

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

21-June-2010

I am writing in regards to CG Docket 10-51 and the filing by the FCC of 11-Jun-10, number FCC 10-88.

VRS is proving to be a vital link between deaf and hearing communities. Because of regulatory delays, (CRTC and telcos) we do not have VRS in Canada.

Sorenson Communications established itself in Canada to lighten the stress on an already strained profession in the U.S. When doing so, Sorenson Communications clearly emphasized the importance of respecting and adhering to the FCC mandates. Sorenson Communications has dutifully taken the responsibility of ensuring fraudulent minutes are not billed to the FCC.

Sorenson Communications is the only US Based VRS company with call centers outside of the US. Being a Canadian employee of Sorenson Communications we stringently follow the FCC mandate not to process Canada-to-Canada calls. I am confident in saying we respect and strictly adhere to the FCC mandates.

From a personal experience, I am disappointed to say that not all VRS providers adhere to the regulations the FCC has set forth as Sorenson Communications does. I received a video-relay call through, Z-video relay service from a local deaf community member. It is my understanding that all VRS companies must follow regulations under the FCC. In this instance the Canada-to-Canada call was placed and processed through Z-Video Relay Service subsequently billing the FCC for fraudulent minutes.

Canada is the only other country in the world where ASL is the recognized language for deaf individuals. 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, on the cusp of providing VRS to Canadians, the upcoming decisions you make are imperative to the future of successfully establishing VRS in Canada.

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. Continue to allow Sorenson Communications to operate centers in Canada while providing high quality service, which every American deserves.

Respectfully,

Karen Anne Smith