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www.nead1902.org

November 28, 2012

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
RE: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski,

The Nebraska Association of the Deaf (NeAD) on behalf of the Deaf and Hard of Hearing people in the state of Nebraska want to express our concerns about the recent proposals by FCC to manage the video relay services industry. In particular, we support the position of the National Association of the Deaf. While the three major proposals are of concern, the proposed changes especially alarm the Nebraskans by weakening the guarantee of functional equivalence in telephone communication access as required by the Americans with Disabilities Act (ADA).

As you are probably aware, the best way to make the video relay services (VRS) truly accessible is through the quality of sign language interpreters. To that end, it is our opinion that the most qualified and thus able to provide quality interpreting are nationally certified interpreters. Cutting the rates would lead to a decrease in the number of qualified interpreters. We urge FCC to abandon plans to reduce the rates for payment of VRS services and to maintain or increase the rates to enable the VRS companies to maintain appropriate number of qualified interpreters. Deaf and Hard of Hearing people need to make phone calls at various times of the day and night. Reducing the rates of payment will force these companies to reduce the hours of services. NeAD is opposed to this.

Additionally, NeAD is concerned with the "off the shelf" equipment and software proposal. The reason why ADA mandated that FCC provide for VRS programs and services is due to the lack of support from the private telecommunication businesses. Once the FCC allows private ventures to develop appropriate telecommunication devices for video communication, the devices will revert to the status known before passage of ADA: none available. Businesses have not taken the initiative to develop VRS devices specifically designed for the Deaf and Hard of Hearing people who rely on American Sign Language. The NeAD is opposed to requiring the Deaf and Hard of Hearing consumer to obtain needed equipment from private businesses.

From what we observe, the FCC proposal would require VRS to be accessed through a centralized database that would assign our calls to different VRS providers. NeAD's only concern is that Deaf and Hard of Hearing consumers should have the right and option to choose VRS providers in the same vein as hearing people choose telephone providers (Sprint, Verizon, ATT, and so forth). If this proposal to use a centralized database will take away our freedom to choose VRS providers, NeAD is opposed to this proposal.

Please feel free to contact me at the phone number and/or address below.

Sincerely,

Jonathan Scherling

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