

Reply Comments of
The Northern Virginia Resource Center for Deaf and Hard of Hearing Persons
to
Notice of Proposed Rulemaking on Telecommunications Relay Services
CC Docket 98-67
September 14, 1998

The Northern Virginia Resource Center for Deaf and Hard of Hearing Persons (NVRC) serves the counties of Arlington, Fairfax, Fauquier, Loudoun, and Prince William as well as the cities of Alexandria, Fairfax, Manassas and Manassas Park. This service area has more than 170,000 deaf and hard of hearing residents. NVRC's mission is to empower deaf and hard of hearing persons and their families through education, advocacy and community involvement.

We submit these reply comments to support final rules that will include more opportunities for consumer choice and input on TRS, encourage regular additions of new technology to improve TRS, and achieve real time relay transmission.

A. Improved TRS

We support the comments of Stephen Gregory that TRS regulations should be designed so that they do not suppress or impair development of transmission technology by current or emerging TRS. We also agree with Mr. Gregory that improved transmission speed should be a measure of qualifying for "improved TRS" in order to qualify as a recoverable expense.

We hope that the FCC will take actions to encourage more pilot testing of relay technology that will bring it closer to real time, such as that using speech recognition. We ask that consideration also be given to technology that will encourage and improve 2-line VCO, which can use ASCII, a much more speedy protocol than Baudot. Additionally, a new product makes it possible to switch between voice and TTY during a call.

We support the comments of Al Sonnenstrahl that improvements for functional equivalency should not be held up because of the length of state contracts.

We support the comments of Telecommunications for the Deaf, Inc. that rulings on what qualifies as an "improved" service be made within 3 months of the request.

B. Speech-to-Speech

We repeat our support for mandatory speech-to-speech services.

We also support comments from Self Help for Hard of Hearing People, Inc. which requests that Speech-to-Speech services not be limited to people with speech disabilities. Many deaf and hard of hearing people may benefit from this service, and it should be designed to run with VCO and TTY.

C. Video Relay Interpreting

We agree with Self Help for Hard of Hearing People, Inc. that any VRI development be able to incorporate captioned transcription and VCO capability.

We support the comments of Massachusetts Assistive Technology Partnership that the growth of VRI will lead to an increase in the number of qualified interpreters. An earlier pilot test in Texas also showed that some interpreters prefer this type of interpreting.

We support the many of standards for interpreters for video relay that were proposed by Sprint.

D. Multilingual Relay Services

We support the provision of ASL translation upon request by all TRS providers. Sufficient expert ASL transliterators should be available 24 hours a day to handle ASL calls without delay. Certification standards should be developed to ensure that those performing this task are fully qualified.

E. Access to Emergency Services

We support the comments submitted by the Advisory Commission on State Emergency Communication for the State of Texas for handling emergency calls to TRS. We agree with the National Association of the Deaf and Consumer Action Network that the automated process should be able to route directly to 9-1-1 systems rather than a 10-digit emergency number, where available.

We also support the requirement that a caller identify emergency situations rather than requiring a CA to determine if a call is of emergency nature.

F. Access to Enhanced Telecommunication Services

We support comments submitted by Leo LaPointe, who noted that the so-called "enhanced" services should be viewed as basic ones and the CA Public Utilities Commission, which views audiotext services as standard TRS conversations.

The same holds true for access to 900 calls. Nine TRS centers already offer this service, but others do not. Access to 900 numbers should be required under the ADA regulations prohibiting TRS providers from refusing calls that can generally be handled by common carriers.

G. Mandatory Minimum Standards

We support the comments of David Coco that quality assurance parameters used to evaluate TRS go beyond average speed of answer. We also support Mr. Coco's request that actual test calls be done by an independent quality assurance organization.

We agree with the USA Deaf Sports Federation that answer performance of 85/10 is too generous and does not meet functional equivalence and that redialed or abandoned calls should be included, since they can be due to busy signals or failure to connect. Busy signals or holds should never occur with TRS itself, only in reaching the person being called. Anything else will not truly meet the requirement of "functional equivalency."

We support the reply comments of the National Association of the Deaf and Consumer Action Network that relay providers keep records of calls abandoned after 60 seconds, re-dialed calls, busy signals received by callers, and incoming calls placed on hold.

H. Competition Issues

We support the comments of Telecommunications for the Deaf, Inc., which requests that consumer and key organizations be involved with the selection process for state contracts. We agree that consumers should have the right to select providers and that there should be alternative 800 numbers to call for both interstate and intrastate calls.

I. TRS Consumer Information

We support the comments by Telecommunications for the Deaf, Inc. that each

state program report annually on outreach and information activities.

We also strongly support the request by the State of Maryland that the Commission reconsider its decision not to propose rules on carrier outreach. These outreach efforts are greatly needed.

J. Enforcement and Certification

We agree with Telecommunications for the Deaf that state notification of substantive changes be reported to the FCC within 60 days and that the FCC should mandate providers and state programs to submit complaint information to the FCC on a regular basis to assist with monitoring service quality.

K. Other Issues

TRS should be required to relay voice mail information without regard to whether a call is in voice or TTY mode. This issue is an especially important one to deaf-blind individuals who have voice mail systems.

NVRC thanks the Commission for its attention to the needs of TRS users. We hope that reviews will be done frequently to stay abreast of new technology and needs.

Respectfully submitted,

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