

As an employee of a Video Relay Service (VRS) provider, my heart is to help deaf individuals live life better with the accessibility need - communicating by videophone (VP) in American Sign Language (ASL) using Video Relay Service (VRS).

What I particularly want to emphasize is that ASL is a natural language proven to the satisfaction of the linguistic community by deaf individuals. It is a visual language which means that information people share with each other during the communication process is expressed not with combinations of sounds but with combinations of movements of the hands, arms and body, hand shapes, body language, and facial expressions. Furthermore the visual language is clearer. VP is faster than any device with no visual interaction capabilities like a text phone (TTY). VRS is faster than any text-based relay services. You probably see that VRS can reduce about half of the time which the deaf individuals spend on the text phone. VRS saves the deaf individuals' time and makes their VRS calls more effective and convenient. VRS is E911 compliant because it could one day save a life. In addition, it is much more easy and convenient for VRS users to update their current address on their VP than updating it with the phone providers thru the text-based relay service.

Moreover, a great deal of deaf individuals had already disconnected their landline phones because of VRS. They would be in danger of much suffering by negligence if the proposed rate is adopted. Because of the Americans with Disabilities Act (ADA) requirement for communication accessibility, I hope that FCC still makes it a top priority to make available to all deaf individuals nationwide "functionally-equivalent" communications.

As for the recent reports of fraud in the VRS industries I have learnt of, I feel that it has led you to make a decision on the proposed VRS rate but I do believe that my employer has operated by abiding by the current FCC guidelines and has worked hard to maintain the integrity of the VRS fund. In the meantime, I have been thinking about making a proposal to my employer to develop a new software platform that would integrate VRS call records and phone call records as well as manage/track each VRS call (including records of dialed and received calls) from beginning and end over a combination of a variety of networks when needing to follow the appropriate rules. This would help VRS prove the integrity and authenticity of digital documents and digital billings. The platform would also probably help VRS protect the digital evidence that would advance the collection, preservation, and use of digital evidence. If the proposal is accepted, an agile software development process would be applied to help design and implement new solutions to follow the NECA TRS forms and instructions. The electronic forms with data would be submitted to NECA for processing. Suitable software would need to be acquired. The platform would save the paperwork hassle.

I am asking that FCC devote more time and energy to focusing on the elimination of fraud. In addition to this, I am asking that FCC devote more attention to the needs of the deaf individuals but not the interests of business. President Obama has announced that broadband for vulnerable

populations is a national priority. I urge you to establish a fair and predictable rate for VRS that will motivate VRS providers to move forward strategically and actively pursue their mission. The goal of the providers is to invest in enhancing overall VRS service quality and reaching more deaf individuals who need to use VRS. The law requires it and it is the right thing to do.

Sincerely,
Edward Li