

I am concern about the Change from a Per-Minute to a Per-User Reimbursement System

I believes that there are three major problems with the per-user reimbursement system:

First, the profit motives of VRS companies would change from one where they want us to make calls and to give us good service, to one where they want us to make less calls so that they make more money. Under the current per minute system, the more service they provide, the more money they make. If this is changed to a per user system, the less service they give, the more money they make. This means that under a per user system, VRS companies will focus on signing up customers who rarely use VRS and avoid those who are heavy VRS users. As a result, the quality of VRS services would likely get worse.

Second, under a per user system, people would have to use only one VRS provider and could not use any other for a specific period (for example, one year). We know that many deaf and hard of hearing people often choose different VRS providers for different reasons. Suppose you need to call someone during a non-911 emergency but you are not able to get through on the only VRS that you are allowed to use?

Third, in order to implement the per user system, the FCC will have to set up a system to register users who are real VRS users. If they do not, then VRS providers will sign up people who do not really use VRS. We are afraid that this registration system could be burdensome or intrusive. We might have to submit an audiogram or even take an American Sign Language (ASL) skill test in order to qualify for VRS.

For these reasons, I am opposed to a ?per user? system.