

SONNY ACCESS CONSULTING

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VIA ELECTRONIC MAIL and ECFS

June 11, 2010

Joel Gurin
Chief
Consumer Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: VRS Rates

Dear Mr. Gurin:

In response to statements from various reports and comments by the VRS industry and, for lack of a better word, the beneficiaries of the VRS, I believe there is a need for clarification.

1. Should the costs of free videophone distribution be the responsibility of the Federal Communications Commission (FCC)? No!

Most states have respective telecommunications equipment distribution programs that provide related generic hardware to respective residents who meet the disability and economic means criteria stipulated by the respective states. Check www.tedpa.org.

2. Should the costs of videophone research and development of videophones be the responsibility of the Federal Communications Commission (FCC)? No!

Various foundations and federal agencies provide research and development grants to develop generic hardware for low incidence populations such as people with hearing disabilities. For example, when text telephone (TTY) first came out, there were about 20 manufacturers. Eventually, the number came down to about three companies that manufactured generic TTYs that were interoperable and interconnect-able with each other and with any relay service provider at minimal cost.

3. Should the cost of training potential video interpreters be the responsibility of the FCC? No!

Existing interpreter training programs are available in various parts of the country, with students supported by various sources such as training grants from the Department of Education including Vocational Rehabilitation Services, scholarships provided by various colleges/universities and tutorial costs, to name a few.

In closing, the FCC should not be considered as the sole source of funds for all related components of relay services. To reach a solution utilizing the most cost-effective approach, it is recommended that an advisory council of affected federal agencies, organizations, manufacturers, and consumers, to name a few, be created to ensure effective intertwining of various components funded by different sources to reach an effective goal of cost-effective and most efficient video relay services.

Respectfully yours,

Alfred Sonnenstrahl
Extremely Concerned VRS User

Cc: Greg Hlibok
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