

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

As a member of the deaf community, I am writing to urge you to keep your commitments to the deaf by setting a fair compensation rate for Video Relay Service providers. I was distressed by your recent announcement that you are considering a rate reduction that would destroy VRS as we know it.

VRS is a life-altering technology for a deaf person. It allows us to communicate in American Sign Language, our native language, over distance, something that no other technology permits. In the Americans with Disabilities Act, Congress directed the FCC to ensure that all deaf Americans have access to "functionally equivalent" communications, and VRS is the most functionally equivalent form of communications available to the deaf today. However, there is much to be done before VRS becomes truly functionally equivalent.

I understand that, after a long process during which thousands of pages of comments were reviewed, the FCC established a fair three-year rate plan for VRS providers in 2007. At the time, the FCC stated that one of the goals behind this rate plan was to encourage providers to invest in better VRS service, better technology, and better interpreters. I can tell you as a VRS user that VRS service has in fact improved - wait times for calls are shorter, videophones are substantially better, and we now have Enhanced 911 emergency service and ten-digit telephone numbers.

Now the Commission has announced that it may drastically reduce the VRS rate. Rates as low as the FCC has proposed will reverse the progress made toward functional equivalence. Providers will be forced to cut their costs by making VRS less functionally equivalent or stop providing VRS altogether. The proposed rate cuts are so deep that the rates would not cover the real total costs of running a VRS business. I understand that what the FCC calls "actual" costs are only a part of the total costs of providing VRS. It is simply common sense that a VRS provider will not be able to provide service at the same level if it cannot recover the real total costs of running its VRS business.

It is unthinkable to me as a deaf person that the FCC would intentionally hurt the deaf community by undercutting VRS. Instead, the FCC should be demanding more improvements in VRS. At the very least, the FCC should do what consumer groups and VRS providers asked you to do last year and initiate a rulemaking proceeding to fully consider the impact of lowering the VRS compensation rate. Have you considered how VRS would be harmed by a lower rate? Have you or the staff thought about how a lower rate would impact VRS providers' investments, research and development, and hiring? How can the deaf community trust that the Commissioners are committed to fulfilling your obligations under the ADA if it is clear from your actions that the FCC does not even want to take the time to consider our concerns?

I urge you as strongly as I can not to shut down the investment and improvements in VRS, and

instead to make better VRS available to more deaf individuals. Take into account the deaf community's needs when you establish the VRS rate. Our hope in the deaf community is that VRS will become a truly functionally equivalent and remain available for our children and the many future generations of signing individuals who require VRS to communicate effectively. Please show us that the FCC also is committed to these goals by keeping your commitments to the deaf community and setting a fair VRS rate!