

Chairman Genachowski,

CG Docket Nos. 03-123 and 10-51

I am writing in response to the FCC's request for comments on the "Structure and practices of the video relay service (VRS) program and on proposed VRS compensation rates." I am very concerned that the changes being considered will destroy a program that is vitally important to people who are deaf or hard-of-hearing.

I am not deaf, but I know firsthand how VRS works. VRS allows people who are deaf or hard-of-hearing to use the "phone" to communicate just like people who can hear. With VRS they can do the things we take for granted - make a doctor's appointment or call a child's school. VRS puts people who are deaf on a more level playing field.

The changes being considered by the FCC would undo much of this progress. VRS largely relies on highly skilled American Sign Language (ASL) interpreters. The FCC wants to drastically cut the rate they pay VRS companies for providing this service. Obviously, this will have an immediate and negative effect on the ability of VRS companies to employ and train qualified interpreters.

The FCC has also suggested that VRS can be just as effectively provided through government-mandated software that is used on off-the-shelf equipment like common videophones, computers, or tablets. While such equipment can provide a convenient backup solution, it can't replace the videophones and other technologies specifically designed to take into account the special needs of the deaf and hard-of-hearing.

If the FCC takes away skilled ASL interpreters and innovative equipment, VRS as we know it today won't exist. This would be a huge step backward for the rights and opportunities of Americans who are deaf and hard-of-hearing.

The ability of off the shelf equipment to effectively provide a quality VRS experience is not possible. Many of the devices use wireless and this dramatically reduces the quality of VRS service. Many of the features to make VRS phones work like a normal phone, and many other functions would not be reliable, like a VRS phone made specifically for the deaf. Removing interpreters would stop access to ordering Pizza or calling a lawyer or any hearing person. Changing the VRS model would stop future planned enhancements for dedicated VRS phones. If something breaks, having the deaf call Dell or Lenovo or Acer, is just unthinkable, as they are not equipped to handle deaf support calls. This is a bad idea. Conrad Maxwell