



California Coalition

Of Agencies Serving Deaf & Hard of Hearing Persons

REGION I

Raymond J Trybus, PhD, CEO
Deaf Community Services of
San Diego, Inc.
3930 Fourth Avenue, Suite 300
San Diego, CA 92103
www.dcsosfd.org

November 24, 2009

REGION II

Lisa Price, Director
Center on Deafness Inland
Empire
3576 Arlington Avenue #211
Riverside, CA 92506
www.codie.org

Mr. Mark Stone, Deputy Chief
Consumers & Government Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

REGION III

Ed Kelly, Director
Orange County Deaf Equal
Access Foundation
6022 Cerritos Avenue
Cypress, CA 90630
www.ocdeaf.org

Mr. Mark Stone:

The California Coalition of Agencies serving the Deaf and Hard of Hearing submits comments supporting NorCal Services for Deaf & Hard of Hearing request for FCC's intervention on behalf of consumers in the state of California.

REGION IV

Patricia Hughes, Ph.D., CEO
Greater Los Angeles Agency on
Deafness, Inc.
2222 Laverna Avenue
Los Angeles, CA 90041
www.gladinc.org

The Coalition was part of the consumer group effort in the *Request for Modification* letter also submitted by NorCal to this docket, and as noted in the letter to CPUC it clearly explained: *"Over the years, advancements in technology have provided other Relay Service options that offer far greater functional equivalency. One such advancement is CTS, which permits the CA to be transparent during the set up and transmission of each call. In 2003, the FCC approved CTS and praised the new technology's ability to achieve functional equivalency through its transparency, noting its ability to connect automatically with the CTS Relay Provider and to the called party by direct dialing of the called party's number, without interaction with the CA by either party to the call. The FCC praised the fact that CTS eliminated any need for the CA to speak or interact with either party, a feature that brought significant advantages and greater functional equivalence. In addition, precisely because the CA is transparent, the FCC was able to waive a number of FCC regulations that apply to traditional TTY Relay Service calls. These included the requirement for the call to be voiced by a CA of the same gender. Similarly, the FCC agreed that a proposal that would have allowed CTS CAs to interrupt the conversation would interfere with the natural flow of the conversation and defeat one of the central features of CTS – the transparency of the CTS CA."*

REGION V

Julianna Fjeld, Director
Tri County-GLAD
702 County Square Drive # 101
Ventura, CA 93003
www.tcglad.org

We object to the Attorney General's rationale and the CPUC's use of a state law to infringe on the communication rights of deaf and hard of hearing consumers who use captioned telephone services, and similarly file comments requesting FCC's immediate intervention.

REGION VI

Michelle Bronson,
Executive Director
Deaf and Hard of Hearing
Service Center, Inc.
5340 North Fresno Street
Fresno, CA 93710
www.dhsc.org

Sincerely,

REGION VII

Sheri A. Farinha, CEO
NorCal Center on Deafness
4708 Roseville Road, Suite 112
North Highlands, CA 95660
www.norcalcenter.org

Ed Kelly, Chair,
California Coalition of Agencies Serving the Deaf and Hard

REGION VIII

Jim Brune, CEO
Deaf Counseling, Advocacy &
Referral Agency
14895 E. 14th Street, Suite 200
San Leandro, CA 94578
www.dcara.org