

May 21, 2004

Regarding Video Relay Service (VRS) - Docket 98-67

Dear FCC:

I am speaking on my own behalf and not representing my employer - the Texas Public Utility Commission.

I want to call the FCC to the attention that VRS brings functional equivalency to the Deaf that is unsurpassed by any other features of TRS. Traditional TRS or Internet Relay does offer some benefits but no where close to what VRS can do. The speed and ease of VRS is unlike any other TRS features; even Captioning Telephone VCO service is not equal to what VRS can provide. VRS provides a much needed service that both hearing and deaf persons now find a very comfortable medium to use.

Additionally, the high quality video we are seeing is a result not only because of the nature of video conference but due to multiple VRS providers that are competing for video users. This is a product - to my best of knowledge of telecommunications history - where the deaf community is actually "ahead" of the hearing community in terms of good video quality as manufacturers are now working hard to offer the highest possible video quality just for the deaf community. However, in terms of functional equivalency it only brings the telecommunication service to the level of what hearing person enjoy with the regular telephone network.

On the other hand, the communicative needs of the deaf community that are being met by video products and services will help the hearing community in the end. In fact, I recently learned that PolyCom and another video conference manufacturer have noted that D-Link is taking some business away from them and they're checking into it - only to discover the untapped deaf market; consequently they are now aggressively looking into this. This means video conference products will continue to improve and at affordable costs and the lucrative hearing market will also benefit from higher video quality and reduced price. Clearly VRS is making an impact; not only for deaf community but hearing world as well. To continue this trend, the FCC

needs to make sure that the price per minute for VRS providers includes incentives to help them pursue quality video products and services.

This, of course, brings an issue of subsidization. I think that one aspect of the overall telecommunications industry that may be overlooked by the FCC is that more and more telecommunications services are of national - indeed global - service. It behooves the FCC to consider that as well and determine the best course of action to best meet this need for TRS world; especially Internet-enabled services which Internet Relay and VRS clearly fall under. In considering that, it becomes obvious that a national fund to subsidize Internet Relay and Video Relay Service is the logical course of action.

As I have said in my presentation at the Solutions Summit, a rose smells the same to ratepayers no matter what name we may give to it; state or federal subsidization. The FCC is legally obliged to provide subsidization that offers the most cost effective and least expensive solution. Indeed, Congress would expect nothing less than that.

If states were to assume the subsidization of these services, they would be forced to go through Request for Proposal procedure and select only one vendor. This would take away the choices of VRS providers that deaf community now enjoys. It may also take away the competitiveness among VRS providers and thus impacts the competitiveness among video conference manufacturers; it is like domino effect. Video manufacturers may no longer be motivated to continue to work on developing best video product for the deaf market. Typically RFP procedure only encourages innovation at the time of bidding process and not during the contract term. In addition to that, VRS providers will bid based on the size of call volume of individual states, raising the price per min - and ultimately ratepayers would pay more. If states opted for multi-vendoring route, it would mean reduced call volume for each VRS provider thus price per min will be considerably higher. States - ultimately ratepayers - would be paying lot more.

On other hand federal funding would not have these problems. Federal funding will ensure that all ratepayers will pay the same nationwide. Multiple vendoring would be possible at national level. VRS providers, in providing cost breakdown, will base their costs on national total call volume rather than based on state, thus cost will be considerably lower.

Conclusion: VRS is the best telecommunications service for the deaf - bar none. National funding is the most cost effective and most accessible solution - bar none.

Sincerely Yours,

Ed Bosson