

98-67  
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-----Original Message-----

**From:** AngelaLeeForeman@aol.com [mailto:AngelaLeeForeman@aol.com]

**Sent:** Monday, March 01, 2004 3:04 PM

**To:** Michael Powell; Kevin Martin; Kathleen Abernathy; Michael Copps;  
jonathon.aldestein@fcc.gov

**Cc:** Thomas Chandler

**Subject:** FCC's decision for VRS

APR - 6 2004

Federal Communications Commission  
Office of the Secretary

Dear FCC Commissors,

I am writing this letter to request that FCC provide the necessary funds and make Video Relay Service program a mandatory service to allow quality equipment and service to allow individuals within the communities to communicate effectively with each other.

The ADA law was passed in 1990 to make the act of providing appropriate accommodation to individuals who need it. However, many people are overlooking the "equal access" portion of the law.

The Deaf community needs equal access in the quality of communication. We use our standard method of communication when interacting with others. Communication, in any equal form, is a valuable tool in allowing us all, hearing, Deaf, and hard of hearing individuals to interact with others and get our message across effectively.

We are very fortunate that we have Video Relay Service accommodation available today and it needs to be recognized as mandatory while maintaining the high level of expected quality as required by the ADA law.

Again, I am asking that funds are to be made available to allow today's generation of Deaf individuals to communicate effectively within the communities to allow them to live independently as possible by making VRS a mandatory service with acceptable quality levels.

Regards,  
Angela Lee Foreman  
President, NorCal Center on Deafness

-----Original Message-----

**From:** Dallaspainter2@aol.com [mailto:Dallaspainter2@aol.com]  
**Sent:** Thursday, March 18, 2004 10:33 AM  
**To:** Michael Powell  
**Subject:** relay problem

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

Hi,

My name is Ron Bledsoe. I wanted to see if we can do something about this particular problem. I am deaf and I use the relay system to make my calls. Lately, I have noticed that some stores are rejecting our calls for some reason. And a friend of mine gave me an article where hearing people were taking advantage of the system because the relay operators cannot allow for tracing of the calls. I find that odd. I thought that the relay operators would allow for call tracing. What is happening right now ( I am not sure if you are aware of this but its something you can look into), is that some hearing people are abusing the system by making calls to stores and suppliers and using stolen credit card information to place orders and the stores are taking the blame for it. The relay operators told us that they cannot give out that kind of information on who the person that is making the call and the number where its coming from because of FCC rules. I really do not want to lose the relay system to abuses from other people. I use this a lot in my line of work since I am a painting contractor and I use this system a lot to place my orders for supplies that I need. I dont need someone to call my suppliers and try a theft through the system and then have them stop accepting relay calls because of this problem. I would like to know if theres a possible solution to this problem to prevent that kind of abuse like allowing the other party the name and phone number that appears on the relay operator screens or setting up specific guidelines in order confirmation callback or something. (We are trying to keep this as hassle free as possible but if we have to deal with some sacrifices to prevent the abuse of the system then we will live with the changes in procedures). We dont want to lose the entire relay system to abuses from hearing people trying to take advantage of this and steal stuff from suppliers on stolen credit card numbers. We really value this system greatly and we will be willing to do whatever it takes to protect this system.

Thanks  
Ron Bledsoe  
Bledsoes Quality Painters  
Dallas, TX

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

**From:** Nanci Linke-Ellis [mailto:nanci.linkeellis@insightcinema.org]  
**Sent:** Wednesday, February 25, 2004 4:36 PM  
**To:** Michael Powell; Kevin Martin; Kathleen Abernathy; Michael Capps;  
jonathon.aldestein@fcc.gov  
**Subject:** MAKE VIDEO RELAY SERVICE A MANDATORY REQUIREMENT

98-67

Dear Commissioners:

It has come to my attention that the FCC is about to make a decision about the Video Relay Service (VRS) which has recently become available for deaf people whose primary mode of communication is ASL. Traditionally, the relay service has been set up for the majority of deaf and hard of hearing consumers who can use a text-based form of telephone service via TTY relay or online (internet) relay.

