

May 7, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51 and Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

The Video Relay Services Consumer Association (“VRSCA”)¹ appreciates the efforts of the Federal Communications Commission (“FCC” or “Commission”) to improve the structure and practices of the Video Relay Service (“VRS”) program.²

The VRSCA has previously filed comments in this proceeding expressing the concerns of many VRS consumers.³ Regarding the April 29, 2013 letter filed by a group of competitive providers⁴ urging the Commission to require all VRS providers to transition to the use of off-the-shelf hardware, the VRSCA has discussed this very issue with VRS consumers at several 2013 Deaf Nation Expositions across the country.⁵ The VRSCA respectfully requests that the Commission consider the following opinions of VRS consumers on such a requirement for VRS access technology.

¹ The VRSCA is an informational forum for deaf, hard-of-hearing, deaf-blind, speech disabled, and hearing individuals who use American Sign Language (“ASL”), providing an objective environment for individuals to be educated and informed about issues that relate to VRS. Consumers obtain information from the VRSCA website, www.vrsca.org, at deaf expositions, and at town hall meetings throughout the U.S. VRS users may participate in the organization at no cost and may receive updates from VRSCA.

² The FCC’s Consumer and Governmental Affairs Bureau recently sought additional comment on proposed improvements to the structure and practices of the VRS program and proposed VRS compensation rates. Public Notice in CG Docket Nos. 10-51 and 03-123, DA 12-1644 (October 15, 2012).

³ The VRSCA filed comments in CG Docket Nos. 10-51 and 03-123 on April 26, 2011, May 23, 2011, March 9, 2012, March 30, 2012 (including results of a VRSCA survey) and November 29, 2012 (including comments in support of portions of the November 14, 2012 comments of Telecommunications for the Deaf and Hard of Hearing, Inc., Association of Late-Deafened Adults, Inc., National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, California Coalition of Agencies Serving the Deaf and Hard of Hearing, National Black Deaf Advocates, Inc., Cerebral Palsy and Deaf Organization, Alexander Graham Bell Association for the Deaf and Hard of Hearing, and American Society for Deaf Children).

⁴ The letter was filed in Docket Nos. 10-51 and 03-123 by Convo Communications, LLC, CSDVRS, LLC (d/b/a ZVRS), and Hancock, Jahn, Lee & Puckett, LLC (d/b/a Communication Access Ability Group).

⁵ For example, Tampa, Austin, Phoenix, Detroit, St. Paul, Pomona, and Washington, D.C.

First, the VRSCA believes that there should not be a single standard, software based VRS access technology ("application") and that there should be multiple VRS providers offering multiple applications that are all interoperable and portable. The VRSCA further believes that the Commission must establish minimum standards for interoperable applications and that consumers must have the ability to choose from multiple, qualified VRS providers and their products or applications.

Multiple providers in a competitive market will encourage continuous innovation to meet the different needs of the various deaf, hard-of-hearing, deaf-blind, and speech disabled consumers. Providers should be encouraged to innovate beyond the standard to continue the quest to provide a more functionally equivalent offering of VRS, as required by the Americans with Disabilities Act, Section 225 of the Communications Act.

Second, the VRSCA believes that VRS consumers should have access to both equipment and software distributed by VRS providers, and off-the-shelf equipment. All such equipment must be interoperable and must meet the minimum technical standards. Allowing VRS providers to continue to distribute equipment and software, proprietary and off-the-shelf, and continue to offer training and technical support, helps to provide access to VRS to consumers that may not otherwise have such access. We meet with deaf, hard-of-hearing, deaf-blind, and speech disabled individuals of all ages and socioeconomic backgrounds, and many of them may not have the financial ability or technical know-how to purchase or maintain off-the-shelf equipment.

In addition, VRS providers may offer equipment with special features that may not be available with off-the-shelf equipment, such as a flashing light ring when receiving a call. If a VRS consumer ports their number to a new default VRS provider and uses that equipment with the new provider, the equipment must retain its minimum features, such as the ability to place point-to-point calls to other individuals, and the ability to transfer a contact list created by the customer. The VRSCA does not expect that every feature would continue to work after porting occurs because proprietary technology that is owned by a VRS provider should remain with that VRS provider. This will encourage VRS providers to improve service and create new products.

The availability of off-the-shelf equipment would also allow hearing relatives, friends, co-workers, and others who use ASL the ability to purchase equipment and place direct point-to-point video calls without the need to utilize VRS. The result would be telecommunications services that improve functional equivalency, decrease the number of relay calls, and reduce the costs of the TRS Fund.

Respectfully submitted,

/s/ electronically signed

Sharon Hayes
Director, VRSCA