

April 26, 2011

Via Electronic Filing

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

Re: Comments in Support of Consumer Groups' TRS Policy Statement
filed April 12, 2011, with the FCC in CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

The Video Relay Services Consumer Association (VRSCA)¹ generally supports the Consumer Groups' TRS Policy Statement - Functional Equivalency of Telecommunications Relay Services: Meeting the Mandate of the Americans with Disabilities Act, filed April 12, 2011, with the Federal Communications Commission (FCC) in CG Docket Nos. 03-123 and 10-51.²

The VRSCA is an organization that provides an information forum for deaf, hard-of-hearing and hearing persons who use Video Relay Services (VRS). All VRS users may participate in the organization at no cost and are encouraged to sign up for email updates. Over 7,000 individuals have signed up for email updates concerning VRS since the VRSCA began in 2007. Its mission is to support the empowerment of deaf, hard-of-hearing, and hearing individuals who use VRS. This organization is led by regional managers and other representatives. One of its primary goals is to integrate VRS into daily life across the country by educating the community, to ultimately help bridge the communication gap between deaf, hard-of-hearing, and hearing individuals. The VRSCA participates in town hall meetings and other deaf-related events.

¹ The VRSCA is an organization funded by Sorenson Communications, Inc.

² The following organizations comprise the Consumer Groups: Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Hearing Loss Association of America, California Coalition of Agencies Serving the Deaf and Hard of Hearing, American Association of the Deaf-Blind, Speech Communication Assistance by Telephone, Communication Service for the Deaf, and Deaf Seniors of America.

The VRSCA, like the Consumer Groups, believes that the national telecommunications relay service (TRS) program is about ensuring that hearing and speech disabled consumers and their hearing contacts enjoy functional equivalency in communications. With specific regard to VRS, the FCC, in examining potential market structures and long-term compensation methods, must ensure that VRS maintains functional equivalency between an individual who has a hearing or speech impairment and one who does not have a hearing or speech impairment, as required by Section 225 of the Communications Act.

We agree with the Consumer Groups' statement that the functional equivalence must be the standard filter through which every action taken by the FCC is assessed, and the Consumer Groups' core functional equivalency principles for TRS. We also agree with the Consumer Groups' rationale for its TRS Policy Statement. With regard to the goals listed by the Consumer Groups as part of their blueprint to guide the FCC with its administration of the national TRS program, the VRSCA generally agrees with all of the goals and would like to specifically comment on two of the goals.

First, with regard to equipment and services offered by VRS providers, the VRSCA generally supports the Consumer Groups' goal that the FCC must ensure interoperability and adequate quality and safety standards. Videophone equipment provided to a consumer by a VRS provider should have a minimum set of functionalities so that if the consumer ports the number and uses the videophone equipment with a new provider, that equipment retains the minimum features. The result is that the calls made with the equipment are still functionally equivalent to calls made by hearing individuals. The VRSCA does not expect that every feature would continue to work after porting occurs because such a requirement would not encourage innovation. The same should be true with off-the-shelf equipment that is considered an acceptable substitute for videophone equipment. This would include not only computers, but videophone equipment as well, because a number of deaf seniors do not own or have access to computers. The equipment should have a minimum set of functionalities needed for consumers to effectively use VRS. It is important for consumers to have options, to choose the equipment and provider based on their needs.

Second, VRSCA agrees with the Consumer Groups' goal that the FCC inform all Americans about TRS. This includes informing those with hearing and speech disabilities about all of the different types of devices, the capabilities and features, and informing the public and private sectors of the benefits of TRS and their responsibility to make and receive TRS calls on a regular basis. The most important objective of the VRSCA is that the FCC reach out to all Americans to build acceptance of all types of TRS nationwide. This will build confidence in the confidentiality of information for all agencies and businesses that use TRS for transactions, including the IRS, Social Security Administration, Department of Veterans Affairs, banks, and doctors, to provide a few examples.

These two goals will assist the FCC as it makes its decisions on Internet-based TRS (iTRS) numbering. The FCC should ensure that iTRS providers are able to register both the ten-digit geographic phone numbers and toll free phone numbers, and that iTRS users (of VRS and IP relay) have the option to continue to use the toll free numbers they have been using. There are numerous VRS consumers who have benefited from the toll free numbers for a long time and the VRSCA urges the FCC to preserve the status quo. If the FCC decides that users who elect to continue to use a toll free number must become the subscriber and assume responsibility for all associated costs, then the VRSCA would ask the FCC to consider the following concerns. Any transition period regarding toll free numbers should be at least one year from the effective date of the FCC order because a fast transition will create confusion, especially among the large majority of seniors who are accustomed to using toll free numbers. More importantly, the FCC should educate consumers and require iTRS providers to inform and assist users with toll free numbers during any transition period. The VRSCA intends to work with the FCC, other consumer groups, and iTRS providers to explain the FCC's decisions to consumers.

The VRSCA supports the FCC's continued efforts to improve telecommunication relay services to deaf and hard-of-hearing individuals, and the national TRS program.

Respectfully submitted,

/s/ electronically signed

Sharon Hayes
Director, VRSCA