Who makes the rules anyway? Reality and perception of guidelines in video relay service interpreting

ERICA ALLEY
St. Catherine University

Abstract

American Sign Language-English interpreters employed in the video relay service (VRS) industry in the United States are subject to numerous guidelines for processing calls, which are mandated by the Federal Communications Commission (FCC) or by independent VRS companies. Anecdotally, VRS interpreters report ambiguity about the guidelines and their impact on the quality of their interpretations. In this pilot study, I investigated the origin of VRS guidelines by reviewing public documents from the Federal Communications Commission (FCC) and the Americans with Disabilities Act (ADA). I then interviewed four experienced VRS interpreters regarding their perceptions of the origin and impact of the constraints placed on interpreters in VRS. Two themes emerged in the interview data: 1) interpreters are uncertain whether the constraints placed on their work are federally mandated or established by individual corporations, and 2) interpreters report a sense of responsibility for their work and have concerns regarding constraints on their professional autonomy. This study suggests that interpreters in the U.S. do not have sufficient knowledge about the system in which they work to make informed decisions when working in VRS.

Introduction

Following innovations in video technology, signed language interpreters began working in a new communication environment known as video relay service

(VRS). VRS relies on equipment (e.g. cameras, monitors, computers) to provide telecommunication access to deaf people. Every day, deaf people around the world rely on the interpretations provided through VRS to communicate with family, friends, and businesses from a distance. Deaf people who at one time struggled to access communication via telephone can now make an appointment with their dentist, participate in teleconferences, check in with their child's school, or conduct any other interaction that is typically managed via the telephone. To support VRS, thousands of signed language interpreters are standing by at 24-hour call centers ready to interpret calls between people who use signed language and those who use spoken language.

In North America, the work of American Sign Language (ASL)-English interpreters in the VRS setting is constrained by rules created alongside the development of video technology. These rules are intended to govern VRS interpreters' approach to this particular type of work. For example, VRS guidelines constrain interpreters' interaction with the hearing and deaf participants (e.g. interpreters are identified by a number as opposed to a name; interpreters do not share personal information about themselves). The rules also dictate how interpreters discern call content (e.g. restrictions on asking the caller for information prior to making the call), and interpreters' ability to determine appropriateness of fit for an interpretation (e.g. calls must be taken in the order in which they arrive). The guidelines instituted in VRS diverge from how signed language interpreters have historically interacted with deaf people. Historically, signed language interpreters' work was rooted in social welfare activity. Until the recent past, deaf people typically relied on volunteers to serve as interpreters, including family members, friends, neighbors, teachers at residential schools for the deaf and church workers (Ball 2013; Cokely1992; Frishberg 1986). Deaf individuals often knew the interpreters in their communities and many developed friendly relationships with interpreters as they worked together. VRS brought a different approach to interactions between deaf people and interpreters, controlling anonymity among participants and placing value in measures such as speed of delivery in addition to quality of work. While the VRS phenomenon has become widespread, to date, there has not been an investigation of the impact of VRS guidelines on the work of interpreters in this setting.

In this article, I suggest that technology and the rules and regulations developed as a response to this technology, constrain the way that interpreters conduct their work in VRS settings. In addition, I examine how interpreters who provide services in this environment perceive these guidelines. I begin by outlining the guidelines that VRS interpreters are expected to follow. Then, I investigate whether interpreters are aware of the origin of these guidelines (i.e. created by the FCC or individual VRS companies). The questions addressed in this study are twofold: first, what is the origin of the constraints placed on VRS interpreting?; secondly, what are interpreters' perceptions of these constraints and their influences on VRS work?

