

February 2, 2012

Marlene H. Dortch, Secretary,
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: FCC 11-184 NPRM Comment

Filed electronically via ECFS on Docket 10-51

Please allow me to introduce myself briefly. I am Todd Elliott and a VRS consumer.

I'm not exactly sure how the 'comment cycle' works for federal rule-making. I originally submitted my comment in response to the FCC 11-184 NPRM on December 30th, 2011 in Docket 10-51. However, the FCC 11-184 NPRM was published in the Federal Register yesterday, starting the 30-day comment period. Seeing that my comment was submitted early, I'm erring on the side of caution and resubmit that December 30th, 2011 comment filing again today, in this official comment cycle for the FCC 11-184 NPRM.

In resubmitting my December 30th, 2011 comment, I must do so with a major caveat. I find the per-minute reimbursement model to be unsustainable over the long term. In my original comment, I advocated strongly for a transition to an eventual single per-minute reimbursement rate for the entire VRS industry. I no longer support this position, and advocate instead for an eventual transition to a 'hybrid' approach on VRS compensation.

I apologize for this change in my position on VRS compensation. I am a VRS consumer and am not privy to a lot of things specific to the VRS industry. Ever since the FCC 11-184 NPRM was released on December 15th, 2011, some comments have appeared in Docket #10-51 in response to this rule-making. Greg Hlibok, Director of the DRO at FCC, also produced a series of vlogs discussing VRS reform, and participated in an iDeafNews panel discussion about this NPRM. There have been some informal vlogs and discussions in response to this important

NPRM. All of this activity has made me better informed on the issues germane to reforming the VRS industry, and I thank these participants for making me a better VRS consumer.

I would like the opportunity to expand more on this ‘hybrid’ approach on VRS compensation at a later date in the 30-day comment cycle.¹ I also find it interesting that the Commission may have made a specific ‘finding of fact’ that Sorenson Communications is the ‘dominant’ provider in the VRS industry, inviting anti-trust scrutiny.² I hope to comment along those lines as well.

In closing, I thank the Commission in this important undertaking, reforming the VRS industry for this year and the next decade, revitalizing the industry and restoring public confidence in TRS/VRS. Thank you for your time in reading this comment.

Sincerely,

Todd Elliott
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Miami, FL 33196

¹ My primary occupation is being a Teacher of the Deaf. While I had the luxury of time during my Winter Break in drafting my original comment, February is an inopportune time for me to do so again.

² Appendix B, Section II. Background, Paragraph 11, page 76 of FCC 11-184 NPRM.