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May 17, 2006

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 03-123

Dear Madam Secretary:

The ADA and the Commission's rules require outreach and education for all forms of TRS, including STS, VRS and IP Relay. Appropriate outreach vehicles are needed to meet the needs of the speech disabled communities and effective national outreach should be one of the FCC's universal service goals. Indeed, the concept of universal service requires that people be informed about telephone relay services that are appropriate to their particular disabilities and be taught how to use that service. It is also important to educate hearing and non-speech-disabled people about relay services so that they grow more comfortable placing and receiving relay calls.

Outreach and education have been critically important to the development of STS, both with regard to reaching people with speech disabilities and in educating others about this important service. STS call volumes are still extremely low because of inadequate outreach and education. But we know that STS call volumes rise rapidly when effective outreach is in place. I believe that effective outreach can have the same positive effect on the development and acceptance of other forms of TRS, including VRS and IP Relay. Yet, hundreds of thousands of Americans continue to be deprived of the use of STS, VRS and other forms of TRS because of insufficient outreach.

Experience has shown that education and live demonstrations can be very effective in expanding the use of STS. Looking for potential users of STS can be like looking for needles in a huge haystack, however. Particularly in less urban locations, there may not be a readily identifiable community of potential relay users and it may be difficult to locate these individuals. This makes it difficult to get the word out to everyone about the benefits of various forms of TRS. It is clear to me that the lack of outreach is fundamentally unfair and is one of the key obstacles preventing more people from using profoundly life-affecting relay services such as STS, VRS, IP Relay and TTY.

Having spent a significant amount of time and effort trying to encourage providers to increase their outreach programs, I was happy to hear that providers had stepped up to the plate and planned to fund additional outreach. I was stunned to see

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NECA push back on these much needed efforts and try to cut the money providers planned to spend on outreach. It is a travesty for NECA to cut these costs. Eliminating these expenditures is like telling speech-disabled and deaf individuals that you don't want them to have access to telephone service. This is not the message the FCC should be sending to speech-disabled individuals or to the deaf community.

The job of government agencies such as the FCC is to protect and advocate for people who cannot advocate for themselves. I strongly urge the FCC to take this responsibility seriously and set a reimbursement rate that encourages more outreach, not less. These outreach efforts are essential to fostering increased awareness and increased quality of service and to ensuring that relay services are available nationwide.

This letter is submitted as an *ex parte* communication in the above-referenced proceeding, and is filed pursuant to Section 1.1206 of the Commission's rules.

Very truly yours,

Bob Segalman, Ph.D
Founder, Speech to Speech