

STRUCTURE AND PRACTICES OF THE VIDEO RELAY SERVICE (VRS) PROGRAM AND ON PROPOSED VRS COMPENSATION RATES

CG Docket No. 03-123

CG Docket No. 10-51

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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 having a deaf relative and working with the deaf community in the past I have firsthand knowledge of how VRS works. VRS allows people who are deaf, and use ASL (American Sign Language) as their first language, communicate with the hearing world. They are able to use their first language ASL (American Sign Language) to speak to a qualified interpreter, who, in turn speaks to the hearing person.

You must understand that ASL has a different grammatical structure than English. It also relies on facial expressions & body movements as part of its grammar. In addition, it is a very literal language. It is a recognized foreign language in the United States and is taught, as such, in high schools and Universities throughout the U.S. Therefore, it would not be able to be replaced by a computer program or a facial & body recognition software package. Furthermore, because the deaf communities first language is so different from English, emailing and texting is often difficult, misunderstood, poorly written, and most importantly, not always immediate.

As the deaf population declines (due to medical advancements) there are less qualified sign language interpreters being trained. If you lower the payments for services this will further erode the ability of the deaf to communicate equally (ADA: "[N]o qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.")

I sincerely hope you now understand the unique success that has been created with the VRS and you will fully consider the implications of these proposed cost cuts and respect the spirit of the Americans with Disabilities Act to provide individuals with disabilities opportunities to live their lives like individuals without disabilities.

Most sincerely,

Nancy Sidford

