

I would suggest that the FCC use a hybrid model of hours of operation reimbursement plus a per minute cost reimbursement. The hours of operation reimbursement would provide the majority of funding to cover the service and then maybe the per minute could be the responsibility of the states if there is a way to move it to the states. This would enable the Fund to share costs with the States while not making it too costly for States to afford.

Additionally, there should be an allowance for profit. The ADA mandated that the service be provided by common carriers. Is every common carrier in compliance? No! Therefore, those carriers that offer Relay are in essence operating as de facto "surrogate service providers" for those other common carriers not offering Relay. Therefore, there should be an allowance for profit of 11.25% to reward those common carriers for doing fulfilling someone else's responsibility.

Thirdly, the FCC should provide a mechanism for "certification" of other VRS providers outside of the Common Carriers. These "certified providers" should be reimbursed from the Interstate Relay Fund and allow 11.25% profit. This will lead to greater competition driving down cost to the Fund and also greater service to the consumer.

Thank you for your consideration.