**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, Further Notice of Proposed Rulemaking

 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 deaf and hard-of-hearing persons 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 spirt and substance of functional equivalency we need to make adjustments. This rulemaking seeks to do just that. We seek comment on reexamining VRS compensation for the smallest VRS providers and reaffirm our goal of fostering a competitive VRS marketplace. We also seek comment on service improvements, including the time it takes to answer a VRS call. At the same time, in light of the history of this program, we seek comment on appropriate safeguards to guard against the potential for any new waste and abuse.

 I look forward to the record that develops in this proceeding.