

Secretary Dortch,

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

May 31, 2013

Dockets 13-24 and 03-123

Dear Secretary Dortch,

I am writing to express my strong opposition to an element of the January 25, 2013 FCC Order on Internet Protocol Captioned Telephone Service (IP-CTS).

I am severe to profoundly hearing impaired and rely on IP-CTS at work to perform my job duties. The new rule requiring the default setting for captioning to be "off" and thus manually engaged at the start of a call made or received is poorly conceived and I oppose it

Manual activation of captioning after the start of a call I make or receive requires up to a 12 second delay before captioning is available. This is much more than the "slight inconvenience" described by the FCC in its order. The new ruling requires that I ask the caller to delay their speech until captioning is operational. That conversation goes something like this: "Hi, this is John, please be patient with me while I wait for my captioning to engage. I apologize for the inconvenience." It is difficult to begin any oral professional communication with a delay and explanation that the delay is ultimately a result of my hearing disability. The power of IP-CTS is, in part, that I do not need to disclose my disability while communicating on the telephone if captioning is available at the start of the calls I make and receive. I appreciate that one motivation for requiring a default off setting is to prevent use of IP-CTS for those who do not need this functionality. At work, my phone is dedicated for my exclusive use and is secured in my office. There is no potential for misuse by a hearing person. In fact, the vast majority of phones at work are issued for individual use, negating the misuse rationale the default off ruling is intended to address.

Perhaps the most distressing consequence of the ruling is the potential impact on my advocacy for the seamless integration of IP-CTS into our new VoIP phone system at work. Information technology specialists at my employer are actively vetting the benefits of captioning for the hearing impaired and are inclined to adopt virtual server technology and videophones capable providing IP-CTS for any of the 14,000 employees who will benefit from it. The new ruling dramatically impacts the functionality of IP-CTS and could derail efforts to secure this vital technology for hearing impaired co-workers.

Sincerely,

John V. Brigande, PhD

1971 Park Forest Avenue

Lake Oswego, OR 97034

Telephone: 503-699-7896 John V. Brigande, PhD