There is a segment of the population, however, for whom this text based form of communication via telephone access is not workable. Thus, they require Video Relay Interpreting services as their functionally equivalent service. I feel it is imperative that the FCC rule to make VRS a mandatory requirement that is functionally equivalent to hearing callers' telephone conversations. Additionally, ASA requirements and other means of quality control should also be applied to this ruling.

It's time to do the right thing for deaf and hard of hearing taxpayers. Please do not exclude anyone from their right to functionally equivalent phone service.

Thank you.

Sincerely,

Nanci Linke-Ellis  
InSight Cinema  
2800 28th Street  
Suite 380  
Santa Monica, CA 90404  
310-452-8700  
310-452-8711 fax  
[www.insightcinema.org](http://www.insightcinema.org)

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

98-67

-----Original Message-----

**From:** Molly Khatami [mailto:mkhatami@norcalcenter.org]

**Sent:** Wednesday, February 25, 2004 12:46 PM

**To:** Michael Powell

**Subject:** Attn: Chris Libertelli or Bryan Tramont

Hello,

My name is Molly Khatami, and I am a deaf woman from California. I am a program manager for NorCal Center on Deafness, and work with the deaf population of Northern California. It has come to my attention that the FCC is about to make a decision about a service that has recently become available for deaf people whose primary mode of communication is ASL. Video Relay Service (VRS) up to now has been considered an experimental project, and has provided many low-language Deaf and Hard of Hearing individuals with equal access to telephone and communication services. I am writing to you to encourage you to continue this much needed service, and establish VRS as a mandatory service (including ASA requirements and other means of quality control.) VRS is a necessary means of telecommunication for the deaf population who are unable to use other modes of communication (for instance, many consumers do not have sufficient English skills to be able to communicate through text typing on the TTY.) These consumers, without guaranteed access to VRS, are denied equal status to telephone access. Please support VRS as a mandatory service for consumers who depend on sign language as their primary means of communication. Thank you for your time.

**Molly Khatami**

Program Manager

NorCal Center on Deafness

4708 Roseville Road, Ste 111

North Highlands, CA 95670

(916) 349-7500 TTY

[www.norcalcenter.org](http://www.norcalcenter.org)

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

From: Rob Roth [mailto:rob.roth@dcara.org]  
Sent: Thursday, February 26, 2004 3:31 PM  
To: Michael Copps  
Subject: Re: Video Relay Services

attn: Jessica Rosenworcel

February 26, 2004

Dear Commissioner Copps,

On behalf of Deaf Counseling, Advocacy and Referral Agency (DCARA), which represents the Deaf and Hard of Hearing community in a 14-county region of northwest coastal California, I would like to express my concerns about the FCC's proposed decision about Video Relay Service (VRS). This service has increased accessibility and the quality of life for many Deaf and Hard of Hearing people across the nation. It is my understanding that this proposal is to continue granting waivers so that VRS remains an optional service. VRS should be a mandatory service, and VRS providers should be subject to the requirements that maintain TTY and other relay services as a functionally equivalent to the telephone services that hearing people enjoy, such as the average speed of answering (ASA) incoming calls and other quality control measures.

Video Relay Services provides a necessary means of telecommunication for a large portion of the Deaf population, especially those who cannot use a text-based relay service that requires typing and reading. By granting waivers and not making this a mandatory service, Deaf consumers will not be able achieve equal phone access. Let's take a step forward in making this a better world for everybody.

Sincerely,

Robert I. Roth, Chief Executive Officer  
Deaf Counseling, Advocacy & Referral Agency  
14895 East 14th Street, Suite 200  
San Leandro, CA 94578  
510/483-7054 TTY  
510/483-0720 Voice  
510/483-0778 Fax  
rob.roth@dcara.org

98-67

-----Original Message-----

From: Patricia Hughes [mailto:phughes@gladinc.org]

Sent: Thursday, February 26, 2004 12:58 AM

To: Michael Powell; Kevin Martin; Kathleen Abernathy; Michael Copps;  
jonathan.aldestein@fcc.gov

Subject: Video Relay Interpreting

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

Let me introduce myself, Dr. Patricia Hughes, CEO of Greater Los Angeles Agency on Deafness, the largest social services agency delivering different kinds of services to individuals who are deaf or hard of hearing. We also provide services to people who can hear but need information on their children or relatives who are deaf or hard of hearing.

