

FCC Consumer Advisory Committee

Draft Recommendation regarding Speech-to-Speech Regulations & Captioned Telephony

There are pending regulations concerning Speech-to-Speech that need to be installed before video assisted STS can become a reality. These regulations need to be installed so that video assisted STS can be implemented as a viable service for STS users. For those of you who are new to this committee, Speech-to-Speech is a relay service that allows a person who has difficulty speaking or being understood on the telephone to communicate using his or her own voice or voice synthesizer. An STS communication assistant (“CA”) re-voices the words of the person with a speech disability so the person on the other end of the phone call can understand them. Since many deaf or partially-deaf individuals communicate verbally, STS provides a vital communications service for these individuals as well. All of the major national disability organizations who are concerned with telecommunications issues have filed a joint comment supporting these regulations.

The following issues comprise the speech disabled community’s request for the changes that are needed in the new STS regulations and are supported by the FCC’s Consumer Advisory Committee. These changes update the original STS regulations which the FCC published a decade ago.

Issue 1: *Time of the Call.* The CA will remain on the call for twenty minutes rather than fifteen because STS calls often take a long time, especially if the caller is using a talking PC or has to repeat often because of garbled speech.

Issue 2: *Muting of the Voice.* Many callers believe that their garbled speech will interfere with the goal of the call and therefore want their voice muted.

Issue 3: *Confidentiality.* New users will be informed that STS calls are confidential and their privacy will be protected. This is important because many people with speech disabilities do not use STS because of confidentiality concerns.

Issue 4: *Retention of Information.* For privacy reasons, STS callers should have the option to put in their profile that they do not want information retained between consecutive outbound calls and they do not want CAs to make any written notes.

Issue 5: *Silence on the Line.* Many STS users have other disabilities which may delay their response after the other person's "Go Ahead" (GA). For that reason, the CA should not disconnect until the speech disabled caller says "Goodbye." If there is silence during the call, the CA should wait 60 seconds before disconnecting a call.

Issue 6: *711 issues.* STS users can now dial 711 and ask for STS. The FCC should establish a mechanism to assure that all providers are making it as easy as possible for STS consumers to access the relay using 711. This is especially important because many STS users have other disabilities which make it difficult or impossible to dial a ten digit number. While branding (through establishing a profile) enables educated users to access STS easily (users who have a branded phone line are directly connected to STS after dialing 711 without asking for it), an efficient way to teach new users about branding is essential.

It is essential that the FCC require providers to file a plan with the FCC to ensure that new users are not hung up on when they use STS for the first time. This concern applies most often to users who learn about STS from the media, rather than from an outreach worker who can teach them how to brand their number for STS. With the proper outreach procedures, there could eventually be 500,000 STS users in the United States, *all* of whom deserve easy access to STS.

Issue 7: *IP-STS relay.* STS-Internet Protocol is a way of accessing STS on the internet and should be mandated as a form of relay just as a similar system is now available to the deaf (Video Relay Service or VRS). For IP-STS to be effective, the reimbursement rate must be high enough to give providers the incentive to identify and reach users from a small population.

IP-STS should be administered nationwide in a manner similar to VRS with the marketplace determining the number of providers. A nationwide IP-STS is reasonable given the small number of potential users. Indeed, when the number of potential users (approximately 500,000 to 1,000,000 for STS and IP STS combined) is divided among the states, some states would have fewer than 500 potential users.

Because IP-STS calls cannot be jurisdictionalized between interstate and intrastate, the Commission has ample authority to mandate a nationwide approach and encourage competitive providers. Moreover, to the extent there are states that do not have the resources or otherwise do not wish to administer state STS programs due to there being only a limited number of potential STS users, the Commission has the authority under Section 225 of the Act to administer STS programs within those states.

Issue 8: Outreach and Compensation

Outreach efforts with respect to STS have not been adequate to identify and reach potential STS users. States should be required to provide STS users adequate information regarding the availability of STS. Since STS was established in an effort to provide effective telecommunications services to Americans with speech disabilities, these important services cannot be effective if consumers do not know that they exist.

It is good that the FCC is continuing to now provide for STS outreach by establishing a high rate for interstate STS. From the perspective of interstate calls, the providers are now receiving adequate financial incentive to identify and train many potential STS users who do not know that STS exists. Both intrastate and interstate rates to be set high enough to provide the necessary funds for STS providers to engage in outreach and education. Such higher rates are also important since, as discussed below; intensive consumer training will also be needed.

There is no known successful STS outreach method to reach consumers in large numbers. We therefore suggest that the Commission establish an STS Advisory Council and work to ensure that each potential user of STS nationwide will be identified and trained. The STS Advisory Council can, among other things, develop national short and long range plans that will increase consumer awareness and education.

Issue 9: Consumer Training

Unlike the adoption of VRS by the disability community where deaf consumers transferred telephone skills (both social skills and technical skills) from previous relay experience, many new IP STS users will not have used the telephone. The ability to learn to use IP STS will therefore require a significant lifestyle change. The Commission should require that, where needed, home visits be made by qualified speech language pathologists (“SLPs”) to enable new IP STS users to internalize the social and psychological lifestyle changes that are necessary to use IP STS. As individuals with speech disabilities often have social and psychological barriers to telecommunications, it is unlikely that individuals with speech disabilities will use STS without the home visits by SLPs to overcome these social and psychological barriers. There has generally been a lack of long-term use resulting from brief customer introductions to STS as compared with greater success from multiple home visits by an SLP. It is strongly recommend that STS outreach be funded to allow 3-10 home visits. Building such a cost into the STS reimbursement rate would not cause it to exceed the current VRS reimbursement rate. VRS users need such expenses for interpreter services, and STS users need the expense for training. Consumer training not only benefits STS users, but it benefits the general public by making it possible to interact over the telephone in a meaningful way with people who have speech

disabilities. Moreover, even with the proposed 3-10 home visits, new STS users' exposure time to STS would still be less than the average citizen's lifetime exposure time to general telephone advertising.

STS and IP STS compensation rates should be sufficient so that CAs can be paid adequately enough to establish a career path for the CA - just as video relay interpreters are compensated. Since video relay users have the ability to receive service from interpreters who have the motivation to provide good service (because of adequate compensation and a career path), so too should STS users have that same ability. STS and IP STS compensation rates should also be sufficient so that Supervisors and CAs can receive regular training from qualified SLPs in order that they have a thorough understanding of the physiology of STS users. This would result in a much higher quality of STS service than currently exists and would help curtail users from abandoning STS due to what they perceive to be sub-par CAs.

It is hoped that the FCC will publish the pending regulations quickly. TDI and the other disability organizations made these recommendations to the FCC before President Obama took office. Unfortunately, it is the inability of the speech disability community that it lacks the lobbying resources to insure that these regulations come out in a timely manner.

Telecommunications Relay Services (TRS) including Video Relay Services, Captioned Telephone Services, Voice Carry Over, Hearing Carry Over, and Speech to Speech Services, as well as innovative services such as mobile video relay, mobile captioned services and video speech to speech services provide a lifeline that allow people with disabilities to maintain and obtain work, healthcare services, emergency services and fully connect to friends and family via phone services.

Therefore the CAC recommends that the Commission move forward with STS regulations.

The CAC also recommends that the Commission continue its strong support and recognition of TRS as a vitally important service for people with disabilities.

Committee action: Adopted, November 2, 2012

Abstentions: American Consumer Institute; CTIA the Wireless Association; NCTA; T-Mobile

Respectfully Submitted:

Debra R. Berlyn, Chairperson

FCC Consumer Advisory Committee

