Federal Communications Commission

RE: Further Notice on Proposed Rulemaking
(Video Relay Service program)

I am a Deaf consumer of the Video Relay Service (VRS) program. I use the VRS and the Video Phone (VP) service frequently for several functions. These functions aren't just limited to calling family members and acquaintances. I also use the VRS and its technologies for a living. I would like to provide my comments on a few key points that I would like to be addressed.

Technical Standards

I am in complete support of establishing a standard across the board for all VRS and VP technologies. I have, on more than several occurrences, had to reduce myself to communicate through VRS, or with my Deaf peers, using email or instant messaging as a result of lack of interoperability which resolving was out of my reach. While the FCC aims towards the goal of providing equal access for the Deaf/HH population as of these in the general public, we should never have these issues.

Neustar Database and Portability

After doing some investigation and reading the petition submitted by Sorenson regarding the iTRS database managed by Neustar it seems that there are only two columns in the database of which is phone number and IP address associated with that phone number.

I would like to make two recommendations in regards of this.

Firstly I would like to expand the tables in the database to include several more information. These columns would be: Phone Number, IP Address, Name of the consumer, Address, Login, Password, Preferred Provider, Minutes, and Last Login Date.

Secondly I would like portability for the consumer to be as **easy** as logging on at a central website that manages all of our phone numbers (ie: home, work, and mobile) for us to be able to update our personal information and preferred providers for each number then click submit. The changes will take effect instantly.

The reasoning behind the recommendations is several. To summarize: We would be required to login on any device we wish to use. Once logged in and calling VRS – we will automatically get our preferred provider. To prevent fraudulent use, each person has their own account for minutes to be recorded and monitored via comparison (not to be disclosed to the public or providers unless there was an investigation). There will be less phone numbers. We don't have to go to each provider's website to update our information. Not to mention some provider's websites are difficult to navigate for us to update our information with. The address column would provide for easier location for emergency calls of any sort. The "last login date" would be an indicator of an inactive number. Perhaps we can determine a lifespan for an inactive number before it gets culled after an unsuccessful notification.

Broadband Availability

I've worked on farms the past several years with Deaf farmers. The farms almost always are "out in the country". That comes with an interesting issue. Since there are a lot of things happening on each farm, i.e.: tractors breaking, supplies running low, etc, it's difficult for these Deaf farmers and myself to call into the city to see where the supplies are available. We, more than likely, have to resort to driving into town to meet with several vendors before we find the item we need because they think telecommunication relay service is a telemarketer call and hang up on us regularly. VRS virtually eliminates almost all of the issues. If broadband was affordable and available "out in the country" a lot of time and monies would be saved for the Deaf farmers. Chalk this up as a "Yes, I support this."

Customer Contracts

Let it be clear – I **completely** oppose this. We already see some issues across the board in various capacities between each provider. What is there to say that there will be improved service if we all wrote an agreement to remain with a provider for a time frame resulting in less competition for the providers? The providers will know exactly how much the projection for the next month is then may start getting careless with services provided.

This goes in line with my recommendations for the Neustar iTRS database. We, the community and FCC, aim for equivalency across the board between our Deaf/HH consumers and the general population. With that in mind, the consumers can improve services provided to them with a single click of the mouse on the submit button.

Respectfully Submitted,

Matt Webster