

APPROVED AND ADOPTED BY THE
DISABILITY ADVISORY COMMITTEE
June 23, 2015

RECOMMENDATION OF THE SUBCOMMITTEE ON RELAY AND EQUIPMENT DISTRIBUTION

TO THE

FCC DISABILITY ADVISORY COMMITTEE

May 7, 2015

The Relay/Equipment Distribution Program Subcommittee of the Disability Access Committee (DAC) was asked by the FCC's Disability Rights Office (DRO), to make recommendations regarding VRS speed-of-answer. DRO asked that the subcommittee base their recommendation on the four questions asked below. The Subcommittee proposes that the full DAC adopt this report, and submit it to the FCC for further action.

1. What is the appropriate speed-of-answer for VRS calls? (i.e., what percentage of calls to be answered within how many seconds)

The Subcommittee recommends that the Commission acts on the industry's proposal that 80 percent of VRS calls be answered within 45 seconds. However, the committee recommends that the industry and the FCC work together to make changes to the VRS rate methodology so that the speed of answer for VRS can continue to improve. 80 percent of calls answered in 45 seconds does not meet a functional equivalency standard for either VRS users placing calls to a hearing individual or hearing individuals placing calls to VRS users.

2. What should be the measurement window for determining compliance with a speed-of-answer requirement? (i.e., should compliance with the speed-of-answer requirement be measured on a daily, monthly, or some other basis?)

The Subcommittee recommends that the Commission monitors the industry's compliance with the speed-of-answer requirement on a monthly basis.

3. How should the Commission measure compliance with the recommended speed-of-answer requirement? (See paragraphs 261-265 of the *VRS Structural Reform Order*). What formula should the Commission use?
 - a. Option One: $(\text{Calls unanswered in 45 seconds or less} + \text{calls answered in 45 seconds or less}) / (\text{all calls (unanswered and answered)})$
 - b. Option Two: $(\text{Calls answered in 45 seconds or less}) / (\text{All calls answered by a CA} + \text{Calls abandoned after more than 45 seconds})$

The Subcommittee recommends that the Commission utilize Option 1. This method is the method currently used by the TRS Fund Administrator to calculate answer performance. If a VRS user abandons a call in 45 seconds or less, it doesn't count against the company. If a VRS provider were to answer all calls in 45 seconds or less and all abandoned calls wait less than 45 seconds, the VRS provider would score a 100% compliance rate. If a VRS provider delays answers beyond 45 seconds, and a person hangs up after 46 seconds, then this formula assumes that the call was abandoned and answer performance begins to be less than 100 percent. Another view of the formula follows:

A = Calls Unanswered and disconnected by the Originating Caller in 45 seconds or less

B = Calls answered by a VI in 45 seconds or less

C = Calls Unanswered and disconnected by the Originating Caller After 45 seconds

D = Calls answered by a VI after 45 seconds.

E = Total Inbound Calls

$E = A + B + C + D$

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The performance measurement is $(A + B) / E$.

4. Some VRS providers use an IVR system as a hold server to handle VRS incoming calls from a hearing caller. How should the Commission treat calls to an IVR system for the purpose of measuring the speed-of-answer performance?

The Subcommittee recommends that the Commission determine that calls handled via the IVR and IVVR are not considered answered. The speed-of-answer service level for VRS must be measured on when an interpreter is connected to the call. Speed of answer calculation begins once a call arrives at the provider's switch and/or platform and continues until an interpreter is connected to the call. Calls answered by an IVR are NOT answered as defined herein. Rather calls must be answered by an interpreter before the speed of answer calculation ends.

5. Finally the Subcommittee recommends that the Commission ensure that the rates used to support a revised speed of answer reflect the providers' resources and staffing needed to provide high quality VRS interpreting necessary to satisfy functional equivalency.