

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

Re: CG Docket Nos. 10-51 and 03-123

Dear Sir:

I am writing this as a deaf consumer, long-time advocate and as a person who is affiliated with a video relay service outfit (CSDVRS, LLC). My involvement with VRS dates back to 1999, when I was part of the first implementation of a commercial VRS service and I have witnessed first-hand as to how the service has evolved over the years. In the forefront, the concept of functional equivalence and freedom of communication has always been the guiding light (and principle) of my involvement. This year marks the 15th "anniversary" of the video relay service as we know it today. Looking back, we have made a lot of progress in partnership with the FCC, without whom the service would not be where it is today. We look to the wireless industry as a "barometer" for functional equivalence. The ability to call between providers, to be able to port between providers and to transfer information such as contact lists from one provider to another, to be able to leave messages on any device from any provider is what I view as examples of what we ought to gauge the functional equivalence of VRS as a service. When the service is truly functional equivalent, it gives the consumer a true freedom of choice (a.k.a. "life, liberty and the pursuit of happiness.") Sad to say (from my point of view and from many others), this is not yet achievable for the video relay service today. Roadblocks after roadblocks from Sorenson seems to drive the agenda for not achieving functional equivalence to protect a market position. It should focus on the needs and requirements and the freedom of choice for the consumer who uses VRS. Moreover, the use of public funds for VRS should be the driving force for

achieving functional equivalence. As part of my work with CSDVRS, I am involved in working with schools and post-secondary institutions. I have come across situations where the lack of functional equivalence is denying full consumer choice for which provider to use. Using videomail as a case in point, many individuals in schools refuse to port away from Sorenson only because as part of their school duties, they do need to reach parents who happen to use devices from Sorenson and if they are not able to answer, they do need to be able to leave messages. If the school cannot leave messages, they could be at-risk for some enforcement issues in notification to parents. Thus, such schools are not in a position to make a choice to switch to another VRS provider because they are unable to leave messages. If they can't switch to another provider, Sorenson is in effect locking up the market, denying freedom of choice and protecting their market position. The argument that it is not part of a basic service, nor the fact it is not a standards issue does not hold water--if the wireless companies can do it, why can't the VRS industry do it? And Sorenson is receiving public funds to protect a market position. This is something I am struggling to reconcile. To further clarify this, the reverse is working...when the caller using Sorenson units call CSDVRS or any other provider, they are able to leave videomail messages. It's a one-way street where there should be a two-way street. The Technology Access Program at Gallaudet University has done studies to affirm this. There are other situations as to this situation which I could relate. But the basic principle from the above example can be applied to those other situations. It is my sincere and fervent hope that the FCC will take appropriate steps to insure full functional equivalence and more importantly, freedom of choice for the deaf and hard of hearing consumers who use VRS as their lifeline. Thanks for the opportunity to express my thoughts.

Sincerely,

Philip W. Bravin

cc: Chairman Tom Wheeler (via email)

Commissioner Mignon Clyburn

(via email)

Commissioner Jessica Rosenworcel

(via email)

Commissioner Ajit Pai

(via email)

Commissioner Michael O'Rielly

(via email)