

As an interpreter of Video Relay Service (VRS) provider, I have the great fortune of assisting deaf individuals in communicating by videophone in American Sign Language using VRS. I have seen first-hand that this empowering service is a vital link that connects deaf people to the hearing community.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as the Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide “functionally-equivalent” communications.

When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion – or force deaf users to revert to TTY communications – a product that most deaf individuals no longer own as TTYs have been replaced by videophone equipment. And, 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 troubled by 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.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve service 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 big 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 in reaching more deaf individuals.

In summary:

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

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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 (ADA). This 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.

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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.

Sincerely,

Jean Nunnally  
NIC Certified Interpreter