

Reference Number: DA-01-155
Docket Number CC 98-67

To Federal Communication Commission,

My name is Charles R. Sterling. I am a citizen of the United States of America, the freest country in the world. I am writing this comment to encouraging FCC to support IP Relay, provided by WorldCom and let the people who need it to enjoy the benefits of it.

BENEFIT: I was introduced to IP Relay by a friend of mine. The friend of mine told me that IP Relay is much better than Maryland Relay service, which we generally not like the service due to slowness and long call waiting to have a service. I decided to try the IP Relay by calling to my mother when I was in school, working on computer because I want to inform my mother about a change in plan. I found that IP Relay to be an excellent service. What benefits did I encounter while using IP Relay? There are many. First, the most primary benefit is the ability to call someone while using computer. I am using 56K phone line modem for Internet connection and I do not have another phone line. Therefore, when I use the Internet, I cannot use the phone. I have to turn off the Internet to use the phone then turn back the Internet when I am done with the phone. It was a hindrance. However, with IP Relay, I can call someone while using Internet. It is the benefit I enjoy the most.

IP Relay is reliable in clarify of communication compares to Maryland Relay Service. When I use Maryland Relay Service with TTY, I have had experiences several garbled messages due to outside interventions, which made me to repeat what I want to say or/and to request the relay to repeat the message they made. It is a hindrance too. If someone is listening to TV, my message in TTY is scrambled. TTY is very sensitive to outside interventions. When I use IP Relay, there are no interventions. I have no scrambled messages. All messages between the IP Relay and I are clarify. I like it and made me stop using TTY except to contact other deaf people because IP Relay do not have the software to allows a calling to TTY. I would like to see that benefit too so I can abandon the TTY and use IP Relay.

The other benefit I enjoy from the IP Relay is cheap cost. I can call to anywhere in the world for the price of local calling under my provider. I can call to London, still paying my local cost for using phone line. I like it. If I use Maryland Relay, calling to other countries are hassle and I have to pay for the long distance. Is there a disadvantage? There is none that I have encountered.

COST RECOVERY: I sometimes call to other states with IP Relay. I am aware that it is not easy to know where the caller is and where is the caller is calling to, which that gives you the difficulty of knowing if the call is an interstate calling or not. I am not very familiar with the geographical location of the callers therefore there is not much I can give comment on this. Since that Video Relay Provider did received funds from interstate TRS Fund and the origin and destinations of calls are irrelevant; it can be the same for IP Relay because origin and destination is irrelevant therefore IP Relay is eligible to receive the fund. I am not aware of the cost of operating the IP Relay service so I cannot give a comment on the cost of running IP Relay compares to other services.

MINIMUM STANDARDS: For me, there is no need for regulations on IP Relay except to enforce privacy and security issues. Let WorldCom be the regulator of their

own service. Privacy and security is a mandatory to me. I want to know that WorldCom will not distributing the information of the conversations I had with the other end of the call or use the information for their benefits without my permissions. WorldCom need to promise the users of IP Relay that they will not use the information for their benefits and the conversations between me and the other person at the end of line will be remaining confidential, the same regulations that Maryland Relay Service had with the privacy. I would like to see that WorldCom abide the privacy laws. WorldCom can abide the privacy laws by promise the callers that they will not use information of the conversation at all and will destroy the conversation after the callers log off the IP relay to preserves privacy.

If IP Relay expands the service, they also should provide free softwares to allow callers to enjoy the expanded benefits if World Com wants to keep the customers coming back and use IP Relay. In addition, WorldCom could make drivers so softwares of customers can download to install already have programs such as Microsoft NetMeeting, Instant Messagers, voice programs, etc to use IP Relay service if WorldCom wants to allow the customers use the expanded services quicker than downloading the softwares which will extend some time before the customers can use the expanded services.

SECURITY: I want to know that WorldCom will not allow others than the relay; the person I call and I are the ones who carry and see the conversations. I want no unseen third party to be part of the conversation. I want to know only the relay and the people I call are the ones who see my messages

IP Capabilities: As far I am aware of, there are many services IP Relay can add, making it an 'all in one service pack.' WorldCom can add video-to-video interactive so deaf people can sign to each other or hearing people want to see each other facial expressions. WorldCom can makes video relay possible by making drivers for video conversation softwares such as Microsoft NetMeeting to use IP Relay's service.

WorldCom can add voice conversation. This technology already have been available to the market for a while and can be incorporates to IP Relay service. Voice conversation will go great with video-to-video conversation. There are several softwares and services providing voice-to-voice conversation therefore, this technology are possible to be provided by IP Relay.

Call to TTY by using IP Relay will be an excellent benefit for me because I have to use TTY to call other deaf people and I not like TTY's technology and reliable. I would like IP Relay to makes a call to TTY possible so I can avoid the hindrance of interventions that cause messages on TTY to be scrambled. I believe it is possible to convert TTY language to IP language without any conflicts if the software is developed as a translator. In today technology, many things can be made possible and this is one of them.

OUTREACH: The simple and fast ways to inform the costumers about the IP Relay are two. The first one is put a declaration of IP Relay in all disability relates media products such as newspapers.

Second, is a short commercial in public broadcast TV that includes the address of IP Relay and outlines of services offer by IP Relay. Who pay for it? WorldCom and Federal Government.

That all I can give comments on. Thank you for allowing me to write a comment on IP Relay service. I hope you will give a GO to IP Relay and allow WorldCom competes with other competitors such as AOL, which provides similar services as IP Relay. In competition, the services to the disability will improve if there are competitors, playing against each other in unregulated environment.

---Charles R. Sterling