

Whom to concern

The FCC is considering adopting a funding rate for relay services that will bankrupt the relay services industry for the Deaf. If this happens, the world's largest employer of the Deaf will not survive. This rogue FCC proposal may throw thousands of Deaf professionals out of work.

I cannot understand why, in a Democratic administration, there would be serious consideration given to cutting a reimbursement rate so low that it would effectively destroy the most efficient, cost-effective VRS provider. This would have at least two net effects:

1) The cascade of VRS users from bankrupted providers to other providers would dramatically increase hold times, forcing VRS providers to miss hold time requirements. When a provider misses hold time requirements, they don't get paid. The cascade of users from bankrupted provider to the next soon-to-be-bankrupted provider would effectively destroy the entire VRS industry. And it would be at the FCC's design.

2) Set the precedent that cost-savings is NOT part of the FCC's formulae for consideration when working with the industry. Is this really the message that a Democratic administration wants to publicize during the Great Recession?

Even a casual glance of all VRS providers' costs shows that costs of providing VRS have risen over time, not decreased. Setting a reimbursement rate that is below an operating cost is a foolish political and business decision. No business establishes services to lose money. It seems that the agency is expecting that though allowable costs have risen over time, and are projected to continue to increase in expense, that a reimbursement rate that undercuts the costs of service provision will not result in operational failure.

And the agency has not included total costs of service in their reimbursement formula!

Does the FCC want to be known as the agency that told Deaf and Hard of Hearing Americans to “go to the back of the bus”? As a Deaf man, if I can't communicate, I guess that the implication is clear: making sure I have access to communication isn't important. The spirit of the ADA in establishing fundamental human liberties for people with disabilities will be quashed because the government decided that human dignity wasn't important anymore. The human costs in the collapse of the VRS industry are incalculable.

Does the FCC really want to be known as the agency that decided “Life, liberty and the pursuit of happiness” is not an unalienable right for Deaf people?

Rather than cut the rate, raise it and guarantee a stable rate to encourage the continued functionality

of this vital service.

Thank you for your time to read my and everyone comment...

Andrew Pitchford