

of telecommunications relay services pay rates no greater than the rates paid for functionally equivalent voice communications services".<sup>32</sup> Accordingly, when adopting standards of affordability, care must be taken to ensure that whatever services are generally available to the public at affordable rates are also affordable to people with disabilities. Stated otherwise, the costs of providing access for individuals with disabilities should be incorporated into the overall costs of providing access for the general population; where necessary those costs can be subsidized through universal service support mechanisms.

The Commission also seeks comment on whether universal service support should be based on achieving specific end-user prices. For individuals with disabilities, keeping these end user prices down is of the utmost importance. For this reason, universal service support should be provided for discounted long distance TTY rates. Specifically, the completion of a TTY call takes much longer - at a minimum three times as long - than does a voice call; use of relay services can add even more time to the total length of the call. The Commission, on at least one prior occasion, has acknowledged that the longer transmission time effectively results in some relay calls "costing more than an equivalent voice call communicating the same message."<sup>33</sup> Just

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<sup>32</sup> 47 U.S.C. §225(d)(1)(D).

<sup>33</sup> Notice of Proposed Rulemaking, FCC 90-376, CC Docket No. 90-571 at p.9 n.19 (released Nov. 16, 1990).

as the Commission now notes that a reduction in service deposits may be necessary to eliminate what is presently an obstacle to initiating telephone service<sup>34</sup>, so too do we urge that discounted TTY toll rates are needed to eliminate disincentives to use toll services over the public switched network with TTYs.

Although some states and a few telephone companies have already begun to address this discrepancy through discounts on the toll charges of TTY initiated or relay calls, such discounts are by no means uniform throughout the fifty states. A nationwide policy of discounting TTY rates for toll calls would go a long way toward ensuring universal long distance telephone service for TTY users.<sup>35</sup>

VIII. Efforts to Publicize the Availability of Services Subsidized by Federal Support Mechanisms Must be in Accessible Format.

Section 214(e)(2) of the 1996 Act requires carriers to advertise the availability of services supported by the Federal universal support mechanisms and "the charges for those services 'using media of general distribution.'"<sup>36</sup> Indeed, we agree with the initial comments of the United States Catholic Conference, et. al. (USCC) that the subsidy programs which are created

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<sup>34</sup> Notice at ¶56.

<sup>35</sup> Indeed, the Commission seeks comment on specific changes that can be made to the Lifeline and Link Up programs to ensure the provision of quality services at just, reasonable, and affordable rates. Notice at ¶65. A uniform TTY discount could easily be incorporated into these discount programs.

<sup>36</sup> Notice at ¶43, citing Section 214(e)(1).

through this docket will have little value if their beneficiaries are unaware that they exist.<sup>35</sup> USCC suggests that information about these programs should be widely distributed through public service announcements on television and radio and in literature of various languages. We agree, and further emphasize that such information must be provided in accessible formats for individuals with disabilities. Such formats can include, for example, captioning and video description of public service announcements, as well as large print materials.

IX. Provisions for Free Access to Telephone Service Information Must Include Relay Calls for this Purpose.

The Commission notes that individuals who subscribe to measured rate service typically choose that service because it is a less expensive alternative to the flat rate. The Commission proposes, therefore, that such low-income subscribers not have to pay charges for service inquiries regarding phone activation, termination, repair, or information regarding subsidy programs. We support including access to telephone service information within the group of services receiving universal service support, and agree that access to basic information concerning telephone service may be needed to maintaining that service. However, we note that, at present, a significant number of such information telephone numbers are not accessible directly to TTYs. Rather, TTY users typically must use relay services to access the telephone services described above. Accordingly, should the FCC

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<sup>35</sup> USCC Comments at 22.

adopt a rule providing such free access, it must ensure that relay users also receive the benefit of not being assessed for relay calls made to these telephone service information numbers.

X. Conclusion

In the quest to develop the full potential of the nation's telecommunications infrastructure, the concept of universal service must ensure that all Americans have easy, affordable access to all communications services, regardless of income or disability. To accomplish this goal, safeguards must be incorporated which take into account the access needs of people with disabilities. Increased access to telecommunications services will be critical to expanding employment and educational opportunities for all Americans, and in particular for Americans with disabilities. We call upon the Joint Board and the Commission to ensure that the our nation's universal service policies continue to fully incorporate the telecommunications access needs of these individuals, and thank the Commission for the opportunity to submit these views.

Respectfully submitted,



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May 7, 1996