

**STATEMENT OF  
COMMISSIONER MICHAEL J. COPPS**

Re: *Telecommunications Relay and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order (CC Docket No. 98-67, CG Docket No. 03-123)

The concept of “functional equivalency” is at the heart of the Americans with Disabilities Act. “Functional equivalency” means that 54 million Americans have a right to equal access to communications technologies and an equal opportunity to succeed.

Today’s decision delves deep into the mechanics of “functional equivalency” by determining appropriate compensation rates. To this end, our Order separately accounts for IP Relay and traditional TRS. This approach allows service provider compensation to more accurately reflect cost.

This Order also adopts a compensation rate for VRS based on a median of the individual rates of providers submitting cost and demand data. I support this outcome, but remain concerned that our calculation of VRS rates has an ad hoc and last minute quality. This is not fair to VRS consumers or providers. We need to work harder to bring consistency and transparency to the calculation process. We also must provide an expeditious and thoughtful response to speed of answer and interoperability concerns raised by the deaf and hard-of-hearing community. With the “functional equivalency” standard as our guide, I look forward to working with my colleagues to do so.