

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

**September 14, 1998**

**In the Matter of** )  
 )  
**Telecommunications Relay Services** )  
**and Speech-to-Speech Services for** ) **CC Docket No. 98-67**  
**Individuals with Hearing and Speech** )  
**Disabilities** )  
 )

**REPLY COMMENTS OF DC ASSOCIATION OF DEAF CITIZENS**

These are the reply comments from the DC Association of Deaf Citizens (DCADC). We are an organization representing Deaf citizens in Washington, DC. We are affiliated with the National Association of the Deaf (NAD).

So much has been changed since the FCC issued the Telecommunication Relay Service (TRS) regulations. It has been over 8 years when FCC last issued NOI. This has been a long time coming for deaf citizens.

We would like to support the NAD's position on Notice of Proposal Rulemaking (NPRM). We are not pleased and satisfied with the FCC's NPRM. We still feel the current and proposed TRS is substandard. We urge the FCC to do more in the NPRM. We would like to revisit a few issues that are of concern to us. They are:

1. We absolutely need an Equipment Distribution Program. In the DC area, we are finding deaf citizens can't afford a TTY. A few years ago, a DCADC board member approached

several parties to see if anyone would be interested in developing DC legislation to create an Equipment Distribution Program. One was very much opposed to it and one said they would be happy to work with us but they didn't have the time and resources. The DC Council is a mess and it may be impossible to get their assistance and support to draft legislation. If the FCC can't issue regulations, we urge you to provide us with guidance and supportive comments to the State's PSC, local bells, and others indicating this need to be coordinated among all parties to develop an equipment distribution program.

2. Lack of incoming international calls. We urge the FCC to issue a ruling on how the TRS users can place international calls into the United States. In DC, we have many citizens and students at Gallaudet University from foreign countries wishing to be allowed to receive international calls.

3. A great need for Multivendoring. We believe it is time for the FCC to issue a guideline in order to have Multivendoring TRS. We have been with the current TRS for 7 or so years and we're ready for a "different" type of TRS. We believe with Multivendoring, many TRS vendors will improve the quality of relay and service as well as add more advance features/functions to the TRS.

In closing, we urge the FCC to review carefully the comments and review NAD's comment very careful and apply them in the TRS ruling.

Respectfully submitted,

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