

VRS has made it possible for individuals who use sign language who are Deaf/Hard of Hearing or Speech Impaired to interface with the world of commerce, the private business world as well as government agencies. VRS has made it possible for individuals to interface with their families, health care providers, teachers and school administrators in unprecedented and meaningful ways.

Understandably, the FCC is not advocating returning to text relay or the demise of VRS. Few individuals own TTY/TDDs any longer nor do they, or those they communicate with, have dedicated or land lines to facilitate text relay use. These methods became obsolete along with such things as typewriters and mimeograph machines due to technological advances.

VRS provides equal access without undue time consumption of either party due to its real time interactive pace as opposed to the days of text relay bound by reading and typing speeds. VRS by its very existence saves time and money for interacting private and public sector business consumers.

Reduction or tiered rate systems of VRS funding would have significant economic impact and job loss for Deaf / Hard of Hearing / Speech Impaired individuals working in the public as well as the private sector who depend on quality VRS provision for conducting their employment duties.

Reduction or tiered rate systems of VRS funding would result in severe economic impact and job loss for those who work in the VRS industry.

With recognition that the FCC supports the ADA (Americans with Disabilities Act) in regard to functionally equivalent telecommunication access for the Deaf, acknowledgement of necessary elements to make that possible is vital. Elements such as nationwide access, enhanced 911 call technological interface and processing, ever advancing technology to assure quality and efficiency of process, consistent systems interface, accurate data management, ongoing education of consumers, ongoing training of interpreters to assure quality service provision, service expansion to satisfy demand and insure efficiency, while simultaneously keeping abreast of technological advances impacting future provision are all factors that play integral parts in the VRS milieu.

The Commission has received proposed tiered rates from NECA that may or may not directly cause the demise of VRS, but it will significantly diminish the quality of VRS as it is experienced today and will stymie efforts or incentive to maintain efficiency and quality.

The Commission could experience far better return on investment by working with VRS providers to explore ways to make VRS over broadband more affordable, focusing more time and energy on the elimination of fraud in the industry, establish collaborative efforts with VRS providers in regard to educating consumers regarding how to utilize VRS services most efficiently and cost

effectively, and establishing a workable, fair and predictable rate across the board for all VRS providers. Engaging in these activities could easily result in cost savings that would exceed perceived savings through rate cuts. These steps would also persuade all providers to manage their funds ethically, transparently and with integrity in order to sustain/improve current levels of service while allowing for technological growth and overall industry development and efficiency while discouraging unethical practices, mediocrity and inefficiency that tiered systems can foster.

It is my sincere hope that all aspects of this issue will be carefully considered toward a win win resolution fostering meaningful access for consumers, reasonable rates for providers supporting ethical, efficient, quality service delivery, with accountability and fiscal responsibility to the FCC/NECA.