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February 20, 2012

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

To whom it may concern,

Reference: Proceeding No. 10-51

I understand that the FCC proposes that each user be “locked in” to ONE VRS provider, for a certain period of time (possibly 1 – 2 years) to reduce possible fraudulent occurrences.

However, I am personally opposed to such a plan because it is potentially harmful to us as consumers of Video Relay Services. First, it is my strong belief that VRS consumers should have freedom of choice – the choice to utilize the service that best suits my needs and interests. Currently, if I feel that one VRS service does not meet my needs or interests, am I free to patronize other services, either exclusively or at random in a search for a good provider. However, being “locked in” would remove my freedom of choice. No longer would I be able to easily find my “match.” If I found a provider I had been “locked into” did not meet my needs or preferences, I would be unable to switch to another provider until my “lock in” period was over, at which time I would then have to “lock in” to a different provider, and hope that that provider worked well for me. This could easily become a multi-year hassle.

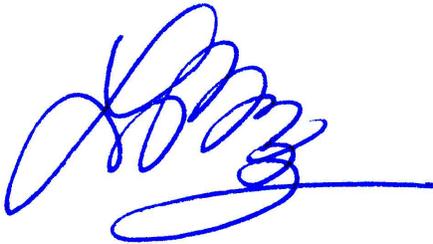
Again, I am wondering how and who makes the choice of which provider I am “locked into.” Is it going to be up to the FCC’s discretion as to whom I have to live with for 1-2 years, or is it going to be my choice? If I had to be “locked in” to one provider, I would want to be sure it is one that I felt comfortable with. Yet, even if I was “locked in” to a provider of my choice, I still would not want to be “locked in,” since there is always the possibility that the service quality of that provider could decline at any point during that period. Under a free market, I could express my displeasure with the quality of the services I was receiving by taking my dollars elsewhere. However, under the FCC’s current proposal, this would not be an option. This is not the American Democracy!

In a common sense, with a “captive market”, each VRS provider would no longer have any incentive to provide quality services; instead, it is quite likely that they would seek to maximize profits and dollars received per-user by cutting costs. Competition encourages improvement and innovation; removal of competition promotes stagnation and decline. Some people have likened the “lock in” to some phone service plans, in which the

consumer is obligated to remain "under contract" to that company for a period of around 2 years. However, there is a major difference here. With the wireless service plans, the consumer is forced accepting these contract terms, usually in return for a reduced (or free) price on a new phone or other similar enticement. It is typically understood that the 2 years contract is effectively a way for the company to amortize the cost of the equipment it provided. But in the case of VRS services, we the customer do not obtain any enticements for accepting any "lock in" period, nor are we being forced in accepting a limitation on our choices as consumers. Therefore, what is the benefit for us in being "locked in?" Nothing. What benefit is there to the VRS companies in having us "locked in"? Potentially everything.

Is this "lock in" plan a good idea? No. The FCC needs to find a different solution to the issue of fraud; one that controls and constrains the video relay service providers, not us as consumers. I don't know what the solution to the issue of fraud is, but I know that for me and you, this is not it.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read "Louis J. Schwarz", with a long horizontal flourish extending to the right.

Louis J. Schwarz