



**Scott R. Freiermuth**

Counsel, Government Affairs, Federal Regulatory

**Sprint Corporation**

6450 Sprint Parkway

Overland Park, KS 66251

scott.r.freiermuth@sprint.com

June 1, 2018

Marlene H. Dortch, Secretary

Federal Communications Commission

445 Twelfth Street, S.W.

Washington, DC 20554

Re: *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket 13-24 and  
*Telecommunications Relay Services and Speech-to-Speech Services for*  
*Individuals with Hearing and Speech Disabilities*, CG Docket 03-123.

Dear Ms. Dortch:

On May 30, 2018, Claudia Gordon and the undersigned counsel on behalf of Sprint Corporation ("Sprint") met in separate meetings with Nirali Patel advisor to Chairman Pai and Amy Bender advisor to Commissioner O'Rielly. The purpose of the meetings was to discuss the IP-based Captioned Telephone Service ("IP CTS") draft item that will be considered at the Commission's June 7, 2018 open meeting.<sup>1</sup>

In addressing the proposed Report and Order section of the Draft Item, Sprint urged the Commission to maintain the competitively-based MARS rate-setting methodology rather than abandoning it and cutting the rate over the next two years by 10 percent in 2018 and 10 percent again in 2019. In cutting the rate and abandoning MARS, the Commission would be unmooring the rate from any rate-setting methodology. As such, Sprint contends the rate would be arbitrary. Sprint would be willing to support a rate freeze at the current \$1.95 per minute in lieu of a reduction while the Commission examines a host of issues including, importantly, an alternative rate making methodology and quality of service issues (which inherently affect the underlying costs of the service). Aside from legal and procedural concerns, an interim, reduced rate could be highly disruptive to both providers and users of IP CTS. Sprint noted that the IP Relay market collapsed through similar regulatory interdiction and encouraged the Commission to heed the lessons of history.

Sprint next addressed the proposed Declaratory Ruling in the Draft Item which would approve Automatic Speech Recognition ("ASR") as a form of IP CTS. While Sprint

---

<sup>1</sup> FCC-CIRC1806-10 (May 17, 2018) ("Draft Item").

recognizes the promises of ASR in the CTS and IP CTS environments, Sprint echoed many of the concerns expressed by consumer groups, including but not limited to, absence of quality standards and performance metrics, ambiguous privacy safeguards, and insufficient assurance that ASR-based IP CTS can effectively handle emergency calls.<sup>2</sup> Sprint joined the consumer groups in urging the Commission to convert the substance of the draft item's Declaratory Ruling on ASR to the Further Notice of Proposed Rulemaking (FNPRM) section of the draft item.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules.<sup>3</sup> In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

**/s/ Scott R. Freiermuth**

---

Scott R. Freiermuth  
*Counsel, Government Affairs*  
*Federal Regulatory*

Cc (via email): Ms. Nirali Patel  
Ms. Amy Bender  
Mr. Travis Litman  
Ms. Jamie Susskind

---

<sup>2</sup> *Ex Parte* Letter from Blake E. Reid, Counsel for Telecommunications for the Deaf and Hard of Hearing, Inc. and the Hearing Loss Association of America, to Marlene H. Dortch, CG Docket Nos. 03-123, 13-24 (May 25, 2018).

<sup>3</sup> 47 C.F.R. § 1.1206(b)(2).