

This filing is in response to the FNPRM on TRS  
(Proceeding 98-67 continued) due May 5, 2000.

I am submitting these comments as an STS consumer.

A. The Florida Public Service Commission recently petitioned the FCC to delay the date when they must provide Speech-to-Speech until the end of their current relay contract. Florida cited their lengthy RFP process and the uncertainty of FCC action as the reason. Clearly, Florida could have anticipated that the FCC might mandate STS and written that contingency into their RFP as Oregon did. Sure, it will be more expensive for Florida to add STS mid-contract than to wait for the next contract. Yet that would delay service to people with speech disabilities and make them pay the price for the Florida PSC's poor planning. I strongly urge the FCC not to submit to the Florida request.

B. Three digit dialing (N11): Speech to Speech users should be allowed three digit dialing just as proposed for TTY relay users. N11 access is especially important for this population because the brain damage which often causes speech disabilities can also cause manual dexterity limitations and memory loss. Having to only dial three numbers, rather than eleven, when your fingers or memory do not work well, makes using the telephone much easier.

C. Outreach. States and providers who conduct relay outreach should devote an appropriate proportion of outreach efforts to STS. That proportion is the jurisdiction's population of prospective STS users divided by the jurisdiction's population of prospective TRS users. One recent estimate was that proportion is 13 percent, but each state should make their own estimate. While many states do not collect such statistics, national estimates of the size of the speech disabled population are available and can be used to estimate state populations by disability for budgeting purposes.

Budgeting for STS outreach using this percentage is important as consumers with speech disabilities have not demonstrated their ability to lobby for such outreach on a state level. In many states, outreach is only done if consumers lobby for it. In those states; if STS users are not capable of lobbying, no lobbying may be done.

I strongly recommend the outreach methods used by Maryland and Minnesota. The two methods are different, but both are very effective.

D. Making Call Volume Data Public - To enable consumers to effectively lobby for STS outreach, call volume data must be public. The FCC should provide a

means to make both interstate and intrastate call = volume data available for each state at least quarterly. These data are for a public service paid for by taxpayers and should be available to the public.

As most states have only one TRS provider, the proprietary value of keeping call volume data confidential is minimal. Much more public good >is derived by making the data public and stimulating outreach than keeping the data proprietary. TRS providers may gain by making call volume data public given that additional outreach may occur resulting from the publication of the data. In turn, that outreach may increase call volume and, hence, increase revenue for the provider.

E. Retaining information between non-consecutive STS calls. Some STS users have enormous difficulty speaking and speak as slowly as 25 wpm of understood words after repetition. An STS user may spend 15 minutes dictating an initial message only to reach a busy line or no answer. Users should be able to store such information in their profile or have other means to make such data retrievable. This is a humane provision for STS users. It also provides equal access in the sense that able bodied speakers can repeat themselves so easily.