

June 23, 2015

Mrs. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. box 3265
Harrisburg, PA 17105-3265

RE: Docket No. P-2015-2484229-Petition of the Pennsylvania Department of Labor & Industry, Office of Vocational Rehabilitation, Telecommunications Device Distribution Program Proposal for Pilot Project—Wireless Expansion Initiative

Secretary Chiavetta:

The Department of Labor & Industry's Office for the Deaf & Hard of Hearing is in support of the Petition of the Office of Vocational Rehabilitation (OVR) that seeks to implement the Wireless Expansion Initiative pilot project of the existing Telecommunications Device Distribution Program (TDDP). ODHH believes this pilot greatly benefits eligible Pennsylvanians with disabilities and the Office urges the Commission to approve the Petition and the associated funding of the pilot project from the Telecommunications Relay Service (TRS) Fund. The pilot will test the use of wireless devices under controlled conditions for 2 years; the pilot is long overdue. As of 2014, as stated in the Petition, several states, such as Arkansas, Kansas, Maryland, Kentucky, California, and Wyoming offer wireless device options through their TDDP programs. The pilot is necessary; it is the first step to determine if the Commonwealth of PA wants wireless devices as a permanent option in the TDDP.

The Institute on Disabilities of Temple University will actively manage the Wireless Initiative two-year pilot project. Temple has operated the TDDP in the Commonwealth for more than 10 years and their staff is very knowledgeable and has the expertise to effectively manage a pilot. The pilot is well thought out in terms of recruitment, distribution of the equipment, oversight, and evaluation. Ultimately, the pilot will determine the feasibility and the need of adding wireless devices to the TDDP.

Secondly, the pilot does not place a burden on the existing TRS fund. For example, the eligible participants, as part of their application to participate, are responsible to provide the internet connection to use the device; the pilot does not budget for these costs. Also, participants will not be reimbursed for travel costs to attend meeting.

Thirdly, The Wireless Initiative pilot project is fully consistent with the applicable statutory requirements of the Pennsylvania law that governs the operations of the TRS and the TDDP. The relevant statute, 35 P. S. § 6701.2 defines a “telecommunications device” as equipment necessary for a person with a disability to engage in communications by wire or radio with another person with a disability or with a hearing individual.” Therefore, the statute clearly covers the distribution of wireless devices to eligible Pennsylvanians with disabilities under the TDDP and easily falls under the purpose of the Wireless Initiative pilot project.

ODHH strongly feels that the approval of the Petition and the implementation of the Initiative will bring the Commonwealth in line with other states that offer wireless devices, and provide more communication options for people with disabilities, as new technology emerges.

ODHH respectfully encourages the Commission to approve the Petition and the associated funds that are available via the TRS Fund.

Sincerely,

Sharon Behun
Director

Cc: Chairman Gladys M. Brown, Pa. PUC
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