My complaint are:

-- The ADA requires relay services of any kind to be functionally equivalent to voice telephone services. Functional equivalence means to be able to receive telephone services that are more on par equal to that with a hearing person's telephone call. For many deaf and hard of hearing, this means, VRS. The ADA requires that relay services be provided on a nondiscriminatory basis to all users! Preventing deaf consumers from being able to easily call anyone at anytime, and limiting incoming calls back to deaf consumers from certain providers are discriminatory under ADA.

-- VRS Services is a federally-administered service, subsidized by all consumers who use telephone services. This funding is to achieve a functionally equivalent phone service for deaf consumers similar to telephone services used by hearing people and therefore should not be restricted in any way.

-- Emergency access - many deaf consumers have replaced TTYs with VRS devices in their homes. Until VRS is a mandated service, we need to continue to use TTY for emergency access. However, the fact remains that when and if this service becomes mandated, VRS equipment restricting access to one VRS provider can be dangerous. Deaf consumers should be allowed to call another VRS provider if the preferred provider line is busy or has any long wait times.

-- The largest VRS provider currently dominates the market (approx 70%) by providing video equipment restricting access to only their VRS Service. Consumers complain when the service is slow to pick up and get a dial tone, they are blocked from calling other VRS Providers. This provider suggests that if you want another VRS provider, you should get an additional device (D-link, can call up to 8 different providers). Having more than one VRS device in the consumer's home or place of employment defeats the purpose of functional equivalency. A hearing person can use one device to call different vendors. To get another equipment to call other providers burdens the deaf Consumer to purchase another DSL/cable (High Speed Internet) wireless line, to hook up the 2nd device, or the need to unhook one device and connect the 2nd device in order to make and receive VRS calls through all 8 VRS providers. This cumbersome process is NOT functional equivalency!

-- FCC policy says relay should achieve a "seamless and integrated network of communication services." When using VRS - Blocking incoming and outgoing calls PREVENTS deaf consumers from having the same level of seamless, interconnected telephone access experienced by hearing people.

-- Restricting equipment to only one VRS provider can lead to a monopoly. Reducing our choices to only one VRS provider when we accept free equipment is anti-competitive! Deaf consumers are, unacceptably, stuck without choices! We believe all VRS equipment and services should be interoperable! Interoperable means any equipment given to deaf consumers for video relay services should allow the deaf consumer to call any VRS service provider of choice, no restrictions!

-- We believe VRS providers should not have separate dialing arrangements. We believe the goal for equal access with equipment should be universally designed without restrictions to ensure access for all Deaf and HH Consumers. The largest VRS provider does not allow telephone numbers to be used on its system to access telephone numbers of other VRS services. Hearing persons can make calls using 7 to 10-digit numbers and do not have to change the numbers when they change telephone companies.