

In view of your recent ruling regarding Video Relay Service providers using their company for legitimate business calls between deaf and hearing employees as not a reimbursable expense, I strongly recommend that the FCC apply this ruling to their own agency. If FCC considers this regulation a fair and valid one, I fail to understand why FCC is not applying to itself its own logic and not receive a double benefit for the VRS calls its employees make or receive. Each year the FCC submits a budget to Congress which may and should include these VRS calls as an agency expense under either telephone services or the accommodations of its employees. Congress includes this expense in its appropriations to the FCC. The FCC should not doubly profit from VRS calls by Congress' appropriations and the free VRS provided to its employees. Indeed, the Federal government has severe restrictions on gifts to its employees from outside sources. Therefore, the FCC should only use in-person interpreting, VRI or strictly compensate the TRS Fund for its use of VRS.

And if FCC can't afford this expense, I suggest replacing all the hearing employees with qualified deaf employees. Of course, FCC would have to deal with hearing people filing complaints against discrimination. But then there's nothing in the FCC regulations that call for functional equivalency in telecommunications for hearing people. So FCC would have the additional benefit of being immune to lawsuits.