



15 September 2010

Federal Communications Commission
Washington, D.C. 20554

**RE: Structure and Practices of the Video Relay Service Program
CG Docket No. 10-51
DECLARATORY RULING, ORDER AND NOTICE OF PROPOSED RULEMAKING
Adopted: May 24, 2010 Released: May 27, 2010**

1. These are supplementary comments submitted by the Canadian Association of the Deaf (CAD) following up on our original comments which were submitted 4 June 2010.
2. The CAD is the national advocacy association of Deaf people in Canada, similar to the National Association of the Deaf (NAD) in the United States. We represent Canada's estimated 310,000 linguistically and culturally Deaf persons. We are entirely controlled and operated by the grassroots Deaf community: we *are* the Deaf.
3. We submit these supplementary comments in response to the comments of the Government of Canada which were filed 8 September 2010.
4. Canada's comments were submitted by Foreign Affairs and International Trade Canada. This department has no responsibility for telecommunications matters such as Video Relay Service. Telecommunications is the responsibility of Industry Canada.
5. The comments were submitted by an individual identified as Second Secretary of the Embassy of Canada. We question whether such an individual is credible as an expert on, or even knowledgeable about, VRS.
6. The comments were not signed anywhere in the document or in the covering letter by an appropriate Government of Canada representative, such as the Minister or Deputy Minister of either Foreign Affairs or Industry. Indeed, they were not even signed by the Ambassador or a senior Embassy employee. We question, therefore, whether this document actually reflects the informed position of the Government of Canada, or whether it was in fact a courtesy letter supplied by a member of the civil service at the request of one of the VRS providers who suggested its contents. Who authorized a Second Secretary to write and submit it?

2...

The Canadian Association of the Deaf
L'Association des Sourds du Canada

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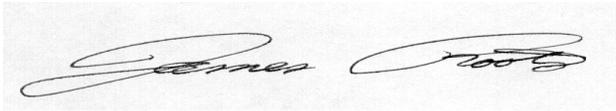
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7. No consultation took place between the stakeholder groups, such as the CAD, and either the Government of Canada, the Embassy, or the Second Secretary in the writing of this document. It is not a consumer-informed document.

8. We point out that this lack of consultation in matters directly affecting a disability constituency stands in violation of the United Nations Convention on the Rights of Persons with Disabilities. The Canadian Government, and the legislative bodies of each province and territory of Canada, signed and ratified the United Nations Convention; if the document is in fact sanctioned by the Government, it is illegitimate because it violates the Convention.

9. The Commission, in its considerations, should therefore give due weight to the facts that: (i) the comment filed by the Government of Canada appears to have been submitted by one person of no apparent authority and without the prior approval of his superiors; (ii) it was filed by a department with no expertise in or jurisdiction over telecommunications matters; (iii) it was filed without UNCRPD-mandated consultation with a national Deaf consumers body; (iv) it opposes in fundamental respects the comments submitted on behalf of Canada's 310,000 Deaf people by their own organization, the Canadian Association of the Deaf.

Sincerely,

A handwritten signature in black ink, appearing to read "James Roots", is written over a light grey rectangular background.

James Roots, Executive Director
Canadian Association of the Deaf.