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Proceeding Name: 98-67 Author Name: 'Augusta Goldstein
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COMMENTS ON THE STS NOTICE OF PROPOSED RULE MAKING - Revised 7/5/98

(PLEASE ACCEPT THE FOLLOWING LATE COMMENTS. WHEN THEY WERE SUBMITTED PREVIOUSLY--AND ON TIME--THE SYSTEM REJECTED THEM AND RETURNED THEM TO ME WHILE I WAS ON VACATION. THANK YOU. 7/25/98)

I am making these comments as an occasional user of Speech-to-Speech (STS). I have used it to communicate with a speech disabled friend, as well as with my own mother when I was myself temporarily speech disabled. The service is invaluable.

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. Text Telephones (TTYs) have been the standard technology for improving communication for the deaf, formerly the only community recognized as needing assistance in telephone communication. It is important to recognize that there are other speech disabled people for whom TTY service is not applicable. For these people, STS is (or could become) an essential technology. STS should be required nationally even though it does not utilize the standard technology, 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.

3. Regarding the specifics of how STS should most effectively be implemented I refer you to the communication you have received from Bob Segalman in this regard. I hope you will study it with care and come to the same conclusion that I have: that STS should be implemented nationwide so that the speech disabled of this country can live their lives with greater ease and hope to conduct their lives and business with the same advantages that are enjoyed by those who are not speech disabled. That is, after all, the intent of the ADA.

Sincerely,
Augusta Goldstein