1. Technology and social interaction

When a new technology is introduced into a society it frequently initiates social change (Heilbroner 1994; Marx 1867/1976). The impact of technology on society is illustrated by the introduction of video relay service as a method of delivering telecommunication access between people who use signed language and non-signers. The development of technology-mediated communication has altered the way that interpreting services are provided to deaf and hard of hearing consumers. Interpretation is no longer exclusively conducted in a face-to-face manner in which the participants have personal contact. VRS creates an environment in which the participants are typically anonymous to one another. Postman (1992) asserts that the primary danger in technology is that it presents itself as making the user's life easier; however, over time technology has changed our perception of human labor in terms of the value placed on efficiency, standardization, objectivity, measurement, expertise, and progress. In this view, technology may lead to the belief that workers should not use their subjectivity when making decisions. Rather, in order to ensure efficiency (which arguably has come to be the greatest aim of business), standardization is considered best practice. As Postman states (1992: 93), "machines eliminate complexity, doubt, and ambiguity. They work swiftly, they are standardized, and they provide us with numbers that you can see and calculate with". In a highly mechanized world, success is measured in terms of statistical measurement, which is assumed to be entirely objective. This perspective can be seen in the way that signed language interpreters work in a video relay setting. VRS is impersonal. Interpreters are identified by a number. Their work is assessed based on the number of minutes that they are logged in to their computer software and connected with a hearing and a deaf caller. Peterson (2011) remarks that, in his experience, VRS providers collect statistics on every aspect of an interpreter's work except the quality of the interpretation provided.

At present there is minimal research studying the work of interpreters in a VRS setting, in part for the protection of the callers' privacy. Section 225 of the Americans with Disabilities Act (ADA) states that relay operators are prohibited from "disclosing the content of any relayed conversation and from keeping records of the content of any such conversation beyond the duration of the call." The inability to observe or record calls places great limitations on those conducting research on VRS. The minimal research available at this time stems from interviews with those who work in a VRS setting (Bocian 2012; Brunson 2011) or are reflections of personal experiences in VRS (Peterson 2011). This article aims to supplement the information currently available regarding interpreters' work by reviewing the constraints placed on interpreters' professional decision-making in VRS and investigating interpreters' perception of these constraints.

2. Professional autonomy in VRS

It is possible that both the video interpreter and individuals who use VRS view the role of the interpreter differently than that of an interpreter in other settings. Peterson (2011: 200) argues that "VRS work does not qualify as interpreting as defined by interpreters collectively since 1964" given the constraints that are placed on interpreters in this setting. In fact, throughout FCC documents, video interpreters are referred to as "Communications Assistants" (CA), removing the term "interpreter" entirely. Further, the FCC clearly states, "the role of a CA during a VRS call is different than the role assumed by 'interpreters' in community settings" (FCC 2011a). VRS interpreters are visible on a computer/television screen and can be accessed at the click of a button and removed just as easily. They are expected to be ready for any call at any time, moving between medical, legal, social, education, business, and a variety of other topics from one moment to the next. This reinforces the expectation that any interpreter can interpret any call at any time. This expectation is in contradiction with the Code of Professional Conduct developed by the Registry of Interpreters for the Deaf (RID 2005), which states that interpreters should use discretion when accepting assignments. As Brunson (2011) points out, there is an assumption that VRS interpreters are one-size-fits-all and do not need to use professional autonomy when considering which calls they will accept. By behaving as if there is one correct way to conduct an interpretation, the belief may develop among VRS providers and interpreters alike that all communicative interactions are the same and can be handled formulaically.

The Telecommunication Relay Service Rules (FCC 2011b) state that VRS providers must offer 24-hour interpreting service and respond to a percentage of calls within a designated amount of time. These mandates place significant demands on VRS companies to appropriately staff their call center in order to meet these goals. Similarly, video interpreters' performance is measured by their ability to comply. Traditionally, when faced with a complicated interaction (e.g. unfamiliar or high-stakes content), interpreters seek the support of a team interpreter to support the work. Working as a team seems more likely to occur in a call center environment because a number of interpreters are working in a single location; however, some VRS companies openly discourage team interpreting in order to ensure that each interpreter is constantly producing billable minutes and is available to rapidly respond to incoming calls. When two interpreters are working together on the same call the VRS company can only earn money from the single call as opposed to if both interpreters were working on separate calls. This information is tracked in statistical reports generated by VRS companies and provided to the FCC. The discouragement of teaming is one example of the constraints on interpreters' work originating from VRS providers and in response to the overarching regulations established by the FCC.

3. Rules and bodies organizing the provision of VRS

To gain more insight into the guidelines that govern interpreters' work in VRS, I conducted an investigation of documents, beginning with a review of the Americans with Disabilities Act (ADA 1990). In addition, I reviewed current documents originating from the FCC that discuss the interpreters' role in VRS call processing. The documents used were chosen based on their clear reference to guidelines. Finally, I explored the Registry of the Interpreters for the Deaf Standard Practice Paper regarding VRS (2007) to see the interpreting community's response to the guidelines imposed on interpreters' work in VRS settings. All of the above documents are public record and are available online. My aim in reviewing these documents was to identify policies on acceptable or unacceptable interpreting practices within VRS.

