

Proceeding: (IN THE MATTER OF TELECOMMUNICATIONS RELAY SERVICES AND SPEECH) Record 1 of 1

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Applicant Name: LuRetta Fairman, M.Div.

Proceeding Name: 98-67 Author Name: LuRetta Fairman, M.Div.

Lawfirm Name:

Contact Name: Contact Email: LuRettaFairman

Address Line 1: 5008 M Street

Address Line 2:

City: Sacramento State: CA

Zip Code: 95819 Postal Code:

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COMMENTS ON THE STS NOTICE OF PROPOSED RULE MAKING
- Revised 7/5/98

As a user of Speech-to-Speech (STS) I would like to make the following comments.

REGULATORY ISSUES - GENERAL

It will be difficult for many consumers and potential consumers to respond to this Notice of Proposed Rulemaking (NPRM) because of the nature of their multiple disabilities. Please understand that the level of responses you receive may be lower than the actual level of interest.

I support the Federal Communications Commission's (FCC) tentative conclusion that STS be required nationally; cost should not prevent establishment of a national requirement. STS is a relatively inexpensive service.

(The cost of Speech-to-Speech plus outreach for California for 1997 was less than \$1m.) The state administrators who questioned making STS a national requirement because of unknown costs may have not been aware of the California costs at the time. (See NPRM paragraph 24).

I support the FCC's tentative conclusion that the costs of providing interstate STS should be reimbursed from the interstate Telecommunications Relay Service (TRS) Fund. This conclusion is based on, and consistent with, the statutory duty not to discourage the implementation of improved TRS.

While STS may have operational differences that make compliance with certain Commission standards for tty relay infeasible, I recommend that a panel of consumers and providers be convened to determine the appropriateness of compliance with each standard.

For instance, the STS standards should deviate from those of TRS in the definition of confidentiality. While general confidentiality is vital, confidentiality should not be defined as specifically for STS as for TTY relay.

REGULATORY ISSUES - QUALITY OF SERVICE

Competition will encourage provision of quality Speech-to-Speech service. (It is important to keep in mind that this population is less able to advocate for quality of service as is the deaf TRS community.)

STS vendor's should be required to provide consistent, reliable, high-quality connections, adequate volume, voice transmission, and all other elements of telephonic telecommunications which able-bodied users enjoy with standard telephone communication systems.

Users should not have to endure noticeable volume changes during a call, echoes, unwanted disconnects, problems reaching 800#s, etc. Vendors must provide a consistently high quality of software, hardware, and other communications devices including lines, connection between lines, area codes, etc.

Vendors should also provide the state with monthly STS-call volume data consistent with data collection criteria outlined by FCC.

All services and practices offered TTY relay users and their callers will be offered Speech-to-Speech users and their callers in a manner appropriate to their use.

TRS quality control standards, such as speed of answer, should apply to Speech-to-Speech. While the delay between when the communications assistant (CA) answers the inbound call and when the outbound call begins may be longer because of speaking time, the required response time for inbound calls should not be relaxed. This should be made equal to that for TTY relay.

Other examples include:

Speech-to-Speech must be available 24 hours a day, seven days a week, year round.

Speech-to-Speech must include directory assistance, since 411 operators often hang up on people with speech disabilities when the person is not easily understood. In addition, many people with speech impairments cannot use the 411 services provided for the deaf because they cannot type.

REGULATORY ISSUES: PRACTICES OF COMMUNICATIONS ASSISTANTS

CAs should never revoice what the speech disabled caller says based on a guesswork, but should request clarification when he/she is unsure if they have properly comprehended what the consumer has voiced.

If a line is busy, the CA should immediately repeat aloud the number dialed to verify that the CA understood the number correctly.

One available option should be that users themselves may leave answering machine messages in which the called party hears the user's voice and the CA re-voicing for the consumer. Alternatively, the consumer may choose to ask the CA to voice their message exactly as the consumer dictates the message to the CA, i.e.: "This is a message for Jim Smith from John Doe. Please call Mr. Doe after 7 p.m. at 444-5555."

After each call, CAs should offer to make another call for the consumer.

While CAs should not counsel, advise, or interject personal opinions into a conversation, they may ask questions to clarify what was said particularly if the meaning or context is unclear.

It should be permissible for CAs to interact with users who may experience difficulty using the service to provide reassurance. CAs may reassure users that the CA has comprehended the consumer's speech, if necessary.

It will also be important at times for the CAs to interact with consumers

to help the consumer use the service more effectively. This is particularly necessary when working with developmentally-delayed users with short-term memory loss. (For example, a CA may correct a telephone number that the user received from a caller but repeats in error, upon their attempt to **call** the number that they were given in a previous call.) However, CAs must never attempt to assist users in ways that could interfere with the user's independence. (This recommendation may appear self-contradictory, but is not in light of the wide variance in intellectual capacity within this user group.)

