

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

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

**COMMENTS OF SPEECH COMMUNICATIONS ASSISTANCE BY TELEPHONE**

Speech Communication Assistance by Telephone is a consumer driven nonprofit concerned with telephone access for STS users and others with speech disabilities. If and when the FCC writes regulations for video assisted STS it should consider the following cautions learned from the development of STS:

1. We assume that VASTS will be a national program like VRS without state involvement. State involvement was one of the things that impaired the development of STS. There are not enough advocates with speech disability in most states to ensure that policies and practices were adequately monitored in each state.
2. VASTS needs to be financially structured so that it will grow. While the deaf community is structured so that their relay services like VRS will grow, the speech disabled population does not have the ability to do that. One way to make it grow is to design it In a way that organizations in our community such as UCP and ASHA make a profit from

VASTS. Organizations like the Parkinson's Society, the ALS Society and UCP will find the consumers and get them to use STS if that organization has a financial stake in its growth.

3. Provisions need to be made to monitor VASTS including regular practice calls. The calls need to be ongoing. We learned from STS that users generally do not complain about the service, they just stop using the service.
4. The current VASTS in California requires the user to make a telephone call for the audio section and go to the website for the video connection. Many users will not have the cognitive ability or dexterity required to be able to handle two connections. They simply will not use the service.
5. Outreach should have a national focus and not be proprietary.

Respectfully submitted,

Bob Segalman, Ph.D., Sc.D. (Hon.)  
President  
Speech Communications Assistance by  
Telephone, Inc.  
515 P Street, #403  
Sacramento, CA 95814  
916-448-5517  
E-mail: drsts@comcast.net  
website: www.spechtospeech.com

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