3.1 Americans with Disabilities Act (ADA)

In the U.S., rules regarding telecommunication for deaf citizens are driven by tenets in the Americans with Disabilities Act. The ADA states:

> The term 'telecommunications relay services' means telephone transmission relay services that provide the ability for an individual who has a hearing impairment or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio.

While the ADA clearly states that the goal of the Telecommunication Relay Service (TRS) is to ensure "functionally equivalent" access to telecommunication, the document does not explicate the meaning of this phrase and does not provide the FCC with a working definition of what it entails. In empowering the FCC to oversee that the goal of the ADA is carried out, Section 225 of the ADA (1990) lists the following regulations pertaining to VRS interpreters' work:

- The Commission shall, not later than 1 year after July 26, 1990 prescribe regulations to implement this section, including regulations that
- Establish functional requirements, guidelines, and operations procedures for telecommunications relay services;
- Prohibit relay operators from failing to fulfill the obligations of common carriers by refusing calls or limiting the length of calls that use telecommunications relay services;
- Prohibit relay operators from disclosing the content of any relayed conversation and from keeping records of the content of any such conversation beyond the duration of the call; and
- Prohibit relay operators from intentionally altering a relayed conversation.

The aforementioned rules that impact the work of the interpreter as they interpret a call are confidentiality, accuracy, and faithfulness of the interpretation, together with acceptance of all calls and call lengths. Many of these goals also appear in the Registry of Interpreters for the Deaf Code of Professional Conduct. Aside from these rules, which directly regulate interpreters' work, the ADA also asserts that the FCC can independently develop a set of minimum standards as well as establish functional requirements, guidelines, and operational procedures for the TRS. In an apparent effort to allow for flexibility in application, legislation does not explicate the meaning of the phrase "functionally equivalent" and further, does not provide a working definition of what it entails. Nevertheless, the FCC developed a list of Mandatory Minimum Standards for the provision of video relay service, which is available online and updated periodically.

3.2   Federal Communications Commission

The FCC's definition of a qualified interpreter emphasizes effectiveness, impartiality, and accuracy of their work (FCC 2011b). The TRS Mandatory Minimum Standards (FCC 2013) requires the following of VRS interpreters:

–   The CA must continue with a call for a minimum of ten minutes.
–   The CA must not refuse calls or limit the length of calls.
–   The CA may not utilize a privacy screen and must disconnect from a call if the caller uses the privacy screen or is not responsive for greater than five minutes.
–   The CA ID number must be included in reports for TRS Fund compensation.
–   The CA ID number must be announced to the Public Safety Answering Point (PSAP) or local emergency authority during a 911 emergency call in order to ensure the ability to contact the CA if the call is disconnected.
–   The TRS provider must make their best effort to accommodate the caller's preferred CA gender.

3.3   Registry of Interpreters for the Deaf (RID)

Several of the aforementioned rules directly constrain the professional autonomy of an interpreter working in a VRS setting. In response to such legislation framing interpreters' practices in VRS, as well as subsequent concerns raised by the interpreting community, the RID created a Standard Practice Paper (RID 2007) "intended to raise awareness, educate, guide, and encourage sound basic methods of professional practice." In this document, the RID states that the minimum standard of qualification for VRS work should be national certification. While VRS providers often screen potential interpreters prior to hire, many VRS providers do not require national certification. Additionally, the RID expresses that interpreters work best when given preparatory information and advises interpreters to gather important information prior to placing a VRS call. The or-

ganization further recommends that VRS interpreters work with a team when necessary in response to call complexity, length of call, call dynamics, and the individual needs of the caller. In these ways, the RID hopes to improve the quality of interpretation provided to deaf people through VRS.

After examining relevant documentation related to the provision of VRS, I then sought VRS interpreters' perspectives of their work as it is influenced by these guidelines. Through investigating interpreters' knowledge of the rules influencing their work and their perception of their ability to exercise professional autonomy we can better understand the efficacy of the rules placed on the provision of interpreting in the VRS setting.

4.   Methodology

In order to examine interpreters' knowledge and perception of the rules governing VRS, I conducted interviews with four interpreters who have either served in a managerial position in a VRS setting or have heavily participated in the Video Interpreters Members Section of the RID. I used purposeful sampling to select the participants involved in this pilot study, each of which were colleagues that I have worked with over the years and/or individuals that were recommended to me by colleagues due to their continuous involvement in VRS. These participants resided in various locations in the United States. I contacted each participant via email to elicit his or her involvement. All of the people that I contacted agreed to be involved in this study.

