

February 15, 2012

Via Electronic Filing

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

Re: Comments in Support of Motion for Extension of Time
CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On February 1, 2012, the Federal Communications Commission (FCC) released a Public Notice, DA 12-119, stating that comments in response to its Further Notice of Proposed Rulemaking (FNPRM) in CG Docket Nos. 10-51 and 03-123, *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, FCC 11-184, are due on March 2, 2012, and reply comments are due on March 19, 2012.

On February 13, 2012, Consumer Groups including Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., Deaf and Hard of Hearing Consumer Advocacy Network, and California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc. filed a Motion for Extension of Time, requesting that the FCC extend the deadline for filing comments in this proceeding until March 16, 2012, and the deadline for filing reply comments until April 16, 2012.

The Video Relay Services Consumer Association (VRSCA),¹ supports the Motion for Extension of Time for the same reasons provided by the Consumer Groups that filed the Motion. Because the FNPRM seeks comment on numerous complex issues and many of the individuals potentially impacted by the proposed rule changes communicate using American Sign Language (ASL) as their first language, additional time is needed for many of them to review the issues and prepare comments. The extensions will allow interested members of the public, including those who communicate using ASL as their first language, the opportunity to more fully participate in this rulemaking process.

Respectfully submitted,

/s/ electronically signed

Sharon Hayes
Director, VRSCA

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