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

17-June-2010

In regards to CG Docket 10-51, and the filing by the FCC of 11-Jun-10, number FCC 10-88, I would like to express my disappointment in the FCC's decision that all VRS call centres must be located in the US.

This decision is based on the assumption that VRS call centres located in Canada would not have adequate supervision and therefore would have more risk in producing fraudulent minutes. I can assure you, as an employee of Sorenson VRS in Canada, I have never knowingly processed a VRS call where both parties were located outside of the US or its territories. In fact, that guideline is introduced in the very beginning of our training.

The centres in Canada run using the same software, and are supervised using the same system as those centers in the US, so the notion that Canadian centers would not be adequately supervised simply based on their location is ludicrous!

In fact at one time, another VRS provider who does NOT have call centers in Canada was supplying Deaf Canadians with video phones and processing their calls. I personally have used the services of 3 different VRS providers who do not have centers in Canada, to call my Deaf parents and friends; calls which originated in Canada to another Canadian number. Whether or not these providers billed the FCC for those minutes is unknown to me, but clearly that is where the risk lies for fraudulent calls occurring.

Because of regulatory delays, VRS is not yet provided in Canada. However, one telephone company is about to embark on a much needed 1-year trial of the service. If the centers in Canada are forced to close their doors, this trial will likely not happen. As interpreters, we have patiently waited for the opportunity to service Canadian callers and have respected our ethics, our employer, and the FCC by not processing Canada to Canada calls from the
centres in Canada. We are now, finally on the on the brink of being able to serve Canadian callers for a 1-year pilot but the decisions you make will have a direct impact on the success of the service in this country.

The decision to close call centres in Canada would result in hundreds of lost jobs and would have a direct impact of the service levels that American deaf callers have come to rely upon.

I encourage you to reconsider your decision. It appears to be nothing but a personal attack on one VRS provider and is founded on the fears of the propagation of fraud when it's already been shown that location of call centres does not indicate fraudulent calls would be made.

Respectfully,

Joni Harvie