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Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street SW, Room TW-B-204
Washington, DC 20554

December 3, 1999

RE: Dockets 96-262/94-1, 99-249, 99-45, Reply Comments

I am writing to point out to you that consumers with disabilities have an important and unique interest in the pending proceeding involving the proposal from the CALLS coalition for access reform.

I was disappointed to learn that no organization primarily representing the interests of people with disabilities filed direct comments in the proceeding. Yet, many of the results of the CALLS proposal will have benefits that are particularly meaningful for people with disabilities. Let me highlight some of them for you:

1. **Universal Service.** The CALLS plan should result in a net decrease in cost to consumers with disabilities who are on lifeline phone plans. As you know, the mere fact that a consumer has a disability does not mean that they are poor. At the same time, it is important to recognize that nine (9) million adult consumers with disabilities are on some form of assistance that would typically qualify for lifeline telephone services rates. Under CALLS consumers on lifeline will benefit from the elimination of the PICC. That is, because the PICC is moved to the local bill and then included within lifeline coverage. Those consumers will further benefit, to the extent that they are long distance users, from lower long distance rates.

2. **Multi-Line Users.** People with disabilities, as you know, are avid users of telecommunications technology. My own experience as a person who is deaf is that moving from TDD technology to the Internet has been liberating in so many different ways. It is also making me and the millions of other consumers who use this technology more efficient and accessible to each other and the world. But many people with disabilities are intense users of telecommunications technology. Many work from home as their primary occupation. It is clear that the CALLS proposal is very beneficial to the "power user." For example, SLC charges on second and third lines will be capped at lower levels under this plan than under existing rules. Long distance rates will also be lower as access costs get reduced. As a university professor, I spend almost as much time Web-surfing and doing email from home as I do from Hofstra, so I will personally benefit.

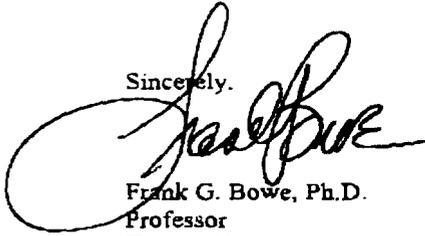
3. **Flatter Rates and Bundling.** As pointed out by some of the commenters, the access costs will quickly be lowered to points that it will begin to make sense for companies to offer flat rated packages of long distance service. This is the Internet model that has proven so successful for consumers generally, and for those consumers who are heavy users, many of who are people with disabilities.

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As someone who has followed the telephone issues as they impact people with disabilities for over 20 years, I am aware of how complicated and contentious these proceedings can be. It is my view, however, that the core principles within the CALLS proposal are very valuable to people with disabilities.

Thank you for your consideration.

Sincerely,



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Copies to: Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Gloria Tristani
Commissioner Harold Furchtgott-Roth