When I learned of FCC's decision to slash VRS (Video Relay Service), I am very appalled!. I was a pioneer in implementing a traditional text relay service across the country. I served on several Task Forces educating FCC in developing standard guidelines for text relay service standards.

With the video relay service, it opens more doors to people whose primary language is not written English. VRS allows more access to people who rely mainly on sign language yet empowers them to make phone calls themselves.

My agency provides extensive services on documentation translation. With VRS, it surely increases self esteem among people who rely on visual language and make calls to make payments to their phone bills, etc.

I do not fathom why FCC would consider this slash as a cost saving tool because it is doing the entire opposite effect. It creates higher costs in text relay service because it takes more time for a person who relies on visual language to figure out and type which word/letter to use on text; whereas, through VRS, it will take fewer minutes to complete a call. Overall, it is cost effective to have VRS.

It is ironic that FCC is very busy approving many different multimedia opportunities for hearing people...phone with pictures which lead to many lawsuits among corporations and individuals yet FCC ignores this part...FCC chooses a very valuable communication tool for deaf and hard of hearing individuals to use VRS but slash it down. It does not sound logical at all.

I hope that you will sit back and re consider the radical decisions your committee has made because these decisions have not been considered thoroughly and did your committee think of asking us consumers who USE the services what we want?

I look forward to hearing from you that your committee has indeed made a reverse decision to a more appropriate decision that views VRS as an equal mode of communication as a cell phone.

Dr. Patricia Hughes, CEO  
GLAD  
323-550-4266  
323-550-4289 TTY or VRS

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

From: Patricia Hughes [mailto:phughes@gladinc.org]

Sent: Thursday, February 26, 2004 12:59 AM

To: KAQuinn

Subject: Video Relay Interpreting

Let me introduce myself, Dr. Patricia Hughes, CEO of Greater Los Angeles Agency on Deafness, the largest social services agency delivering different kinds of services to individuals who are deaf or hard of hearing. We also provide services to people who can hear but need information on their children or relatives who are deaf or hard of hearing.

98-67

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I look forward to hearing from you that your committee has indeed made a reverse decision to a more appropriate decision that views VRS as an equal mode of communication as a cell phone.

Dr. Patricia Hughes, CEO  
GLAD  
323-550-4266  
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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----  
From: Rob Roth [mailto:rob.roth@dcara.org]  
Sent: Thursday, February 26, 2004 3:27 PM  
To: KAQuinn  
Subject: Re: Video Relay Services

attn: Matt Brill

February 26, 2004

Dear Commissioner Abernathy,

On behalf of Deaf Counseling, Advocacy and Referral Agency (DCARA), which represents the Deaf and Hard of Hearing community in a 14-county region of northwest coastal California, I would like to express my concerns about the FCC's proposed decision about Video Relay Service (VRS). This service has increased accessibility and the quality of life for many Deaf and Hard of Hearing people across the nation. It is my understanding that this proposal is to continue granting waivers so that VRS remains an optional service. VRS should be a mandatory service, and VRS providers should be subject to the requirements that maintain TTY and other relay services as a functionally equivalent to the telephone services that hearing people enjoy, such as the average speed of answering (ASA) incoming calls and other quality control measures.

Video Relay Services provides a necessary means of telecommunication for a large portion of the Deaf population, especially those who cannot use a text-based relay service that requires typing and reading. By granting waivers and not making this a mandatory service, Deaf consumers will not be able achieve equal phone access. Let's take a step forward in making this a better world for everybody.

Sincerely,

Robert I. Roth, Chief Executive Officer  
Deaf Counseling, Advocacy & Referral Agency  
14895 East 14th Street, Suite 200  
San Leandro, CA 94578  
510/483-7054 TTY  
510/483-0720 Voice  
510/483-0778 Fax  
rob.roth@dcara.org  
[www.dcara.org](http://www.dcara.org)

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APR - 6 2004

-----Original Message-----

From: Sfmxo@aol.com [mailto:Sfmxo@aol.com]

Sent: Thursday, February 26, 2004 3:37 AM

To: Michael Powell; Kevin Martin; Kathleen Abernathy; Michael Copps; jonathon.aldestein@fcc.gov

Cc: Thomas Chandler

Subject: FCC's goals for 2004 --a Laughingstock???

