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Via E-Mail

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:

I am I. King Jordan, former president of Gallaudet University and current advocate for the rights and abilities of people who are deaf and people who are disabled and I am writing to express my concern about the Federal Communications Commission's recent Public Notice that proposes to reduce the compensation rates for Video Relay Service.

Improvements in the ability to communicate as a result of the Americans with Disabilities Act have changed the lives of deaf people. Most notably, the advent of VRS has changed my life and the lives of many other deaf and hard of hearing individuals who have come to rely on this service. VRS is by far the most "functionally equivalent" form of TRS available today for those who communicate in American Sign Language, allowing us to communicate with rapidity and nuance that is not possible with other forms of relay. When I began my eighteen-year tenure as the President of Gallaudet University, I coined a phrase which has come to be my motto – "deaf people can do anything except hear." VRS technology has enabled my words to ring truer and truer by allowing people who are deaf to become increasingly integrated into society.

VRS technology has improved rapidly in just the past three years. Because the Commission implemented a fair and predictable rate plan in November 2007, VRS providers have been able to set long-term goals and make investments that have benefited deaf users. There are more and better products available today than three years ago, VRS wait times have improved dramatically, and the skills of interpreters are noticeably better than in the past.

The progress of VRS is enormously beneficial to people who are deaf, and is a direct result of investments made in VRS. Still, VRS has a long way to go before functional equivalence is achieved. I was disheartened to see the Commission's proposal to decrease the compensation VRS providers receive. If this proposal is implemented, recent advances will be eliminated because VRS providers will be unable to continue making the investments that are necessary to enhance VRS and reach more deaf individuals. I have serious concern that VRS will be degraded and perhaps even eliminated for large numbers of deaf users.

Chairman Genachowski, in June 2009, I attended your Senate confirmation hearing. You said in your opening statement that you came to the realization that "communication technology has the power to transform lives for the better" many years ago when your father showed you plans he had developed for a device to help blind people read. It is especially ironic that less than a year later, you and your fellow Commissioners appear poised to take actions that will irreparably harm the disability community by undoing the recent progress which has taken place with VRS.

The Commission must be vigilant in its support of VRS and equal communication access for people who are deaf. VRS rates should encourage, and the FCC should demand, improvements in VRS until we reach functional equivalence. I urge you to set rates for VRS which are adequate to assure continuation of the high level VRS service we have seen in the recent past as well as continued research and development, new product development, marketing and outreach to new consumers, and shortened wait times. The VRS rates proposed in your Public Notice will not do this and I urge you to reject them.

Thank you for your consideration in this matter.

Respectfully submitted,

I. King Jordan