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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 writing today as a 20-year veteran of the TRS industry and as a TRS consumer. I have some concerns about the numbers in the NECA report, which the Commission will use to base its critical decision regarding the compensation rates for Video Relay Service. After studying the report in great detail, I find the numbers convoluted. There appears to be many ways to shake them up and spit them out, but the burning question from my perspective is, what is the right way? What is the way that will encourage quality (including nationally certified interpreters), competitiveness (resulting in consumer choice) and technological advances (cellular VRS!)? This analysis caused me to wonder whether the Commission might consider the option of continuing the current rates or setting an interim, 6-month rate, whilst doing thorough audits of all data submitted? I simply am not convinced providers are being completely forthcoming and transparent in their submissions. The NECA Advisory Council is equally unsure and unnecessarily in the dark.

I understand the Commission specifically requested feedback on the set of numbers titled Historical Costs from actual 09 data submitted. NECA says based on applying a percentage, the composite cost to produce a minute of VRS = \$3.8349. It is unclear what formula was used to produce this composite. Further, is a tiered system necessarily the best for consumers? In some ways it deters competition (if the middle tier is compensated at a higher rate than the rest, why not just intentionally force minutes to stay within that tier?) and in other ways it encourages white label providers to enter the marketplace and muddy the water for consumers with re-selling.

As with most things in life, the truth lays somewhere in the middle. One approach could be to issue ONE rate just as all the other forms of TRS have. Using one rate and the numbers on page 22 (NECA report) puts the composite cost of one minute of VRS at \$5.24. This number would be encouraging to all sizes of providers and would not be a drastic reduction which negatively impacts service delivery, outreach or R&D. Another option might be to have a graduated rate decrease over 2 or 3 years. While I agree rates are currently too high, I do not want to see quality, choice or R&D suffer.

Thank you for your hard work to provide telecommunication access for all. Great strides have been made; many more are to be looked forward to expectantly! I stand ready to help in any way I can and appreciate the opportunity to provide some thoughts on this crucial topic.

Respectfully Submitted,

Stephanie Buell