

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

CG Docket Nos. 03-123 and 10-51

I am writing in response to the Federal Communication Commission's request for comments on the "Structure and practices of the video relay service (VRS) program and on proposed VRS compensation rates." I am very concerned that the changes being considered by the FCC will destroy a program that is vitally important to people who are deaf and hard-of-hearing.

I am not deaf, but I know firsthand how VRS works. VRS allows people who are deaf or hard-of-hearing to use the "phone" to communicate comfortably and easily just like people who can hear. In this way, it has changed the lives of so many people who are deaf. With VRS they can do the things we take for granted – make a doctor's appointment, call a child's school, or simply order a pizza. VRS puts people who are deaf on a more level playing field.

The changes being considered by the FCC would undo much of this progress. VRS largely relies on highly skilled American Sign Language (ASL) interpreters. These are the people who relay the conversation between the deaf and the hearing participants. The FCC wants to drastically cut the rate they pay VRS companies for providing this service. Obviously, this will have an immediate and negative effect on the ability of VRS companies to employ and train qualified interpreters.

The FCC has also suggested that VRS can be just as effectively provided through government-mandated software that is used on off-the-shelf equipment like common videophones, computers, the iPad, or a smart TV. While such equipment can provide a convenient backup solution, it can't replace the videophones and other technologies provided by VRS providers. These have been specifically designed to take into account the special needs of the deaf and hard-of-hearing.

If the FCC takes away skilled ASL interpreters and innovative equipment, VRS as we know it today won't exist. This would be a huge step backward for the rights and opportunities of Americans who are deaf and hard-of-hearing.

Sincerely,

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