

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

CG Docket Nos. 03-123 and 10-51

I am writing in response to the Federal Communication Commission's (FCC) request for comments on the "Structure and practices of the video relay service (VRS) program and on proposed VRS compensation rates." I am opposed to the changes being considered.

VRS has created a more level playing field for people like me who are deaf or hard-of-hearing, empowering us to communicate via videophone with anyone at any time in our native language, American Sign Language. The nature of the work I do requires that I be able to use the phone to communicate with colleagues, clients and business associates regardless of whether they are hearing or deaf. Without reliable, high-quality VRS service I would not be able to do my job effectively.

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The changes the FCC is considering would drastically change the nature of the VRS I depend on. One of the aspects of VRS that makes it such an effective way to communicate is the quality of the videophone technology used and the fact that the products provided by VRS companies have been developed specifically with the needs of the deaf – my needs – in mind. Yet, the FCC is considering changes that would, instead, force us to use off the-shelf products and government-mandated software. Using products developed by and for people who are hearing would be a huge step backwards! The FCC cannot consider this to be a reasonable replacement for the high quality, specialized VRS technology we use every day.

The rate changes being considered by the FCC would also directly affect my ability to access VRS, as well as the reliability and quality of service I depend on. If the FCC slashes the rates paid to VRS providers, as suggested in its Public Notice, many companies will simply stop providing this essential service. This will put me and all members of the deaf community at a significant disadvantage.

In my view, VRS today is a shining example of what Congress intended when it passed the Americans with Disabilities Act 22 years ago. It is absolutely essential that any changes to the current program maintain the access, innovation and reliability that define VRS today.

Sincerely,

Name Marlene Richter

Title, if appropriate \_\_\_\_\_

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