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Chairman Julius Genachowski
Federal Communications Commission
445 12th St, SW
Washington, DC 20554

Re: Docket No. 03-123
Reply Comments on Video Relay Services Rates

Dear Chairman Genachowski:

As the former executive director of the TDI, the following are my responses to the Comments on Video Relay Services rates.

1. Elimination of abused and fraud VRS minutes:

Based on the affidavits by federal agents in two separate cases, <http://www.edsalert.com/wp-content/uploads/2009/07/ICS-Criminal-Complaint.pdf> and <http://www.edsalert.com/wp-content/uploads/2009/07/Hawkinscriminalcomplaint.pdf>, information related to possible abused and fraud VRS minutes were collected from informers such as the video interpreters (VIs).

In general, all communications assistants (CAs), including VIs, are sworn into extreme confidentiality. In other words, all CAs are to be as transparent as telephones to ensure functional equivalency for all users. Would CAs' sharing information without warrant be considered as illegal wiretapping? In addition, having CAs as informers may raise several questions such as inequality of freedom of speech, violation of civil rights, and distrust of relay services as a whole. Also, reliance on informers or whistleblowers on certain companies may lead the investigators away from companies performing similar violations.

It is recommended that the Commission create its own observation network to monitor variety of relayed calls randomly. The proposed central monitoring network of all VRS providers under the direction of the Commission should enhance consistency of observations and minimize possible illegal warrant-less informant networks.

2. Certification of Videophones:

To date, some VRS companies have been distributing their videophones to encourage the users to patronize their services.

It is noted that some videophones have several second delays between conversations. These delays accumulate to wasted VRS minutes which are being paid by the Interstate TRS Fund.

Also, pre-recorded voice phone numbers tend to operate only with the VRS providers who manufacture respective videophones, resulting in shorter startup sessions prior to the conversation session. For those who want to use VRS providers different from the manufacturer of the videophone, they had to spell out the numbers, causing the startup session to be much longer. As a result, the conversation minute rate for this particular company is higher to compensate lengthy startup sessions.

It is recommended that the Commission create its own videophone certification program to ensure minimal delays between conversations and equal interoperability between any approved videophone and any approved VRS provider.

3. Centralization of 911VRS:

To date, all VRS providers, regardless of the size, are required to provide 911VRS at all times (24 hours/7 days/365 days). To ensure effective emergency services, every provider should have at least one backup system, for example, an extra interpreter assisting in the background. Also, each provider would need liability insurance coverage. This creates unnecessary duplications and increases VRS rates ineffectively.

It is recommended that the 911VRS network be centralized to minimize unnecessary duplications and enhance effective communications, especially in emergency situations.

Respectfully submitted by

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