the signal is transferred multiple times to reach an available CA, acoustic degradation may occur and reduce the cues=20

needed for understanding the communication

CAs providing STS services must learn what many compromised communication patterns are, how they can vary from individual to individual, and listen to many hours of such communication to increase their familiarity with these types of communication. Even so, many messages will not be understandable without reflecting back to the caller what was understood and asking questions to fill in what was not understood. These skills are completely different from those required in communicating via TTY where users employ a protocol and code that is fairly consistent from user to user.

ASHA also has concern about the application of transliteration to the CA for STS. Such a concept requires verbatim transfer of the communication message. As a result, a person with language problems due to stroke who says, "Pizza, pepperoni, two," would have the exact words communicated rather than the more complete message "I'd like two pepperoni pizzas." Or, another person with word finding problems who says, "Pizza, pepper, two," would have these words communicated without any questioning by the CA to confirm with the caller the real intent of the message.

#### RECOMMENDATION

Therefore, ASHA recommends that the FCC retain the current definition of CA and add a the new definition below:

Communication assistant: Speech-to-Speech (CA-STSS) : A person who provides more intelligible voice communication between one end user of TFS and another end user while maintaining the integrity of the communicative message. '0

#### Minimum Mandatory Standards - STS

ASHA believes that STS calls will require additional time before a CA-STSS is prepared to place the call for the following reasons:

(1) Protocols should be modified so that the CA can be informed of the nature of the call prior to placing the call. Speech perception is enhanced when the topic of conversation is known.=20

A CA-STS who knows that the topic is pizza and not financial investment is better prepared to understand words that are not completely intelligible or are inappropriate and can make a more reasonable guess at the intent of the message. Such protocols will require additional time before the call can be placed to the third party.

(2) As noted above, additional time may be required to reflect back to the caller what was understood and to ask questions about what was not understood. Also, the CA-STS may need to ask additional questions because all information was not provided. For example, the CA-STS who receives a call where the caller simply says, "Pizza," may need to ask questions about toppings, delivery or carry out, type of crust etc., before placing the call so that communication is more effective when the call is finally placed

(3) Presence or absence of certain technology in processing calls will influence speed of answer. For example, if common carriers provided speech recognition software trained to individual caller profiles so that voice-to-text output could be provided to the CA-STS, speed of answer would be increased. Use of speech clarifying software prior to delivery of the acoustic signal to the CA-STS would have a similar effect.

(4) Familiarity with a caller's speech and language patterns will increase intelligibility. One only needs to consider that parents understand their child's developing speech and language before grandparents and strangers to understand this concept. Relay centers that, as often as possible, can use the same CA-STS each time a particular individual calls should find that speed of answer is more favorable.

ASHA believes that the emphasis on minimum standards for CA-STS at this time should be on conveying the intended message of the communication rather than the speed of answer. Since STS is a new and improved service for a heterogeneous population and since the methods of implementation of this service may vary widely, it is not possible to suggest industry standards now

#### RECOMMENDATION

ASHA recommends that each CA-STS pass a practical competency examination for accurately conveying the communication message at least 80% of the time. This examination should represent communication samples from a broad range of speech and language disabilities

and include a broad range of severities. Data including speed of answer, number of attempts by the CA-STS to clarify the message (as a function of severity), and consumer satisfaction measures, should then be gathered to determine minimum standards for the future.

#### Other Areas of Proposed Rulemaking

In other areas of the proposed regulation, ASHA supports the inclusion of video relay interpreting as a recoverable cost and the use of qualified interpreters for these services. ASHA also believes that the FCC's proposal to allow flexibility when interactive-recorded messages are encountered is a small step forward. However, ASHA's comments in response to the proposed regulations for Section 255 of the Telecommunications Act indicated that such technology should be viewed as an adjunct-to-basic service and, therefore, should require product accessibility to people with disabilities.

with respect to CA voice communication, effective communication is essential to functional equivalency. However, there is wide variation in patterns that are clear and articulate and can include regional, cultural, and other variations. Because of the familiarity concept discussed earlier, persons from the same geographical region or culture may seem more clear and articulate to each other than someone from a different geographic region or culture although all possess communication within normal limits.

The specific use of "clear and articulate" implies a standard that exceeds effective communication and, therefore, exceeds the essential functions (as defined in the ADA regulations) of the position of CA. For example, a person with a chronically hoarse voice may be able to relay intelligibly the message of the communication, however, it is doubtful that such a person would be considered to have "clear and articulate" communication.

#### RECOMMENDATION

Therefore, ASHA recommends that the FCC not amend its rule to require "clear and articulate" voice communication. A more useful standard would indicate that a CA be able to relay the communication to a third party at least 80% of the time without a request for repetition.

#### Comment

Success of a STS service will depend upon strong and detailed training of communication assistants specific to this purpose and the CA's familiarity with the broad range of communication

patterns of people with speech and language disabilities. Initial =  
training will need to be  
supplemented with ongoing education and consultation.

It may not be cost-effective to provide such a level of training for =  
CA-SW's at all relay  
centers, especially those where call volume is at the low end of the =  
continuum. Rather, common  
carriers should seriously consider national or regional centers accessible =  
by their own toll-free  
telephone numbers where CA-STTS's can be concentrated and counseled on an =  
ongoing basis by  
staff with specific expertise in the full range of communication disabili-  
es. ASHA is willing to  
assist carriers in the development and implementation of all necessary =  
training.