Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC  20554

23 June 2010

I am writing to protest a recent proposal by the United States Federal Communications Commission (FCC) that would prohibit United States providers of Video Relay Services (VRS) from locating call centers staffed with American Sign Language (ASL) interpreters in Canada. CG Docker No. 10-51. Sorenson Communications established itself in Canada to lighten the stress on an already strained profession in the U.S. When doing so, Sorenson Communications clearly emphasized the importance of respecting and adhering to the FCC mandates. Sorenson Communications has dutifully taken the responsibility of ensuring fraudulent minutes are not billed to the FCC. The Canadian Managers made this point very clear in the training at the time of hiring. They have continually reinforced the importance to the integrity of the services.

VRS has allowed the deaf and hard of hearing community in the United States to access all services on an equal par with their hearing counterparts. Because of regulatory delay (CRTC and telcos) we do not have VRS in Canada and the deaf and hard of hearing community readily await for VRS to be available here in Canada. I am sure I can speak for many Canadian Interpreters currently employed with Sorenson Communications, we would NEVER jeopardize the potential of VRS coming to Canada. For that reason, we respect and uphold ALL of FCC protocols and have never knowingly processed a Canada to Canada call.

TELUS is about to start a limited one year trial, but, it could be 2 or more years before VRS can be offered in Canada. Sorenson and Sorenson Canada have been active in CRTC proceedings explaining how VRS can be introduced quickly on a national or regional basis. Sorenson has established 8 VRS Call Centres in Ottawa, Vancouver, Calgary, Edmonton, Winnipeg, Victoria, Halifax, and Toronto providing employment for 326 people including highly skilled and qualified American Sign Language (“ASL”) Interpreters. Our Canadian centres have been some of the most efficient and lowest cost centres, and we pride ourselves in providing top quality services and following proper procedures and protocols. Sorenson entered Canada on the basis of not pulling all of the community interpreters out of the community in the US.

A May 27, 2010 decision from the US Federal Communications Commission will require Sorenson to close all of the Call Centres in Canada because of new rule that all VRS Call Centres must be located in the US. If this happens, then the strain on the services will increase and the quality of calls will...
decrease. The deaf and hard of hearing community will experience long wait times, and once again be behind the times for equal access.

Canada is the only other country in the world where ASL is the recognized language for deaf individuals. This will mean that highly skilled ASL Interpreters will have to leave Canada and go to the US if they want to continue working with Sorenson. Cutting our Canadian centres would impact service levels of the deaf and hard of hearing. We would be cutting hundreds of jobs in Canada and delaying the ability to provide VRS in a timely fashion. Sorenson is working on an appeal of the FCC Decision requiring Sorenson to close its Canadian Call Centres. Lawyers for Sorenson consider there are strong grounds for the appeal including a possible violation of NAFTA.

Instead of closing the Canadian centers, try to keep highly skilled ASL Interpreters in Canada and not force them to go to the US for work. Spur the CRTC to permit VRS in Canada by showing them that equal services for deaf and hard of hearing communities is a priority.

The FCC has an opportunity to show the deaf and hard of hearing communities that they recognized the new era of technological change and will be the fore runner in bringing technology to all persons in an equal manner.

Sincerely,

Kim Clark
Canadian VRS Interpreter