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11/5/2013

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Speech-to-Speech and Internet Protocol (IP)) Speech-to-Speech Telecommunications Relay) Services)	CG Docket No. 08-15
Telecommunications Relay Services) And Speech-to-Speech Services for) Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123

I'm Neil Jacobson. After 29 years of working for Wells Fargo as a disabled IT professional, I retired as a Sr. Vice President to start a disability-focused employment company that specializes in consulting on staffing and placement issues.

After reviewing these regulations, I conclude, as a person with a speech disability and a potential STS user that:

1. One or more nationwide providers should be selected. STS should be provided by the FCC without any responsibility given to the states.
- 2-3. There are thousands of potential users but the FCC or another entity has to commit to identify and teach them to use STS. If the providers are expected to identify and teach consumers to use STS, they need to have the expectation of sufficient profit to justify that effort and to justify improving the quality of the service so that more consumers will want to use it.
4. Having a single entity provide the outreach nationwide will resolve a series of administrative problems preventing the current outreach effort from being effective.
5. Bundling the STS outreach with that for other relay services will not work because outreach for STS requires a completely different method that outreach to people with hearing disabilities. Sub-contracting outreach efforts to consumer-based agencies and/or disability-focused marketing firms should be encouraged.
6. Some money for STS can come from the TRS fund, but that will not be sufficient to conduct the necessary outreach.
7. The structure of a national STS outreach program requires defining the parameters of the potential user population. To define such parameters requires a survey of the medical

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professional and consumer-based agencies that have ongoing contact with that population. Such a survey will provide the information necessary to structure an outreach program.

8. The FCC seeks comment on how to establish rules to clearly define and oversee the eligibility, registration and verification of STS users. I think that required registration of STS users is not appropriate. The FCC should only consider voluntary registration if it were done to build a user profile that will enable Communication Assistants to better assist users. Video conferencing as well as desktop sharing should be optionally available to help with this process.
9. Other matters:
 - a) Establish profiles of all the users to facilitate regular and emergency STS calls by having necessary information available to the CA. That way information on user preferences will not need to be identified each time the consumer calls STS.
 - b) Establish a STS advisory council to formulate the STS outreach plan. The council could also help establish mandatory minimum standards for STS CA training and performance.
 - c) When a STS user is silent, the CA should wait at least 60 seconds before disconnecting because many users have complex disabilities which may prevent them from having a spontaneous and/or continual flow of conversation.
 - d) Optionally enable video conferencing to facilitate communication between the user and the CA.
 - e) Optionally enable the user to hear communication between the CA and the third parties.
 - f) Encourage employment of people with disabilities.

Respectfully,

Neil Jacobson

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