

This article written by my sign competent hearing sister was published in the RID (Registry of Interpreters for the Deaf) magazine 4 years ago. I'd like to know when FCC will take action on this issue. FCC is in violation of the deaf and hard of hearing community's functional equivalence rights. Either correct this or else establish regulations that foreign language users of telecommunications be required to use foreign language relay services for point to point calls to bilingual foreign language speakers so that the foreign language users have the same functional equivalency rights that we deaf people have.

The following information is required when filing a General complaint with the FCC:

- Your name, address and the telephone number or numbers involved with your complaint; (if telephone related)

Lawrence J Brick  
Wesley Enhanced Living Pennypack  
8401 Roosevelt Boulevard, P206  
Philadelphia, PA 19152-2035

- A telephone number where you can be reached during the business day;  
215-261-7027

- Specific information about your complaint, including the names of all companies involved with your complaint;

See copy and pasted article below from the RID (Registry of Interpreters for the Deaf) journal.

- Names and telephone numbers of the company representatives that you contacted, the dates that you spoke with these representatives, and any other information that would help process your complaint;

I've been filing complaints for years about bilingual ASL - English speaking hearing people not being allowed to have 10-digit number with the Neustar data base. What's taking you so long to get this done. There are 5 hearing members of my extended family and are sign competent and I want to be able to communicate with them point to point via videophone and not via a video interpreter!!!

- What type of resolution are you seeking?

I've been filing complaints for years about bilingual ASL - English speaking hearing people not being allowed to have 10-digit number with the Neustar data base. What's taking you so long to get this done. There are 5 hearing members of my extended family and are sign competent and I want to be able to communicate with them point to point via videophone and not via a video interpreter!!!

I plan to file this complaint to FCC daily until FCC answers 1. whether they plan to act on this issue. 2. time lines to correct this failure to make video communications functionally equivalent to what

hearing people have. This is being copied to my two PA senators and 1 representative to request that they follow up on this complaint. I consider this over a decade of inaction on this issue by the FCC a criminal violation of the functional equivalence rights of deaf and hard of hearing people who use the Video Relay Services to communicate with people who can hear. If I had one wish, I'd rub Aladdin's lamp and request that every member of FCC become deaf until this oversight is corrected.

The Article:

Title: Open the VRS 10 Digit Number Database

Like many of you, I am a hearing individual who is involved in the deaf community; our common language is American Sign Language (ASL). Years ago, many of us bought TTY's and called deaf people directly using our land line phones which connected to their land line phones. We all figured out how to put our telephone receivers on the TTY coupler; it wasn't rocket science to check whether our call was a voice or a TTY call. If it was a TTY call, we would type our conversations. It was sometimes a struggle, since English is not all deaf people's primary language, but we managed.

In the early 90's after the ADA was passed and 24/7 Telecommunication Relay Services (TRS) was required, no government body prevented us from

calling one another using our TTY's. If deaf people needed to make a doctor appointment they would use the relay service. But if both parties had TTY's, like many of us, we just dialed the number directly and chatted by typing to one another.

Over a year ago, were you excited to hear about the Federal Communications Commission (FCC) ruling, regarding Video Relay Service (VRS) and Internet Protocol Relay (IP Relay) users? Oh, you never heard of the ruling? Deaf people got "real" ten-digit numbers instead of the "proxy" numbers they were originally given, so they could make and receive VRS calls in addition to calls from one videophone (vp) to another. The deadline for getting a "real" ten digit number was mid November 2009. Innocent and foolishly, I thought my D-link vp, for which I had happily paid \$200, would allow me to make and receive calls to deaf people using the "real" ten digit numbers. I saw all the ads from the VRS providers and went on line to get one. The only way I could get a "real" ten digit number was to swear I was deaf or speech impaired; there were serious penalties for lying. Disappointment didn't describe my reaction; fury is a better word choice.

Like many of you, I work as an interpreter and need to use the phone as one form of communication. I also have deaf relatives I like to chat with, just to keep in touch. Eight years ago, I coauthored a book with a deaf business partner; we travel widely making

presentations to both deaf and hearing audiences. We need to stay in touch with one another to discuss and make arrangements. Another deaf woman and I are coauthoring a book; we need to converse in our common language, ASL, regularly.

