

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 have many friends who both interpreters and who are deaf. I am greatly concerned about the impact that the proposed changes would have on both groups.

First and foremost, the deaf. So many of the deaf are low functioning and elderly. Off the shelf technology is designed for the hearing, and is designed for younger generations. My hearing elderly family members rely on simple land telephones, they do not own nor how to use cellular phones. Forcing the deaf elderly to use an iPad, or a PC to communicate, would be like asking my hearing grandparents to purchase an iPhone, download the app, and learn how to use the technology. It's not going to happen. It is unfair to the elderly who do not have an equivalent of a simple land line telephone. Deaf centered technology exists in the form of Sorenson VP-200 and nVP.

Impact on interpreters. I have many friends who interpret ASL for a profession. Some work for VRS providers, some in the community. Nearly all of them have already expressed a desire to move to the community because they are overworked and underpaid in VRS. It is my understanding that all VRS companies need more interpreters, and need to pay more to professionally certified interpreters. It seems that by dropping the rate even lower, interpreters are likely the biggest expense of these companies, and VRS providers will be required to both lay off interpreters, and pay them less. This does not seem responsible to me.

It seems the FCC does not like Outreach efforts. When I signed up for hearing Comcast hearing line, Comcast sent out a technician for free and set up my whole service for free. They also offered me incentive to bundle together their other services. I do not see why deaf VRS industry cannot have same option of outreach"

I have question for FCC regarding why they feel "investors should not be getting a return on their investment from the fund." Why has the government never invested money into the deaf communication" Too risky" These VRS providers take huge risk to develop applications and hardware technology for the deaf, to take away any chance at return on investment is going to make them invest their money elsewhere. Where is Comcast" Where is Sprint" Where is ATT" Why aren't they providing VRS to the deaf" These are for-profit companies also. Why are they not providing to the deaf" Simply put, the current VRS providers are the only companies willing to take on the risk of VRS, and they should be rewarded with a profit.

I also think that all VRS providers should have the same rate. I am not opposed to a rate cut, and believe that continual rate review is necessary for responsible oversight of the iTRS fund. However, it seems contradictory that FCC wants to push business away from Sorenson to other VRS providers, when those providers are paid a higher rate, and will cost the fund even more money. Set 1 rate, and keep it the same for everybody. Find a rate that lowers the overall % by a responsible amount (perhaps the amount that the industry has grown), and set the same rate industry-wide for everyone.

VRS has improved the lives of my deaf friends drastically. They are no longer prisoners of their own home. They can get out in the community, have jobs, and contribute to society. The purpose of this fund should be to grow VRS, and help the deaf become more integrated into the community, not less.

Interoperability: This should be a goal for the industry, but is a challenge given the nature of business. Face Time cannot call Skype, why are they not mandated to interoperate" Play Station customers cannot play and talk together with X Box customers. FCC should push for 1 provider decision for consumers, rather than try to merge all providers into 1 provider and 1 application.

The impact of these changes would be huge. I do not see how FCC believes that cutting VRS rate by 30% would not drastically change the industry."." How would the Government operate with 30% decrease in funding" There would be changes right" How would any company operate with 30% decrease" Most would go out of business, some would survive in a primitive form. FCC is blind if they truly believe any company could function normally with 30% decrease.

Proposed changes are very harmful, and expose FCC for not having the best interest of the deaf in heart. Brian Smith