

BROADBAND FOR THE DEAF AND HARD OF HEARING CORPORATION

1050 Connecticut Avenue, NW
Tenth Floor- Number 1053
Washington, D.C. 20036

October 20, 2009

Ms. Marlene H. Dortch
Secretary to the
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Broadband Accessibility for People with Disabilities II: Barriers, Opportunities
and Policy Recommendations, General Docket Nos. 09-47, 09-51 and 09-137

Dear Ms. Dortch:

Broadband for the Deaf and Hard of Hearing (“BDHH”) is an organization dedicated to the goal of providing broadband Internet access to low-income deaf and hard of hearing Americans (hereinafter referred to as deaf). We appreciate the Commission’s efforts in organizing today’s workshop on broadband access for people with disabilities.

BDHH submits this letter as part of its effort to bring broadband Internet access to low-income deaf individuals across America.¹ We applaud the Commission for its efforts to identify and address barriers faced by people with disabilities in affording broadband Internet access and urge the Commission to act promptly to address the lack of broadband access among this vulnerable population.

Individuals who are deaf, especially those with low incomes, face significant barriers. Providing broadband Internet access to deaf Americans will enrich their lives by affording tangible opportunities for jobs, education, and training and will enable these individuals to be part of the economic and social fabric. As presented in the record of the Commission’s broadband proceeding, broadband adoption among adults with disabilities significantly lags behind the adoption of those without disabilities.² The Commission

¹ BDHH has also applied for a grant under the Broadband Technology Opportunities Program (BTOP). A summary of the grant proposal is attached for reference as Exhibit A.

² See e.g., Comments of Connected Nation, Inc. in response to NBP Public Notice #4, GN Docket No. 09-47, 09-51, and 09-137 (October 5, 2009).

should remedy this disparity and implement policy changes that allow deaf individuals to experience the benefits of broadband Internet access.

Other groups have also urged the Commission to address this disparity. For example, the Coalition of Organizations for Accessible Technology (COAT) filed a petition for rulemaking that asked the Commission to allow deaf individuals to use existing Low Income programs (Lifeline and Link Up) to pay for broadband Internet service.³ BDHH agrees with COAT that the Commission should allow low-income deaf individuals to choose to apply Lifeline and Link Up subsidies to broadband service.

Thank you for organizing this workshop and for bringing attention to such important issues.

Respectfully submitted,

signed

Dr. Robert Davila
Chairman
Broadband for the Deaf and Hard of Hearing

signed

Dr. Vinton Cerf
Board Member
Broadband for the Deaf and Hard of Hearing

Dr. John S. Schuchman
Board Member
Broadband for the Deaf and Hard of Hearing

Attachment

Copy Provided to:
Ms. Cheryl King, Consumer and Government Affairs Bureau, Federal Communications Commission

³ The Coalition of Organizations for Accessible Technology, Petition for Rulemaking, WC Docket No. 03-109; CC Docket No. 96-45 (October 30, 2008).

Exhibit A

Summary of Grant Proposal of the Broadband for the Deaf and Hard of Hearing Corporation

Broadband Technologies Opportunity Program

Individuals who are deaf or hard of hearing face significant barriers. Providing broadband to these Americans who do not have access will enrich their lives by affording tangible opportunities for jobs, education, and training. It will allow these individuals to be part of the economic and social fabric that broadband propels. Dr. Robert Davila, Dr. Vint Cerf, and Dr. John S. Schuchman have formed the Broadband for the Deaf and Hard of Hearing Corporation (“Applicant” or “BDHH”) to bring broadband Internet access to the vulnerable and underserved low-income deaf and hard-of-hearing population. They have launched this project because it has the power to transform the lives of deaf individuals (hereinafter including the deaf and hard of hearing) who are frequently excluded from the benefits of the high-tech broadband economy and community life.

The Applicant will provide broadband access for a period of two years to a target of 66,000 low-income households that include a deaf individual and provide outreach, access and support services to facilitate greater use of broadband Internet access by this vulnerable population. The project will provide a “jump start” that will stimulate demand for broadband, economic growth, and job creation.

Professionals with years of experience in the deaf and hard of hearing communities will lead the Broadband for the Deaf and Hard of Hearing Corporation. These renowned professionals are proven leaders with experience in technology and education, and with a deep understanding of the deaf community. The expected overall cost of the project is \$70 million.

THE NEED

A disproportionate number of the one million Americans who are unable to hear a conversation are unemployed, receive Social Security, live in poverty, or have household income below \$20,000. (See Erika Steinmetz, Current Population Reports in Americans With Disabilities: 2002, Household Economic Studies, U.S. Census Bureau (issued May 2006), available at: <http://www.census.gov/prod/2006pubs/p70-107.pdf>.) These economic factors, combined with persistent cultural barriers such as discrimination and bias, have often isolated and marginalized deaf people. (See The Americans with Disabilities Act of 1990 ("ADA"), 42 U.S.C. 12101(a) (discrimination against individuals with disabilities continues to be a serious and pervasive social problem).) Deaf Americans are much more likely than their hearing counterparts to have inadequate access to healthcare, education, government agencies or services, or support networks. (See Position Statement on Mental Health Services for People who are Deaf and Hard of Hearing, National Association of the Deaf, 2003, available at: <http://www.nad.org/issues/health-care/mental-health-services/position-statement>.) Deaf Americans’ access to the nation’s communications system has been particularly limited, and only began to improve with the mandate of the ADA to provide deaf individuals with “

UNIQUE, SIGNIFICANT, AND SUSTAINABLE BENEFITS FOR THE DEAF- AN UNDERSERVED AND VULNERABLE POPULATION

Broadband has enormous potential to lower or eliminate the barriers that historically have caused deaf Americans to be isolated or marginalized. Empowered with broadband, deaf persons can search for jobs and submit resumes; have access to training and educational materials; and communicate with businesses, friends, and colleagues. For example, Users of IP Relay can place calls over the Internet by connecting instantly to a relay operator at the touch of a button. With broadband access, deaf Americans who use American Sign Language (“ASL”) can communicate across distance quickly and naturally in their primary language by using Video Relay Service (“VRS”). For many ASL users – such as senior citizens and children who are unable to type – video communication is the only means of communicating with another person over distance.

Providing deaf Americans with broadband access is an innovative approach to improve their daily lives, education, and job prospects. Although the idea has been proposed in the past, there has been no financial support for such a program and no large-scale project has been attempted. (See Petition for Rulemaking, Coalition of Organizations for Accessible Technology, WC Docket No. 03-109 (Oct. 30, 2008) (recommending that the Commission allow deaf individuals who use existing telephone-related low income programs to use this funding for broadband Internet service).

A large-scale, national strategy will best serve the vulnerable, often rural, deaf population because deaf individuals who lack broadband Internet access are dispersed geographically. (See Letter from Doris O. Matsui, et al., U.S. Congress, to Michael Copps, FCC, Bernadette McGuire-Rivera, NTIA, and James R. Newby, RUS, at 1-2 (Apr. 29, 2009) (requesting that low-income urban populations be considered potential “underserved” populations as the agencies develop grant programs and finalize requirements).) The proposed project will bring sustainable benefits to this underserved and vulnerable population by introducing low-income deaf individuals to the opportunities broadband access provides. The knowledge that deaf Americans gain about the benefits of broadband will provide lasting improvements to their daily lives. The project will also create sustainable increases in broadband adoption rates beyond the grant period by providing deaf users the opportunity to continue receiving broadband service at substantially discounted rates after the funding period.

