

Chairman Genachowski,

CG Docket Nos. 03-123 and 10-51

I have worked as a VRS interpreter for Sorenson Communications for over 7 years. During that time, I have seen the development of the VRS industry as it has brought Deaf and Hard of Hearing Americans closer to ADA-mandated functional equivalency, and has changed their ability to access the services of everyday life and to overcome barriers to communication with the hearing world.

Over the seven years I have worked at Sorenson, I have experienced an increase in our consumer base and frankly our work load. Especially in the last year, the call volume has become ever more steady and high. No longer do we have slow periods, at least during the daytime hours I work. With mere seconds between calls, the pace can be literally exhausting. I have seen interpreters beginning to burn out and look to other "live" interpreting opportunities that are easier on them, physically and mentally. If the rate is reduced and more layoffs are needed, the burden on those of us who remain may become unbearable. Equally, if hourly rates paid to VRS interpreters are lowered and become unfavorable when compared with other less taxing interpreting jobs, more interpreters are sure to leave the industry - again further burdening those who remain. This will necessarily cause companies to lower their standards for interpreter quality, negatively impacting service and making functional equivalence more unlikely.

Over this same period of time, I have seen the explosion of technology rooted primarily in mobile and internet worlds. I feel strongly that VRS is much more like the cell phone and mobile internet industries than that of land lines. The ever-changing platforms that must be adapted to, the high cost of the devices as well as the reality of cost of internet service to users, and more make it a proposition much more expensive than a wired phone system. Using models based on the latter seems unrealistic and could lead to demise of the VRS industry.

This unrealistic proposal seems designed to undercut the competition that has fueled the development of this life-changing industry. Deaf and Hard of Hearing Americans have now experienced something closer to functional equivalence than they have had in the past - you can't un-ring that bell. Expecting providers to work for no profit, never mind at a loss, undercuts all the benefits of capitalism. Unless the government wants to take over providing VRS, it must allow private companies to do so as a business. Taking away their realistic ability to do so will lead to a loss of functional equivalence and the other mandates of the ADA, and may lead to class action lawsuits or other negative responses toward the FCC. This seems penny-wise and pound-foolish.

I have other concerns with this latest proposal, but the rate cut and the removal of competition

between providers seem the most troubling to me. I strongly urge you to step back from assumptions about this industry, which cannot be compared to any that have come before it. Look at the real numbers submitted by providers, not the unsupported projections, and seek the counsel of economists. Please do not try to turn back the clock on either technology or ADA rights.

Thank you for taking the time to consider all comments including mine. I trust you will think long and hard before making a decision that could destroy an industry and penalize a community by taking away or reducing its legally protected right to communication access.

Sincerely,

Susan Maynard Susan Maynard