



NATIONAL ASSOCIATION OF THE DEAF

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September 20, 2001

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

Re: CC Docket 98-146, In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996

Dear Ms. Salas:

The National Association of the Deaf (NAD), the nation's oldest membership organization representing Americans who are deaf or hard of hearing, appreciates the opportunity to respond to the Commission's Notice of Inquiry (NOI) on advanced telecommunications services.

As the Commission indicated in its "Third Notice of Inquiry" (August 10, 2001), cable modem and digital subscriber line (DSL) deployment is accelerating. However, the actual numbers of residential subscribers remains quite low. The Commission's report, dated August 10, 2001, *High-Speed Services for Internet Access: Subscribership as of December 31, 2000*, shows that just 3,300,000 residential or small-business subscriptions were in effect as of the end of last year. We note that this figure includes small businesses as well as residences. For a nation of 270,000,000 individuals, living in 90 million households, and having some 8 million small businesses, that level of penetration is rather modest.

We believe that high costs are one reason. Residences must pay some \$40 to \$50 per month, or roughly \$500 to \$600 per year for cable-modem or DSL service. Those costs must come down. The NAD believes that FCC action to encourage more competition and to remove unnecessary regulatory barriers would be two positive steps that would, in time, reduce costs to residential subscribers.

There is a third step the FCC could consider: finding ways to reduce the total costs of high-speed connections for Americans with disabilities. There are three (3) components of those costs:

- (1) The cost of a PC itself, which has fallen dramatically; however, the necessity to replace units every two or three years due to rapid changes in both hardware and software largely mitigates this factor.
- (2) The cost of the monthly service, whether cable-modem or DSL; this cost will only come down if competition increases and if regulatory barriers that impede deployment are removed. In this connection, the NAD notes that many of its members reside in rural areas, where high-speed service is lacking. Such areas will not soon see high-speed services unless the FCC proactively moves to remove regulatory barriers and to provide incentives.
- (3) The cost of adaptive equipment such as screen readers/speech synthesis, voice recognition, and the like, which are required by many Americans with disabilities in order to benefit from (1) and (2) above. These costs must be reduced. The FCC can help.

The NAD is familiar with Steve Kaye's report of March 2000, which is cited in the FCC's "Third Notice of Inquiry." The FCC may benefit by reading that document again. This report documents low levels of ownership of internet-ready PC's by Americans with disabilities. It further notes that because employment by Americans with disabilities remains low, adults with disabilities seldom can gain access (as can most American adults with no disabilities) to high-speed services at places of employment. That is a very important point. It is essential for the FCC to act to accelerate *residential* access to high-speed connections. Such services have the crucially relevant potential of increasing participation via telecommuting in the workforce.

The FCC should consider the extent to which its enabling legislation permits it to grant favorable status (perhaps via tax credits) to small and large businesses that use high-speed services and have employees with disabilities, whether on-site or telecommuting. If the FCC determines that it lacks authority to provide such incentives, it should seek legislative authorization. The NAD notes that a bill, HR 1542, the Internet Freedom and Broadband Deployment Act of 2001, has been cleared for floor action. While amending that bill is not feasible, doing so with a Senate counterpart bill may well be.

The NAD is particularly intrigued by high-speed services because of the potential for video conferencing (see our comments dated 10/8/1998, in response to the first NOI on section 706). High-speed DSL service, and to a lesser extent high-speed cable-modem service, would allow deaf or hard of hearing Americans to sign to/lipread each other. That would be a *dramatic* improvement. It is one that is difficult to over-emphasize. Because many deaf or hard of hearing adults read at Grade Two to Grade Five levels, today's technologies -- which require skilled reading and writing -- are less than ideal. Video messaging (e.g., instant messaging), on the other hand, would bypass those low reading levels and permit very high-comprehension communication.

Estimates that Kaye cites and that others have, as well, are that fewer than one in every twenty (5%) of American adults with disabilities who need such devices have the adapted equipment they need. (See, for example: Bowe, F. (2000). Universal Design in Education. Westport, CT: Bergin & Garvey.)

The NAD further notes that while much progress has been made in provision of high-speed services to public schools and libraries (thanks to the Snowe-Rockefeller amendment in PL 104-104, the Telecommunications Act of 1996), little similar progress has occurred in the delivery of adapted devices to children, youth and adults with disabilities enabling them to use these high-speed services. The FCC should explore the possibility of making Snowe-Rockefeller funds available to schools and libraries specifically for the purpose of acquiring adaptive technologies.

The NAD appreciates this opportunity to comment. We look forward to offering, as well, Reply Comments at the appropriate time.

Sincerely yours,

Nancy J. Bloch
Executive Director

cc: NAD Board of Directors