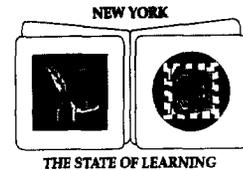


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THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, N.Y. 12234

CHIEF OPERATING OFFICER
Tel (518) 474-2547
Fax (518) 473-2827
E-mail rcate@mailnysed.gov

July 15, 1998

Office of the Secretary
Federal Communications Commission
Room 222
19 19 M Street, NW
Washington, DC 20554

Dear Secretary:

Thank you for the opportunity to comment on the June 16, 1998 Federal Register proposed rules regarding Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, **47 CFR Part 64, Docket No. 98-67; FCC 98-90.**

The Federal Communications Commission's proposal to expand and enhance the quality of the Telecommunications Relay Services (TRS) is a timely one that will benefit all parties in New York and other states. The Speech-to-Speech Services being incorporated into the existing TRS within the two-year time frame is much needed in this State.

In reviewing the proposal, there are several areas that are essential to effective TRS service delivery.

- The Multilingual Relay Services should be included in the regulations and used for major languages that are commonly used, e.g., Spanish.
- New York State is working to enhance the 911 telephone system to include the direct Telecommunications Device for the Deaf/TeleTypewriter (TDD/TTY) contact. This should be encouraged and implemented in a consistent manner.
- The 85 percent, 10-second rule needs to be looked at closely. Will people who are deaf, hard of hearing, and speech impaired, as well as the general public, perceive the delay as poor quality of service and lack of interest in providing equal access to all parties involved? Perhaps the rule should be comparable to that for telephone operators throughout the nation.

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- The concept of not establishing typing speed makes sense; however, spelling accuracy is critical and the ability to translate common typing abbreviations and errors is important to the success of the TRS.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard H. Cate". The signature is written in a cursive style with a large, prominent initial "R".

Richard H. Cate

c: Judy Boley, Federal Communications Commission