

December 19, 2014  
Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, DC 20554

Re: In the Matter of Rates for Interstate Inmate Calling Services, WC Docket No. 12-375, "Inmate Calling Services for the Deaf and Hard of Hearing Community"

Dear Commissioners:

We, the Deaf and hard of hearing student community members at Rochester Institute of Technology (RIT)/ National Technical Institute for the Deaf (NTID), urge you to mandate the installation of videophones, captioned telephones, and other auxiliary aids to support access to telecommunication for deaf, hard of hearing, deaf-blind and speech challenged incarcerated individuals and their family members.

On November 21, 2014, approximately three hundred deaf and hard of hearing students from all walks of life attempted to use a Telecommunication Devices for the Deaf ("TTY") - *either for the first time or have not recalled when it was our last time* using the 'ancient' technology. The Federal Communications Commission ("Commission") appropriately voted to limit the sky-high rates charged by ICS providers to family members of all incarcerated people. We are sad to learn that for years, ICS providers have charged these same excessive rates for calls via "TTY" - a technology that can require more than quadruple the amount of time it takes to use a videophone or voice telephone. Some ICS providers have chosen not to provide any technology for incarcerated people with disabilities, while others provided equipment but erected other barriers to access - charging extra for the incarcerated to use TTYS; blocking telephone relay numbers, placing TTY technology locations that are locked for inaccessible, or even creating phone systems that function solely through voice-command.

The Commission's own reports indicate that TTY calls account for mere 12% of the total relay volume and that TTY usage is continuously decreasing, having cut in half over the past seven years. To make matters worse, TTYS and videophones are incompatible. This means that deaf prisoners in hundred of prisons across the nation cannot communicate with their loved ones who no longer use outmoded TTY technology.

Simply put, family members of deaf incarcerated individuals have endured and even greater financial burden and often have been entirely denied communication with their loved ones solely based on disability. The Commission emphasizes that its recent efforts are to ensure that “rates for Inmate Calling Services are just, reasonable, fair.” While we applaud the Commission’s decision to ensure that rates are just and reasonable, we remind the Commission that there is no fairness without equality. Our community letters enclosed is calling upon the Commission once again to ensure that prison communication is affordable and universally accessible - that fair reaches all, not some.