



Board Views

Dr. Roy E. Miller
TDI President

“... aural paralinguistic cues ... are generally absent when viewing only words on a screen.”

TRS Functional Equivalency: Equality in Telecommunications

The concept of functional equivalency comes from the Americans with Disabilities Act of 1990 (ADA). Title IV of the ADA defined Telecommunications Relay Services (TRS) to mean “telephone transmission services that provide the ability for an individual who has a hearing 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 or speech impairment to communicate using voice communication services by wire or radio.”

When relay services began, functional equivalency was operationally defined by the Federal Communications Commission (FCC) when it announced various “minimum standards” for TRS providers, which included such things as a maximum average length of time for communication assistants (CAs) to answer a call, a minimum number of words per minute that the CA could type, and so forth. Since then, there has been a steady pressure on the FCC to expand the operational definition of functional equivalency, and recently the FCC has done so by further reducing the maximum average length of time required for TRS to connect to incoming calls, increasing the minimum typing speed of CAs, and mandating that speech to speech services be provided. The question still remains, however, are deaf and hard of hearing people receiving anything resembling “functionally equivalent” relay services?

Equivalency must begin with the selection of a service provider. On all long distance calls, hearing persons can pick up their telephone and place the call with their choice of providers, thus giving them a choice of billing procedures and discount plans. At the moment, most users of relay services have no choice of vendors. They are limited to the one vendor that their state has contracted with to provide relay services. So, at the front end of every long distance relay call there is no equivalency.

When the phone is answered the CA may type something like “Hello (F) GA” meaning that a female has answered the phone by saying “Hello.” But which female? Is it the TRS caller’s sister or their sister’s daughter or their sister’s mother? Again, no equivalence for TRS users when it comes to identification of the called party.

And once the conversation has begun the absence of these same paralinguistic cues make it difficult if not impossible to know when the called party is serious or joking, bored to tears or interested, confident or fearful, pleased or mad, happy or sad. All of these emotional states are primarily conveyed by aural paralinguistic cues, such as pitch, tone, rate of speech, length of pauses, voice amplitude, and so forth, and these cues are generally absent when viewing only words on a screen. Again, no equivalency for TRS users in this area.

And, of course, everyone is familiar with all of the errors, lengthy pauses, missed content, requests for repetition, need to spell out words, checking and double checking numbers to ensure their correctness, and so forth that are a common feature of TRS conversations, but seldom play a role in direct conversations between two hearing people. Again, no equivalence for TRS users here.

While CA’s may type at speeds of 60 words per minute, and Baudot code may transmit at about that same rate, hearing people may talk at speeds over 200 words per minute. This results in TRS calls lasting at least three times as long as identical conversations between hearing parties. Again, no equivalence for TRS users here.

Elsewhere in this issue of the GA-SK News Magazine are discussions of many ways in which TRS calls could be made “more” functionally equivalent than they are now. What is needed is for consumers, and consumer organizations like TDI, to continue making their perspective known in the political arena, and keep up the political pressure for continued TRS improvements. Only through such efforts can we ever hope to get close to true “functionally equivalent” TRS calls. **SK**