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June 18, 2010

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

**RE: CG Docket No. 10-51  
In Reply Comments to VRS Practices and Rate Structure**

As Deaf consumer, I rely heavily on videophone (VP) and VRS for making calls at both home and work, I am writing to express my concern in replying comments about VRS practices.

With my understanding, FCC considers the decision on rate structure and practices of the VRS program that will ensure functionally equivalent (FE). Before I continue, I like to say thank you very much for your action to prevent abuse, fraud and waste. We are very optimistic about the enforcement, which it would remain dependability, consistency and integrity.

There are some crucial aspects along with my comments as shown below:

*“Our goal is to ensure that VRS continues to thrive as a highly functionally equivalent form of TRS, that it remains readily available to consumers (deaf and hearing alike), and that it continues to offer consumers high quality service.”<sup>1</sup>*

I support your goal but in this case it has not reached to the level of highly functionally equivalent (FE). Several reasons are that

- Practices of VRS providers do not meet our expectations
- Hearing callers using ASL (sign language) are unable to contact us via videophones
- Overwhelming of receiving ten digit numbers and registration system
- Videophone equipments still remain being lacking interoperability
- Incoming and outgoing calls via ten digit numbers to different VP equipments are troublesome and confusing
- Lack of technical support service for repairing, troubleshooting, and training

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<sup>1</sup> See *DECLARATORY RULING, ORDER AND NOTICE OF PROPOSED RULEMAKING*, Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51 (May 27, 2010)

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### **1. Location of VRS Call Centers**

I agree wholeheartedly that the call centers shall be strictly located in the US because of ASL as language difference issue between US and out of country. I had several undesirable confrontations with Communication Agents (CA) (any of VRS providers) and found that their ASL skills were inappropriate for video communication. However, I had reported these occurrences to the VRS providers as though I was very disappointed at the providers because I did not receive any call back with resolution after my reports.

My suggestion is that the VRS Call centers may be identified in any location and so I would be able to detect the difference in ASL communication. For example, one call center shows California based and I would be able to understand the ASL culture. That is one major reason some hearing callers refused to accept some VRS calls where they assumed from outside of my location. As I have been tolerant along with my patience, I had repeatedly to explain them to accept the calls. Unfortunately I do not see how to convince some hearing callers because the call centers are out of control and unable to meet my expectations.

Instead of making VRS calls, I would take an extra step to send an email in advance to notify hearing callers with time and date before I would make any call in next step. Therefore, they would expect the VRS call from me. That is too much aggravation for both hearing callers and me as though I am not pleased with any VRS provider and their questionable quality of call centers.

### **2. VRS CAs Working from Home and Compensation**

As I had pointed out about my concern about VRS call center as previously stated above, I am uncomfortable with the idea of VRS CAs at home. I would like to see some possibilities of better monitoring, overseeing and supervision system available at home as well as strongly confidentiality issue. Secondly, I hope it will ensure highly quality of communication issues such as inadequately sign language skills and distractions; and at the same time if unpleased with one CA would I be able to request to transfer to a different CA with smooth transition?

### **3. Specific Call Practices**

- **International VRS calls:**

Since functionally equivalent (FE) may be expected to be met, I believe strongly to be entitled to make VRS calls regardless of from and to out of country. I would have the right to make calls when I visit abroad anytime, anywhere as long as I am US citizen. I

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do not like an idea to be helpless in the strange country and unable to reach friends or business colleagues there due to unreasonably refusal by VRS providers to accept calls but at least there should be any way to offer availability option as necessary. As I am trying to imply here, I would suggest by registration or caller id carrying card if possible for prepayment calls upon travelling out of country. Otherwise, we will not have the opportunity to work or participate in the global economy.

- **VRS Calls in Which the Caller's Face Does not Appear on the Screen; Use of Privacy Screens; Idle calls**

That is typical that sometimes I am distracted to answer visitors at the front door or in the office, and for any reason but I believe it would be sufficient for VRS CAs to wait at least 2 minutes before disconnecting the calls.

- **Calls Involving Remote Training**

I would support calls during remote training for the webinars, online seminars and call conferences with the vendors, agencies and businesses. That is why I asked you about the issue of call conferencing between deaf callers and hearing callers but I understand that the FCC may consider the decision later.

I agree that if VRS providers employ deaf people or hearing interpreters, then they should be accountable for call conferences during remote training but should not be reimbursed for call minutes by FCC.

#### **4. Transparency and the Disclosure of Provider Financial and Call Data**

I am uncomfortable when VRS provider asks for my support for rate structure issue as though I am unable to view the data and financial reports. I am unable to make any comment. I don't appreciate the behavior of VRS provider for being aggressively pushing consumers to get involved to protest about the rating structure. I couldn't believe that the VRS provider causes problematic among the deaf and hard of hearing community as if the provider makes good threats. On analogy, the electric vendors, oil companies and phone providers would threat us in similar to VRS provider. We have nothing to do with the rate structure and therefore, we should not be ruffled. I am uncertain about how this ongoing attitude and bad behavior by VRS provider would be resolved but we should be entitled to access any information about data and provider financial report. Their unethical move is precedent as opening the door to our right to know why we are being threatened.

#### **5. VRS Recording Calls and Junk Calls**

Once we had acquired new ten digit numbers I had received VRS calls and found that the CAs had relay messages from recording calls. I had reiterated that I refused to accept

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calls from recording calls but VRS providers did not comply with my request. I had contacted VRS provider to “opt out” accepting recording calls as I initially thought they were fully aware of my request but to no success although I am still receiving recording calls.

#### **6. How long will VRS calls be saved**

As I understand some providers suggest for five years to store VRS calls, I accept it is up to the providers’ decision but why is it necessary to save these calls? Normally the messages should be discarded immediately once after call is completed. I don’t agree that it is a good idea to save calls but I strongly believe that these calls should immediately be discarded at least seven days after the call has been completed.

I don’t permit the agents to record and save our conversation messages unless they request our permission. My concern is that perhaps they may use these saved messages against us at whatever reason in case whenever it is up to the judicial matter.

Will the goal for highly functionally equivalent (FE) reach toward the best achievement, I am eagerly looking forward to this success of highly FE.

Sincerely yours,

/s/

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