

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.

I married into the deaf community by marrying my wife, a child of deaf parents. I have seen firsthand the opportunity that VRS videophones and not traditional text relay service has increased her parents' independence in conducting their own business as true adults should. What is even more awesome is being able to contact them so easily with the increasing technology. IN the past, you were only able to reach them at home and only if they saw the light flashing when the phone would ring. Now, we can contact them at home, or away from home with apps on their cell phones that utilize the same Video Relay service. True functional equivalence is occurring with the increased technological advances that these private vRS companies are developing. Moreover, using VRS rather than text relay over a TDD is much more accurate. I often found with TDD the difficulty in comprehending the message in written English and not in their native ASL language. I also run a business in insurance and utilize the VRS service all the time. I can clearly explain what I need to explain through VRS and the use of ASL interpreters on the phone. Most importantly, what I explain is often something that the deaf consumer is understanding for the very first time in their lives. The communication barrier never allowed the deaf consumer to truly learn about insurance coverages. VRS is a win-win situation for all!

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 will not exist. This would be a huge step backward for the rights and opportunities of Americans who are deaf and hard-of-hearing. Charlie Snyder