Two of the interviews were conducted in person and were video recorded. One participant was interviewed from a distance using video communication computer software that allowed for recording. These interviews began in English; however, the participants often switched back and forth between English and American Sign Language throughout the interviews in order to visually demonstrate a specific comment originally given in American Sign Language. The last participant was interviewed over the phone and the conversation was audio recorded.

Interviews were conducted as guided discussion rather than utilizing a strict interview protocol. I began with a general description of my goal to investigate interpreters' knowledge of the origins of guidelines that constrain the work of VRS interpreters. There was no script for the interview. Each interview was approached as an open conversation regarding interpreters' experience working in VRS. After initiating the topic (and assuring participants that there were no right or wrong answers), the rest of the interview consisted of open discussion. In an effort to elicit further discussion, I provided a series of follow-up questions during the interview. Follow-up questions consisted of asking the participant to expand on something they had recently said. When there were lulls in the conversation I would ask if the participant had heard of a specific guideline. For example, during a long pause in conversation with one participant I introduced the concept of asking a caller for information prior to beginning a call. This led to further discussion of the participant's experience.

Each interview was recorded, transcribed, and analyzed using an open and closed coding process (Emerson *et al.* 1995) in order to ultimately determine whether the participants were aware of the origin of the guidelines that interpreters follow as well as to explore their perception on the effectiveness of the rules. Participants' responses regarding the origin of VRS regulations were considered "uncertain" if they included forms of hedging and/or use of ambiguous or doubtful language.

5.   Results

Conversations with participants reflected two themes: responsibility and uncertainty. Interpreters expressed feeling a strong sense of responsibility to both provide quality interpreting service and also to behave according to the rules as they understood them. The participants in this study indicate that they have concerns about the constraints under which they work, but they are uncertain as to the origin of these perceived rules. I briefly discuss the notion of responsibility before delving into the idea of uncertainty as described throughout the interviews.

5.1   Who is responsible?

A frequent theme throughout the interviews is responsibility. Participants discuss the RID's role in examining the guidelines, the FCC's authority as the legal backbone of VRS guidelines, and interpreter education programs' responsibility in preparing students for VRS work. Additionally, interpreters have responsibility to provide quality interpretations and appropriate customer service. According to the participants, VRS providers have a responsibility to look at the statistical data that they collect in order to ensure that they are in compliance with the FCC as well as to determine if they are producing billable minutes. While it is clear that there are many responsible parties involved in the success of VRS, the participants show a great deal of uncertainty regarding who is responsible for the guidelines that constrain interpreters' work in VRS settings. One participant describes these dynamics as the following:

> I think the FCC's upset at the providers and the providers are upset with the FCC and it's kind of back and forth [...] interpreter's [are] standing in the middle going 'well is it the FCC? Is it my provider?' you know, who do I need to be looking at to be asking for something?

Interpreters expressed recognition that the constraints under which they work impede their ability to provide quality interpreting service, but do not know where to go in order to advocate for change.

5.2   Uncertainty

Throughout all of the interviews, participants used phrases to hedge their responses, such as "I think", "I believe", and "my understanding is". These phrases reflect uncertainty in their answers (O'barr/Atkins 1980). There was also a high degree of fillers such as "um", "uh", and "you know". These hedges and fillers create a perception that the interpreters did not feel confident about the accuracy of their comments. Additionally, several of the participants in this study expressed concerns regarding guidelines that they feel were company driven, but feel bound by the guidelines and adhere to protocol as it is explained to them by their supervisors despite their concerns.

When asked about the origin of the rule that interpreters should be identified by a number as opposed to a name, one participant responded:

> Um, my understanding is it's an FCC rule but that's a guess. Um, I know the FCC tracks us based on numbers so it would make sense that it would be an FCC rule.

A second participant commented:

> I don't know where that comes from. I know that when VRS was originally set up, um, with the original language from FCC we were, um, more equated to a dial tone or, um, an accessibility. A vehicle for accessibility more so than a person. Um, so the tone and the language from FCC, I could see that requirement would be in line with the way that VRS started.

