

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Telecommunications Relay Services and ) CG Docket No. 03-123  
Speech-to-Speech Services for )  
Individuals with Hearing and Speech )  
Disabilities )

**Telecommunications for the Deaf and Hard of Hearing, Inc.;**  
**Association of Late-Deafened Adults, Inc.;**  
**National Association of the Deaf;**  
**Deaf and Hard of Hearing Consumer Advocacy Network;**  
**California Coalition of Agencies Serving the Deaf and Hard of Hearing;**  
**American Association of the Deaf-Blind; and**  
**Hearing Loss Association of America**  
**Reply Comments on 2010 VRS Rate Public Notice**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), through its undersigned counsel, Association of Late-Deafened Adults, Inc. (“ALDA”), National Association of the Deaf (“NAD”), Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”), California Coalition of Agencies Serving the Deaf and Hard of Hearing (“CCASDHH”), American Association of the Deaf-Blind (“AADB”), and Hearing Loss Association of America (“HLAA”) (collectively, the “Consumer Groups”) submit their Reply Comments on the proposed payment formula and fund size estimates for the Interstate Telecommunications Relay Services (“TRS”) Fund submitted by the National Exchange Carrier Association (“NECA”) for the period of July 1, 2010, through June 30, 2011.<sup>1</sup>

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<sup>1</sup> *National Exchange Carrier Association Submits the Payment Formula and Fund Size Estimate for the Interstate Telecommunications Relay Services Fund for the July 2010 through June 2011 Fund Year*, CG Docket No. 03-123, Public Notice DA 10-761 (rel. Apr. 30, 2010) (“2010 TRS Fund PN”).

The Consumer Groups filed comments in this proceeding on May 14, 2010. In summary, the Consumer Groups stated that functional equivalency is the standard by which every action proposed or taken by the Commission and TRS providers should be assessed. The Consumer Groups urged the Commission to ensure that the rates established for the 2010-2011 Fund year compensate TRS providers for the services they are providing and for the services necessary to continue moving towards functional equivalency.

The Consumer Groups also expressed our strong desire for high quality video relay service (“VRS”) technology, highly qualified and certified interpreters, improved speed of answer requirements, consumer marketing and outreach, customer service and training, technical assistance, research and development, and other activities necessary to continue moving towards functional equivalency. We recognized the benefits of healthy competition and we also recommended that the Commission examine how the costs of VRS equipment (hardware and software) distributed to consumers are compensated. We urged the Commission to gather the data needed from VRS providers to set fair and reasonable rates that ensure quality service and advance functional equivalency.

The Consumer Groups are filing these reply comments in support of the portions of the comments filed by AT&T Inc. (“AT&T”) on May 14, 2010 and reply comments filed by Speech Communications Assistance by Telephone (“SCT”) on May 17, 2010<sup>2</sup> that pertain to the Speech-to-Speech Services (“STS”) rates proposed by NECA. Specifically, the proposed rate for STS includes an additional per-minute amount of \$1.131 to be used for STS outreach, outreach which is still very much needed.<sup>3</sup> However, both SCT and AT&T question whether

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<sup>2</sup> SCT requested that its Reply Comments replace its original comments filed on May 3, 2010.

<sup>3</sup> See 2010 TRS Fund PN, at 2 n.11.

dividing the funds for STS outreach among the seven different providers is effective. Instead, they each propose that the additional funding be directed towards a single organization that would develop a program for promoting STS. As AT&T points out, the Interstate TRS Advisory Council recently passed a resolution supporting having a single fund for nationwide outreach to promote STS.

The Consumer Groups agree with SCT's proposal that the Commission should initiate a process to select and fund a marketing/communications firm to develop the STS outreach program. As explained, the firm needs to be experienced in marketing to people with disabilities as well as to their caretakers and providers. The Consumer Groups also support SCT's proposal that the Commission consider naming one or more individuals that have experience working in the speech-disabled community as consultants to the firm charged with the outreach program. Lastly, the Consumer Groups support SCT's proposals that the Commission commit to the outreach component of the STS rate for three years, and that a portion of that funding be used to develop overall strategy for outreach.

Respectfully submitted,

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/s/

Claude L. Stout  
Executive Director  
Telecommunications for the  
Deaf and Hard of Hearing, Inc.  
8630 Fenton Street, Suite 604  
Silver Spring, MD 20910

Tamar E. Finn  
Eliot J. Greenwald  
Troy F. Tanner  
BINGHAM MCCUTCHEN LLP  
2020 K Street, NW  
Washington, DC 20006  
(202) 373-6000

*Counsel to Telecommunications for the Deaf  
and Hard of Hearing, Inc.*

Jamie Pope  
Executive Director  
American Association of Deaf-Blind  
8630 Fenton Street, Suite 121  
Silver Spring, MD 20910

Linda Drattell  
President  
Association of Late-Deafened Adults, Inc.  
8038 MacIntosh Lane  
Rockford, IL 61107

Nancy J. Bloch  
Chief Executive Officer  
National Association of the Deaf  
8630 Fenton Street, Suite 820  
Silver Spring, MD 20910

Brenda Battat  
Executive Director  
Hearing Loss Association of America  
7910 Woodmont Avenue, Suite 1200  
Bethesda, MD 20814

Sheri A. Farinha Vice Chair  
California Coalition of Agencies Serving  
the Deaf and Hard of Hearing, Inc.  
4708 Roseville Rd, Ste 111  
North Highlands, CA 95660

Cheryl Heppner  
Vice Chair  
Deaf and Hard of Hearing Consumer  
Advocacy Network  
3951 Pender Drive, Suite 130  
Fairfax, VA 22030

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