



**Illinois/Iowa Center For Independent Living**

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*Docket # 96-198*

Liz Sherwin  
Executive Director

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June 24, 1998

Federal Communications Commission  
Office of the Secretary  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

**DOCKET FILE COPY ORIGINAL**

Dear Sirs:

My name is Susan Sacco and I am a Community Advocate here at the Illinois/Iowa Center for Independent Living. I am also a person with a hearing loss and rely on TTY/Relay as my means for telecommunication. I am writing to share some of my concerns with you in hopes that you will realize the importance that ALL telecommunications be accessible for persons with disabilities. This can include persons who are Deaf, hard of hearing, blind or have a disability with speech, cognition or mobility. We ALL depend on telephones just like all other Americans and we need to ensure they are accessible for us.

We at IICIL hope that you will FULLY adopt the Access Board Section 255 guidelines for both manufacturers and service providers. These guidelines are needed to provide clear guidance on the obligations of companies to make their products and services accessible. In my job I use the telephone frequently and it is important to me to have access when I do make calls. Most of the time, I do use Relay Center to provide the accommodations I need to conduct business. It is very important to me that telephones remain accessible for ALL persons with disabilities, regardless of what that is. We cannot afford to neglect or ignore the services of telecommunications. based on a persons disability or our not being able to provide the appropriate accommodations.

We are also opposed to the "cost recovery" concept because this would in fact defeat the purposes of Section 255. We need FCC to follow the definition of "readily achievable" as it has been defined in the ADA. It is sad to say that even though it has been 7 years of the passing of the ADA, there are still many telecommunications services that I do not have access to. For example, during the many telephone calls that I make in my job, I get many voice mails or other interactive telephone systems. This results in lost time and is a barrier to my not being able to have complete access when I need to on the telephone. I often wonder if hearing persons face these same obstacles every time they make a business call? Probably not.

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*"Where the emphasis is on ability, not disability."*

When I do make these calls, I am forced to have the Relay re-dial and call back again to leave the message on voice mail or get instructions from the interactive telephone systems. There have been times, unfortunately, that I later find out that my message was not delivered. These again are barriers to my being able to fully utilize the telecommunications systems and until there is complete access for ALL persons with disabilities who need to use the telephone and in compliance with the ADA, your work is not finished

Finally, it is also important that FCC develops and enforces a complaint process with Section 255. It is one thing to pass a good bill in our Congress, but without any way for persons to follow up with complaints or concerns or have their voices heard, is rather pointless. How else do we ever improve in our culture? We need to have the ability and means to write letters or make calls to manufacturers or companies when we encounter barriers with products they sell or provide. We should also not be required to pay any filing fees for either informal or formal complaints. Nor should there be a time-line when one can or cannot file a complaint, as one would not know when they find a product or service inaccessible.

Furthermore, persons with disabilities must be able to provide complaints in any format or means that is accessible to them! We also need to ensure that manufacturers and service providers be required to establish contact points in their companies that are accessible to consumers with disabilities. I would also love to see if those companies and manufacturers could also be encouraged to have a local Centers for Independent Living (CILS) provide an inservice to their staff on Disability Awareness, which would better educate them about proper etiquette on interacting and service persons with disabilities. This is one of the many services that many of our national CILS do provide in their own communities.

We hope that we can count on you for your support and cooperation in the issues that I mentioned. We look forward to working with you to ensure that telecommunications becomes accessible and achievable for ALL persons with disabilities. Thank you for the opportunity to share our concerns and comments and help educate FCC about our needs for complete access. I believe together we can work to make our telecommunication systems accessible for all of the 54 million Americans with disabilities

Sincerely yours,

L - s - - -  
Susan A. Sacco  
Community Advocate

Docket # 96-198

PROGRESS CENTER

for Independent Living

June 26, 1998

Federal Communication Commission  
Secretary Magalie Salas  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

Dear Secretary Salas:

I am writing in response to the Federal Communication's rules proposing to enforce section 225 of the **Telecommunications** Act. Implementing these rules would only weaken the intended purpose of this act - that all telecommunications manufacturers and **service** providers make their products and services accessible to people with disabilities,

That is why I am urging the FCC to adopt the Access Board Section 225 guidelines for both manufacturers and service providers. These guidelines are needed to provide clear guidance on the obligation of companies to make their products and services accessible to ALL people with disabilities. I have a speech disability. I **often** use the Relay System which expedites my communication process. This service provides independence for me, both in my professional and personal life. Without the Relay System, I would have to struggle making phone calls.

I am very concerned that under the FCC's proposed rules companies would be allowed to consider what is 'readily achievable' in providing services, allowing these companies to consider the extent to which the costs of providing access **will** be recovered. This would only defeat the spirit of Section 225. After all, Section 225 of the Telecommunication Act is in existence because the market failed to respond to the needs of people with disabilities.

The FCC's proposed rules do not cover "enhanced services" under Section 225, being deemed information rather than telecommunications services. I can tell you that if you include these services under Section 225 it would make life fairer for the disabled community. For instance, I have difficulty accessing my voice mail at work because I cannot physically respond quickly enough to the commands on my voice mail message before it defaults, making it **frustrating** for me to use this service.

I strongly **recommend** that the FCC adopt the Access Board guidelines instead of its proposed rules to enforce Section 225. This effort will enable people with disabilities to have complete access to telecommunications services. I thank you for your time regarding this matter.

Sincerely,

Larry Biondi

Larry Biondi  
Advocacy Specialist

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