

March 20, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51;
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and
Speech Disabilities, CG Docket No. 03-123

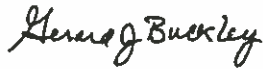
Dear Ms. Dortch:

RIT/NTID's position on the VRS (Video Relay Service) Access Technology Reference Platform ("VATRP") and associated Relay User Equipment specifications ("RUE Profile") is as follows:

- Historically, the lack of interoperability between various Telecommunications Relay Service ("TRS") provider equipment and platforms resulted in increased consumer frustration and, more importantly, in a lack of functional equivalence in telecommunications access for individuals who are deaf and hard of hearing. VATRP and the RUE Profile are designed to address this gap. Additionally, some high-importance items like privacy (encryption) and handling of emergency calls are addressed by the RUE Profile and implementation of these features is important to VRS users.
- The RUE Profile will allow and encourage new providers to use a pre-defined telecommunication specification that eliminates the guesswork in forming the required connections to each existing provider, and the continued development of the VATRP client provides a good starting point for new VRS providers.
- The RUE Profile further ensures that all consumers are able to communicate with minimal technical limitations, regardless of the type of equipment used.
- Establishing the RUE Profile will streamline the ensuing interoperability testing process, saving additional time and money.
- The RUE Profile still allows providers to be innovative with their own products and services.
- RIT *supports* the Joint VRS Providers' request to delay the April 29 deadline for compliance to the RUE Profile, but RIT *disagrees* with the recommendation to cease VATRP and RUE Profile development efforts.

- Pausing the VATRP/RUE Profile effort will delay and possibly disrupt progress towards the goal of functional equivalence that the ADA demands.
- Concerns such as encryption should not prevent the implementation of RUE Profile as a provider standard. These can be amended at a later time through a collaborative process that includes input from the Joint VRS Providers' technical experts.

Sincerely,



Dr. Gerard Buckley
President, NTID
Vice President and Dean, RIT



Gary Behm
Associate Vice President of Academic Affairs, NTID
Director, Center on Access Technology