July 27, 2015

Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: NDBEDP Comments, CG Docket 10-210

Missouri Assistive Technology (MoAT) serves as the certifying entity for the National Deaf-Blind Equipment Distribution Program (NDBEDP) in Missouri. MoAT is also the Assistive Technology Act state entity and administers the state telecommunications equipment distribution program for individuals with disabilities. We appreciate the opportunity to comment on the Notice of Proposed Rule Making (NPRM) seeking comment on rules to govern the NDBEDP on a permanent basis.

Certification

We support the Commission's proposed retention of the current structure of the NDBEDP, certifying one entity within each state to be responsible for the administration of the program, distribution of equipment, and provisions of related services. It has been our experience that this approach has been successful in effectively and efficiently meeting a state's unique needs and demographics of its residents who are deaf-blind and in utilizing available state and local networks and resources.

The NPRM notes that 10 of the 53 state programs have relinquished their certifications, requiring the Commission to seek replacement in those states. We applaud the Commission proposal that certified programs seeking to relinquish certification provide written notice to the Commission at least 90 days in advance of its intent to do so. We would encourage the Commission to ensure a process that encourages and gives preference to the selection of qualified state programs rather than national programs as certified NDBEDP entities to reduce administrative layers and to more effectively serve residents within those states who are deaf-blind.

The Commission is proposing that each certified entity under the pilot be required to re-apply for certification under the permanent program. We disagree with this approach. The Commission already has extensive data and other information related to each state to make a determination as to whether there exist program performance issues in a state. The Commission's alternative proposal to allow state entities to demonstrate their ability to meet

any new criteria that is established makes much more sense in terms of avoiding potential disruption of services. The duration of certification should be no shorter than the Commission's proposal to be certified for a period of five years. Shorter timeframes would result in an unnecessary administrative burden on states, as well as possible disruption of the system of services within states to individuals who are deaf-blind.

Centralized Database for Reporting and Reimbursement

The Commission is proposing that a centralized national database be created to assist state programs in the generation of reports to the Commission, to enable the submission of those reports electronically to the NDBEDP Administrator, and to allow for the aggregation and analysis of nationwide data on the NDBEDP. IN the NPRM, the Commission comments that difficulties ensued because some of the data submitted by states not using the Perkins database was not uniform. MoAT submitted data in the format prescribed by the FCC, so assumed that the data was appropriate to include in any aggregation or analysis. If there had been any modifications that the Commission felt was necessary in order for Missouri's data to be included, we could have easily made those changes. We believe that it would have been relatively simple to incorporate Missouri's data into aggregated reports for analysis purposes.

If the FCC moves forward to implement a centralized database, it should only be required if it streamlines the reporting and reimbursement process to reduce duplicate entry. We would encourage the Commission to look at reducing the data burden on states in addition to considering a national database to resolve data issues. If a centralized database is required by the FCC, the commission should invite entities via a public notice to submit applications for the development and maintenance of the database. Input should first be obtained from states that reflect the diversity of state programs before a national database is pursued. The cost of any national database should not be part of costs assumed by states that would have to be diverted from serving consumers. Personally identifiable information about consumers should not be required in any national database used for reporting purposes.

National Outreach

From our experience, we continue to believe that state and local outreach has been more effective than national outreach efforts. We believe that the funding allotted to national outreach should maintain the national website, 800 number and call center and to provide marketing materials in electronic format that can be customized by states and that can be provided at no additional costs to states. However, we feel that additional outreach should be left to state entities.

Assessment and Training Costs

We agree with the Commission's proposal that reimbursement should be allowed for costs of travel for consumers for assessment and for training. On occasion, it has been our experience that the option for consumers to travel would have been conducive to better meeting their needs for assessment or training. Lodging and accepted per diem rates should be included when necessary, in addition to travel costs. The Commission should consider allowing costs for both in-state travel and for travel to adjoining states when needed.

Training Trainers

We support the concept that expenditures for train-the-trainer activities should be reimbursable under the NDBEDP. We believe that a significant component of those efforts should be focused on activities within states or regions, rather than on a national train the trainer program in order to continue to build capacity within states. Train the trainer activities should not be considered administrative costs, as they directly relate to benefitting state residents who are deaf-blind.

Reimbursement Mechanism

MoAT supports the Commission's proposal to continue to allow states to submit claims on a monthly, quarterly, or semi-annual basis. The approach allows certified programs to select the timeframe that best meets their programmatic and administrative needs.

Reporting

MoAT supports the Commission proposal to retain the six-month reporting requirement. While an annual reporting period would also be acceptable, a period shorter than six months should not be considered.

Administrative Costs

MoAT agrees with the Commission's proposal to reimburse administrative costs as they are incurred and claimed based on the annual allocation, rather than on a percentage of "direct costs" expended. The process in the pilot of allowing administrative expenses based only as a percentage of direct costs caused hardships for a number of programs.

Thank you for the opportunity to comment on the establishment of a permanent NDBEDP. The program has enriched opportunities for individuals who are deaf-blind to take advantage of technology needed to more fully participate in so many aspects of daily living.

Sincerely,

C. Marty Exline
Director, Missouri Assistive Technology