

Chairman Genachowski,

CG Docket Nos. 03-123 and 10-51

My name is Daniel Har and I live in Draper, Utah.

I am writing in response to the FCC's request for comments on the "Structure and practices of the video relay service (VRS) program and on proposed VRS compensation rates." I am opposed to the changes being considered.

VRS has created a more level playing field for deaf people like me, empowering me to communicate via videophone in my native language, ASL. The work I do requires that I be able to use the phone to communicate with colleagues, clients and business associates regardless of whether they are hearing or deaf. Without high-quality VRS service I would not be able to do my job effectively.

The changes the FCC is considering would drastically change VRS. The quality of the videophone technology used is critical to VRS. The products provided by VRS companies have been developed specifically for the needs of the deaf. Yet, the FCC is proposing that we be forced to use off-the-shelf products and government-mandated software. Using products developed for people who are hearing would be a huge step backwards! The FCC cannot consider this to be a reasonable replacement for the specialized VRS technology we use every day.

The rate changes being considered by the FCC would also directly affect the availability, reliability and quality of VRS. If the FCC slashes the rates paid to VRS providers, as suggested, many companies will simply stop providing this vital service. This will put me and all deaf individuals at a significant disadvantage.

Why can't you simply police the service, remove fraud, and continue to provide this outstanding service" Adding another cent to the telephone surcharge tax is not a burden for hearing people, but slashing costs to the VRS providers will diminish, if not stop the service altogether.

Additionally, I disagree with off-the-shelf solution, simply because software companies are not regulated nor required to follow mandates, so they can change business objectives and sell to the highest market (hearing population). Our needs, although vital, will not be considered. The software landscape oftentimes sees a change, an acquisition or exit, that it would more than harm VRS than help level the playing field. Sorenson is a perfect example of a company that designs and builds products for, of and by the deaf people. The features designed by Sorenson do not exist anywhere else. For instance, 1-Line VCO feature does not even exist as a solution on off-the-shelf software, nor do businesses have an incentive to do it.

I totally and respectfully disagree with off-the-shelf solution, and I sincerely hope that you abandon the idea.

VRS is a shining example of what Congress intended with the Americans with Disabilities Act. It is essential that any changes maintain the access, innovation and reliability that define the VRS program today. Daniel Har