

The following lists several points in response to the FCC's NOI, CG-10-51 related to video relay services (VRS) for telecommunication for the deaf and hard of hearing.

- Let me first address the issue of why VRS is needed and is the closest example of functional equivalency as described by the American with Disabilities Act (ADA). When ADA first became law, the only option for a phone call for someone with a significant hearing loss was a TTY/TDD. The text was and still is too slow and it was barely useful for communication between the deaf/hard of hearing (hoh) and hearing worlds. Still an improvement from nothing and it should continue to be available. ADA was based on wire and telephone technology available then, but the letter of the law encouraged the use of current and advanced technologies.

Additionally, American Sign Language and spoken English are different languages. ASL has its own syntax like any other language. A user that is born deaf and learns ASL first may have a different level of understanding of spoken English. Any text is not equivalent in comparison to the visual needs provided by VRS and video phones for deaf/hoh users that use ASL as their first language that is required by ADA.

Technology has advanced in recent years and we moved to caption phone possibilities. This service relies on a 3rd party and voice to text software. It is slow and not always accurate. It DEFINITELY can't keep up with computerized menus for customer service as needed for calls to banks, utilities, and large businesses or organizations. TTYs can't either, so both text based technologies are obsolete or not helpful at all in this situation and continue to not be functionally equivalent for people with significant hearing loss. Text alone options do however provide some assistance to people with mild or moderate hearing loss to help them achieve equivalency.

VRS provides qualified interpreters that can assist people with significant hearing loss with calling the hearing world in near real time. VRS and video phones provide the nearest possibilities for functional equivalency for making phone calls. Ask yourself these questions if you have normal hearing:

1. Can you make a call in real-time?
2. Can you make a call away from a land line?
3. Can you leave a message for someone not available for a call?
4. Can you receive a message regarding a call away from a land line?
5. Can you communicate person to person or business to business in real-time?

These are just a few of the most basic things available to hearing people (that make all answers to the questions above "YES") that video phones and VRS make possible for people who are deaf or hard of hearing. Without VRS, the answer is "NO" to all of the above for the deaf/hoh.

Additional comments to CG-10-51 are:

- Some problems w/ person to person or peer to peer (P2P) calls to some vendor video phones exist.
- Distribution of equipment should be available to any user wishing to communicate with people who are deaf/hoh. Availability in WalMart or RadioShack (or similar business) is also a good idea for hearing people to communicate w/ deaf and hard of hearing friends and family.
- Downloaded software for computers for video phones is good, but seems silly that you need to be deaf/hoh to get a 10 digit number. Again, what if you are hearing and know ASL and want to talk to deaf/hard of hearing friends or family.
- I don't think equipment should always be free. With regard to the issue of functional equivalency ANY of the features video phones or software offer is equal to those of cell phones for hearing people. However, hearing people pay for their phones, so UNLESS it is a financial burden, deaf/hoh should pay equivalent prices for video phones.
- All VRS interpreters seem qualified, but have varied levels of understanding of the needs of the user. An example of this would be if the user is very proficient in ASL or if the user uses more ASL in English word order (CASE). Also, whether or not the interpreter moves his/her lips with the speech and speed of the ASL are huge factors for understanding for those less proficient in ASL (late-deaf, hoh). VRS and Communications Access Real-time Translation (CART) or caption of some kind would be best for these users (see next point).
- Currently VRS is not helpful to someone who does not know American Sign Language. TRS is not beneficial for someone with severe or profound loss. Text in real-time is more beneficial to those that understand English best (late-deaf) or a combination of text and video interpreted relay calls. Funding for research to achieve this to VRS companies may also be helpful as well as the availability of oral interpreters.
- Wireless VRS is essential for functional equivalency. Hearing people can make wireless calls on cell phones. In a very mobile society, this is very important to the deaf/hoh for travel, work, and communicating with families and friends just as hearing people do.
- A ten digit number should be available to anyone for a video phone. Availability only to the deaf/hoh excludes hearing interpreters, family, and friends that can communicate directly with other video phone users.

In closing, let me also say that I am sure a large reason for questions or this NOI is abuse of VRS and receiving government funding. How funding and services should be provided is really a separate issue. My only strong feeling on this is that industry alone does not look out for best interest of society and some regulation is needed, especially where funding is provided by the government. I suppose that is where capitalism and democracy are sometimes at odds and I leave that issue to be resolved separately. My major point is that I am thankful for VRS services as a person that is hard of hearing and that it has brought the telecommunication possibility back into my life. I strongly urge the continued availability and funding of VRS and encourage enhancement of features that are equivalent to telecommunications for hearing people. Thank you.

Best regards, Chris Littlewood, M.Ed.