

I apologize for this late comment. The opportunity to comment came to my attention as I was preparing to do Speech to Speech Outreach training in Australia and Hawaii. There was no time to prepare comments until my return.

A Late Comment to Docket No. 98-67

Telecommunications Relay Services  
CC Docket No. 98-67  
and Speech-to-Speech Services for  
Individuals with Hearing and Speech Disabilities

The FCC has requested comments on 711 as it applies to Speech to Speech under Paragraph 126 of the FNPRM.

STS must be available through 711 as STS is part of TRS and STS users deserve the same nationwide access to TRS as other TRS users. It is unfair to provide 711 access to other TRS users and deny that access to people with speech disabilities.

Access through 711 is essential to the many STS users who have cognitive disabilities and may not be able to remember a 10 digit number. Access should be at the beginning of the menu. STS users with cognitive problems may be unable to successfully access a choice that is not at the beginning of the menu.

Other STS users have limited dexterity and difficulty dialing and they will also have access problems if the STS choice requires dialing an 800 number. It would be much easier for these consumers to use 711 than to dial an 8 digit number.

With proper outreach procedures there could eventually be 200,000 to 500,000 STS users in the United States. They all deserve easy access to STS.

This comment is probably the only comment you will receive from STS users. A large proportion of STS users have multiple disabilities which would prevent them, directly or indirectly, from filling comments.

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STS OUTREACH

The FCC has requested comments on TRS Outreach as it applies to Speech to Speech under Paragraph 134 and 135 of the FNPRM.

I support the FCC's tentative conclusion that TRS service would be improved with a nationwide awareness campaign. Special care should be taken to ensure that the campaign reaches potential STS users. I agree with previous comments that the outreach effort be supported by the interstate TRS Fund and that the interstate TRS Fund administrator administer the funding for educational outreach programs.

I also agree with the FCC proposal to amend the mission of the Interstate TRS Fund Advisory Council to include establishing guidelines and a procedure to fund a coordinated national outreach campaign. Campaign expenditures for outreach efforts directed at specific users groups should be in proportion to the percent of potential TRS users in that user group and compensatory

strategies may be appropriate if TRS outreach to that user group was disproportionately small in the past.

For example, several years ago, I calculated that after separating prospective TRS users in Wisconsin by disabilities, 13 percent of prospective TRS users would be prospective STS users. Thus, in this case, 13 percent of the expenditure for TRS outreach should be directed to prospective STS users. If STS was omitted from previous TRS outreach efforts this percent should be doubled to make up for such omissions.

This percent will vary over time and location. To make up for past practices, this percent should be doubled in locations where previously there was no TRS outreach to people with speech disabilities

If public awareness campaigns do not result in increased STS call volume, the proportion of future campaign funds slated for STS should be directed into other outreach efforts. Minnesota, for example, has developed effective one-to-one STS outreach techniques that help raise call volume. These techniques should be used elsewhere.

The FCC should require a state's certification program to include, and budget for, outreach efforts. This requirement is particularly important for STS as STS consumers have not been effective lobbyist so far. Many current and potential STS users have disabilities which prevent them from being effective lobbyists.

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#### OTHER STS IMPROVEMENTS

The FCC also requests other proposals that would make TRS more functionally equivalent for TRS users. Such proposals follow:

1. STS/VCO is available in TX and MN and should be extended to all states. This service allows deaf consumers who have speech disabilities to use the services of a CA for revoicing and yet the CA types to these deaf consumers what their caller says. STS providers could offer this service with a minimum of additional expense as STS CAs already have the capacity to type to deaf TTY and VCO users who call STS users.

2. Someone who wants to reach a TRS user should be able to call TRS without knowing the phone number of the person who they are calling, just their full name, ie, John Quincy Adams. If a TRS provider has profiles on more than one John Quincy Adams, TRS should alert the user may select an identifying name of their choice, such as: John Quincy Adams #1 or John Quincy Adams #2.

This procedure is necessary to enable a TRS user to give a potential caller their TRS number without having to give the potential caller two numbers. For functional equivalency TRS users should not be burdened by having to provide two numbers when they give out their phone number.

3. The FCC should require all TRS providers to allow all users to have profiles which the CA can access whenever the caller calls in. Having pertinent caller information available to the CA speeds up the call and thus makes the call more functionally equivalent.

- 3a. Users should be encouraged to adopt profile code names which will enable

them to have the CA access their profile from any phone. Australia's STS, called SSR, uses this procedure effectively. Again, having pertinent caller information available to the CA speeds up the call and thus makes the call more functionally equivalent.

3b. For reasons of functional equivalency, callers should be allowed to store any information they like in an "other" section of their profile. Example 1: as an STS caller, I often dictate a long message to a CA to leave on an answering machine and then get a busy line. If I could put that message in the "other" section of my profile, it would be available to me when I called back. Such a procedure increases functional equivalency as able-bodied speakers do not need to voice a message before they determine if they reach a busy line.

Example 2: As an STS caller, I may call a series of different businesses asking their price on an item. Putting those questions and the surrounding dialogue into my profile enables the CA to access that language rather forcing me to repeat all that verbiage in my labored disarthric speech.

4. When an STS consumer calls STS, an STS CA should answer the telephone and should identify herself/himself as such. That STS CA should be ready to take the call.

It is very confusing to consumers, if the consumer reaches someone who responds: "This is Massachusetts Relay" rather than this is "Massachusetts Speech to Speech". Some STS users do not know what relay is, only what STS is. They may assume that they reached a wrong number and give up on STS entirely.

STS providers should not make consumers wait on the line to be transferred to an STS CA as Hawaii STS currently does. The STS CA answering the telephone is the functional equivalent of a dial tone and should be available to the STS consumer as soon as the phone is answered.

5. All states should have a toll free number to access STS as well as 711. I recently had to access Hawaii STS from the mainland through a local Hawaii number that was not toll free. That is not functional equivalency as I had to pay for the call to Hawaii STS as well as the call to the party that I was calling.

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