

Congress of the United States
Washington, DC 20515

March 10, 2025

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Dear Chairman Carr:

We write as Members of Congress concerned about the Video Relay Service (VRS) program, which serves hundreds of thousands of Deaf Americans. American Sign Language interpreters, who provide the critical backbone that allows this government service to function, have raised significant concerns with our offices about deteriorating quality in VRS for consumers caused by poor working conditions and uncompetitive wages.

On February 5, 2025, French multinational Teleperformance completed its acquisition of ZP Better Together after receiving regulatory approval from the FCC on January 29. We urge the FCC to closely scrutinize how wages and working conditions are impacting service quality when determining whether to grant permanent certification to Teleperformance.

VRS is a critical translation tool for Deaf and hard-of-hearing individuals. It is used for essential communication including with medical providers, emergency services, and family. Unfortunately, interpreters who provide the VRS service to our constituents report quality issues and poor working conditions caused by a failure to retain an adequate number of qualified interpreters, insufficient training for new interpreters, and hardware and software quality concerns.

In a 2023 VRS Order, the FCC included an estimate that wages and benefits for VRS interpreters would need to increase by 65 percent over the five-year period, and that the substantial rate increase given to VRS providers was indicative of those labor costs.¹ Interpreters report that this promised wage and benefit increase has not taken place. Instead, interpreters have seen much more modest increases than the approximately 26 percent that would have been the case if the increase had followed the anticipated schedule.

The Office and Professional Employees International Union reports that a surprisingly small proportion of the rate paid to providers is going to interpreter wages and benefits—only about

¹ Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 03-123, CG Docket No. 10-51. <https://docs.fcc.gov/public/attachments/FCC-23-78A1.pdf>

one quarter on average, despite limited additional expenses. VRS users will face further negative outcomes if Teleperformance is planning to use this acquisition to bolster its profit margins at the expense of the investments in VRS.

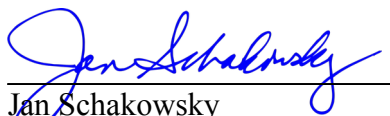
One way for Teleperformance to allay some of our concerns would be for it to implement, in the United States, its Global Agreement regarding freedom of association with UNI,² a global federation of labor unions. This would ensure that interpreters are able to sit down with management and work collectively to improve VRS.

We have the following questions:

- 1) Has Teleperformance has made any assurances or disclosures to the FCC related to human capital management in VRS, or wages and benefits of VRS interpreters?
- 2) Has the FCC requested and Teleperformance provided data on actual wage increases that have occurred since the 2023 FCC rate increases, interpreter turnover rates, compliance with US labor and employment law, and service outage information?

We urge the FCC to continue to closely scrutinize Teleperformance as you consider whether or not to grant permanent certification, and to examine additional steps the Commission could take to improve VRS and the working conditions of interpreters across the industry.


Sincerely,



Jan Schakowsky
Member of Congress



Brian Fitzpatrick
Member of Congress



Henry C. "Hank" Johnson, Jr.
Member of Congress



MARK TAKANO
Member of Congress

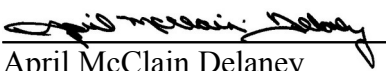
² Teleperformance - UNI Global Agreement on Social Responsibility. December 1, 2022.
https://www.teleperformance.com/media/rpdnyf0o/tpse_uni-global_global-agreement-on-social-responsibility_2022-12-01.pdf



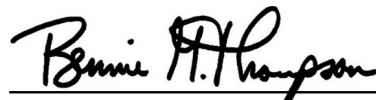
Alexandria Ocasio-Cortez
Member of Congress



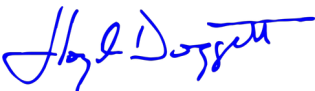
Ro Khanna
Member of Congress



April McClain Delaney
Member of Congress



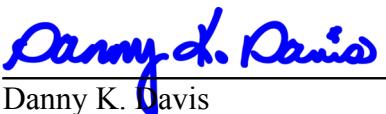
Bennie G. Thompson
Member of Congress



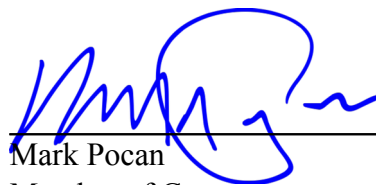
Lloyd Doggett
Member of Congress
Ranking Member,
Subcommittee on Health



Eleanor Holmes Norton
Member of Congress



Danny K. Davis
Member of Congress



Mark Pocan
Member of Congress



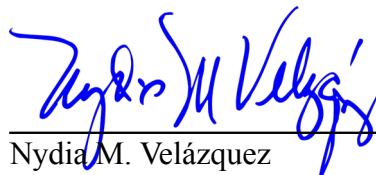
Jamie Raskin
Member of Congress



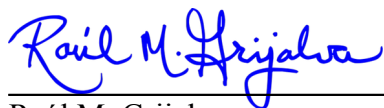
Greg Casar
Member of Congress



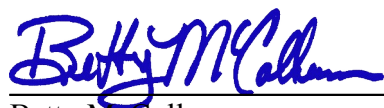
Brendan F. Boyle
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Nydia M. Velázquez
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Raúl M. Grijalva
Member of Congress



Betty McCollum
Member of Congress



Rashida Tlaib
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Val Hoyle
Member of Congress



Dwight Evans
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Kathy Castor
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Marilyn Strickland
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