

September 2, 2014

Federal Communications Commission
Office of Strategic Planning & Disability Rights Office
445 12th Street, SW
Washington, DC 20554
Jonathan.Chambers@fcc.gov
Gregory.Hlibok@fcc.gov

RE: Universal Access to Video Mail – CG Docket No. 10-51 and 03-123

Dear Chiefs Chambers and Hlibok:

The National Association of the Deaf (NAD) is writing to express serious concerns regarding interoperability among video mail services. We have received numerous messages of anger and frustration from members of our community regarding the inability to leave video mail messages with friends and family who use different videophones. This lack of interoperability seriously impedes our telecommunications access and our freedom to choose among video relay service providers.

We appreciate and strongly supported the Commission’s June 7, 2013 recommendation to amend the Commission’s rules to:

“explicitly require that, if a VRS provider offers a video mail feature to its customers, the provider must ensure that video mail messages can be left by point-to-point callers who are customers of other VRS providers and are using access technology provided by such other providers.”¹

However, it has been more than a year since this recommendation was made and our community is still waiting for universal access to video mail.

We have reached out to several video relay service technology experts to better understand the barriers to video mail interoperability. It is our understanding from these discussions that video mail interoperability is feasible. In fact, one expert estimates that it will take one software developer and one system test engineer 120 days to start from scratch and implement the call routing service necessary to allow point-to-point callers using access technology from competing providers to leave video mail messages.

¹ *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*, Report and Order and Further Notice of Proposed Rulemaking, CG Docket Nos. 10-51 and 03-123, FCC 13-82 at ¶ 275 (rel. June 10, 2013) (“FNPRM”) and *Consumer Groups Comments*, CG Docket Nos. 10-51 and 03-123 at 23 (Aug. 19, 2013).

Although the Commission has made full interoperability a mandate to be achieved through the Reference Platform,² we realize that this platform will take some time to develop and implement. Rather than wait for the Reference Platform to arrive in working order, steps need to be taken now to immediately require video mail interoperability given this feasibility of modification. It is clear to us that we need the Commission to mandate immediate video mail interoperability since the continued lack of such interoperability, as the Commission has noted, “causes significant degradation in the value of point-to-point communication capabilities for all VRS users.”³ We receive too many stories from people as well as community-based organizations about having to repeatedly call clients throughout the day since they cannot leave important messages. This is a serious inconvenience and is also a restraint on our ability to choose VRS products.

The Commission should not sanction this lack of video mail interoperability by letting it continue any longer. The NAD urges quick action to mandate universal access to all video mail services.

Sincerely,

A handwritten signature in black ink, appearing to read "H.A. Rosenblum", with a long horizontal flourish extending to the right.

Howard A. Rosenblum
Chief Executive Officer

cc: Chairman Tom Wheeler
Kris Monteith
Karen Peltz Strauss

² FNPRM at ¶ 53 and 61.

³ FNPRM at ¶ 276.