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

I am making these comments as a user of Speech-to-Speech (STS) and an
advocate of people who rely on STS to live independant lives. While I
don't require STS for my own telephone usage, I recieve calls from
people who do.

REGULATORY ISSUES - GENERAL

1. Many consumers and potential consumers will be unable to
respond to this Notice of Proposed Rulemaking (NPRM) because of
the nature of their multiple disabilities. Please do not take
the lack of response as a lack of interest.

2. Speech-to-Speech should be required nationally even though it
does not utilize Text Telephones (TTYs). I support the California
Public Utilities Commission (CPUC) position that the
specific reference to TTYs in the Americans with Disabilities Act
(ADA) "... is meant to illustrate the type of technology that
might be used, not to preclude the use of other technologies."

        Title IV of the ADA is applicable to any wire or radio
communication service that enables persons with hearing or speech
disabilities to engage in communication with persons without such
disabilities and is not limited to services using TTYs.

        STS services fall within the scope of the ADA's
definition of "telecommunications relay services" as a telephone
transmission service that enables an individual who has a speech
disability to communicate by wire or radio with a hearing
individual in a manner that is functionally equivalent to the
ability of a person who does not have a speech disability to
communicate using voice communication services by wire or radio.
The NPRM states in paragraph I, 5, that STS comes under
the jurisdiction of the ADA.

3   i support the Federal Communications Commission's (FCC)
tentative conclusion that STS be required nationally; cost should
not prevent establishing a national requirement. STS is an
inexpensive service. The cost of Speech-to-Speech plus outreach
for California for 1997 was less than $1m. As California is the
most populous state, all other states can expect lower costs;
some costs will be much lower. Therefore, this low cost is
another good reason to make STS a national requirement. 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).

4. 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.

5. While STS may have operational differences that make compliance

with alll current Commission standards for tty relay infeasible,
a panel of consumers and providers should be convened to
determine the appropriateness of compliance with each standard.

5. 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. FCC could convene such a consumer board to
study this issue.

REGULATORY ISSUES - QUALITY OF SERVICE

1. Competition is especially important in providing quality
Speech-to-Speech service as this population is not as able to
advocate for quality of service as the deaf TRS community is.

2. While time between when the communications assistant (CA)
answers the inbound call and when the outbound call begins may be
longer because of speaking time, this is no reason to relax the
speed of answer time required for inbound calls. This should be
the same as for TTY relay.

3. TRS quality control standards, such as speed of answer,
should apply to Speech-to-Speech.

4. 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. STS vendor's
must 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.

5. The vendor will provide the state with monthly STS-call volume
data consistent with data collection criteria outlined by FCC.

6. 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 (unless specified below).

For example:

        A. The vendor should always answer incoming calls within the
        contracted answer time.

        B. Speech-to-Speech must be available 24 hours a day, seven days

        a week, year round.

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

REGULATORY ISSUES: PRACTICES OF COMMUNICATIONS ASSISTANTS

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

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

3. Users themselves may leave answering machine messages in which the called party hears the user's voice and the CA revoicing for the consumer. Alternatively, the consumer may ask the CA to voice their message exactly as the consumer dictated 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."

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

5. While CAs may 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. Apple differs from ample, articulate differs from article, interest differs from inter-test, pants differs from Lance. CAs must never revoice a word or phrase based up guesswork or conjecture but will clarify unclear word/s with consumer before revoicing.

6. CAs may interact with users who may experience difficulty using the service and to reassure new users. CAs may reassure users that the CA has comprehended the consumer's speech, if necessary.

7. CAs also may interact with consumer 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 previous call However, CAs must never attempt to assist users in ways that could interfere with the user's independence. The above policy may appear self-contradictory but is not in light of the wide variance in intellectual capacity within this user group.

An opportunity for a CA to facilitate communication takes priority over transparency. However, the CA must not facilitate if there is a great risk of diminishing communication.

8. Given the limited telephone experience and delayed social development of some users, CAs will prompt users leaving messages on answering machines who forget to leave their name and/or telephone number.

9. CAs will avoid informality which my be interpr-eted by users as

patronizing. Adult users must always be treated as mature adults regardless of their behavior.

10. Before dialing, the CA will ask: "Shall I tell the party who's calling?"

11. At the start of the call the CA shall 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 revoice (except if the caller is profiled for voicing only when his/her caller doesn't understand.)

12. Some people with speech disabilities can be clearly understood if allowed to speak uninterruptedly; they don't need CAs to revoice for them, they just need the other party not to interrupt them. Such customers may request the CA to only repeat what they say when the speech-able customer misses a word. This request may be profiled.

13. Prior to a call a user may ask CA to write down information that may be given during the ensuing call that is to be used in consecutive call/s.

14. Consumers may ask CA to assist consumer to record an outgoing message (OGM) on consumer's voice mail or answering machine. The consumer will dictate the desired OGM to the CA and give CA any directions CA may need to activate voice mail or answering machine OGM recording mechanism.

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

REGULATORY ISSUES: SERVICES THAT DIFFER FROM TTY RELAY

1. Because there are so few STS consumers in each jurisdiction, it is not 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 circumstance TRS centers shall be required under the Commission's rules to convey a 'caller's AL1 (automatic number identification) needs to be define) to an emergency services phone personnel. Current TRS confidentiality rules prohibit a CA from revealing a consumer's ALI without the consumer's prior consent.

2 Consumers with speech disabilities will often request that a CA recite a prepared message to 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 befor the CA dials the number.   Often, the number called is busy. None of the STS providers currently allow CAs to retain the message so 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.