This participant explained that interpreters are viewed as a "vehicle for accessibility more so than a person", which is a different response than other participants' impression that interpreters are identified by number in order to protect their personal safety. Two participants noted that they had heard that interpreters are identified by number in order to prevent the caller from finding the interpreter for any reason. Both participants qualified this response by stating that they did not think that this was in fact the intended purpose of the rule. None of the participants in this study mentioned having intentionally deviated from this protocol in the past.

An additional constraint expressed by participants was that interpreters should not reveal the gender of the callers. One participant had worked for three VRS companies in the past and noted that each company had a different protocol regarding this guideline. She stated that the first company instructed employees that if it was possible for the interpreter to perceive the hearing caller's gender then they should inform the deaf caller immediately when connecting the call and reciting the initial script; however, they should not reveal the deaf caller's gender for any reason. If the hearing person asks the gender of the deaf caller, this question should be interpreted directly to the deaf person. The second company stated that the gender of both callers should be revealed to the other conversational participant at the beginning of the call as part of the introductory scripts. The third company's rule mandated that the interpreter not reveal either caller's gender for any reason. If either caller asks the gender of the other, the question should be interpreted.

Another participant, when presented with the question of sharing caller gender, responded differently. He agreed that caller gender should never be revealed; however, he seemed uncertain of the origin of this rule and stated:

> [...] as far as I - the way I understood it, it was a [company] thing and it was imposed in order to protect the interpreter so that they do not incorrectly assume a caller's gender.

In one interview, the discussion of divulging caller gender was followed by one regarding the ability of the interpreter to ask for information from the caller before placing a call. The participant explained that collecting additional information would ensure the interpreter is qualified for the call as well as help them prepare for the upcoming discussion. The participant, who had served as a manager of a call center for several years, responded:

> It's basically a yes or no answer [to the question of] 'do you have the person you wanna call?' Um. No it's not an FCC rule. I don't think that's an FCC policy. Probably more of a [company] policy. Again I think it's that [call] ownership.

In response to the same question, other participants used the qualifiers "I would say," "um," "I don't think," "I think," "I would assume," and "could be":

> Um see now I would say that is the company because I know RID's come out in their standard practice papers that the more information you have the better. Um I don't think that's FCC's requirement. I think that's a company's requirement [...] I would say that's more company requirement but it's funny how all the companies - it's very similar across different companies that they request the same thing.

A third participant said:

> I think that each company has its own policies around that, but understand as a service companies don't get paid unless there's that three way connection between the interpreter, the deaf person, and the hearing person and so I would assume that that's, you know, an element in it.

In my examination of various FCC documents, there was no mention of whether the gender of callers should be shared. This may be a guideline derived from independent companies that is so widespread that it appears to be FCC driven.

In addition, interpreters may be adhering to a perceived constraint that they cannot ask for more information before interpreting a call despite the likelihood that if they were interpreting a similar topic, such as a medical discussion, in another setting, they would most likely ask preparatory questions. This raises the question of whether what VRS interpreters are doing is effective practice and what the pros and cons of deviation from this practice would be (i.e. more time would be needed for each call, but the quality of the interpretation could be seen to improve). Would the ability to converse with a caller about the upcoming call (within reason) significantly alter the amount of time needed for the call? Do deaf individuals prefer speed of access over accuracy of interpretation?

Another constraint discussed with the participants states that the interpreter must commit to the continuous interpretation of a call for ten minutes despite their self-declared ability. One participant seemed certain that the FCC states that you must stay with a call for ten minutes only if you can faithfully interpret it. She said, "so if you can't faithfully interpret it you break that rule, that ten minute rule" and then you can transfer to another interpreter. This coincides with another participant's comment that, "an interpreter has a legal right to disconnect from a call [...] the interpreter has an ethical responsibility and a legal right to switch to another interpreter if that is necessary." The Mandatory Minimum Standards written by the FCC states "CAs answering and placing a TTY-based[1] TRS or VRS call must stay with the call for a minimum of ten minutes." It does not add additional stipulations regarding qualification even though, as previously stated, the definition of a qualified CA, according to the FCC in this same document, indicates that they interpret effectively, accurately, and impartially.