Federal Communications Commission  
Office of the Secretary

February 26, 2004

98-67

Dear FCC Commissioners:

Recently, the FCC in its annual review conducted a presentation featuring its intended goals earmarking "Consumer Input" as its main highlight for 2004,

([www.fcc.gov/realaudio/presentations/2004/011504/cgb.ppt](http://www.fcc.gov/realaudio/presentations/2004/011504/cgb.ppt)).

This effort is commendable being that the FCC recognizes its "new" goals are in fact, long overdue.

I am puzzled though, as to when does the FCC intend to actually enforce its own goals?

One of the issues before you now, is to decide upon an important service for the Deaf and Hard of Hearing Community: Video Relay Service. Out of 24 billion Americans who have a hearing loss, amongst them is a smaller percentage of Deaf and Hard of Hearing ratepayers who depend on sign language as their primary mode of communication. For this segment of our population, the equivalency to access telephonic communication now proven after a 2-year trial and its importance of Video Relay Service (VRS) should already be well documented. Traditional relay services to achieves functional equivalency as mandated by the Americans with Disabilities Act, but only for the millions who are able to articulate their communication needs is quite well using such "text-only" based relay services (TTY relay, Online internet relay, etc. However, it is important that the FCC does not overlook the ratepayer population who is not functionally literate. Many of which do have substantial gainful employment, but are unable to receptively and expressively communicate their thoughts via such text-based relay services. With the remarkable breakthrough of VRS, deaf and hard of hearing persons who fall under this category are finally able to have true equal communication access to the telephone. It behooves us to think that the FCC would sweep under the rug the needs of this specific low-incidence population by proposing to make a decision to continue this service as an "optional/desirable" tool without any quality assurance controls or oversight. This service has proven itself to be the equivalent and therefore should now be endorsed by the FCC as a mandated service with specifications to regulate and control quality via ASA, ethics, and the like.

Related to your aforementioned goals to collect "Consumer Input", aren't you supposed to collect input from the target population who will use the service BEFORE actually making any decisions?

Otherwise, what would be the point of this "new" goal?

Furthermore, just how do you intend to get the word out?

Your presentation states "web-based formats, various centers will be set-up, forms for individuals to download and fill out, etc". Do you realize now, these efforts are still in a format of text-only so the question remains, just how do you intend to collect feedback from a person who uses American Sign Language?. No doubt your forms are catered to receiving input from various ethnic backgrounds such as Spanish, Russian, Hmong, etc.

98-67

One suggestion I have, since this is about collecting input for a Video Relay Service, wouldn't your "bulletin" asking for input be in this target population's primary mode of communication via Video message itself? With instructions in sign language on how to provide input to the FCC, what the issue is that you are seeking, etc?

Since you did not ask us for input, Consumers nationwide have decided to give it to you anyway. And, because you did not ask us for input about a service you consider Optional, and we consider it as users to be critical, therefore it should be MANDATORY with Quality Controls over the ASA, ethics, etc.

Is it time, to involve our Congressional leadership to request that they step in and intervene? I know THEY at least listen and advocate on our behalf on civil rights:

We are talking about a basic human need: Communication Access. The right to decide what form of communication works best for variety of individuals who have varying degrees of hearing loss should be left to the Consumers to decide what best fits their communication needs. Thus, the reason we need a variety of services to meet these communication needs of our population. These needs should be viewed as equal to, not lessor of the hearing population who has far more access to the world around us than the Deaf Community will ever have.

I'd like to ask that you put action in the goals you set-up.  
Get input from the Deaf & Hard of Hearing Consumers  
BEFORE you make a decision.

