

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51;
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; CG Docket No. 03-123

Under the Americans with Disabilities Act, functional equivalency has been the foundation of our telecommunications relay service policies. Functional equivalency may sound like the kind of regulatory lingo that only a lawyer could love. But for millions of Americans with hearing and speech impairments, it means that they have the right and ability to pick up the phone, reach out and connect, and participate more fully in the world.

Our Video Relay Service program, which allows individuals who are deaf and hard-of-hearing to communicate using the phone system in a conversational way, plays a vital role in providing functional equivalency. But with the march of time comes changes in technology. So in order to keep our VRS policies current and honor the spirit and substance of functional equivalency we need to make adjustments. This rulemaking seeks to do just that by making changes that will hopefully allow for greater access to VRS. It also asks questions to inform the agency's future work about in-home interpreting and ways to speed service to new consumers or those that change providers. I support this order and rulemaking and I appreciate my colleagues' willingness to work with me to make modifications I requested to ensure public and enterprise videophones are more accessible to persons with hearing and speech disabilities.

Of course, this rulemaking is not the only work that lies ahead. We also have to address an outstanding petition that seeks clarity from this agency surrounding how telecommunications relay service fees are presented on consumer bills. As this agency considers this request, I hope that it carefully considers the duties and obligations that arise under the Americans with Disabilities Act, including the cherished principle of non-discrimination. On that score, it will be important to consider the words of the National Council on Disability, which has warned the requested relief is "antithetical to the purpose of the ADA."

Thank you to the Consumer and Governmental Affairs Bureau and Disability Rights Office for your work on today's order and rulemaking and your efforts to expand access to communications every day.