

I just read:

**Partial Petition for Reconsideration
CG Docket 10-51 and CG Docket 03-123
Dated: March 8, 2010**

Respectfully submitted,
Ed Bosson
Vice President Regulatory Affairs
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I agree and support completely Mr. Ed Bosson's recommendations. I trust you are as impressed as I am with the clarity of and justifications for his position. As he made clear:

1. the potential for top quality service in effectively meeting the communication access needs of members of the deaf and hard of hearing community lies in those who need the relay services for their own access and are regular users of such services.
2. Because his company is serving primarily members of the deaf and hard of hearing community, he wants to hire qualified deaf and hard of hearing people because they, as users, are in a better position than those who can hear, to understand and address the needs of the users of the relay services
3. Not covering the extra costs of deaf and heard of hearing employees for using the relay services to conduct business puts them at a severe competitive disadvantage compared to those with a far lower percentage of deaf employees. To quote from his letter:

“Convo believes that its VRS niche is best understood by its users and with its deaf/hoh staff, Convo can recreate the user experience in a manner that allows it a competitive opportunity to provide high quality VRS services and to innovate and develop future relay enhancements. As a result of this competitive position from its “employees/users”, Convo will likely maintain that hiring percentage for the foreseeable future.”

“The actions of the FCC are penalizing smaller legitimate VRS providers to the advantage of the largest provider since the latter is able to absorb the costs of nonreimbursable calls as it has only one deaf person situated in executive management and has a disproportionately low number of deaf employees given the size of its VRS administrative workforce. These cost burdens on smaller companies will result in a monopoly opportunity in conflict with the Commissions goals and policies supporting competitive markets. Convo believes that it was unintentional on FCC's part. Consequently, FCC should re-evaluate and promptly redress the uneven and patently unfair landscape its *Declaratory Ruling* has created for VRS markets as soon as possible.”

A review of past history will prove that leadership by users of services result in top quality of service. The best examples of the Federal Government respecting this practice has been the leadership of the late Dr. Boyce Williams as the Director of the Federal Office of Vocational Rehabilitation and Dr. Robert Davila as the Director of the Federal Office of Special Education. Under the leadership of these two highly qualified deaf men, the quality of rehabilitation services to people with disabilities and special education services for special needs children has been unequaled prior to and after these two deaf men were in office. Ed Bosson, as former director of the relay services of Texas and the recognized father of Video Relay Services could easily join these two esteemed leaders in the area of relay services as head of any Federal Government agency overseeing relay services. His words are well worth heeding.