

Center on Deafness

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November 14, 2012

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Public Notice CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch,

I would like to applaud the efforts of the Federal Communications Commission on reducing waste, fraud and abuse by Video Relay Service providers.

In the interest of maintaining a viable Video Relay Service system in the country, I would ask that the rate structure not be less than \$5 per minute for Tier III (or any other tier for that matter). I have researched this issue and do not believe that the current rates are much above actual cost and it appears to be unanimous that anything less than \$5 a minute will have negative consequences for the quality of service.

In terms of technology, there has been a widespread call for all VRS providers to have standards for interoperable systems and I support this. This will help ensure a more accessible system and provide the kind of equitable access that telephone users currently have (e.g. regardless of the provider, a caller can contact any other user). This means FCC should support the development of standard, software based VRS access technology (“application”) that could be used on commonly available off-the-shelf hardware as a means of furthering the Commission’s interoperability and portability goals. This technology needs to be available as open source software development by anyone.

I look forward to an improved and better VRS system that will ensure equitable communication access for all people.

Sincerely



David H. Smith, Ph.D.
Director of the Center on Deafness