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20 November 2012

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

RE: Comments regarding CG Docket Nos. 03-123 & 10-51

To Whom It May Concern:

I write by way of Reply Comment to the above docketed items regarding the structure and practices of the video relay services (VRS) program and on proposed VRS compensation rates. I have reviewed a sampling of comments online and felt compelled to address several issues raised there.

By way of background, I am a hearing individual with lengthy ties to the deaf community. I was raised in a household with deaf children and adults. My wife works in the field of special education with an emphasis of Assistive Technology and Augmentative and Alternative Communication. My mother was for many years the Director of Therapeutic Services at the Helen Keller National Center, the standard-bearer for the rehabilitation and education of the deaf-blind in America.

I therefore consider myself to have significant insights into the norms of communication between various deaf and hearing communities, and so write with some concern about the changes proposed by the above docket items.

Emerging technologies provide great promise for the future of deaf-hearing communication, as indeed phones with hand-held keyboards have in a short generation reduced the need for Telecommunication Devices for the Deaf (TDD's / TTY's), particularly among younger users. Such success stories tempt us towards the notion that currently available "off the shelf" technology can have the same effect in the VRS market and reduce the need for dedicated VRS devices and service providers. This notion, at least as applied to today's technology, is well-meaning but inaccurate.

Commercially available “peer to peer” connection systems such as computer webcams and Apple’s Facetime are breathtaking harbingers of things to come; one can conceive of a day in the not too far distant future when depth cameras (such as Microsoft’s “Kinect,” sold as part of its Xbox video-game system) will be able to recognize and translate American Sign Language for a hearing audience. An internet search of “kinect sign language recognition” reveals that such efforts are already underway in earnest. These are exciting times in the area of deaf-hearing communications, when such commercial technology serves both as a platform for future development and an important backup system providing a valuable lifeline for the deaf community.

But we are not there yet. Webcams and Facetime suffer from both inherent limitations related to resolution and screen size, and practical limitations such as image stutter caused by data bottlenecks. The current crop of technology represent commercial parlor tricks – novelties which allow us to hear one another’s voices while we see one another’s faces – impressive novelties, but novelties nonetheless.

Dedicated VRS devices don’t have these problems. These devices and service providers are designed from the ground-up to provide a useful and practical user experience both to the deaf service recipient and the hearing interpreter. The ability to follow smooth motion on one’s television set is a far more robust and useful experience than attempting the same on an iPad, a fact to which anyone who has spent more than a few minutes engaged in a “Facetime” conversation could attest.

I have additional concern that the proposed changes insufficiently consider the needs of the “deaf-blind” population. This is a not-insignificant community – between 42,000 and 700,000 people, according to the Department of Education (*see* Turkington, Sussman (2000) *The Encyclopedia of Deafness and Hearing Disorders, 2d* page 63). Nearly 50% of this population suffers from Usher Syndrome, a genetic condition which manifests in deafness / mild hearing loss in youth, and progressive loss of vision from retinitis pigmentosa later in life. What this means in real terms is that there is a very significant community of Americans who are functionally deaf and who are losing their eyesight.

For this population, any change to the VRS system which results in a diminished or contracted user experience can signal the difference between effective communication and not. The FCC has made great strides in the area of access for the deaf-blind; we are in fact at the beginning of a pilot program targeting the communication needs of this very community, *see* 47 C.F.R. § 64.610 – Establishment of a National Deaf-Blind Equipment Distribution Program. The significant changes proposed by the Docket Items at issue would weaken the backbone of the VRS infrastructure, even as pilot funds have been allocated for an equipment rollout which depends on that very backbone.

Letter to FCC
20 November 2012
Page Three

The above circumstances highlight what is wrong with the proposed changes – they are well-intentioned, but come at the wrong time.

A time will come in the not too far distant future when emerging technologies will increase the quality and lessen the cost of telecommunication services for the deaf and deaf-blind. This will be a great day, but we are not there yet.

For the above reasons, I urge the Commission to decline to adopt the proposed changes.

I appreciate the Commission's thoughtfulness on this matter, as well as the opportunity to express my comments. I may be reached at the above address by way of return correspondence. Thank you.

Yours,

A handwritten signature in black ink, appearing to read 'Ian Kelley', written in a cursive style.

Ian Kelley