

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 have deaf family and friends and 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.

In addition to having deaf family and friends, I am also a video interpreter who uses sign language to relay Video Relay Service (VRS) calls between deaf and hearing people. Because of my work with the deaf community, I understand first-hand how critical VRS communication is to deaf people and the hearing people with whom they communicate.

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.

I am afraid that if the FCC proposals go into effect, deaf people will not have choices in their equipment and will no longer have access to the quality VRS equipment we now use. I am also afraid that if your proposals go into effect, it will degrade the quality of service I provide as a Video Interpreter, thereby affecting the level of functional equivalence deaf people experience and have come to rely on. If the FCC wants change and wants to provide functional equivalency - and wants us interpreters in the middle to assist, this is not the way to do it. These ideas are a huge step in the wrong direction. The FCC cannot consider their proposals to be a reasonable replacement for the high-quality, unique VRS technology we use every day. Let's keep VRS innovative and progressive. 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. Alan Logan