

RE: Additional Comment Sought on Structure and Practices of the Video Relay Services (VRS) Program and on Proposed VRS Compensation Rates

CG Docket No. 03-123

CG Docket No. 10-51

To Whom It May Concern:

I've reviewed the comments about the future plans. I thought I would give my input about some of the comments made. I generally agree with the response of National Association of the Deaf, which can be found on their website:

<http://www.nad.org/blogs/andrew-phillips/nad-responds-fcc-vrs-public-notice>

I do have some concerns to share as the Deaf Systems Advocate of Regional Center for Independent Living. I agree with the concerns of the VRS Customer Association and the National Association of the Deaf about this new proposal.

From reading the document, the FCC is talking about saving funds from waste, fraud and abuse. However, my concern is that the functionality of the VRS in terms of communication is not equal to that of the general population's phone systems. One problem is that TRS and VRS phones cannot yet communicate with each other. Deaf ASL Signers can not yet call their hard of hearing friends or parents who can not sign and prefer to speak. At my office, I can not communicate with hard of hearing individuals by phone because they prefer to speak and I use sign language. Also video phones (VRS) cannot call Captell phones (TRS). Deaf people with other disabilities cannot use either VRS or TRS phones.

Another ignored group are people who are deaf-blind. Deaf-blind individuals need Communication Facilitators (CF) and no one is reserving funds for this service. Individuals with Spina Bifida and mental challenges cannot type or sign very well for either VRS or TRS to be effective. These people need a Communication Facilitator (CF) to create a better environment to make calls. Currently, I do not see any of the TRS/VRS agencies or the FCC ensuring that these funds are used correctly for all deaf people to get equal communication using phones as the general population.

Even in 2012, Deaf and Hard of Hearing individuals are still not yet treated equally in many ways. Products supposedly made for us are more functional for hearing people. Each product does benefit the deaf community in some small way, however, they are not 100% effective yet. This proposal adds limits that remove the focus from ensuring that all deaf and hard of hearing individuals are functionally equal to the general population.

## Single VRS Access Technologies

I would support a standard VRS access technology only if the product is created by an innovative, deaf-owned or operated agency with no connection to any VRS agency or any entity connected to the Government, including the FCC. However, I fear a standard product will re-create a wheel that was already removed when years ago when Sorenson was once the only agency with this kind of product. Ever since that monopoly ended, a wide variety of competitive products were invented that helped improve the quality of lives and choices for all deaf and hard of hearing individuals. Currently, VRS industries are still stuck under the control of Sorenson that had a head start on products. At the same time, this is why Sorenson has upgraded their technology very little since, because Sorenson already built their roots in their deaf and hard of hearing community and these people are already happy with the current system. Our current VRS agencies have moved forward from this issue. I do realize this causes many Video Phones (VP) not to work properly while making a point to point call between different VRS agencies.

A single product will actually re-create this problem. There is no product available that is a perfect fit for the deaf community because the companies that provide communication devices are merging products with hearing products. Sorenson is the only VRS that produces a deaf-friendly device, because it includes built-in flash with the hardware part of the system. The other agencies are creating a product that creates access as a plug-in to fix this problem.

I would suggest that FCC make funds available to create new agencies that will become third-party innovators to do research and development specifically for VRS. I prefer that this third-party agency be either deaf-owned or operated. This is preferable because a deaf perspective will generally make technologies that come out of the newly created agencies will be more deaf-friendly. Also, employment for deaf individuals is still not equal to hearing population or the speaking deaf population and this would help with that situation.

There should be some kind of language that will carefully define the equal number of deaf operated or owned agency to ensure that those who have been ignored for a long time are part of the development. I hope to see more fully cultured and fluently ASL users involved in the technical parts of the VRS business. At the same time, these funds should be used to support colleges that have deaf programs to prepare our future deaf and hard of hearing generations to become technology researchers and developers.

In addition, I do have a problem with these new products being available ?over-the-counter? at commercial stores. Currently, deaf sales representatives are reaching out to the deaf community. They know what will best suit the needs of individual deaf people. They are also trained to help deaf

customers feel comfortable with any new technology. A product that is available off the shelf will mean deaf people will end up buying products that are not suited for them and there will be fewer employment opportunities for the deaf community.

On the other hand, I do see an advantage of off the shelf products, because they could reach some deaf and hard of hearing people who previously did not have access to the technology. However, the ability for anyone to purchase VRS technology directly means there will be more opportunities for hearing people to take advantage of VRS by pretending to be deaf ? a problem we already have to deal with VRS.

These reasons outline why I support having a third-party agency or college program not under control of the FCC, Government or VRS industries to create products that can become future VRS Access Technologies. These should be developed by deaf-operated, deaf-owned or deaf college educational groups. We should make sure not to remove the opportunity for VRS industries to be responsible for developing technology and to continue their competition in creating products.

#### iTRS Database Operations

I would support a TRS number directory as long as there is some kind of privacy protection for users. In other words, every individual should have the right to decide how their number and information can be shared. This means they should decide if their number is private or public and if their video mail and address book should be stored locally or on the TRS number directory.

In addition, the FCC and VRS industries should not share any information with anyone other than 911 call centers without permission of the customers. This is similar to agreements that the cell phone industry has with the 911 call centers. From my understanding, customers need to sign a release to share their information with 911 call centers.

#### RLSA? Rate Proposal

I reviewed the questions and proposal of rate adjustments. There should not be cuts in the current system. Cutting rates when the demand for VRS interpreters is still high will reduce the availability of interpreters. This violates our rights as defined in the Telecommunication Act.

Independent Living Centers tend to look for cost-saving reforms that maintain people's independence as opposed to cutting rates which would drive the amount of services down. Our fear is that lowering rates will prevent demands for this service from being met in the community. At this time, our agency sees that demand for deaf people to have access to phone communication is still high. This means the supply of VRS interpreters has not fully met the community's needs. We

would encourage the FCC to fund an independent, deaf-owned, deaf operated or deaf school program to focus on third party research to audit the actual supply and demands of VRS industries today.

Thank you,

Dean DeRusso  
Deaf Systems Advocate