



# NATIONAL ASSOCIATION OF THE DEAF

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February 27, 2003

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*Re: Federal-State Joint Board on Universal Service, CC  
Docket 96-45; and CC Dockets 98-171, 90-571, 92-237, 99-  
200, 95-116, 98-170*

Dear Ms. Dortch:

The National Association of the Deaf (NAD), the nation's oldest and largest consumer-based advocacy organization working to advance the human and civil rights of 28 million deaf and hard of hearing Americans, wishes to offer a comment on the contribution methodology for the universal service fund (USF). Recognizing that there is widespread concern about the current USF financing mechanism, and much uncertainty about which direction to move in reforming such, the NAD urges the Commission to consider the potential detrimental impact of proposed changes on low-income and fixed-income consumers, many of whom are people with disabilities.

This potential effect has to do with the fact that a revenue-based, or subscription-based, funding mechanism might inadvertently raise real costs for individuals who use short-term rather than long-term means to pay for their phone calls. This is particularly the case with many persons who have low incomes. A connection-based universal service fee would unfairly burden these persons. They tend to make few calls. Their USF contribution per call would skyrocket under a connection-based fee system.

The NAD has worked long and hard to secure access to wireless phones for people who are deaf or hard of hearing. Now that some wireless models can at last be used with accessibility peripherals, thus opening up for Americans who are deaf or hard of hearing the "world" of wireless telephony, we are concerned that a connection-based USF fee might make each call these persons make very expensive. People who do not have reliable revenue streams (because they do not work or only work part-time or part-year) often cannot qualify for nor afford contracts for cell phone service. Many purchase "phone cards" offering them prepaid service. These are the very people who will be charged, on a per-call basis, a very steep USF rate under a connection-based system.

We urge the Commission to ensure that any changes to the USF mechanism do not inadvertently raise the cost of pre-paid wireless service to the detriment of those who need it the most.

Sincerely,

Nancy J. Bloch  
Executive Director