



The House of Brick

Sunday, June 28, 2009

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Docket 03-123: Regarding Video Relay Service Rates

Dear Commissioner Copps:

This letter supports the May 28, 2009 letter sent to you by Ed Bosson, who is a well-known and well-respected member of the Deaf and Hard of Hearing Community. Since you have his letter, he needs no introduction. But while I don't share, but support with great pride, my fellow deaf colleague Ed Bosson's prestige and national recognition, I am a member of 5 advisory boards on local, state, and national levels, including representing the Deaf and Hard of Hearing Consumers on the NECA TRS Council, I'm a well known advocate for deaf and hard of hearing people on issues concerning the education of deaf children, communication access and interpreting in the deaf and hard of hearing community, and telecommunications.

I agree with Ed's expressed need to weed out the unethical and illegal practices on the part of relay services. As a member of the deaf and hard of hearing community, I have read about such practices via several email chats that's been floating around. While I have not directly talked to any one, such as interpreters, who have been involved in such practices, I have seen enough discussion about this to believe that there is a large enough grain of truth to believe that it is more than hearsay. The closest I've come to experiencing this questionable unethical practice personally was when I received an email contact from a Video Relay Service (VRS) customer/tech support person to contact them about updating my video phone account. Upon returning the call I reached a Video Interpreter (VI) who connected me to a deaf customer/tech support person. The entire updating process between me and the customer/tech support person was handled through the VI. I thought it strange that I was talking to a deaf customer/tech person via the VRS VI and wonder if such a service was a valid reimbursable cost and wondered if NECA would be double billed for the use of the VI as well as customer/tech support. As a heavy user and beneficiary of the wonderful relay services that contributed greatly to leveling the playing field in my personal, professional, community advocacy, and retirement life in my telecommunications with the majority, the hearing people, I want to see FCC develop ways of policing the abuse

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of the relay services. Because the operating costs of running relay services are not open to the public, I am not qualified by any means to evaluate whether the contributions by the telephone companies and the reimbursement rates for relay services are fair and equitable. But basic math tells me that the cost of policing and preventing abuse of relay services so valued by the deaf and hard of hearing community and the hearing people with whom this community interacts should cost far less than the costs of abuse. Just one hour of abuse of the Video Relay Service (VRS) at roughly 6.50/minute costs the telephone companies and their consumers \$390.00. That one hour alone should cover 1 hour of work at \$25.00/hour for 16 enforcement employees. So multiply this one hour of abuse by the number of fraudulent calls day in and day out, and we're talking about tens of thousands, if not millions, of dollars per month. The reimbursements for all relay services for the month of April, 2009 alone was approximately 64 million (\$64,000,000) dollars. I'd rather see the reimbursement money used to create jobs to oversee and weed out the abuse of relay services than see the kinds of fraud mentioned by Ed perpetuated. Surely, after the fraudulent relay services become contrite via corrective actions or forced out of business, the costs of overseeing fraud will lessen. Such enforcement and policing could be done by hiring and training deaf employees who are part of the community and aware of the kinds of abuses going on in their community.

As for the rate structure, until the operating costs of the relay services are open to the public or, at the very least, to the members of the NECA TRS Council, I do not feel qualified to express an opinion on this issue. Since Ed is now in the business of providing relay services, he knows what it costing him to operate the business and I'll leave the negotiations of the rate structure between relay service CEOs like him and the FCC and continue devoting my attention to ensuring that functional equivalency and quality of telecommunication services for hard of hearing and deaf people are reached and maintained. Eliminating fraud is a concern to consumers like me because it impacts on the trust that hearing people, businesses, and the FCC have in the integrity of the relay services which are so important in the quality of life for all deaf and hard of hearing people and the speech impaired.

Sincerely yours,

Lawrence J Brick

CC: Ed Bosson

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