

The Commission is unbelievably decoupling the mandate contained in the ADA for common carriers to make their services accessible from the inherent economic drivers that have long held costs down in TRS. The Commission's actions are equivalent to the Department of Health and Human Services telling doctors across the country they no longer are required to ensure accessibility.

Simply paying into a fund is a primary reason attitudinal barriers are never addressed. It relieves the telephone company from any real responsibility for serving people with disabilities. It creates an "I already paid my dues." mentality.

The Commission ignores that every amount of fraud originated from non-common carrier providers. The Commission's actions are taken in haste and I believe will lead to only more fraud, waste and abuse. The inherent requirement of common carriers to pay into the fund creates an economic incentive for self-policing. There is no amount of regulatory oversight that can equal this long standing incentive, which Congress built into the ADA.

There is at least one current "common carrier" which has as few as 6 public telephone lines being sold.

When I approached the Commission for permission to provide TRS, during the first meeting, a Commission staff attorney asked me "How many telephone customers do you have?" My answer was that I didn't have any until they all could be served. However, my answer and goal was to pursue a successful telephone service, not just a facade of common carrier. The Commission should investigate the current provider(s) that are nothing but facades. These "common carriers" in name only pay little to nothing into the fund and exemplify potential for waste, fraud and abuse.

Today, the Commission is truly doing a disservice to the public as a whole.