

**CONCURRING STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order on Reconsideration,
CG Docket No. 03-123

The Americans with Disabilities Act spurred this country to make accessible to 54 million Americans the facilities that so many of us take for granted on a daily basis. For our part, the Act's mandate of "functional equivalency" directs the FCC to create rules that ensure that the deaf and hard of hearing have access to communications technologies on par with those technologies available to everyone else. To this end we have implemented and updated many times the rules that make telecommunications relay services (TRS) available to anyone who needs them.

Once again this Order on Reconsideration addresses the extent to which providers are entitled to compensation for certain activities going back to 2003. I concur in this decision because getting the reimbursement methodology right only treats the symptoms and not the underlying problem, which is the lack of transparency in the system. Consistent, clear and fully transparent rules benefit the disabilities community that relies on the availability of TRS as well as the providers who are the beneficiaries of a reliable reimbursement road map for the services they offer. As the stewards of this program, the Commission would also greatly benefit from a more transparent system and I hope we will promptly take the steps needed to shed more light on such a vital process.