

**Before the  
Federal Communications Commission  
Washington, DC 20554**

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Telecommunications Relay Services	)	CG Docket No. 03-123
For Deaf And Hard Of Hearing and Speech	)	
Disabled Persons	)	
	)	

**Reply Comments of  
Telecommunications for the Deaf and Hard of Hearing, Inc.**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), by its undersigned counsel, submit these reply comments for inclusion in the above-referenced proceeding.

At the outset, TDI expresses its support for the proposals put forth by Speech Communications Assistance by Telephone, Inc. (“SCT”) in its comments filed in the above-referenced proceeding.<sup>1</sup> As established in the SCT Comments, reimbursement rates for both intrastate and interstate TRS need to be set at a level which ensures that providers can continue to serve existing Speech-to-Speech and Internet Protocol Speech-to-Speech (collectively “STS”) users as well as identify and train new users. Thus, SCT urges the Commission to adopt the NECA-proposed reimbursement rate of \$2.9621 for STS.

A higher rate than the MARS rate for STS needs to be established due to the intensive consumer training that is often required for STS. Brief customer introductions to STS (*e.g.*, less than three visits by the provider) prove inadequate for establishing long-term use of STS. TDI therefore recommends that STS outreach be funded to allow between 3-10 home visits by the provider.

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<sup>1</sup> Comments of Speech Communications Assistance by Telephone, CG Docket No. 03-123 (filed June 4, 2009) (“SCT Comments”). *See also*, Letter from Dr. Bob Segalman, CG Docket No. 03-123 (filed April 15, 2009) (“SCT Ex Parte Letter”).

The MARS rate alone is insufficient because it leaves the providers with no financial incentive to do STS outreach. The MARS rate cannot fund both STS and the marketing necessary for functional equivalency. For STS to reach a significant portion of the speech disability population, reimbursement must be sufficiently above cost to provide that necessary financial incentive.

For those without speech disabilities, daily communication over the telephone is a form of independence that is often taken for granted. On the other hand, many individuals with speech disabilities have never used a telephone. Until the advent of STS, those Americans with speech disabilities faced formidable obstacles to telephone use, which oftentimes proved insurmountable. Thus, STS reimbursement should be set at a rate that includes the expenses for adequate training because training an individual to use STS requires far more than simply offering a training manual. In addition to teaching individuals with speech disabilities how to use the telephone and STS, such individuals need training on simply becoming comfortable with telephone use. Therefore, a minimum of 3-10 home training visits is necessary to develop independent use of the telephone for the first time.

Further, a higher rate than the MARS rate is necessary since the population of current and potential STS users is small; and because, unfortunately, poverty is common throughout the STS-user population due to the low employment rate of people with speech disabilities. As the Commission is well aware, functional equivalency means individuals with disabilities having access to the same services as everyone else. This equal access is vital to accessing jobs, education, public safety, and simple communications with family, friends, and neighbors. All people deserve a high quality of life, even those with disabilities. For individuals to achieve this sort of functional equivalency, as mandated in Title IV of the Americans with Disabilities Act,

the Commission must ensure that individuals with speech disabilities have sufficient training to use STS.

The continued success of STS depends upon a delicate balance between consumer needs, government regulations, and the ability of the contracting telephone companies to make a profit. There is no known successful STS outreach method to reach consumers in large numbers. However, if STS providers have sufficient financial incentive, they will do the necessary research to find one.

Respectfully submitted,

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June 11, 2009