In a word, an opportunity for a CA to facilitate communication should take priority over transparency. However, the CA should not facilitate if there is a great risk of diminishing communication.

Before dialing, the CA should offer to tell the call's recipient who is calling.

At the start of the call, the CA should announce that he/she will voice for the speech disabled person throughout the call unless either party asks, and both parties agree, that CA should not voice (except if the caller is profiled for voicing only when his/her caller doesn't understand.)

Prior to a call, a user should be able to ask the CA to write down information that may be given during the ensuing call, for use during consecutive calls.

Consumers should be able to ask the CA to assist the consumer to record an outgoing message (OGM) on consumer's voice mail or answering machine. In such a case, the consumer will dictate the desired OGM to the CA, and will give the CA any directions the CA may need to activate the voice mail or answering machine OGM recording mechanism.

If the CA must talk to several people at the number called, in order to reach the desired party, the explanation of Speech-to-Speech need only be given to the desired party, unless the user specifies otherwise.

REGULATORY ISSUES: SERVICES THAT DIFFER FROM TTY RELAY

Because there are relatively few STS consumers in each jurisdiction, it would not be efficient for local jurisdictions to train emergency personnel (such as 911 phone staff) to handle emergency calls for these consumers with speech disabilities. Such calls should be made through STS. Under these circumstances, TRS centers should be required under the Commission's rules to convey a caller's ALI Automatic number identification) to emergency services phone personnel. (Current TRS confidentiality rules prohibit a CA from revealing a consumer's ALI without the consumer's prior consent.)

FCC regulations should enable consumers to have STS retain **messages** for 24 hours, during which time the consumer may call back STS and attempt again to reach an answering machine.

Typically, the consumer will inform the CA that he/she wishes to leave a message on an answering machine and that they prefer to dictate the message to the CA before the CA dials the number. If the number is busy, the CAs should offer to retain the message, so that the customer may call later to leave the message when the answering machine is free. It may take a long time before the answering machine line is free. Currently, the only way a consumer can avoid redictating the message is to stay on the line with the CA and have her/him keep redialing the number. This policy places an onerous burden on the consumer with a speech disability for whom the process of dictating a message may take an extremely long time. Many consumers do not possess the manual dexterity to record the message themselves. (Under present rules, the consumer must call back STS and revoice the message as many times as it takes until the CA reaches the other number.)

Speech-to-Speech needs to have its own separate 800 number (separate from the TTY relay number). Only one Speech-to-Speech number is necessary for each state. Eventually, there should be one national Speech-to-Speech number.

User assistance (such as STS customer service staff and complaint resolution personnel) must have the resources necessary to provide services to Speech-to-Speech users (by voice) of the same quality available to other users. Customer service staff should have comprehensive training and knowledge and access to written policy and procedure manuals employed by STS staff.

Vendors should call each user annually to confirm the accuracy of the user's profile.

Users should be able to register their home and business telephone Numbers in their personal Speech-to-Speech profile and indicate what time and where they can be reached. This will allow speech-able users to request the speech disabled person by name rather than by telephone number. This service is provided because many speech disabled people have trouble saying numbers. Requiring STS consumers to give their telephone callers both an 800 number and their own telephone number would discourage telephone use.

Many people with speech disabilities have memory problems and many also find it easier to say one number over again than to say different numbers. Therefore, the 800 number chosen for Speech-to-Speech should have **as** many of the same numbers as possible.

Users should not be required to give the area code for local calls, since the user's area code will be displayed on the provider automatic number indication (AMI) equipment. (This will decrease the speaking requirements for users with speech disabilities.)

CAs must be able to turn up the volume on their console because some people with speech disabilities either have a hearing loss. The volume control on the console should be able to independently increase the volume of the CA and both callers.

If all Speech-to-Speech CAs are engaged in other calls, the

user should hear a recording directing them to wait on the STS line.

Speech-to-Speech users should be able to make regular relay calls to TTY, VCO, HCO users through Speech-to-Speech.

Users should be allowed to submit to the STS vendor (by telephone or other means) lists of names and telephone numbers of people that they call regularly. Each entry will be comprised of a name and telephone number which CAS will employ after accessing the consumer's personal list. In effect, this list of names and telephone numbers will be a mini-database unique to each consumer. These lists are necessary because CAS may have difficulty understanding the name and telephone number of the person that the speech disabled customer is calling; (unlike other utterances, this information has no context.)

The vendor should demonstrate adequate knowledge of and involvement with the speech disabled community to provide a service which meets the needs of that community. These methods can include, but are not limited to, employing an STS Program Manager who has a speech disability; or employing a speech disabled consultant who spends regularly scheduled time at the relay assisting the STS program.

