

May 2, 2019

Ex Parte

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,

I write as President and Dean of the National Technical Institute for the Deaf ("NTID"), one of the nine colleges of the Rochester Institute of Technology ("RIT"). NTID supports over 1,000 deaf and hard of hearing students and has nearly 600 employees, many of whom themselves are deaf or hard of hearing and use American Sign Language as their primary mode of communication. As such, these individuals often depend on Video Relay Service ("VRS") and its various providers (the "Providers") for their telephony needs.

NTID's position with respect to the provision of VRS on campus has long been to allow its students, faculty and staff to make direct arrangements with one or more Providers to use their services on an individual basis. NTID neither recommends nor promotes the use of specific Providers, nor does it monitor or otherwise interfere with these individual arrangements. NTID does not provide technical support for videophone installations beyond ensuring that proper ports have been opened, and does not provide ongoing maintenance or customer support; that is the bailiwick of the Providers. NTID also allows all Providers to install public videophones in various locations on campus for consumer use, and similarly leaves the monitoring and maintenance of these public videophones to their respective Providers.


The Draft Order and Further Notice of Proposed Rulemaking currently scheduled for consideration at the Commission's May 9, 2019 Open Meeting contains some items of concern to NTID, particularly in the area of Enterprise and Public Videophone Registration. Specifically, the Draft Order would require Providers to obtain a signed certification from the person "responsible for ensuring compliant use of the videophone" that includes a statement that the individual responsible for a public or enterprise videophone "will make reasonable efforts to ensure that only "registered VRS users" are permitted to use the videophone for VRS calls. The Draft Order further suggests that these "reasonable efforts" could

include "maintaining a list of users, requiring such individuals to provide proof of registration when requesting to use a videophone, and maintaining a copy of the user's request."

NTID is cognizant of the issues (such as fraud, waste and abuse) that have led to this Draft Order and understands the Commission's need to address them. However, it is simply unreasonable to ask an entity as large as NTID to devote resources to monitoring the compliant use of all of the public and enterprise videophones on its campus. Should these particular requirements be implemented, NTID may have no choice but to require Providers to remove all public and enterprise (defined loosely as those that are at workstations or reception desks for use by multiple people, but which conceivably could also include any that are installed in multiple-occupant dorm rooms) videophones from its campus. This would have the immediate and deleterious impact of reducing, for our more than 1,000 deaf and hard of hearing community members, the unfettered access to telephony that is enjoyed by their hearing counterparts. That is an unacceptable consequence, particularly to an institution like NTID that exists to provide equal access and opportunity in higher education for individuals who are deaf or hard of hearing.

NTID therefore requests that this specific item be removed from the Draft Order and placed in the Further Notice of Proposed Rulemaking ("FNPRM") portion of the Item upon which the Commission will vote on May 9, 2019.

Very truly yours,



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

cc: Michael Carowitz
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