

ASL SERVICES HOLDINGS, LLC.

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KISSIMMEE, FLORIDA 34741

Via Electronic Comment Filing System

December 18, 2013

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

RE: Ex Parte communication to the Technology Transitions Policy Task Force on the needs of people who are deaf and hard of hearing during the TDM to IP transition, GN Docket No. 13-5 and WC Docket 12-353, CG Docket Nos. 03-123 and 10-51

Dear Secretary Dortch:

ASL Services Holdings, LLC (“ASL/Global VRS”), hereby underscores the necessity to integrate the communications access needs of those communities and the general public in achieving fully functional communications equivalency through an Internet Protocol (“IP”) regulatory transition, as stressed by the Consumer Groups in this proceeding.¹ ASL/Global VRS is a woman-owned, federal Telecommunications Relay Service Fund eligible provider of video relay services to English and Spanish speaking Deaf/Hard of Hearing communities. Although the IP transition is tangentially related to the provision of IP-based video relay services ASL/Global VRS provides, functional equivalency is at the heart of the Deaf/Hard of Hearing Community’s ability to communicate effectively.

IP enabled technology has given the Deaf/Hard of Hearing community unprecedented capabilities to begin communicating without encumbrances, in a way that others members of the public currently take for granted. Any change in the Commission’s regulatory framework must ensure that all members of the general public² may take full advantage of IP enabled technology without restrictions or limitations.

¹ See, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the National Association of the Deaf (NAD), the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), the Hearing Loss Association of America (HLAA), the Association of Late-Deafened Adults (ALDA), the Cerebral Palsy and Deaf Organization (CPADO), the American Association of the Deaf-Blind (AADB), and the Technology Access Program at Gallaudet University (collectively, the “Consumer Groups”) *Ex Parte* Letter, GN Docket No. 13-5 and WC Docket 12-353 (December 11, 2013).

² Chairman Wheeler in his remarks to the House Energy and Commerce Subcommittee on Communications and Technology just last week asserted that that networks must work for everyone.

Functional communications equivalency has been *the* underlying tenant in the Americans with Disabilities Act³ and Commission regulations⁴ governing the provision of telecommunications relay services. True functional equivalency must enable the Deaf/Hard of Hearing community to *experience* communications seamlessly, as if communicating in person, without cultural or linguistic distraction.

The Consumer Groups raise two specific concerns pertaining to how the Deaf/Hard of Hearing community will be able to use IP enabled communications technology to achieve functional equivalency following the regulatory IP transition. Indeed, Commission policies and regulations will have a direct impact on IP enabled technology use by the Deaf/Hard of Hearing Community and on functional equivalency in a post Public Switched Telephone Network world, as the Consumer Groups stress, and must be addressed through this proceeding.

The Commission should ensure through its IP transition as with *any* matter of public policy affecting the Deaf/Hard of Hearing Community, that the Deaf/Hard of Hearing community will be able to:

- utilize the *same* technologies as the hearing public has that fits the Deaf/Hard of Hearing communications access needs;
- *adapt* any technology available to the hearing public that fits the Deaf/ Hard of Hearing communications access needs;
- *develop specialized* technologies the hearing public does not use but which are necessary in order to ensure the full range of the Deaf/ Hard of Hearing community communication access needs are met.

The Commission is currently engaged in reforming the federal TRS Fund program. Many of its proposed reforms focus specifically on IP enabled technology and standards.⁵ These reforms and those being considered by the Commission in its IP Transition proceeding should be consistent in promoting full functional communications equivalency for the Deaf and Hard of Hearing through fully interoperable devices, networks, and multiple service providers.

³ See, e.g. 47 U.S.C. 225(a)(3).” The term “telecommunications relay services” means telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio.

⁴ See, e.g. 47 C.F.R. §601(a)(22).

⁵ *In the Matter of Structure and Practices of the Video Relay Service Program Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 13-82 (June 10, 2013) [2013 VRS Reform FNPRM].

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Commission IP transition policy and resulting regulations must ensure that the Deaf/Hard of Hearing community will make full use of this new technology in achieving functional equivalency. Any regulatory impediment to achieving full functional equivalency now or under an IP framework will preclude the Deaf/Hard of Hearing community from the benefits of technology to communicate, as the Consumer Group has stressed. For the foregoing reasons, ASL /Global VRS supports the Consumer Group's comments in this proceeding.

Sincerely,

ASL SERVICES HOLDINGS, LLC

A handwritten signature in black ink, appearing to read "Angela Roth". The signature is written in a cursive style with a large initial 'A' and a long, sweeping tail.

Angela Roth
Managing Member, President and Chief Executive Officer