

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re:)
)
TELECOMMUNICATIONS RELAY)
SERVICES FOR DEAF AND HARD) CG Docket 03-123
OF HEARING AND SPEECH)
DISABLED PERSONS)

To: The Commission

PETITION FOR RULE MAKING

We, the undersigned representatives from the Speech-to-Speech Relay user community, and pursuant to FCC Rule Section 1.401 et seq. petition the Commission to open a proceeding that addresses issues and recommendations that impact the functional, operational and technical requirements for Speech-to-Speech Relay Service. Many of the recommendations being presented in this document have been previously filed with the Commission as part of other proceedings and by other parties. We would like to now urge the Commission to formally begin a proceeding that will allow these recommendations to be placed on the record and will allow for public comment leading to a rulemaking.

When the TRS Advisory Council met on October 20, 2010, the Council voted that the undersigned should make a proposal to the FCC regarding several issues. The majority of individual Council members favored the contents of the proposal.

1) We applaud the Commission for its decision to continue to include as part of the Speech-to-Speech per minute rate reimbursement, a minimum of \$1.13 that should be used for outreach however, we strongly recommend and urge the commission to reconsider how this outreach component is being used. For the period from March 2008 through July 2010, over \$1,067,000 from the Interstate TRS Fund has been reimbursed to six different providers for Speech-to-Speech Service. Of this amount, more than \$394,000 has been allocated as outreach funding. Instead of continuing to include the outreach component in the rate that is reimbursed to the providers, we would like the FCC to consider combining the outreach funding and to contract with one entity capable of delivering an effective, nationwide outreach program. The reasons for this request are:

- a. No increase in call volume has appeared during the years of the current outreach funding. In fact, a decrease has occurred.
 - b. The combined resources of such a project could be much more effective in increasing STS use than the current system. Now, providers do not share the outcomes of research that each of them may do to increase usage. Providers also have the disincentive of extremely low reimbursement rates for calls within almost all the states, such that they lose money on each call. Thus, while the FCC is directing them to use the money to increase use, the economic structure of STS continues to motivate them to do the opposite.
- 2) The FCC should open a proceeding to request public input concerning administering STS through the FCC rather than through the states. Such a service would be contracted to just one provider to begin with, both because of the currently small user

base and to avoid the many problems that have resulted from VRS being administered by a large number of users. The reasons for this request are:

- a. Very few users are able to monitor and advocate for STS at the state level. This inability has led to reduced quality of service and extremely little outreach in most states. Users are not able to ensure that providers receive enough reimbursement to make a profit in most states. Within the user community many people with speech disabilities also have other disabilities which either directly prevent them from being STS advocates or preoccupy them because of the extra energy and resources required to perform employment and the activities of daily living.
 - b. There is almost no communication between states about effective techniques of providing STS or STS outreach. A national service administered under the aegis of the FCC would combine the meager national resources to be more effective in this effort.
 - c. The ADA prohibits discrimination favoring one disability group. While the deaf community has the advantage of a national VRS service, which is one reason for its great success, STS users lack this advantage.
 - d. The current outreach advocacy efforts over the last decade have resulted in use of STS by less than 1% of prospective users. A major reason for this lack of use has been low quality of service and insufficient outreach, both of which are built into a state administered STS.
- 3) If remote interpreting is approved for VRS, it should also be approved for both landline and internet protocol STS in the spirit of equal access across disabilities

under the ADA. Remote interpreting would motivate accredited speech and language pathologists to work from home as CAs while they would not be motivated to work on-site. SLPs could be much more effective as CAs than the current CAs because of their understanding of speech disability and their professional motivation to work with this population.

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