

Before the □Federal Communications Commission
□Washington, D.C. 20554

In the Matter of □Structure and Practices CG Docket No. 10-51 □of the Video Relay
Service □Program

Dear Honorable Joel Gurin, Chief Consumer and Governmental Affairs Bureau:

I would like to introduce myself once again, Steve McClelland, owner of Bay Area Communication Access and founder of ASL Wave VRS. I have been operating this interpreting business for almost 30 years and have recently expanded our office to include a state of art high technology call center to provide Video Relay Services.

ASL Wave, a new VRS service by us has just launched on June 7, 2010. We are fortunate that it is made possible by an agreement with CSDVRS, LLC, who graciously understood our intent of becoming a full fledged VRS provider down the road. Such partnership like this enabled Linguistic Minority groups like us, Deaf people, to have a shot in owning, operating and providing top quality VRS to everyone in America. By having a company run by consumers themselves surely will raise the bar in quality and provision of VRS. Who knew better what the VRS consumers wanted or needed other than we as consumers? That's why we believe it is important for us to take the bull's horn, so to speak, and lead in VRS industry.

We have a team of highly skilled interpreters who have been and still are working with us since day one. Cumulations of experience in that field are irreplaceable and added a high value for our customers. Also, our interpreters are thrilled to have the opportunity to do both, working as interpreter for VRS as well as out in the Community. That's the ideal way to address and balance the needs of our customers.

Having said that, it's clear why we strongly support the recommendation on Certification, E NOI #24 – #26, from the declaratory ruling, order and notice of proposed rulemaking released on May 27, 2010.

We are in full support and do share the same position that of Convo regarding the establishment of Provisional Certification process. The suggested set of criteria to become a "Provisional" VRS provider made sense and we do support them on all counts.

This "Provisional" Certification process will ensure Deaf owned and operated business to survive in the market and compete with the giants that's often run by Corporations whose bottom line is often about profit and not the quality of services. The advantages of having "Provisional" Certification far outweigh not having one as it will close out Deaf people to participate equally in provision of VRS service. It's imperative for us to be able to take control over something that we, ourselves, relied on daily basis. "Provisional" Certification granted to us, ASL Wave, will ensure competitors to set higher standard and providing employment opportunities to Deaf people, not just the front line but highest management level such as Chief Executive Officer, Chief Operating

Officer, Vice President, to name a few. Without the “Provisional” Certification, these will not be possible and will relegate VRS to large corporations whose only interest are their investors by making money and not providing the highest quality possible and/or or creating higher job opportunities for the Deaf people.

While we made our position to the issue stated above clearly, the rest of recommendations seem to be out of precedents from TRS and other rulings that made sense and we fully support them. We also welcome strict oversight on VRS providers to ensure VRS program remain strong and viable for the Deaf Community. We are committed to hold VRS in highest standard possible and will never condone fraudulent activities as we are customers ourselves and will never want to jeopardize this program that we relied on a daily basis. We hope you will take our position regarding white label seriously and we do look forward to working with you closely in the future to ensure viable VRS providers are given equal playing field as this is only and sure way the consumers will win!

Respectfully yours,
Steve McClelland, Owner
Bay Area Communication Access and ASL Wave VRS.