



November 30, 2021

Federal Communications Commission  
45 L St NE  
Washington D.C. 20002

To Whom It May Concern:

The National Association of the Deaf (NAD) strongly supports Project IRIS led by Dr. Gary Behm at the National Technical Institute for the Deaf of Rochester Institute of Technology (NTID/RIT). Project IRIS, with its technological innovation of a one number solution for relay users with smartphones, contributes tremendously to functional equivalence.

Deaf and hard of hearing consumers have shared with the NAD how often they face the dilemma of which phone number to give out when asked by various entities. Do they give their text number for an appointment confirmation or do they give their VRS number if it's for a call? Often, they are unsure how a phone number will be used. Having one number for both texts and calls would eliminate this dilemma, which is not experienced by hearing users. Since the advent of smartphones, hearing users have always been able to call and text using the same phone number. The IRIS solution would resolve this disparity for deaf and hard of hearing consumers.

Further, Project IRIS would allow users to make VRS and IP CTS calls within the native phone protocol of any smartphone rather than having to download specialized apps. This is particularly useful in giving deaf and hard of hearing users a single number for all their telecommunications needs. This would drive choice and competition in the industry, which is a goal that the NAD has long advocated.

Project IRIS would also enable automated captioning on VRS calls, which would aid in verifying the VRS interpreter's voicing and making any corrections in real-time. This will result in more efficient calls and save costs for the TRS Fund. It also would benefit hard of hearing users who are using other means of video calling, such as FaceTime, through the use of automated captioning to supplement the communication.

When deaf and hard of hearing users are on a VRS call, it can feel impersonal looking only at the VRS interpreter and not at the other party. While there are other apps that provide a solution for this such as Wavello and Sivo, Project IRIS would enable this feature in a single app rather than the user needing to download separately as is the case with currently existing solutions.

The NAD is appreciative of NTID/RIT staff for developing Project IRIS to move us towards our shared goal of functionally equivalent telecommunications. IRIS will have a remarkable impact on our community for the better. We urge the Federal Communications Commission (FCC) to continue its support of this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Howard A. Rosenblum', is written over a light blue background.

Howard A. Rosenblum, Esq.  
Chief Executive Officer