

First, the FCC asks whether the FCC should mandate the use of a single software program or app for all VRS calls? Second, the FCC asks if it should require the use of a central database for telephone numbers? The FCC also asks for feedback on proposed changes to the VRS rates.

The NAD with other Consumer Groups will respond to those questions through the filing of comments with the FCC. We wanted to share our comments with you. You can file your own comments or you can tell the FCC that you support our comments, or that you support the comments filed by others.

Single VRS Application

The NAD believes that mandating the use of a single application is not good for deaf and hard of hearing consumers. Many VRS providers compete with each other by offering competitive products and this competition encourages innovation. The NAD is concerned that without this competition, VRS products will not keep pace with technological change (SIGN NOT IMPROVE AND TECHNOLOGY WILL PASS BY US). The NAD understands that the FCC wants to make sure all VPs can communicate with each other, but the single application idea does more harm than good. Instead, the NAD encourages the FCC to address interoperability problems with third-party testing and certification of VRS products for interoperability.

Functional Equivalency

The NAD wants to see full interoperability between VRS products, and we need to be able to make calls without any problems, be able to leave video mail messages on any video phone, port our contacts list between video phones, and more. In March 2011, the Consumer Groups filed a TRS policy statement with the FCC that includes ten core principals for providing functional equivalency.

Central iTRS Database

The NAD sees some benefits in having a central iTRS database to keep track of all phone numbers for us, but we want to make sure our information is kept private and is managed well.

VRS Rate Changes

The NAD does not have enough information from VRS providers to comment on the appropriate rates for VRS but urges the FCC to set the rate to encourage VRS providers to give better services that are equal to what hearing people get on their telephones. We are concerned that cutting rates without having minimum quality standards may lead to decreases in service quality. For instance, the FCC could compensate VRS companies for using nationally certified interpreters or providing a way for users to be better matched with VRS interpreters.

