

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,

As concerned citizen, and having experienced the use of VRS or know many that have experienced it, I have seen first-hand that this life-altering broadband 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 Chairman and Commissioners of the Federal Communications Commission (FCC). The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide “functionally-equivalent” communications.

You will soon determine the future of VRS. 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. And, you will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even in the face of poverty and isolation.

Relay TTY communications is a much slower and out-dated mode of telecommunications and would incur more minutes to be submitted to the FCC for reimbursement than VRS. VRS allows for communication to occur as any natural conversation would and therefore, would require half the time than if it were communicated through TTY Relay.

I was deeply disturbed to see the Commission's recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. I understand that if these proposed rates are adopted, a leading VRS company would head into bankruptcy. This would be disastrous for deaf VRS users.

VRS has opened the world for many deaf users who have been able to finally connect to family, friends and the world at large. Your proposed rate would put an end to the services that have opened their world. This would be tantamount to putting them all in an isolation cell. It would be inhumane.

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 services 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 that I know 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 reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,

Victoria Yee