Last but not least, recognize this is a true need. I am a Deaf woman with a professional career, my communication needs are somewhat met by the traditional relay services but the flow of the conversation when using VRS is actually more on par with that of what my hearing peers have today. I'm a graduate of California State University, Northridge, with my Masters Degree in Special Education. I'm just merely the "exception" rather than the "rule" of the greater target population of deaf and hard of hearing consumers who needs this service in sign language, to gain access to employment to further themselves. National statistics still show that the average Deaf adult still reads at 3rd to 4th grade reading level. In California, the results of the STAR standardized tests of deaf children show that less than 24% barely passed, the remainder were "not tested", because they do not possess the necessary English skills to take such tests. What does this simple fact tell you? Quite honestly, it means that you are discriminating against a segment of the ratepayer population who still does not have equal access to the telephone in which they pay for out of their own pockets. When you finally get around to asking for input,

even your own way of getting input which is all text-based, will fail.

I'm choosing at this moment, to use my own "text-based" skills to send my input on behalf of hundreds who cannot write such letters to you today:

Make VRS a mandatory service, one with specifications about quality assurances, controls and regulatory oversight.

Thank you,

Sheri A. Farinha, CEO  
NorCal Center on Deafness  
sfarinha@norcalcenter.org

CC: California Congressional Delegation

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----  
From: Rob Roth [mailto:rob.roth@dcara.org]  
Sent: Thursday, February 26, 2004 3:31 PM  
To: Michael Powell  
Subject: Re: Video Relay Services

98-67

attn: Chris Libertelli or Bryan Tramont

February 26, 2004

Dear Chairman Powell,

On behalf of Deaf Counseling, Advocacy and Referral Agency (DCARA), which represents the Deaf and Hard of Hearing community in a 14-county region of northwest coastal California, I would like to express my concerns about the FCC's proposed decision about Video Relay Service (VRS). This service has increased accessibility and the quality of life for many Deaf and Hard of Hearing people across the nation. It is my understanding that this proposal is to continue granting waivers so that VRS remains an optional service. VRS should be a mandatory service, and VRS providers should be subject to the requirements that maintain TTY and other relay services as a functionally equivalent to the telephone services that hearing people enjoy, such as the average speed of answering (ASA) incoming calls and other quality control measures.

Video Relay Services provides a necessary means of telecommunication for a large portion of the Deaf population, especially those who cannot use a text-based relay service that requires typing and reading. By granting waivers and not making this a mandatory service, Deaf consumers will not be able achieve equal phone access. Let's take a step forward in making this a better world for everybody.

Sincerely,

Robert I. Roth, Chief Executive Officer  
Deaf Counseling, Advocacy & Referral Agency  
14895 East 14th Street, Suite 200  
San Leandro, CA 94578  
510/483-7054 TTY  
510/483-0720 Voice  
510/483-0778 Fax  
rob.roth@dcara.org  
[www.dcara.org](http://www.dcara.org)

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

From: smvaldivia@juno.com [mailto:smvaldivia@juno.com]  
Sent: Thursday, February 26, 2004 10:18 PM  
To: Michael Powell  
Cc: Kevin Martin; osborn@earthlink.net; Sfmxo@aol.com  
Subject: VRS for the Deaf and Hard of Hearing

98-67

Dear Mr. Powell:

I have become aware that the FCC is considering to offer VRS as a secondary means of communication.

The VRS is a necessary means of telecommunication access for the deaf population who have no other means of communication.

Our deaf community are NOT second class citizens!

Please, I implore you and your colleagues to research this important issue and provide mandatory service to deaf community. This would provide equal status to telephone access.

I am a hearing mother of a 7 year old profoundly severe deaf child who in the near future will need the VRS to communicate with us. It would be a shame not to have this as a mandatory service.

Respectfully,

Marie A. Valdivia

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

**From:** Valerie Stern [mailto:vsstern@ispwest.com]

**Sent:** Sunday, February 29, 2004 5:08 PM

**To:** Michael Copps

**Subject:** Video Relay Service

98-67

*Attn: Jessica Rosenworcel*

*Dear Commissioner Copps,*

*Please, I believe that it is important to view Video Relay Service (VRS) as a mandatory service, functionally equivalent to hearing persons telephone conversations as other relay services provided currently, that VRS is an necessary means of telecommunication access for the deaf population who has no other means of telephone access up til the time VRS was introduced 2 years ago. Average Speed of Answering requirements and other means of quality control, should indeed be applied to this VRS service. Without this oversight, the Consumer using this service has not achieved an equal status to telephone access.*

*Thank you for your attention and support to this matter.*

*Sincerely,*

*Valerie Stern*

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

**From:** TDIExDir@aol.com [mailto:TDIExDir@aol.com]

**Sent:** Monday, February 23, 2004 4:27 PM

**To:** KAQuinn

**Subject:** a Video Relay Service operational issue - the speed of answer requirement

98-67

Hi Chairman Powell, Commissioners Abernathy, Martin, Copps, and Adelstein,

I am Executive Director with Telecommunications for the Deaf, Inc. It has come to my attention today that you will probably be making a decision early this week on one Video Relay service waiver issue. The waiver issue concerns the speed of answer that one gets when dialing for a VRS call.

