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I am making these comments as the executive director of an agency that provides a wide variety of services to people with developmental disabilities and a supporter of the Speech-to-Speech (STS) service.

1. Most of the consumers I serve will be unable to respond to this Notice of Proposed Rulemaking (NPRM) because of the nature of their disabilities. Their lack of response does not denote a lack of interest.

2. STS should be required nationally even though it does not utilize Text Telephones (TTYs). I support the California Public Utilities Commission position that the specific reference to TTYs in the Americans with Disabilities Act is meant to illustrate the type of technology that might be used, not preclude the use of other technologies.

3. I support the Federal Communications Commission's (FCC) tentative conclusion that STS be required nationally.

The reason I support these comments is because the majority of the consumers I serve are not able to read or write and a large number also have speech impairments. However, they do have a need to communicate. The use of TTYs is either very difficult or impossible for them, as is direct voice communication due to severe speech impairments and learning disabilities. For a more detailed narrative from someone who is intimately acquainted with STS and its uses, I would refer you to the comments posted by Bob Segalman. I wholeheartedly lend my support to his position on this issue and urge your serious consideration of Speech-to-Speech as a nationwide service,

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