

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 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 my brother of 45 years is. I know firsthand how VRS works. VRS allows people, who are deaf or hard-of-hearing, like my brother and his wife, to use the "phone" to communicate just like people who can hear. With VRS, my brother, his wife and others in the deaf community can interact within society in ways we take for granted, i.e., contact 911, make a doctor's appointment, or call a child's school. VRS puts people who are deaf on a more level playing field and allows them to participate more fully within our society at large. Moreover, VRS almost always improves the frequency and quality of dialog for the deaf with family members and the non-deaf community.

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. More importantly, interpreters bridge the gap between the ASL sign language of the deaf and conversational English understood by the hearing world. While interpreters are skilled at bridging this gap, there is really no hope that off the shelf programs could adequately perform this same task, especially given the fact that much of sign language is communicated through facial and body expressions which provides context and meaning to their signs.

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 and would make a mockery of the concept that the deaf have equal access under the law.

Please do no harm and take whatever action you can to ensure that the proposed FCC changes are not implemented.