

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

The rates for VRS proposed by the Federal Communications Commission (FCC) in its April 30 Public Notice would be a disaster for VRS because:

- * The rates are so low that it would be the end of VRS as we know it today. No provider would seek to provide VRS at the low rates proposed by the FCC;
- * The FCC proposes a low interim VRS rate. A better option would be a multi-year VRS rate, which would allow VRS providers to continue to invest in their offerings for the deaf.
- * VRS and the improvements made to it over the years have moved us closer to the goal of function equivalence mandated by the Americans with Disabilities Act. The FCC rate proposal would destroy that progress and move us further from achieving the goals of the ADA;
- * My employer has informed me that this rate proposal would lead our company into bankruptcy, leaving our deaf customers without the vital VRS service they have come to expect;
- * This proposal would almost certainly mean that my job and countless others would be in jeopardy in an economy where finding a new job would be extremely difficult, if not impossible.