

Chairman Genachowski,

CG Docket Nos. 03-123 and 10-51

I am writing in response to the FCC's request for comments on the "Structure and practices of the video relay service (VRS) program and on proposed VRS compensation rates." I am very concerned that the changes being considered will destroy a program that is vitally important to people who are deaf or hard-of-hearing.

I am not deaf, nor have I had to use VRS personally, but I have seen several individuals who have. Students, who use the system to speak to family back home; instructors talking to a student who didn't understand their homework assignment, but was too sick to come to class. Without VRS, the deaf community would be unable to use the phone like we do. They would be unable to just call up their doctor when their child is sick for some simple advice on whether the cough is okay or life-threatening. Should I take him to the hospital" No" If you have children, you know that you've made at least one phone call like this. Imagine if you weren't able to. Imagine if the only way you could speak to your doctor was in person. Would you drive 30 minutes to ask about Johnny's runny nose or what to put on Susan's skinned knee" VRS puts people who are deaf on a more level playing field.

The changes being considered by the FCC would undo much of the progress that VRS has provided for the deaf community. VRS largely relies on highly skilled American Sign Language (ASL) interpreters. The FCC wants to drastically cut the rate they pay VRS companies for providing this service. Obviously, this will have an immediate and negative effect on the ability of VRS companies to employ and train qualified interpreters.

The FCC has also suggested that VRS can be just as effectively provided through government-mandated software that is used on off-the-shelf equipment like common videophones, computers, or tablets. Such equipment largely require one hand to hold and operate the device or don't have the ability to see more than the bust of an individual~a boon against a language that relies heavily on body language and hand positioning. Not to mention that in order to communicate to someone with hearing, that individual would either have to know sign-language themselves, or a program would have to be developed that can recognize every slight body movement. In a day and age where face-recognition technology is still in its infancy, this would be a very daunting and prohibitively expensive venture. While such equipment might provide a convenient backup solution, it can't replace the videophones and other technologies specifically designed to take into account the special needs of the deaf and hard-of-hearing.

If the FCC takes away skilled ASL interpreters and innovative equipment, VRS as we know it today won't exist. This would be a huge step backward for the rights and opportunities of Americans who

are deaf and hard-of-hearing. We would be alienating them in a world that already has a means to allow them to express themselves. Christina Lopez-Hidalgo