

In the Matter of)
)
)

Telecommunications Relay Services)
and Speech-to-Speech Services for)
Individuals with Hearing and Speech)
Disabilities)
)

CC Docket No. 98-67

Comments of

Bob Dunbar, Administrator
Idaho Telecommunications Relay Service
P.O. Box 775
Donnelly, ID 83615

I, Bob Dunbar, Administrator of the Idaho TRS file these comments on July 10, 1998 in the FCC's Telecommunications Relay Services and Speech-to-Speech services for Individuals with Hearing and Speech Disabilities, CC Docket No, 98-67.

The Idaho TRS requests that Speech-to-Speech not be made a mandatory requirement for FCC certification of relay service for the reasons that follow.

Based on the 1996-1997 trial of STS in California, the Idaho relay estimates that Idaho will have fewer than 6 users of STS.

Higher wages, perhaps double the normal rate, would have to be paid to the CA's skilled in STS.

Our per minute costs will increase due to lost efficiency and the higher rate paid to CA's proficient in STS. STS will have to be staffed for, regardless of use.

The level of quality and usefulness will depend entirely on the skill of the individual CA on a specific call.

Should STS become mandatory for certification, the Idaho relay requests that we be allowed to subcontract with other providers to gain efficiency.

Submitted by:



Bob Dunbar
P.O. Box 775
Donnelly, ID 83615
July 10, 1998

No. of Copies rec'd
List ABCDE

5