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THE FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: DOCKET NO. 20140029-TP ORDER NO. PSC-2017-0292-PAA-TP

August 16, 2017

Dear Public Service Commission:

This letter is to petition the Public Service Commission to reconsider the: "NOTICE OF PROPOSED AGENCY ACTION ORDER ESTABLISHING FLORIDA TELECOMMUNICATIONS RELAY, INC.'S 2017/2018 BUDGET AND REDUCING THE SURCHARGE TO \$0.10." The Florida Telecommunications Relay, Inc. has been charged with providing access to basic telecommunications services to people who are deaf or hard of hearing through specialized equipment and has not been given the appropriate equipment or guidance to fulfill the intent of the Florida Statute under which it was established.

My concern is not so much the reduction in surcharge to \$0.10 whereas fiscally appropriate as it is the lack of attention to the changing needs of services which the Telecommunications Access System Act (TASA) is supposed to provide pursuant to F.S. 427.701(1). I request for consideration the expansion of services to digital and Internet (IP) protocol equipment that is not otherwise prohibited by the existing FL statute. Additionally, I would request that the change in surcharge be suspended until further investigation is completed for adequate and "functionally equivalent" equipment for State relay services for people who are deaf or hard of hearing.

If the PSC does not do this, it is continuing to ignore the changing needs of deaf and hard of hearing constituents in the State of Florida "consistent with the intent" and which "is in the best interest of the citizens of this state."- 427.701(1).

427.701(1), Florida Statutes (F.S.) Statute which creates telecommunications relay system, specifically states: 427.702 (g) -**“That the telecommunications access system uses state-of-the-art technology for specialized telecommunications devices and the telecommunications relay service and encourages the incorporation of new developments in technology, to the extent that it has demonstrated benefits consistent with the intent of this act and is in the best interest of the citizens of this state.”** Therefore, with the accelerated use of digital technology and the decreased availability (not simply the decreased use) of analog, landline technology has reduced the demand for FTRI equipment. Increased cost of an analog/landline phone and the availability of broadband phones at a more cost effective price make use of TDD/TTYs and other analog telecommunication devices obsolete. Finally, many places of businesses, organizations, and hospitals or group homes now have ONLY digital telecommunications which makes availability of only analog use telecommunication equipment for “traditional TRS” for people who are deaf or hard of hearing pointless. Finally, Florida statute does not prohibit the use of more current wireless technologies (with exception of cellular).

As stated on pages 2 and 3 (DOCKET NO. 20140029-TP ORDER NO. PSC-2017-0292-PAA-TP), “Traditional relay users are transitioning to the following services:”

- Internet Protocol (IP) Relay
- Video Relay Service (VRS)
- Captioned Telephone (CapTel) Service
- Internet Protocol Captioned Telephone Service⁶
- Internet Protocol Speech-to-Speech (STS) Service
- Wireless Service

Of these, only Captioned Telephone Service in limited capacity is available through equipment provided by FTRI. Also, on Page 2 it states, “This system provides telecommunications service for deaf or hard of hearing persons functionally equivalent to the service provided to hearing persons.” This is no longer the case for the State of Florida, whereas only assistive telecommunication equipment which is outdated is provided. Equipment is not available to connect with current landline networks which are IP/digital.

Parties who use more current technologies such as video relay service (VRS) and captioned telephone service (CTS) that uses IP technology, which are both faster and more accurate are not available for distribution through FTRI as specialized telecommunication equipment. VRS and CTS which uses IP and VoIP technologies provide a more seamless method of telecommunications, whereas old relay service equipment that are the only options available through FTRI such as a TDD/TTY or old captioned telephone use analog phone lines which is antiquated technology and are no longer functionally equivalent.

On page 3 (DOCKET NO. 20140029-TP ORDER NO. PSC-2017-0292-PAA-TP), it states "The biggest decrease in expense in the budget arises from relay provider services..." This is the case because people can only use traditional relay equipment that is outdated and unavailable for use through current networks. Many broadband cable companies that have also become telecommunication providers either do not offer analog services or do not provide converter equipment. Many traditional telecommunication companies that do offer analog services now have a smaller client base since many customers have migrated to only using wireless and no landline phones. That said, fewer customers are paying more money to receive analog service through a traditional telecommunications provider. People who are deaf or hard of hearing who need access to telecommunications via analog, so that FTRI equipment works, either have to pay more for it through traditional utility providers OR cannot utilize the services 427.701(1) and FTRI are supposed to provide. For many lower income people who are deaf or hard of hearing this makes "functionally equivalent" telecommunication cost prohibitive.

Thank you for your attention in this matter. I urge the Commission to reconsider the amended surcharge for telecommunications relay and consider the appropriate expanded services of telecommunications relay as appropriate for current technologies under the existing Florida Statute 427.701(1). Finally, please provide a copy of this petition to all appropriate parties of record including members of the TASA advisory board.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Littlewood", written over a light grey rectangular background.

Chris Littlewood
Very Hard of Hearing Citizen of Florida
Disability and Deaf and Hard of Hearing Advocate
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