Chairman Genachowski,

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This is an open letter in response to the recent FCC Public Notice (CG Docket 03-123 and 10-51) issued on October 15, 2012.

Before I share my thoughts, here is my background with the relay service industry. I was an Engineer and a Product Manager for Sprint, an Engineer and a Business Unit Manager for HOVRS (now Purple), and the co-founder and former VP of Technology for Convo Communications.

At the time of this writing, I am not a full-time employee for any VRS provider.

I'll be focusing on two areas of interest: Video Access Technology and Enhanced iTRS Database.

Video Access Technology

I support the concept of having FCC regulate video access technology but with certain conditions.

I must clarify the usage of the term "application" in the Public Notice. Usually an "application" is defined as a set of features, including the User Interface.

I do not support FCC regulating or requiring an uniform VRS "application" if that includes the User Interface.

I, however, support FCC requiring an uniform and regulated video "widget." A widget is defined as a component of an interface. In other words, it's an isolated piece that can be plugged into any software or hardware application. A video widget can be made available to all developers through an API. This would solve the current interoperability problem without compromising innovation.

I also strongly encourage making the VRS video widget a part of the open source community. The heart of my reasoning is the idea that two heads are better than one. It'll be important to point out that this video widget project should be developed with visual communication as the primary focus (ie: video quality) with audio as an important but secondary add-on, especially for consumers using voice (ie: VCO).

A good example of an excellent open source community focusing on video is FFMpeg at www.ffmpeg.org. It is a powerful community available to everybody and it receives new code everyday.

With all that said, Convo and Sorenson's claim that such solutions would hinder innovation and strip out features is misleading. It would be possible to create new and better video solutions by contributing to the open source community, while creating unique competitive features outside the video widget. This would guarantee consistent video quality from all VRS providers.

I must point out that Sorenson is perfectly capable of enabling video communications to any H323 and SIP endpoint such as Mirial's video solution. Currently, several VRS providers use Mirial's video solution to operate their full-scale applications. Sorenson's current hardware (ie: VP200, ntouch) was once capable of communicating with all other VRS applications. Sorenson has purposefully restricted video communications to certain endpoints for the sake of controlling the market. This act makes it frustrating for Deaf users like myself when I'm unable to call a nTouch user from my Z4 softphone. This does more harm than good and FCC needs to stop this in order to create true functional equivalency.

To sum it up, I totally support FCC requiring an uniform regulated video "widget", not "application", that can be plugged into any VRS software or hardware to ensure full interoperability and functional equivalency. Everything else can be up to each VRS provider to create the best user experience.

Enhanced iTRS Database

I support all proposed changes outlined in the docket, especially the User Registration and Validation, including the centralized process for 911 calls.

From my experience with two relay companies, developing the User Registration and Validation was a painful process. The FCC had too many suggestions on how to validate customers' addresses and whether they were deaf. This allowed profit-generating leaders in the industry to use loopholes. They were too focused on meeting monthly quotas and only cared about getting as many customers in the system as quickly as possible, often without actual validations.

"It's better to ask for forgiveness than permission" was the advice at one of my previous employer. This is the leading cause of VRS fraud and abuse. VRS providers will continue to seek out loopholes to maximize profits as long as the FCC isn't explicitly clear with how to verify deaf customers and their addresses for emergency purposes.

There is no reason why each VRS provider should have different verification processes for the same deaf user. Likewise, there is already a centralized iTRS database. It would be simple and much more cost efficient to include the verification process in this database, rather than have each VRS company verify the same deaf user over and over again. This would actually free up VRS companies to spend more time on research and development!

A FCC-regulated process to centralize verification and the 911 database, especially to ensure our safety in times of emergency, is necessary in my mind. This will benefit our community twofold: 1) to save FCC money and 2) to prevent abuse and fraud.

In closing, I am personally excited about the docket as this is definitely going to push things into the right direction -- a direction that will benefit all of us VRS users. We should be able to make calls from and to any provider's software and/or hardware without difficulties. We should be secure in knowing that we are protected in times of emergency because of a centralized database. We should be able to trust FCC in giving clear mandates for VRS providers to follow to reduce abuse and fraud. This will encourage VRS providers to continue creating better and even more efficient solutions for VRS.

Best,
Chad W. Taylor Chad Taylor