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August 20, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554

RE: CC Docket No. 92-105
SHHH ex parte comments

Dear Ms. Roman Salas:

Self Help for Hard of Hearing People, Inc. (SHHH) hereby submits ex parte comments on 711 access to telecommunications relay services.

SHHH is a national educational organization representing people of all ages and all levels of hearing loss who are hard of hearing. SHHH is structured with a national office, eight state associations, and a network of 250 chapters and groups nationwide.

SHHH submitted comments on the original FCC proceeding on 711 access and wholeheartedly supported easier access to telecommunications relay services. Our comments here focus on two aspects: the importance of facilitating relay services for hearing parties, and the need to make it possible for all users and potential users to access the relay service via 711.

It is vital that we find ways to make relay easier to use for hearing parties. When the relay system was first introduced nationwide, hearing parties were not familiar at all with relay and there were frequent cases of hearing parties hanging up on relay calls because they thought they were telemarketers or crank calls. Now, more and more, the hearing public is familiar with relay calls. But now they refuse to take them precisely because they know what relay calls are and they find them much too slow. This is particularly true with receptionists who are staffing a desk alone and have to answer all incoming calls. In this type of situation, they will often refuse to take the call because it holds up the line for too long. The hearing public see relay services as slow. Therefore we must take measures to dispel this perception.



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Although access to relay services is being facilitated on the front-end by 711 because of an easy to remember number, this still does not address the more serious public perception problem. The role of a communication assistant in relay service calls is far from transparent. It is only through use of advanced technologies, such as speech recognition, that we will be able to approximate a functionally equivalent telephone calling experience. SHHH supports decisions by states to acquire this enhanced technology for relay services. In addition, SHHH supports decisions to hire, train and fairly compensate the best communications assistants available.

There was excitement when Maryland introduced a new code, 711, for quick access to the relay service. However it was set up without making provisions for voice carry over (VCO) users to be able to use 711. VCO users in Maryland still have to use the ten-digit number to access the relay service. Our understanding is that this was a budget decision made by the state and not a technological problem. When setting up the service, choices were made based on economic considerations and voice and TTY users were given priority. 711 is not a reality today for VCO users in the state of Maryland. SHHH is very concerned that this large group of users and potential users were consciously left out of the plan to provide 711 access. In the FCC rules for Title IV of the Americans with Disabilities Act, VCO was required as a feature that should be made available for people with hearing loss who prefer to use their voice to speak to the hearing party.

The percentage of VCO users in any given state tends to be lower than that of TTY users. There are several reasons for this. Relay service providers have not been able to market successfully to this group. VCO users may not have grown up using relay services. They most probably have used the regular voice telephone system until their hearing started to deteriorate. It can be a difficult transition for them as they are used to the speed and efficiency of the voice system. They will undoubtedly have higher expectations of the relay service based on their prior use of the regular phone system. Relay is so much slower and it takes new VCO users a while to get used to going through a third party to make their calls. In addition, they have to go out and purchase new equipment as they most probably do not have a TTY, TTY software or a VCO phone and, therefore, this is another step they have to make before actually being set up to use the relay service. As a result, though the numbers of hard of hearing people are large, their usage of the relay service has not yet reached its potential.

It would be easy for state administrators to look at the numbers and make decisions about access based on those statistics. But this is not an acceptable practice where access to telecommunications is at stake. No group of relay users or potential users should be left out when a state is setting up 711 access. Through education and appropriate outreach more VCO users can be reached and helped to realize the benefits that relay services can provide

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to them. Of the 26 million people who are hard of hearing in the U.S., a conservative estimate of those having enough difficulty hearing on the voice phone and therefore who could benefit from VCO would be 5-7 million. This is where the relay service potential growth lies. All interested parties need to do more outreach to this population, but first we need to ensure that improved access to relay services is available to all users and potential users.

Another concern is related to state-by-state variances in 711 access. A primary virtue of 711 is the ability to access a relay wherever one may be. If each state sets its own rules about which services can and cannot access relay via 711, as in the case of Maryland, then we would have chaos on a national level and the key benefit of the three digit code would be lost.

Respectfully submitted,



Brenda Battat
Acting Executive Director