

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of
Telecommunications Relay Services and CG Docket No. 03-123
Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities

Speech Communications by Telephone, Inc. 501(c)(3)

REPLY COMMENTS*

This is a reply to the filing in procedure 03-123 by Hamilton Relay concerning the SCT proposal to improve STS. It is good that SCT and Hamilton agree about the need for a national outreach coordinator and we urge the FCC to move forward with this issue.

We understand Hamilton's concerns with not reducing competition by limiting STS to one provider. If STS call volumes increase to justify multiple providers, we would favor Hamilton's position. As it currently appears that less than 1,000 consumers use STS nationwide, it would be difficult to justify multiple providers. Each STS provider requires a costly infrastructure and each additional infrastructure reduces the funds that can be allotted to each STS call. With so few callers, multiple infrastructures are likely to reduce quality of service.

If outreach efforts increase, given the estimated 1.6 million potential STS and STS IP users, there would certainly be justification for multiple providers. The FCC should consider setting up a minimum call volume at which multiple providers would be authorized.

This office receives reports that very few state relays are monitored by STS consumers. Therefore, the relay providers are free to focus solely on profit with no reason to maintain high quality of service. Spot calls around the country suggest a generally low quality of STS services, especially in terms of operator performance. Because of this low quality of service, we have to assume that the states are not adequately monitoring such performance.

It would stand to reason given that a large proportion of consumers in most states are not in a position to advocate for STS and demand high quality of service. (California is the exception, which proves the rule.) There is a good track record of STS consumer input on a national level and that record would foresee adequate consumer monitoring of a centralized national STS service under FCC control. It is for this reason that we must respectfully question Hamilton's comments about proper and efficient management of STS programs. Hamilton should feel free to file comments about this concern.

We understand Hamilton's concern about the lack of legislative mandate for an FCC administered service. Our office would have the support of other national disability organizations in sponsoring federal legislation which would take STS away from the states. Clearly, a national service could be administered less expensively, which is important in this economic climate. Before this office undertakes this task, we would need assurances from the FCC and the major STS providers that they would support such legislation.

We understand Hamilton's concern about not decoupling the STS rate from the MARS rate. If we are to preserve the MARS rate, it must be high enough to give providers adequate incentive to do sufficient outreach and to increase usage for the reasons stated earlier. Reimbursement would have to be on a session rate rather than for conversation minutes given the long set up time for a STS call. It would be possible for the FCC to administer STS and continue to pay for calls between states, while the states reimbursed the FCC for calls within states. Under this scenario, states would no longer contract with providers for STS. Such a scenario would preserve the structure of the MARS rate.

*This is a resubmission of our reply to Hamilton Relay. Our original reply inadvertently consisted of our original petition for rulemaking rather than our reply.