

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)
)
Telecommunications Relay Services,)
the Americans with Disabilities Act of 1990,) CC Docket No. 98-67
and the Telecommunications Act of 1996)
)

**REPLY COMMENTS OF
Mitchell D. Travers**

I. Introduction

By way of introduction, I am:

- The moderator of the electronic Telecommunications Relay Services forum (eTRSf) which is both email-based (etrsf-moderator@48i.com) with 650 direct subscribers and web-based (www.48i.com/etrsf) over 3,000 unique visitors,
- A member of the Maryland Governor's Advisory Board for Telecommunications Relay (GABTR) working with the Maryland State Administrator, Telecommunications Access of Maryland,
- Chair of the TRS Committee of the Maryland Association of the Deaf (MDAD),
- Vice chair of the National Association of the Deaf Telecommunications Committee (NADTC), and
- A full-time information systems professional at Medlantic Healthcare Group.

I am an individual with a profound hearing loss who has used hearing aids for most of my life, has recently begun using a cochlear implant, and utilizes various modes of communication including sign language, lipreading/speechreading, and speech. I offer only a few reply comments contained and they are my own.

II. Expanding Beyond Traditional Forms of TTY Relay Services

I wholeheartedly agree with FCC's tentative conclusion that "Title IV's language and structure establish that Congress intended TRS to be an evolving service that would expand beyond traditional TTY relay service as new technologies developed." This is from paragraph 14 in the NPRM.

However, the FCC needs to demonstrate its belief in this conclusion with real and definitive actions, not only with new technologies but with existing technologies as well. An excellent example of this is Two-Line Voice-Carry-Over (2LVCO) which already being offered throughout the country but is not mandated. It should be and here is why.

Whoever uses 2LVCO must absorb an additional economic burden of paying for the necessary second telephone line, second telephone equipment, and the three-way calling service. Make no mistake, 2LVCO significantly approaches "functional equivalence" by several orders of a magnitude than any other current TRS service. Yet, it is not mandated. More importantly, the additional costs for use 2LVCO are not reimbursable from the interstate TRS Fund. It should be. I personally know twenty individuals in states between Maryland and New York who would immediately begin utilizing 2LVCO if they did not have to incur the additional monthly costs for the second telephone line, equipment, and three-way calling service.

Additionally, I can state emphatically that 2LVCO has been and continues to be instrumental to my career growth and success in the work place. Without it, I would not be where I am today. This is not hyperbole nor an exaggeration to make a point. It is fact. 2LVCO also contributes significantly to my nonwork-related telephone communications. It should also be known that the lack of 2LVCO availability has and continues to prevent a large number of people from conducting successful job hunts.

2LVCO must be mandated so that its costs can be allowed to be reimbursed to relay users, both for interstate and intrastate relay calling. Guidelines and procedures for this should be among the tasks for the Interstate TRS Fund Advisory Council.

III. Costs of Providing Interstate "Improved" TRS Should Be Reimbursed

I wholeheartedly agree with the FCC's conclusion that "the costs of providing interstate improved relay services should be reimbursed from the interstate TRS Fund." This is from paragraph 15 in the NPRM.

However, the FCC must guard against allowing this Fund to be used to support technologies and services that would have the effect of perpetuating the separation of those who use TTYs from being made part of the mainstream. An example are enhanced transmission protocols that have been developed and are being made available specifically for TTY use only. This is an untenable state of affairs and public funds such as the Interstate TRS Fund and state TRS funds must not be allowed to be used to perpetuate clearly exclusionary results. A rule must be established to ensure that whatever improved services may emerge that it not be reimbursed if it also has the effect of perpetuating the isolation of TTY users.

Consider, instead, alternatives such as V.18 which would have the effect of enabling all existing TTYs of being able to be used with any and all computers, of which there are millions. There is, at present, an NAD Telecommunications Communications (NADTC) Task Force addressing this very issue. This task force has 41 people who come from many different companies and organizations throughout the U.S. Testing of one such V.18-enabled modem is now being performed by the Technology Assessment Program at Gallaudet University.

Consider, also, alternatives such as the recently announced softmodem from NXi Communications from Salt Lake City, Utah. This softmodem will work in computers and translate Baudot and ASCII codes in real time between computers and TTYs. It is now in testing and will be available in the general marketplace before the end of this year. In fact, since all computers are essentially telecommunications equipment, all computers should be required to come equipped with either a modem that is V.18 compliant or the NXi Baudot/ASCII softmodem.

The point here is that Telecommunications Relay Services is meant to be a service that brings together all individuals into the mainstream community of our country. This is what will be happening with the requirement for Speech-to-Speech and Video Relay Interpreting services. But we must also guard against seemingly benevolent technologies and/or services that do not contribute to this goal.

Specific guidelines and procedures regarding new technologies and services that may be appropriately reimbursed should be included as among the tasks for the Interstate TRS Fund Advisory Council (see paragraph 16 of the NPRM).

IV. Video Relay Interpreting Services

It is critical that POTS-based video communications be specifically stated as being among technologies that will be considered as being acceptable for reimbursement by the Fund. It must be made explicitly clear that ISDN is not the only way that VRI may be provided because that seems to be the thinking evidenced in all the Comments touching on this subject. In fact, it is POTS-based (plain old telephone system) VRI that will bring that service into the mainstream. Everyday, more and more POTS-based equipment is being bought by the relay using public.

As a case in point, one company, Birnbaum Interpreting Services, Inc. (BIS) of Silver Spring, Maryland has a contract to provide POTS-based VRI to the Defense Logistics Agency in New Cumberland, Pennsylvania. Note here that the acronym, VRI, is being taken to mean Video Remote Interpreting, which is the delivery of interpreting services through video communications (as opposed to telephone relay services). The upcoming Maryland Relay VRI Trial will also include, at least, one POTS-based VRI workstation.

There is, at present, an NAD Telecommunications Committee (NADTC) Task Force addressing the issue of compatibility of video-based communications products. The objective of this task force is to ensure that products being introduced into the deaf and Deaf communities do not have the effect of creating further isolations from mainstream use of similar technologies and services.

The FCC should ensure that whenever it reimburses for VRI that the provision of that VRI service is not being accomplished in a way that prevents its use in the mainstream of video communications.

Respectfully submitted,

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