

Proceeding: **IN THE MATTER OF TELECOMMUNICATIONS RELAY SERVICES AND SPE** Record , of 1
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COMMENTS ON THE STS NOTICE OF PROPOSED RULE MAKING - Revised 7/5/98

I am making these comments as an advocate of people who are **severely** speech impaired and have benefitted from technology to communicate.

REGULATORY ISSUES - GENERAL

1. Many consumers and potential consumers will be unable to respond to this Notice of Proposed Rulemaking (NPRM) because of the nature of their multiple disabilities. Please do not take the lack of response as a lack of interest.
2. Speech-to-Speech should be required nationally even though it does not utilize Text Telephones (TTYs). I support the California Public Utilities Commission (CPUC) position that the specific reference to TTYs in the Americans with Disabilities Act (ADA) "... is meant to illustrate the type of technology that might be used, not to preclude the use of other technologies."

Title IV of the ADA is applicable to any wire or radio communication service that enables persons with hearing or speech disabilities to engage in communication with persons without such disabilities and is not limited to services using TTYs.

STS services fall within the scope of the ADA's definition of "telecommunications relay services" as a telephone transmission service that enables an individual who has a speech disability to communicate by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of a person who does not have a speech disability to communicate using voice communication services by wire or radio. The NPRM states in paragraph I, 5, that STS comes under the jurisdiction of the ADA.

3. I support the Federal Communications Commission's (FCC) tentative conclusion that STS be required nationally; cost should not prevent establishing a national requirement. STS is an inexpensive service. The cost of Speech-to-Speech plus outreach for California for 1997 was less than \$1m. As California is the most populous state, all other states can expect lower costs; some costs will be much lower. Therefore, this low cost is another good reason to make STS a national requirement. The state administrators who questioned making STS a national requirement because of unknown costs may have not been aware of the California costs at the time. (See NPRM paragraph 24).

4. I support the FCC's tentative conclusion that the costs of providing interstate STS should be reimbursed from the interstate Telecommunications Relay Service (TRS) Fund. This conclusion is based on, and consistent with, the statutory duty not to discourage the implementation of improved TRS.

5. While STS may have operational differences that make compliance with all current Commission standards for tty relay infeasible, a panel of consumers and providers should be convened to determine the appropriateness of compliance with each standard.

6. The STS standards should deviate from those of TRS in the definition of confidentiality. While general confidentiality is vital, confidentiality should not be defined as specifically for STS as for TTY relay. FCC could convene such a consumer board to study this issue.

Thank you,
Ann Ratcliff Ph.D.