The FCC currently requires that the TRS providers must answer calls within ten seconds equal to or higher than eighty five percent at all times. This requirement has been waived for Video Relay Service calls to allow for this service to evolve on an experimental basis.

However, the number of VRS calls have accumulated by leaps and bounds on a monthly basis in the last two years since this service began, and we really need to see the speed of answer be made a mandatory requirement for the VRS providers, not to be given waiver extensions anymore. We want to have quick access to the VRS service, like we enjoy with the traditional TRS service. We seek to have functional equivalency, like those who experience regular voice phone service. The same goes to those without hearing disabilities that need to make VRS calls with us, they would also experience functional equivalency, not like what they experience with TRS calls involving voice and TTY interaction. They would not experience as much lag time during turns of conversation in a phone call. For example, one using voice would speak 200 words per minute and the person signing back to the agent via video would sign 200 words per minute. The agent would facilitate communication without any delay to either party. Functional equivalency is something we value very much, and please be assured this is not an added-on value (as some may call it) to the array of features in relay services. We respectfully ask that you grant us a mandatory speed of answer requirement in the earliest time possible. We ask that we not experience such a waiver for the next four years.

Thank you for giving TDI's request your full, serious consideration.

Sincerely,  
Claude Stout  
Executive Director  
Telecommunications for the Deaf, Inc.

98-67

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

From: WaechterC@aol.com [mailto:WaechterC@aol.com]  
Sent: Wednesday, February 25, 2004 11:14 PM  
To: Michael Powell  
Subject: ATTENTION: Chris Libertelli

Chairman Powell,

When some Americans who happen to be deaf depend on ASL as their primary means of communication, it stands to reason that VRS is the only mode by which they can make use of telephone communication. For that reason, VRS should be mandatory rather than an option to meet their needs.

Please do whatever you can to help this become a reality. Sincerely, Carol N. Waechter

98-67

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

Original Message-----

**From:** Valerie Stern [mailto:vsstern@ispwest.com]

**Sent:** Sunday, February 29, 2004 5:07 PM

**To:** Michael Powell

**Subject:** Video Relay Service

*Attn: Chris Libertelly or Bryan Tramont*

*Dear Chairman Powell,*

*Please, I believe that it is important to view Video Relay Service (VRS) as a mandatory service, functionally equivalent to hearing persons telephone conversations as other relay services provided currently, that VRS is an necessary means of telecommunication access for the deaf population who has no other means of telephone access up til the time VRS was introduced 2 years ago. Average Speed of Answering requirements and other means of quality control, should indeed be applied to this VRS service. Without this oversight, the Consumer using this service has not achieved an equal status to telephone access.*

*Thank you for your attention and support to this matter.*

*Sincerely,*

*Valerie Stern*

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APR - 6 2004

Federal Communications Commission  
Office of the Secretary

-----Original Message-----

**From:** Valerie Stern [mailto:vsstern@ispwest.com]

**Sent:** Sunday, February 29, 2004 5:45 PM

**To:** KAQuinn

**Subject:** Video Relay Service

*Attn: Matt Brill*

*Dear Commissioner Abernathy,*

*Please, I believe that it is important to view Video Relay Service (VRS) as a mandatory service, functionally equivalent to hearing persons telephone conversations as other relay services provided currently, that VRS is an necessary means of telecommunication access for the deaf population who has no other means of telephone access up til the time VRS was introduced 2 years ago. Average Speed of Answering requirements and other means of quality control, should indeed be applied to this VRS service. Without this oversight, the Consumer using this service has not achieved an equal status to telephone access.*

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*Sincerely,*

*Valerie Stern*