

Chairman Genachowski,  
CG Docket Nos. 03-123 and 10-51

I am writing to share my opinion with you about some of the comments I have read on CG Docket Nos. 03-123 and 10-51.

I am a VRS Interpreter and I am deeply concerned that some of the proposals on the table for VRS will degrade the world-class VRS service that the FCC has built.

I am in FULL SUPPORT of the following comments:

The declaration of Michael L. Katz, that the proposals by CSDVRS, LLC and the RSLA proposals would likely quash competition, stifle innovation, and degrade the quality of service.

Regarding the CSDVRS proposal, Mr. Katz states that this proposal will create a monopoly-franchise VRS application that would deny choice to deaf and hard-of-hearing consumers. Furthermore, it would likely not solve interoperability issues. I agree 100% with Mr. Katz' statement that "there is a far-superior approach that is compatible with competition and consumer choice: the creation of industry-wide standards.

Regarding the RSLA proposal to retain rate tiers, Mr. Katz states that "the retention of a tiered rate structure with a sizeable gap between the higher and lower compensation rates would distort incentives and support inefficient competitors". I fully agree that this rate structure punishes the most efficient providers and rewards the most inefficient. I feel that the commission should adopt a Price-Cap Rate as Sorenson Communications has proposed.

Regarding CSDVRS's proposal to mandate the use of off-the-shelf equipment , Mr. Katz states that "purpose-built video phones include features that likely would not, or could not, be implemented using off the shelf hardware". In my work as an interpreter see that consumers overwhelmingly prefer the features and the quality that the purpose-built video phones provide. In addition, as an interpreter, I overwhelmingly prefer to interpret for consumers who use purpose-built videophones. Occasionally, we as interpreters get calls from off-the-shelf video equipment and because of the different design features we find it much harder to get about the job of interpreting because we must adjust to the off-the-shelf equipment. With a purpose-built videophone, we know what to expect. The sheer number of off-the-shelf video devices would certainly add complexity and inefficiency to our work.

In reference to CSDVRS's proposal that VRS providers be forced to offer video access service on a stand-alone basis, Mr. Katz states that this proposal would harm deaf and hard-of-hearing consumers through several mechanisms. I fully agree with Mr. Katz that forced vertical separation may lead to higher overhead and customer-care costs, that providers would be less accountable to customers when multiple providers were involved in serving any given user, and that it would lead to distortions in investments.

In conclusion, I fully support the following:

- a)VRS providers should be able to offer their own internally developed hardware and applications.
- b)Consumers should not be forced to use off-the-shelf equipment.
- c)A cost-based compensation system stifles innovation and promotes inefficiency.
- d)If these proposals are adopted, all consumers of VRS can expect lower quality service and fewer options.
- e)RSLA's rate methodology is flawed; it stifles competition and promotes inefficiency. The commission should adopt a price-cap rate initialized at auction.
- f)The statutory goals of ensuring that VRS is available to the deaf and hard-of hearing would be better achieved by promoting undistorted competition with industry-wide interoperability standards.

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