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>  
>3049 Noriega Street  
>San Francisco, CA 94122  
>July 13, 1998

>ecfs@fcc.gov

>  
>Dear Public Service Division,

>  
>I have a colleague whom I really respect. His name is Dr. Bob Segalman  
>whom I know you have heard from because he has championed  
>Speech-to-Speech to help an important segment of American citizens  
>with disabilities. I feel especially close to Dr. Segalman because my  
>own, now-deceased mother, Estelle Thalheimer Gurdin, was severely  
>hearing impaired until she was 52 years of age when a new surgical  
>technique restored much of her hearing loss. I know how much she  
would  
>have been in favor of helping people who have difficulty  
communicating  
>in speech avail themselves of the new communications technology to  
>improve their lives. Since January 15, 1998, I have been doing a  
study  
>of a very debilitating disease. Through my research, I have met many  
>intelligent, productive citizens whose quality of life has been  
>improved through the various new technological devices, one of which  
>is Speech-to-Speech.

>Based on these life experiences, I support the Federal Communications  
>Commission's (FCC) tentative conclusion that STS (Speech-to-Speech)  
be  
>required nationally. Its cost should not prevent establishing a  
>national requirement. STS is an inexpensive service. The cost of  
>Speech-to-Speech plus outreach for California for 1997 was less than  
>\$1m. As California is the most expensive state, all other states  
>should expect lower cost. Some costs will be much lower. The state  
>administrators who questioned making STS a national requirement  
>because of unknown costs may have not been aware of the California  
>costs at the time. Regardless of the cost, I believe it is an ethical  
>act to improve the lives of the many people Speech-to-Speech helps.

>I support the FCC's tentative conclusion that the costs of providing  
>interstate STS should be reimbursed from the interstate  
>Telecommunications Relay Service (TRS) Fund. This conclusion is  
based  
>on, and consistent with, the statutory duty not to discourage the  
>implementation of improved TRS.5. While STS may have operational  
>differences that make compliance with all current Commission  
standards  
>for tty relay infeasible, a panel of consumers and providers should  
be  
>convened to determine the appropriateness of compliance with each  
>standard.6. The STS standards should deviate from those of TRS in the  
>definition of confidentiality. While general confidentiality is  
vital,  
>confidentiality should not be defined as specifically for STS as for  
>TTY relay. The FCC could convene such a consumer board to study this

>issue.

>I am sure that you are familiar with the many other important legal  
>and technical points surrounding this issue, and I will not repeat  
>them in my letter. I have chosen those arguments that strike me as  
>being the most cogent in support of Speech-to-Speech. Nevertheless, I  
>support the general statement advocated by Dr. Bob Segalman and other  
>STS advocates.

>

>Cordially yours,

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