

CC Docket 03-123
Reply Comment

I hereby submit my reply comment on NATIONAL EXCHANGE CARRIER ASSOCIATION (NECA)'s rate proposal. I am uncertain about the proposed rates by NECA for 2007-2008 although the rates reflect very drastically reduced over successive years in past until these are now unreasonably lower. As I understand I have nothing to say about the rating methodology issue since I have no idea about financial reports from those providers and NECA, I agree in every respect with these providers and organizations representing the deaf consumers that the rate methodology is flawed and in questionably in conflict with the Americans with Disabilities' functional equivalency requirement.

Therefore I urge the FCC to reject NECA's rate proposal and to restore funding available for Research and Development; and Outreach and Marketing in crucially demand to meet the expectation of functional equivalency.

Otherwise, with NECA's proposed rates it is no doubt that it would lead to some setbacks and violation of the ADA's functional equivalency. There are some inconsistencies as follows:

- Interoperability is still ongoing as unresolved yet.
- The speed of answer capability should require some upgrades but it seems still in struggle. For example, several VRS providers put us on hold for more than five minutes (too excessive) after dialing. For your information, I admitted I had to switch to more than four providers during dialing. Once I found out that I was put on hold for at least three seconds, I hang up quickly in order to switch to another provider until the video interpreter responded quicker about one second.
- Equipment such as VP 100 or Dlink is not 100% fully interoperable. Sometimes it became freezing during VP conversations; sometimes it all of sudden was blacked out; sometimes it was disconnected. I had to reboot it occasionally in order to ensure that it runs consistently before dialing out.
- When will 10 digit telephone number (TN) in place of IP address be offered as available? Frankly I am having hard time to deal with over

eight telephone numbers with VRS providers as though I prefer one primary TN in replacement of those eight different TNs especially with 800s, & 866s. My colleagues, business contact people and family are confused with my TNs as though they informed me that they are uncomfortable with 800s or 866s. Same with the Internet I had confronted some denial of access during logging in due to improper TNs as Web Developer I work daily with Internet Technologies.

- IP relay requires some improvement and further timing for R&D. I believe IP relay including mobile IP relay requires extensive attention for retuning and refining in systematic correlation with wireless or WiFi.
- Non compete agreement is another issue that cause uneasiness among the deaf community. I urge the FCC to ban the non compete agreement. Due to scarcity of interpreters, the interpreters have the right to move freely from one to another provider unless they know trade secrets that may be a different story. I protest one condition in the agreement that requires employees after leaving a job at one provider they have to wait one year. Their sign language skills may not be up to par due to timing factor as they ought to utilize it daily. Otherwise their sign language skills may be lagging. Who will be accountable for the costs for their retraining?
- False advertising is a major concern here among the deaf community. I express serious concern about how some VRS providers or venders were able to access to my mailing address, email address and telephone numbers as though I put our family names on "Do Not Call" list in both state and national levels. I believe that I have the right to opt not to share my name or information about our family address with vendors for any reason.

Lastly, I would like to add my further statement that we have the right to request for raw financial data from all the providers including NECA since we are repeatedly requested by those providers to make any comment on the rate proposal or put on the "spot" in front line with the FCC. I need your help to push the providers and NECA to divulge their information about the data on the Fund size and TRS fund to public including how the rate proposal works in distributing to each provider.

Very truly yours,

/s/

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