An open line with no switching must be provided so that the CA, the speech disabled caller and the speech-able caller can all hear each other at all times. The outcome would be similar to that observed in three way calling.

Speech-to-Speech users should have the option of asking for people with speech disabilities by name rather than by telephone number. The consumer must first establish his/her personal profile (ie: database, Hofmann list).

Vendor must provide a database that is adequate to provide useful consumer profiles.

Consumers should be informed that their call may be monitored.

OTHER ISSUES

COMMUNICATIONS ASSISTANTS: TRAINING, SELECTION, RETENTION, AND WORK ENVIRONMENT

Vendor should be required to provide monthly or bi-monthly communication sessions between STS CA staff and management whereby CA staff may freely make suggestions for improvement of service, policies that are more user-friendly, and the like, as well as a forum for venting frustrations.

These forums will also provide a venue for CAS to share techniques and methodology that they may have developed to assist comprehension or other skills required to work with consumers whose speech or cognitive functions are particularly challenging to the CA. Consumer's privacy shall be protected at all times, but identifying information may be shared among CAS, in a private and confidential area, so that CAS will be able to identify the

consumer for whom the special techniques/method of working with the consumer has been developed.

All CAs and supervisors who take STS calls should thoroughly understand and respect the Speech-to-Speech protocols, requirements, and philosophy.

Counseling personnel, employed by the vendor to assist CAs with job stress, should learn the values of the Speech-to-Speech Service before counseling Speech-to-Speech CA staff.

The CAs' work area should be quiet and the partitions between the CA work stations should be sound proof enough so that CAs can concentrate intensely on hearing the caller's speech. (CAs need much more sound proof cubes than used for TTY relay. Calls may lack confidentiality if it is difficult for a CA to voice an STS call over ambient noise.)

The vendor should develop a small bank of CAs for the service. This bank must be large enough to handle the traffic but small enough so that CAs become accustomed to most of the users' speech patterns.

Because the psychological effect of changing operators during a call is often disruptive to people with speech disabilities, minimum time-on-call shall be established to which CAs should be required to conform. In the initial stages of a call, there is a settling-in time whereby the caller and the CA get accustomed to each other. During this time the caller with the speech disability develops the assurance that the CA will understand him/her. Rotation of a CA during a call disrupts this assurance and the speech disabled consumer's confidence, and may actually cause the user to speak less clearly.

The CA should only be changed if an outbound call (the call placed by the CA on behalf of the consumer) lasts more than five minutes. The CA should then not be changed again unless the inbound call (a call initiated by the person with a speech disability to the Speech-to-Speech relay service) lasts more than 30 minutes.

A change of CA is rarely necessary during Speech-to-Speech calls as repetitive motion injury is not an issue as it is with the TTY relay. Performance standards should be created that allow a CA to take his/her scheduled break or other time off the phone (bathroom, lunch, staff meetings, etc.) without changing CAs during calls

As part of his/her training, every CA should have a minimum of 8 hours of training by a speech disabilities professional or consumer expert. STS CA training should include introduction to various technologies used by consumers to communicate including voice synthesizers. Training should include introduction to many speech disabilities. Some training may be provided by video tape.

In order to familiarize STS management with consumers, the STS vendor's technology, and the developing culture of STS, the

service itself, and provide first hand experience of CA role, supervisors should be required to perform direct STS live phone service, in the role of a CA, 4 hours per week. The live phone work that supervisors perform should be in time segments a minimum of 30 minutes each in duration.

CAs must be fluent in English, able to speak English without a distortional accent. CAs should be tested for hearing acuity, speech comprehension, and English language skills including vocabulary, grammar, and syntax. This will apply to English and all other languages offered to STS users. National standards must be developed in order to ensure consistent performance and practice by each vendor and their employees.

It is desirable that CAs have life experience related to people with speech disability.

All communications assistants should be called operators because they are a third-party on the line and the term will be less confusing than communications assistant.

The FCC should establish national standards of hearing acuity for Communications Assistants (CAs).

STS CAs should have a toll-free number, that is confidential and safe, where they can call to report perceived abuses of STS by vendor management.

CAs should be able to give their input to relay advisory committee without fear of recrimination or job loss. Perhaps the CAs could vote for a representative who would regularly make presentations to advisory committee. Presentations could include list of technical problems, policy problems, and other suggestions for making the service more consumer-friendly (and better working conditions for CAs).

Vendors should define acceptable CA hearing acuity and speech comprehension levels and insure that all CAs meet that criteria.

The STS supervisor will identify CA and remove CAs from Speech-to-Speech duties if: 1) CAs hearing or concentration has become impaired because of a cold or other (temporary or permanent) medical condition. 2) CA is no longer extremely patient and courteous to customers.

