As an employee of a Video Relay Service (VRS) provider, I have had the great fortune of assisting deaf individuals to communicate to the hearing via videophones. I have had the opportunity to see improvements to this technology and the wonderment of the deaf at reviving services that I have taken for granted for the past 15 years. Services that have just now became available to the Deaf, and the wonderment at these capabilities.

I have been humbled and shocked to realize how difficult it would be to be born, grow up, and work in this country with the inability to speak the same language as the vast majority of the inhabitants, and not because of a lack of education, but because of physical difference that make that simple task an impossibility. VRS is an amazing step to bridging the gap between the deaf ASL and the English spoken language.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission (FCC). The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide ?functionally-equivalent? communications, and as Americans, it should be your solemn duty to take care of your fellow citizens that do not have a choice as to what language they can speak.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion, bringing the deaf into more of the American culture ? or force deaf users to revert to TTY communications and divide individuals of the same country by unsurmountable barriers. You will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even in the face of poverty and isolation.

I was deeply disturbed to see the Commission?s recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. My employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for deaf VRS users, and for the employee's of my company, a very large portion of which are Deaf. It seems a grave thing to do when our country is so determined to save it's economic situation, provide jobs and opportunities to those who have had the misfortune of becoming unemployed, to set a rate that will guarantee the loss of jobs, and the loss of service, community, communication, and equivalence with the deaf

The FCC should be increasing the availability and use of VRS, not cutting back. The FCC should not be punishing companies that can handle large call volumes, nor provide an artificial roadblock to any other companies to provide this same level of service. No company will aspire to grow or progress when the middle tier provides the largest reimbursement, and the highest tier ruins a company.

I know first hand the goals these companies have in providing the service and quality I've had for years, and the deaf are dearly hoping for. I know first hand the chance we have to lead the world as an example of how we treat our citizens regardless of their capabilities, and how we care for our own. I know first hand the dreams these VRS companies share in leading the way forward with technology and service. And I know first hand that these rates will cripple any such advancements and destroy any motivation to provide services to large amount of American citizens, as to do such would cause bankruptcy.

You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a prohibitive expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

Recent reports of fraud in the VRS industry are disturbing to employees who work for a company that has operated within current FCC guidelines and has worked to maintain the integrity of the VRS fund. The FCC must devote more of its time and energy to focusing on the elimination of fraud.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,

Cody Coleman