

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

CG Docket No. 03-123 and No. 10-51

I am writing this in regard to the proposed changes involved with VRS reform. I am an American Sign Language/English Interpreter that has been working in the VRS setting for three years. Within the past three years I have noticed significant progress in achieving our goal of providing functional equivalence to the users of VRS. Users (both hearing and Deaf) are becoming more and more comfortable using the service and calls are consistently being successfully processed. Therefore, I am against the proposed changes outlined in CG Docket Nos. 03-123 and 10-51, for fear that the changes would cause the structure of VRS and the efficiency to be jeopardized.

If the Commission decides to approve a reduction in the rate paid to providers it will have a significant impact not only on the providers themselves, but more importantly, the users that rely on the relay service for everyday communication. Moving to a cost-based model of reimbursement will cause drastic cuts in funding compared with the current per-minute reimbursement rates. If these cuts were to take place then changes within the various VRS providers would be inevitable. Perhaps the providers wouldn't be able to maintain as many centers, resulting in fewer interpreters attempting to handle the same call volume. This would result in longer hold times for the users of VRS, which certainly is not equivalent to conventional voice telephone service that has no wait time at all. Perhaps providers would have to stop hiring certified and highly qualified interpreters. This would result in calls being processed in a less efficient manner.

Also, the proposed migration of technologies to a software based VRS application that could be installed on "off-the-shelf" hardware seems like an impossible task. Would the FCC require providers to revoke their videophones? What would the individuals do during the period of time prior to obtaining their own equipment and installing the software themselves? This time period would leave many VRS users without any communication at all. In the broadband internet proposal it states, "a disproportionate number of Deaf American adults are unemployed, receive social security, live in poverty, or have a household income below \$20,000." How are these individuals supposed to afford off-the-shelf hardware? I feel that these changes would result in direct violations of the Americans with Disabilities Act (ADA) by preventing access to communication.

However, even if there was a way to put the proposal into action, I can assure you that the technology of the various videophones is more advanced and more directed towards the needs of Deaf users. Webcams and "off-the-shelf"

hardware do not provide the same video quality needed for a video relay call. Poor video quality from cell phones, webcams, iPads, etc. can completely prohibit accurate interpretation and once again functional equivalence is lost.

Also, according to the goal set forth by the Consumer Groups, it is important to have competition among qualified vendors and to give the user population a range of choices. If the proposal was accepted, and there was only one VRS software application, the Deaf user will no longer have the opportunity to choose which equipment best suits their preferences. The providers would no longer have to continue to make innovative changes to their videophones and that would result in minimal competition among the providers.

Please take these concerns into consideration. The prevention of fraud and misuse of TRS funds is extremely important and I support the continued monitoring procedures that are in place. I'm sure that the providers and the FCC share the same goal of providing an "effective, efficient, and sustainable" service for the users of VRS. My fear is that the implementation of the changes proposed would be detrimental to the current services provided to the users of Video Relay Services. We have spent too many years getting to this point: it would be devastating to many people if we had to go back to frustrated callers, long hold times, and technology that is lacking features to which interpreters and Deaf individuals have become accustomed.

Sincerely,

Ashleigh King

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