

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A32S
Washington, DC 20554

CG Docket Nos. 03-123 and 10-51

I am writing as an American Sign Language/ English interpreter. I have been professionally interpreting for eighteen years and providing interpreting services for VRS for the past ten years.

I oppose the proposed reforms outlined in CG Docket Nos. 03-123 and 10-51. VRS has changed Deaf peoples' lives. It has leveled the playing field for so many. As an interpreter providing VRS services over the last ten years I have seen the impact. Through the years I have seen an increased number of people who can hear initiate VRS calls. These are business, doctors and family members who are reaching out to Deaf people in ways that before seemed unnatural and awkward. The difference between having an interpreter in the call relaying the information compared with a call agent reading a typed message through text relay is tremendous. Deaf people can now communicate in their first language with people in ways that allow them to express themselves fully and freely.

As a high qualified and certified interpreter I have many challenging assignments. None, however, compare with the challenges I see as a VRS interpreter. These challenges range from interpreting for Deaf consumers who use regional variations of American Sign Language to interpreting for a variety of situations with no time to prepare myself for the content of the call. The proposed rate reduction will likely mean VRS providers will be forced to hire less qualified interpreters. This will, without doubt, impact the quality of interpreting services the Deaf and hearing consumers of VRS received. This will mean that Deaf will no longer experience the ability to express themselves fully and freely with the confidence that their message is being relayed accurately.

It is also likely that VRS providers will have to limit the number of interpreters they hire at any given time. This will mean longer wait times for the callers before the call can be placed. This is not the functionally-equivalent services that Deaf people have a right to receive.

Reduction in funds will bring innovation to a stop. The quality and availability of videophones will be limited. Having videophones designed to meet the unique needs of a visual language is paramount to the ability of Deaf people to communicate in ways which provide functional-equivalency. Off-the-shelf options will not meet the visual demands needed when communicating in American Sign Language. As an interpreter who has interpreted calls from both specialized videophones and off-the-shelf webcams I can attest to the difference. Interpreting through a video medium is difficult enough without having to deal with the additional difficulties in video quality.

I ask that you carefully consider how the proposed changes in rate and VRS Access Technology will impact the ability for Deaf people to communicate in ways that hearing people take for

granted. The proposed reform will have significant impact to the lives of Deaf people. It is my hope that through the continued oversight and careful monitoring of the appropriate use of TRS funds that the FCC can avoid a further reduction in rates and continue to provide Deaf people with functionally-equivalent services.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anne Braun", with a long horizontal flourish extending to the right.

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