You may be thinking, “This woman could use a Video Relay Service (VRS) to call any of these people. What’s her problem?” The problem is, although we both have vps, I have to use a VRS interpreter to call deaf people. They have to use a VRS interpreter to chat with me. Why should we be forced to use an interpreter when we speak the same language? As interpreters involved in the deaf community, we all know the value of direct communication. I hope I don’t need to convince this audience on that idea! In addition, what a waste of time and money because, as you know, we are all paying for VRS calls through charges on everyone’s phone bills.

The essence of the problem lies in the FCC ruling that says a hearing person cannot have a ten-digit number. Did you know that? When I filed a complaint with the FCC, they told me ten digit numbers are available ONLY to deaf and hard of hearing people; only deaf people can be part of the VRS database of “real” ten digit numbers. I know Deaf people can call one another using their new ten digit numbers, but I, someone as much involved in the deaf world as a deaf person, cannot! Can you imagine my chagrin?

Why did the rules change when VRS occurred, in contrast to TRS when we could call one another with our TTY's? Why did the FCC forbid hearing people from getting "real" ten digit numbers to use with their vps? I didn't mind paying for my D-link vp, although deaf people got theirs free, but what was the point if I couldn't use it as a "functionally equivalent" phone? The intent of the ADA Telecommunications Act was to assure "functional equivalency." The status quo is not "functional equivalency!" The major consumer groups, the National Association of the Deaf (NAD), Telecommunications of the Deaf Inc. (TDI), Hearing Loss Association (HLA) and the RID have all filed comments with the FCC to rectify this situation, but so far, nothing has changed.

Other people have expressed their concern as well. Marla Berkowitz and Charisse Heine, two deaf women from Ohio, wrote to the FCC saying:

The issue is we cannot deny the facts that there are people like yourselves who are hearing people such as our parents, relatives, interpreters, service providers and friends that we are forbidden to call because our current videophone cannot call their videophones. In addition, our new ten-digit number lets us call only people who are deaf but we are unable to call

directly (without the use of VRS) to those hearing people who use ASL just like us. Many of them do not purchase videophones because of your policy - they know we can't call them with ours. This is very frustrating especially for face to face phone calls.

A frustrated hearing voice is Deacon Tom Smith (CSW), Pastoral Minister of the Deaf from New Jersey, who wrote the following when I asked him to write to the FC about this issue:

I thought I was the only one. All my clients/church members are Deaf and most have vp's now (not TTY's) but I am forced to rely on VRS as a third party to all our communications, some of which are very private and personal. I feel like it is 15-20 years ago before I had a TTY and had to rely on that form of slow, voiced/typed relay services. Except this time it's even more frustrating since it's not necessary. I feel I am forced again to talk with strangers instead the intended party.

Your letter is a very important step toward getting real justice around this issue. The VP providers I've contacted have all indicated that I need to be Deaf to "use their services" with my webcam-equipped laptop. One very creative rep from a VRS company\* suggested I apply as a Hearing person (like you said in your letter - not be able to lie) but have a Deaf person present when they come to install the service

acting as my assistant. (They've probably had requests like mine before). Why should we have to play these deceitful games just because those who wrote these regulations were foolish enough to think that only Deaf people would need regular direct contact with other Deaf people? I am copying your letter and asking our Church members to sign and send to Lautenberg and Menendez and Pallone, etc. Thanks for your Chutzpah!

Have any of you tried to get a ten-digit number? I have. And no matter which company I approach, like Deacon Tom Smith learned, I have to swear that I am deaf or speech impaired. I am aware that some interpreters and codas have said they were deaf and let VRS providers install vps for them. Some have kept their deaf relative's vp just so they could talk directly to their deaf children, consumers or friends. As you know, many deaf people have several vps so leaving one with their hearing relatives was not a problem. But I am not willing to lie to get a ten-digit number and should not have to! In this "communication age," it is beyond my comprehension that the FCC technocrats can't figure out a way to open the database to allow hearing people who can sign, like most of you reading this, to have ten digit numbers. If you agree with me and the consumer groups about this issue, how about letting the FCC know how you feel? The simplest way would be to write to the FCC and insist they "open the VRS database to allow hearing people who can sign to get

ten digit numbers.” You can fax the FCC at: (fax) (1-866-418-0232) or e-mail them at [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)