RE: CG Docket No. 03-123
Federal Communications Commission (FCC)
445 Twelfth Street SW
Washington, DC 20554

Dear Chairman Copps, Commissioners Adelstein and McDowell:

Video Relay Service has improved greatly because the FCC initiated a stable, predictable and fair three-year rate plan fifteen months ago. We understand that the FCC is inexplicably considering abruptly changing the VRS rate for the 2009 – 2010 rate year.

The FCC adopted the three-year rate methodology after 16 months of deliberation and considering thousands of pages of comments. Now, the FCC is proposing to change the rate with just weeks for public comment.

VRS is succeeding – it is available to more in the Deaf community, service quality has improved, hold times have dropped, interpreter training and recruitment have expanded, and new videophones have been developed. The stable, fair and predictable three-year rate plan is critical to improving VRS and moving towards functionally equivalent telecommunications for the Deaf. The Deaf still do not have the functional equivalence mandated by the Americans with Disabilities Act, but every improvement in VRS moves the Deaf closer to the fulfillment of that mandate. Why would the FCC suddenly, with virtually no notice, and only weeks for comment, undermine what has been working?

President Obama has correctly emphasized the importance of making broadband available to vulnerable populations like the Deaf community. Is it possible that the FCC at the same time, in defiance of the President's leadership on this issue, will undercut this vital broadband-based service to the Deaf?

I strongly urge the FCC to focus on how to improve VRS, not destroy it. It is simply not right to crush progress towards functional equivalence and tell Deaf people they deserve only second class telecommunications.

Sincerely,

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