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March 8, 2013

Federal Communications Commission
445 12th Street, SW
Washington DC 20554

Dear Commissioners:

Re: WC Docket No. 12-375

I write regarding deaf and hard of hearing prisoners' access to telecommunications. I respectfully urge the FCC to adopt rules through this docket that promote the installation of, and equitable access to, videophones, captioned telephones, and other auxiliary aids. Deaf prisoners should have access to telecommunications that is on par with that afforded to hearing prisoners.

It is well documented that family support is an important factor in helping prisoners avoid going back to prison.¹ It is also documented that families are challenged to stay in touch with prisoners because of the distant location of the prison.² This makes contact through telecommunications vital.

In the past deaf individuals used TTYs to communicate. TTYs provided basic communication, but they were slow, cumbersome, and unreliable. Further, they did not allow deaf individuals to communicate in their primary language, American Sign Language (ASL). Today, videophones are ubiquitous in the deaf community. They allow individuals to communicate effectively in their native language. They can capture the full meaning and intent of what is being said. Videophones are to a deaf caller what a voice phone is to a hearing caller. Similarly, captioned telephones support and clarify the words being spoken over the phone. They provide auditory information through text, thus allowing the deaf or hard of hearing individual full access to this information.

Prisons should not limit or block access to telecommunications devices used by deaf and hard of hearing individuals. These prisoners should be provided access that is comparable to that provided hearing prisoners. For example, in situations where a TTY is used, the deaf prisoner should be allowed more time because of the slowness of TTY communication. The phone call should not cost more than a comparable voice call.

Today federal laws such as Section 504 of the Rehabilitation Act and the Americans with Disabilities Act are intended to protect the rights of people with disabilities in jail. Sadly,

¹ Urban Institute, Research of Record, <http://www.urban.org/projects/reentry-portfolio/families.cfm>, visited March 8, 2013.

² *Id.*

these rights often are violated.³ In this proceeding the FCC has an opportunity to protect the rights of deaf and hard of hearing prisoners to communicate with others via telecommunications. The FCC should use its power to protect this fundamental right.

Thank you for your consideration.

Very truly yours

A handwritten signature in blue ink, appearing to read "Barbara Raimondo". The signature is fluid and cursive, with the first name "Barbara" and last name "Raimondo" clearly distinguishable.

Barbara Raimondo

³ Vernon, McCay, ADA Routinely Violated by Prisons in the case of Deaf Prisoners, Prison Legal News (n/d), https://www.prisonlegalnews.org/21430_displayArticle.aspx, visited March 8, 2013.