Thus, FCC regulations should enable consumers to have STS retain messages for 24 hours during which time the consumer may call back STS and attempt to reach an answering machine. This method will provide functional equivalence to the STS consumer who wishes to leave a recorded message. This service is necessary for consumers who lack the speaking ability to leave a lengthy message to the CA, then receive a busy signal, and then call back and revoice the message repeatedly.

3. Speech-to-Speech shall 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.

4. 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 will have comprehensive training and knowledge and access to written policy and procedure manuals employed by STS staff.

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

6 Users may register their home and business telephone numbers in their personal Speech-to-Speech profile and indicate what time they can be reached where. 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 and asking them to give their telephone callers an 800 number and their own telephone number will discourage telephone use. Users may not specify that certain calls only be put through to one particular number.

7 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 will have as many of the same numbers as possible.

8. Users will not be required to give the area code for local calls as the user's area code be displayed on the provider

(automatic number indication (AMI) equipment. This will decrease the speaking requirements for users with speech disabilities.

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

10. If all Speech-to-Speech CAs are engaged in other calls, the user will hear a recording directing them to wait on the STS line.

11. Speech-to-Speech users may make regular relay calls to TTY, VCO, HCO users through Speech-to-Speech.

12. Users must be allowed to submit to the STS vendor (by telephone to vendor or other means) a 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 is 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.

13. The vendor must 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 one day a week at the relay assisting the STS program.

15. 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.

16 Speech-to-Speech users will have the option of asking for people with speech disabilities by name rather than by telephone number. The consumer must first established his/her personal profile (ie: database, Hofmann list).
      Vendor must provide a database that is adequate to provide useful consumer profiles. MCI's is too limited; it takes too long from consumer input until CA actually retrieves the information. Sprint's profile capacity is far superior to MCI's.

17. Consumers shouid be informed that their call may be monitored and consumer should have choice of saying: I don't want my call monitored.

18. Vendors may not randomly monitor calls. For each call monitored they must present written documentation of cause to the contract monitor.

19. Every STS center should be at least "10 miles" from any TTY relay center. Such a practice will allow STS to develop as a service designed for people with speech disabilities. This distance will insure that STS is not overly influenced by the needs of TTY relay users (whose needs differ from those of Speech-to-Speech users).

The deaf are politically stronger than are people with speech disabilities and experience has shown that the needs of people with speech disabilities cannot be met in such an environment.

NOTE: The following issues may be non-regulatory but thay are absolutely necessary to the functioned of Speech-to-Speech.

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

1. Vendor will be required to provide monthly or bi-monthly discussion 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 frustration with difficult consumers, call protocol.

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.

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

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

4. 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 lack confidential if it is difficult for a CA to voice an STS call when the CA in the next cubicle has a booming voice. Thay also lack confidentiality if a nearby TTY CA has a hearing-impaired caller that requires the CA SHOUT in order for the caller to hear.

5. Vendor will 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.

6. Because the psychological effect of changing operators during a call is often disruptive to people with speech disabilities, :ninimum time-on-call shall be established to which CAs shall 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 consumer1 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.

7. 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

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

9. 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 will 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 must be in time segments a minimum of 30 minutes each in duration.

LO. CAs must be fluent in English, able to speak English without a distortional accent.   CAs will be tested for hearing acuity, speech comprehension, and English language skills including vocabulary, grammar, and syntax. This will apply to English and 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.

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

12. The FCC requested comments on the two year time-line for training STS CAs. When Sprint began STS trials in California, they recruited and trained CAs within several months. MCI had a similar time-line when they trained the CAs for California (who are housed in Wisconsin).   I have trained many STS CAs and am

available to travel anywhere to do such training. TTY CAs only require a few weeks training to become STS CAs.

13. 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. I support the position of Wisconsin TRS-AC on this issue.

14. The FCC should establish national standards of hearing acuity for Communications Assistants (CAs). One former CA had a hearing problem which frustrated many users.

15. 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.

16. CAs may 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).

17 Vendor shall define acceptable CA hearing acuity and speech comprehension levels and insure that all CAs meet that criteria.

18. 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

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

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

3. Each state will 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

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

2. Each state will 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 must do the outreach. Many speech (disabled people are very isolated and require extensive encouragement and counseling before they **are** willing to try Speech-to-Speech.

California began Speech-to-Speech with such a program. Both Wisconsin and Maryland began Speech-to-Speech without extensive outreach programs: all Wisconsin did is one mailing. Because of that, call volumes are very low in both states. Do not allow states to avoid providing adequate outreach and then try to abandon Speech-to-Speech on the basis of its not being used. We fear that this will happen in Wisconsin. Missouri had a Speech-to-Speech trial without adequate outreach and the trial failed.

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 of the psychological resistance of consumers, parents, and caretakers to the use of Speech-to-Speech, each state needs a master's level counselor (in psychology, social work, or a related field) to work with such people.

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. One of our current outreach staff is a trained, licensed counselor. That contact is necessary because:

> A. Potential users often require individual contact through the following multiple step process. Such people are unavailable in groups and do not know each other. The large number of referral sources listed below verify that potential users must be identified individually to be taught about Speech-to-Speech.

> 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 tc 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 a-nd 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. DDTP's response to the NOI states: "... the population of potential users may be isolated

and very difficult to reach."

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. Bob now provides this model, not only as a fellow Speech-to-Speech user. but as the founder of the first statewide Speech-to-Speech service.

Thank you for your attention and support!

Sincerely,

Bruce Fleming, BSE
Rehabilitation Engineer
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