

file in dockets 09-47, 09-51, 09-137; CS 97-80.

In NBP Public Notice # 27 the FCC asks how it can encourage innovation in the market for video devices that will assist the Commission's development of a National Broadband Plan. The FCC can do this by taking steps toward making Video Assisted Speech-to-Speech (VAS) a reimbursable part of VRS. Such authorization would encourage innovation of services and equipment to meet this need. While the general process is applicable to VAS, equipment and services must be specific to the unique needs of this population. For example, some users will want cameras to read their facial expressions and AAC users (people who input PCs for voiced output) will want cameras that can read the output on the screens of their devices.

There are thousands of people with speech disabilities who can only be understood if their faces can be seen. In all face-to-face communication, visual information constitutes a large proportion of what is communicated. Of the 4 million Americans with speech disabilities that do not accompany hearing disabilities, a significant proportion could benefit from "Video-Assisted Speech-to-Speech (VAS)". These are people who do not speak well enough to use the currently FCC mandated telephone relay service for people with speech disabilities called "Speech-to-Speech". VAS would be the only way that this population can access the telephone for emergencies and non-emergencies.

SCT developed a series of questions based on the first broadband workshop with the FCC. These questions were sent to members of the Speech Communication Assistance by Telephone, Inc. 501c3 (SCT) board and members of the speech disabled community to review and provide input. After suggestions were received, We posted the survey online. We then sent the survey link to the speech disability community, the AAC community, Speech Language Pathologists, United Cerebral Palsy and other disability organizations, disability advocates, AAC manufacturers, STS providers, etc. The survey period was open for approximately one month, and 114 responses were collected.

Those 114 responses were the best input that we could get in the time available from the 4 million non-deaf speech disabled Americans. This is not a representative sample. There are no large organizations of people with speech disabilities and no one to identify them in large enough numbers to take a representative sample. Because people with speech disabilities often have other disabilities and identify with the other disability communities, they do not know each other. I grew up knowing only two other people with speech disabilities.