



California Speech-Language-Hearing Association
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FCC Mail Room

Chairman Julius Genachowski
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: FCC NPRM 08-149 (released June 24, 2008)
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with
Hearing and Speech Disabilities, CG Docket No. 08-123; Speech-to-Speech and Internet
Protocol (IP) Speech-to-Speech Telecommunications Relay Services; CG Docket #08-15

Dear Chairman Genachowski and Commissioners:

The California Speech-Language-Hearing Association (CSHA) is the professional association that represents Speech-Language Pathologists (SLPs), Audiologists, SLP Assistants (SLPAs) and families with communication and related disorders through information, education, advocacy & professional collaboration. CSHA is organized to promote speech and hearing to children and adults with communication and related challenges, and works with its parent organization, the American Speech-Language-Hearing Association (ASHA).

CSHA strongly endorses the efforts of numerous consumer groups in urging the Commission to take action on the *Notice of Proposed Rulemaking (NPRM)* regarding speech-to-speech relay ("STS") in the above cited proceeding that has been pending for four years. The issues raised in the NPRM have been well documented and the comment period has long since been closed. We respectfully urge the Commission to act affirmatively and soon on the proposed rules.

STS allows a person who has difficulty speaking or being understood on the telephone to communicate using his or her own voice or voice synthesizer. An STS communication assistant ("CA") re-voices the words of the person with a speech disability so the person on the other end of the phone call can understand them. Since many deaf or partially-deaf individuals communicate verbally, STS provides a vital communications service for these individuals as well.

The record shows strong support for: (1) the Commission to require all STS CAs to remain on a call for a minimum of 20 minutes; (2) STS providers to offer the STS user the option to have his or her voice muted so that the user's voice is not heard by the recipient of the call; (3) STS users to be informed of the confidentiality requirement; (4) in instances when an STS user is silent but does not say "goodbye," requiring a CA to wait until at least 60 seconds have passed before disconnecting either party from a call (5) IP STS to be a form of Telecommunications Relay Services (TRS) compensable from the Interstate TRS Fund; (6) IP STS to be compensated at the same per minute rate as STS; (7) substantially improve outreach efforts with respect to STS; and (8) training new STS users so that they can easily use STS.

CSHA respectfully urges the Commission to approve and publish the proposed rules as soon as possible to ensure that individuals with speech disabilities can access the telephone system using speech-to-speech relay.

Sincerely,

Tricia K. Buckles Shepherd, MS, CCC-SLP
Tricia K. Buckles Shepherd, MS, CCC-SLP
President

cc: Karen Peltz-Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau

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