Chairman Genachowski,

CG Docket Nos. 03-123 and 10-51

I am writing in response to the FCC’s request for comments on the "Structure and practices of the video relay service (VRS) program and on proposed VRS compensation rates." I am opposed to the changes being considered.

VRS has created a more level playing field for deaf people like me, empowering us to communicate via videophone in our native language, ASL. The work I do requires that I be able to use the phone to communicate with colleagues, clients and business associates regardless of whether they are hearing or deaf. Without high-quality VRS service I would not be able to do my job effectively.

The changes the FCC is considering would drastically change VRS. The quality of the videophone technology used is critical to VRS. The products provided by VRS companies have been developed specifically for the needs of the deaf. Yet, the FCC is proposing that we be forced to use off-the-shelf products and government-mandated software. Using products developed for people who are hearing would be a huge step backwards! The FCC cannot consider this to be a reasonable replacement for the specialized VRS technology we use every day.

The rate changes being considered by the FCC would also directly affect the availability, reliability and quality of VRS. If the FCC slashes the rates paid to VRS providers, as suggested, many companies will simply stop providing this vital service. This will put me and all deaf individuals at a significant disadvantage.

VRS is a shining example of what Congress intended with the Americans with Disabilities Act. It is essential that any changes maintain the access, innovation and reliability that define the VRS program today. yvonne montelongo