

Chairman Genachowski,

I read over the info about the proposed changes to VRS that the FCC is proposing. While I do not fully understand all the proposals, I do have some concerns.

First of all, make sure that the new arrangement is indeed, as the ADA states, functionally equivalent. Just because an item is "off the shelf" like a phone for hearing people, doesn't mean it is equivalent. I'm not sure from what I read, that the ones who made these proposals are thoroughly familiar with the technology required to maintain functionally equivalent quality of phone service. Is the US government willing to fund the continual development of new video relay equipment to keep up with the changing technology of this world. Case in point, one vrs company developed a new Video phone that provided excellent picture quality. By the time the product rolled out to consumers, the televisions that most people had begun to buy were no longer compatible. The technology moves very quickly. My concern is that the technology for video phones, if not produced by those thoroughly familiar with the needs of deaf people, as well as the interpreters who process the calls, will not be functionally equivalent at all in quality. Not having functional equivalency in quality will end up in skewed messages and extreme strain on the interpreter, resulting in fewer interpreters working fewer hours. You cannot imagine any hearing person buying a phone that had such poor reception that they would accept skewed messages due to poor video quality. Unless the FCC or another government agency invests large amounts of time and money into the development of such equipment, that is precisely what will happen, nullifying the progress made so far in equal access to communication for millions of hard of hearing and Deaf Americans. That would be a crime.

Im not sure how much the writers of this proposal have looked into the strain this would put on video interpreters like myself. Already I process calls from equipment that is not a video phone, such as a computer or iphone or android that has an app for video relay. Let me tell you, they are terrible, mostly unintelligible calls the vast majority of the time.

Another concern in off the shelf equipment is access to technical support from knowledgeable support persons who speak the language of the user. Imagine that you had to call tech support for your iPhone and spoke to a person in India, which often happens, but they are speaking Punjabi and talking to you through an interpreter. Not one hearing person has to do this; therefore, VRS will never be true equivalence. However, most VRS companies have tech support personnel who speak ASL, so that makes a huge difference in quality of help when the information is being transmitted directly and through a third party. Additionally, in my experience as an interpreter who has interpreted many tech support calls, no outside company except VRS providers has any knowledge of how to resolve VP(video phone) issues.

My last concern is the wording that calls VRS interpreters: ASL CAs. It makes it seem like anyone

who uses ASL can be a VRS interpreter. That is ABSOLUTELY NOT the case. Interpreting requires a lot of training and testing in order to learn the discipline of interpreting. VRS interpreting is one of the hardest forms of interpreting and therefore requires even more extensive and specific training. Do not think that we can be trained in a manner similar to TTY relay or IP relay operators. There is a world of difference in what we do. And we are not compensated with a higher rate of pay for doing it than if we were working interpreting at a community college, K-12, doctors office, etc, which are far and away easier jobs. Do not think this is an easy job just because we sit all day, which I don't. For my sanity, I have to get up and get some fresh air to get the last emotionally intense call out of my system. There is a very high burn out rate for this job. Do not make it harder for us.

But more importantly, do not make it harder for the deaf community. Many in the US, due to the ADA and well meaning hearing people who chose to say that functional equivalency meant having deaf children in a hearing school with hearing teachers and an interpreter, have made the education quality for deaf people so bad that most couldnt read the manual that would come with an off the shelf video phone. Most of these mainstream schools teach English phonetically, which for a person without the ability to hear, makes as much sense as teaching a blind person about music by giving them non-Braille textbooks. Do not make them have to figure out how to set up video equipment without the aid of assistants. If you want to talk equivalency, back in 1982 when I graduated high school, hearing people had to have a professional install a phone into their home. It was very new technology to get one they could easily plug in. Byt that time, telephones had been around almost 100 years. VPs have not been around that long, so it is not far fetched that a VP user might need assistance in setting up their equipment. In time that will change.

Absolutely, please consider what I, as well as many others, am saying about the future of communication for the Deaf community. Don't step backwards in your attempts to bring functional equivalence and, in effect, mute the voice of millions of very capable and deserving Americans. kelly johnson