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HEARING
ASSOCIATION

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January 19, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, DC 20554

Re: Docket No. CC 98-67 and Docket No. CC 90-571
Pursuant to Public Notice DA 00-2739 released on December 6, 2000

Dear Ms. Salas:

The American Speech-Language-Hearing Association (ASHA) wishes to support certain comments submitted in response to Public Notice DA 00-2739, released on December 6, 2000, and pertaining to Docket No. CC 98-67 and Docket No. CC 90-571. As WorldCom, Inc., commented on January 5, 2001, a separate reimbursement rate for speech-to-speech (STS) telecommunications relay services (TRS) is needed rather than a single reimbursement rate for all TRS services due to the higher labor and capitol costs associated with STS.

As Bob Segalman, Ph.D., commented (also on January 5, 2001), additional start-up costs are also incurred by operators of STS relay services to inform the public of the availability of this new mandated service. Without the ability to recover such costs on an accelerated basis, operators have no incentive to do more than minimal outreach. Potential users will be unaware that these services exist and will continue to believe that they are denied the same telecommunications access as people without speech disabilities. Therefore, ASHA also supports a reimbursement structure that provides accelerated recovery of costs for public outreach programs that are sensitive to the culture and diversity of people with speech disabilities, such as the Minnesota program.

Thank you for the opportunity to provide these reply comments. STS services provide an important rehabilitative option for the more than 98,000 members of ASHA who increase the communication skills of children and adults with speech, language, or hearing disabilities in everyday life activities, including telephone use.

Sincerely,

Charles C. Diggs, Ph.D.
Director, State and Consumer Advocacy

Cc: Leslie Selzer

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