If the interpreter feels they are unqualified, according to one participant, who was the manager of a call center, it is recommended that they call for a team member as opposed to transferring the call to another interpreter. This is considered good customer service according to the company. It promotes call ownership by giving the caller the opportunity to decide independently if they would like to transfer to another interpreter and also reinforces the idea that the interpreter should stay on the call. Working with a team member alleviates the stress of interpreting a challenging call; however, as previously mentioned, some VRS companies subtly discourage interpreters from calling for a team too frequently. One participant stated:

> [...] right now there's a big crackdown against teaming [...] it costs twice as much to have a team there than it does to have one interpreter there.

She further asserted that teaming should be more acceptable in order to ensure quality service. Another participant was called to their manager's office and reprimanded for calling a team too frequently. If the FCC is stating that the interpreter should stay with a call for ten minutes, and companies are discouraging frequent teaming, this is a conflict that may lead to an interpreter attempting to interpret a call that they feel they are unqualified to interpret in an effort to achieve the statistically appropriate productivity levels that their employer prefers. During one interview it was said that VRS interpreting is:

> [...] a solo sport. I mean you have the walls around you, they're you know six and a half feet tall. Nobody can see you, you know, you can't see anyone else. They've started moving stations around so you don't even have eye contact into another station and, you know, so I think it's been a big cut off towards teaming and a lot more, you know, individualized.

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1   Teletypewriters (TTYs) are electromechanical typewriters that are paired with a telephone and which are used by the deaf community to communicate in written text at a distance.

It is this participant's opinion that the logistics of the call center dissuades interpreters from requesting the assistance of a team and that the layout of call centers have been changing over time to be more isolating. Policies for requesting a team and working with a team are governed by independent companies and seem to be a concern for the participants in this study.

The participants expressed certainty that rules regarding break times stem from individual companies. One participant stated:

> FCC doesn't have really anything to do directly with working conditions [...] They don't say 'well this is the way we want you to treat your interpreters.' That's all down to company policy.

She went on to say that the RID is not involved in regulating independent company practices either. Another participant discussed her feelings about company rules, stating that they are often geared toward what happens outside of the call. She said that she feels more comfortable following FCC rules and tends to question the effectiveness of company rules. For example, she had concern regarding the rigidity of break times. She stated:

> It makes sense they're trying to manage call volume and they know it's gonna peak at certain times. They need so many people sitting in their seats. So they can't have you just willy-nilly decide to take a break at any one time. But at the same time they need to build in some times that, you know if I take one call and it's a really hard call then I need a break regardless of whether it's my ten minutes or not. And so they need to kind of flex those schedules but in the great effort of efficiency with companies being a for-profit company that concept doesn't really work into it.

The pressure to manage call volume and answer calls in a timely manner originates from the FCC regulation that calls must be answered within 120 seconds of when they are received by the call center (FCC 2011a). However, specific rules about break time are created by each individual company in an effort to satisfy this FCC regulation. It is this participant's view that the company's approach to break time protocols is not conducive to the provision of quality interpreting service.

6.   Conclusion

The information gathered from the interviews in this small-scale pilot study indicates that there are a number of constraints to the professional autonomy of ASL-English interpreters in the VRS setting. VRS interpreters interviewed displayed uncertainty of the origin of these constraints and have concerns regarding their perceived inability to exercise professional decision-making. Regardless of these concerns, the interpreters in this study choose to continue to adhere to the rules as they are provided. Further investigation with a wider sample is needed to discover whether interpreters associate these rules with customer service or call ownership, while others are unsure of the origin of a rule and adhere to it out

of habit. Often the consistent application of guidelines from one company to the next gives the impression that they are federal mandates, when in fact they are individual companies' interpretation of FCC documents.

The FCC does not regulate video relay service working conditions including break times, teaming, and the logistics of work stations. They do not regulate the scripts provided by any company, the ability of an interpreter to share their name with a caller, or the ability of an interpreter to request information from a caller prior to placing a call. These are all company-specific interpretations of FCC rulings such as the requirement that an interpreter must interpret a call for ten minutes, maintain confidentiality, respond to a high percentage of calls in a minimal amount of time, among others.

It is important that interpreters know the difference between FCC regulations and the protocol that is established by independent VRS companies. Knowledge of the origin of constraints allows interpreters to make informed decisions regarding how they process each call. It also allows interpreters to choose to work for a VRS company that has the kinds of working conditions, policies, and practices that they feel are aligned with their own work philosophy. Additionally, through incorporating VRS into interpreter preparation program curricula in the U.S., interpreters will be better prepared to respond to expectations regarding their work in the VRS setting.

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