

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

I am a hearing Sorenson Communications employee who has been with the company for past 6 years. Our business is to provide a deaf person with the ability to communicate in their native language of Sign Language using the internet and a videophone (works like a telephone for them). This device and technology has changed the lives of tens of thousands of deaf people who had to type text messages as their method of communication on a TTY for a telephone. This made the conversation tedious and very difficult for everyone involved. Deaf people were patient for years with this limitation when finally a Sorenson videophone was invented to allow them to use sign language over a real time video connection. Now with a Sorenson videophone and VRS (Video Relay Service) I have had conversations with deaf people and it's so natural, I forget that they are using an interpreter and that they are deaf. The calls are extremely fluid even to the point of having emotions expressed during the conversation. Sorenson is providing these resources and services for the cost of their internet connection; the equipment is free to them.

The US government arranged a way to help deaf people with the cost of such a system by reimbursing interpreting services to companies like Sorenson Communications through a TRS fund collected from phone bills, a few pennies from each telephone bill which provides for the fund. This was a great experiment that has proven a cost effective way to provide a life changing thing. The costs of the VRS (Video Relay Service) program have dropped steadily as companies have figured out the business of delivering the services across the country. Sorenson has led this battle dropping the rate by lower costs from efficiencies in scale from rates of \$17.04 per minute in 2002 to \$6.64 in 2008 to \$6.24 per minute on tier III now. The FCC now proposes a rate of \$3.89 per minute dropping from \$6.24 per minute which is substantially and absurdly below the cost of doing business for all tier III minutes. This is a massive drop in the rate cutting it at 40% which seems amazingly sharp.

The majority of the costs for VRS is interpreters that are in a very highly skilled job because they have to be able to communicate on all sorts of levels like legal, medical, 911, professional, technical, and then common language for deaf in sign language. The VRS service is where a deaf person calls a hearing person using a videophone to an interpreter or a hearing person can call a deaf person using an interpreter to a videophone. It takes years of experience and a certification to be a qualified Sorenson interpreter. They are short in numbers and worth the money to get the quality and experience that deaf people rely on so much for important communications.

These high quality interpreters are the equivalent of a hearing person needing a good telephone signal or someone to help us understand high level legal counsel. Deaf people who use interpreters rely on interpreters for everything they do to communicate with hearing people including interviews for jobs, family counseling, customer service, medical or fixing a banking error. When this communication occurs over a telephone the VRS service is extremely important to a deaf person

because they depend on the accuracy of interpreters to represent what they are saying.

The proposed rate of \$3.89 for tier III minutes by the FCC does not even cover the cost of quality interpreters as mentioned above and could force Sorenson to close its doors on the VRS service that deaf people depend on so much for important communication. This would be a disaster given that deaf people who have come to depend on this basic technology. Sorenson does a large percentage of the VRS calls and the entire remaining industry could not support the existing call volume without Sorenson. The current costs of the VRS service is on the public record at the FCC and shows it has increased across the industry all three of the prior rate years. Interpreters have to pay higher gas prices and housing costs which will create the need for them to need cost of living adjustments. Why would we expect to provide the required quality interpreter and not maintain their compensation in the face of inflation of basic things over time?

Sorenson has been very successful at building access to these high quality interpreters for deaf people over the internet. Sorenson is the most efficient company in the VRS business at processing VRS calls and Sorenson provides the service for the lowest administrative costs. Because of increasing scale of deaf users, the challenge to build better technologies to support the population has increased costs. Networking tens of thousands of users and interpreters with 24x7 up time is a major cost not covered by the rate and absorbed by Sorenson. An example of technology needed right now by deaf users is they don't have voicemail (Signmail) to each other through Sorenson's videophone device. This videophone is a very basic device that doesn't come close to functional equivalence for the deaf to a hearing telephone but it is extremely reliable and functional with high quality video to support finger spelling. Sorenson proposed and was required to build e911 services for the deaf to use. This is an extremely important service but is not a money maker and the development was not reimbursed through the rate. Basic improvements to the technology is not being compensated or considered by the current fund proposal at \$3.89 per minute.

There are many deaf employees at Sorenson whose jobs could be at risk at a rate of \$3.89 per minute. Sorenson is the largest employer of deaf people in the world. Given that the deaf population is already 70% plus unemployed, this is a total slap in the face by the FCC to them. This unemployment has been an ongoing problem even before the current financial crisis. As a coworker of these deaf people, I see them as the hardest and most dedicated workers I have ever worked with. Why would the FCC want to cut off the accommodations for those deaf people who manage to get a job? This type of telecommunications tool is giving them access to the job market through accommodations on jobs not possible before. For the first time in history with videophones and VRS, a deaf person could function in the workplace in a wide variety of positions not available before. I find it foolish to even consider underfunding the program that eventually gets deaf people the ability to get and perform on a job and function like any other hearing person. Instead, we should be increasing the rate to accelerate getting these people into the workplace.

I would propose maintaining the current rate of \$6.24 for a 5 year term and then a special 50 cent increase in the rate from \$6.24 to \$6.75 per minute across the board for research and development on improved accommodations. I also would like to see other funded programs created to get these people back to work using the accommodation tools we now have. Let's put it all together with the support for quality interpreters, tools/technology, funding and new programs to solve problems. Let's not cut off what Sorenson VRS and other VRS providers have worked so hard to create which is a way to succeed in the world for deaf people.