

Chairman Genachowski,

CG Docket Nos. 03-123 and 10-51

I am a hearing person and a current video relay sign language interpreter (VI). I would like to address some of the current proposed changes.

First of all, while it is a great theoretical concept to have one across the board software for video relay service (VRS) users to utilize, the current "apps" that allow users to make VRS calls on their smart phones or using a computer webcam are subpar when compared to Video Phone (VP) equipment that has been specially designed to meet the needs of both the deaf and hard of hearing users as well as the interpreters that process the VRS calls. It is often frustrating because important calls are easily disconnected, pixelated and impossible to interpret effectively for the consumer. I understand the need to reduce costs for the FCC, but requiring "off the shelf" technology that has not been developed for the needs of American Sign Language (ASL) users is not the answer. I feel that the VP equipment that has been specifically developed for the purpose of VRS is the best option out there. Additionally, if consumers are required to purchase their own equipment, it significantly limits them based on their income as far as what equipment they would be able to afford.

From the interpreter's perspective, when I interpret for many mobile calls or calls placed through poor computer connections in a row, I experience headaches and queasiness that cause me to be less effective as the relay interpreter. Waiting for a software to be developed that works for all providers and types of "off the shelf" equipment consistently all the time will cause a great setback in the quality of service compared to that which is currently being provided.

With that said, I do not think that the FCC necessarily needs to be the sole funding for the use of specific VP equipment. If the FCC were willing to subsidize the cost of this equipment, I feel that it would be fair for consumers to pay a nominal monthly fee for the rental/use of their equipment, much in the way that many of us pay a few dollars a month for the modem provided by our internet company of choice. Likewise, deaf consumers would have the choice to buy their own equipment and use an app or software to run their VRS calls through if they were so inclined, as many of them already choose to do anyway.

In regard to having a single database in order to save time, this does not seem to be an effective use of the funding. It would take a large amount of time, money, and development for the FCC to create a single data base system, when the private companies have already spent time and money developing systems that meet the FCC standards. There seems no point to reinvent the wheel and give deaf users less choice of which interpreter services they feel best meet their needs. Hearing people can

choose their phone provider (ATT, Sprint, Verizon...) so it is functionally equivalent for deaf individuals to be able to choose their provider for relay calls (Sorenson, Purple, CSDVRS...)

As an interpreter, the high standards as far of speed of answer and other mandates already set forth by the FCC are difficult enough for us to obtain. I am fearful that if rates are cut even deeper that VRS companies will have to cut our hourly pay, or cut employees, both of which would lead to a decreased number of interpreters available and a lower quality of service for our deaf consumers. They would have to be on hold longer for an interpreter, there would be less interpreters willing to work, and there would be more interpreter burn out. Also, as the FCC keeps their standards for interpreters high, we must keep up with continuing education, licenses and certifications. These are additional expenses that VRS companies want to cover in order to provide incentive for their VI employees and also maintain highly qualified interpreters as the standard for those who use VRS.

As a current VI, I respectfully ask that you consider not only the needs of the deaf and hard of hearing users, but also those of the interpreters who passionately want to provide the best service possible to those individuals but have a hard time doing so when we are so squeezed by the pressures of time requirements and other mandates. Our "per minute rates" are not only paying our wages but also those of the management and operations people who can do the other tasks needed so that we can focus on providing the best interpreting for our customers. I hope the FCC will consider how far we have come in allowing deaf and hard of hearing individuals to become functionally equivalent to hearing individuals and not make us take any huge leaps backwards.

Thank you. Lisa Adele Kurtz