

The Deaf Counseling, Advocacy and Referral Agency (DCARA) submits the comments below in support of the Petitions for Reconsideration filed by AT&T Corporation, Communication Services for the Deaf, Inc., Hands On Video Relay Services, Inc., Sorenson Media, Inc., and Sprint Corporation.

DCARA supports petitioner's request for the Commission to adopt the Video Relay Service (VRS) per-minute rate of \$14.023 proposed by the National Exchange Carrier Association (NECA) retroactively to July 1, 2003.

DCARA is a nonprofit social services agency providing counseling, communication, community education, advocacy and referral services to deaf and hard-of-hearing residents of the San Francisco Bay Area and the North Coast of California pursuant to a philosophy of "Of, By and For" deaf and hard-of-hearing people. Prior to the advent of a state-administered and funded relay services in California, DCARA provided relay services. It has been involved with and monitored California's administration of relay services since its legislative authorization 20 years ago. DCARA supports consumer driven relay regulation and policies that promote high quality, always available services, including a meaningful choice of providers.

DCARA is extremely concerned with the low interim rate recently approved by the Commission and urge it to reconsider its decision and approve NECA's recommended rate. Businesses providing VRS have already reacted to the Commission's low rate by cutting services. The impact of insufficient funding is discouraging rather than encouraging further development and growth of this fledgling service. VRS is critically useful and important to the many deaf who depend primarily on sign language because their English skills are too low for adequate communication through text-based relay. VRS also is a boon to a larger segment of the deaf population because it offers a means by which they can finally come close to the goal of functional equivalence to a service that the hearing population has enjoyed for over a century.

DCARA believes that the Commission's rationale for approving a low rate is flawed. Rates charged by IP Video Remote Interpreting services are useful but not directly relevant to VRS, which is clearly much costlier to deliver due to the always available, stand-by nature of the service and compliance with minimum service standards and other regulatory requirements. While DCARA does not support rates that will produce windfall profits for telecommunications companies, it is equally concerned that insufficient funding will put a halt to the prospect of widespread use and improvement of VRS. DCARA believes that a fair rate of reimbursement initially will be higher for VRS as the services are established, developed and marketed and that over the long run, as VRS matures, the rate should be lower. It is incumbent on the FCC to periodically revisit any rate it approves. The FCC should reconsider its decision.

Sincerely,
Robert I. Roth, M.A.
Chief Executive Officer