STATE ISSUES

The state relay advisory committee should include a representative of the Speech Disability Community which representative should be a Speech-to-Speech user.

Each state should have the option of offering an additional two hours of training monthly whereby the vendor pays CAs' salaries for the training and trainers are provided at the state's expense.

Each state should assign at least a one quarter-time person who is either a knowledgeable consumer or has at least one year of

training in speech disability to monitor STS service quality and insure that the vendor abides by the contract. This person could also be employed to perform STS outreach.

OUTREACH ISSUES

Vendors who promote Speech-to-Speech should do so in a manner appropriate to the target audience.

Each state should assign at least a one three-fourth-time person who is either a knowledgeable consumer or has at least one year of training in speech disability to provide outreach. Someone with an MSW (or equivalent) and with experience working in the speech disabled community would be best equipped to do the outreach. Many speech disabled people are very isolated and require extensive encouragement and counseling before they will be willing to try > Speech-to-Speech.

Providing inadequate outreach may result in disappointingly low rates of STS use. The service should not be allowed to fail due to insufficient outreach efforts.

(California employed two master's level counselors for the first year and a half of operation in order to recruit and train 150 consumers.)

Because Speech-to-Speech is so new, there is a great influx of new users. Many new users require one-to-one contact with trained counselors as an introduction to the service.

That contact is necessary because:

A. Potential users often require individual contact through the following multiple step process.

First, outreach staff establish contacts with professionals who interact with people with speech disabilities. These professionals then refer consumers to Speech-to-Speech themselves, because such professionals could not release consumers' names to the STS Outreach Staff with outd breaking confidentiality.

These professionals include: 1. physicians and organizations of physicians specializing in neurology, physical medicine, and ENT., 2. Department of
> Rehabilitation Counselors, 3. Staff of Area Boards and Regional Centers on Developmental Disabilities, 4. Speech therapists specializing in severe speech disabilities and their professional organizations, 5. Special Education teachers, 6. College Centers for People with Disabilities.

Thus, contact with the non-speech disabled community is essential in order to reach people with speech disabilities. At the same time, this contact encourages non-speech disabled people to call users with speech disabilities.

Second, staff also identify potential users through

consumer oriented organizations. These organizations can sometimes provide users' names and telephone numbers with the user's permission. These organizations include: 1. Local Assistive Technology Centers, 2. United Cerebral Palsy Association Centers, 3. Lost Chord Clubs (for people who have had laryngectomies), 4. Multiple Sclerosis and Muscular Dystrophy Societies, 5. Parkinson's and ALS organizations and 6. Independent Living Centers.

Third, while some users can use Speech-to-Speech with no further assistance, many users require individual training by outreach staff. For call volume to be sufficient, effective outreach must include both easy to reach and difficult to reach users.

B. Many potential users have never used the telephone and do not accept the usefulness of the telephone or Speech-to-Speech. This acceptance often requires intense one-to-one counseling.

C. Many users have difficulty overcoming "denial" and other psychological obstacles to the use of Speech-to-Speech. As the California Public Utilities Commission's response to the FCC's Notice of Inquiry states, "...the potential user may still have great reluctance to try, for fear of failure and the experience of rejection."

D. Outreach staff must also teach users who lack the social skills to relate appropriately with agents in Speech-to-Speech's interactive environment. Speech-to-Speech agents often must interact extensively with users having them repeat words or say phrases a different way. Outreach staff must teach users, many of whom have limited social skills, to master the Speech-to-Speech process without becoming overfamiliar with the agents.

E. Family members and caretakers (who often "voice" for potential Speech-to-Speech users) may resist Speech-to-Speech use, because they find it threatening. Speech-to-Speech deprives a family member or caretaker of the voicing role for a user. This role deprivation can threaten the co-dependency between user and voicer, because it limits the voicer's knowledge and control over the user's telephone calls. Speech-to-Speech outreach staff provide one-to-one professional counseling to help potential users, family members and caretakers resolve these issues.

F. Transportation barriers make it difficult to gather potential users in one spot for education about Speech-to-Speech.

Outreach staff often work with them effectively one-to-one by telephone and in person. Staff often trains users to facilitate their initial use of

Speech-to-Speech and eliminate barriers to regular telephone use.

G. Users, families, and caretakers need training and help resolving practical problems related to telephone equipment and disability certification. This includes obtaining and installing body positioning devices, speakerphones, etc.

H. Users often have cognitive limitations necessitating one-to-one training. This training must include immediate feedback in the learning situation.

I. People with speech disabilities have no role models for telephone use.

Thank you for your consideration of these comments.

LuRetta Fairman
5008 M Street
Sacramento, CA 95819
916-454-5964 home; 916-492-3350 office
E-Mail: lfairman@cris.com