

February 15, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

On behalf of the Video Relay Services Consumer Association (VRSCA),¹ this letter is to notify the Federal Communications Commission (FCC), in CG Docket Nos. 03-123 and 10-51, of ex parte communications on February 13, 2012. As the Director of the VRSCA, I attended a round table discussion with the following representatives from the FCC: Gregory Hlibok, Karen Peltz Strauss, Robert Aldrich, Eliot Greenwald, Susan McLean, Paul de Sa, Nicholas Alexander, Henning Schulzrinne, Richard Hovey, Andrew Muiltz, Heather Hendrickson, Diane Griffin Holland, Sharon Diskin, Diane Mason, Sean Lev, Sharon Lee, and Richard Hindman. There were other attendees representing Video Relay Service (VRS) providers and consumers.

During the discussion, I informed those present at the meeting of several concerns raised by the FCC Further Notice of Proposed Rulemaking of December 15, 2011. First, many VRS consumers do not agree with the recommendation of the FCC to change from a “per minute” rate to a “per user” rate because this would limit their choices. VRS consumers would prefer to keep the ability to dial around, which would allow them to have access to VRS equipment and VRS providers that meet their needs. Second, it is important for VRS consumers to obtain reliable videophone equipment that is easy to use and that will connect with any other manufacturer without glitches. Because many of the VRS users are baby boomers or elderly who may not be familiar with the latest technology, videophone equipment should be user-friendly and allow consumers to simply “plug and play.” Third, we are concerned that broadband is not accessible for many VRS consumers living in rural areas.

¹ See Comments of VRSCA, April 26 and May 23, 2011, CG Docket Nos. 03-123 and 10-51, for additional information about VRSCA. See also www.vrsca.org.

Finally, information released by the FCC should be available in American Sign Language (ASL) on the FCC's website at the same time it is released to the public. While we appreciate the FCC's efforts to provide ASL videos for consumers who communicate using ASL as their first language, we strongly encourage the FCC to make the ASL videos available on a more timely basis. This would improve the notice and comment process by allowing all members of the public, including those who communicate using ASL as their first language, the opportunity to fully participate in the FCC's rulemaking process.

Respectfully submitted,

/s/ electronically signed

Sharon Hayes
Director, VRSCA

cc: Gregory Hlibok
Karen Peltz Strauss
Robert Aldrich
Eliot Greenwald
Susan McLean
Paul de Sa
Nicholas Alexander
Henning Schulzrinne
Richard Hovey
Andrew Mulitz
Heather Hendrickson
Diane Griffin Holland
Sharon Diskin
Diane Mason
Sean Lev
Sharon Lee
Richard Hindman