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Via Electronic Filing (ECFS)
Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: CG Docket 03-123; Extension of Waiver of 47 C.F.R.
64.604(a)(3)(ii) and 64.604(b)(3)

Dear Ms. Dortch:

On August 2, Hamilton Relay, Inc. filed a Petition for Extension of Waiver in connection with the waiver currently relieving TRS providers of carrier of choice/equal access obligations as well as the so-called "billing option" requirement.¹ The current waiver is set to expire on August 24, 2019. Hamilton requested that "this waiver be extended for all similarly situated providers, including Sprint."²

Sprint Corporation ("Sprint") on behalf of its Relay operations appreciates Hamilton's request, and Sprint echoes Hamilton's well-reasoned arguments supporting the need for an extension of the waiver related to Sections 64.604(a)(3)(ii) and 64.604(b)(3). Simply stated, the conditions that

¹ See, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing or Speech Disabilities*, CG Docket No. 03-123, *Petition for Extension of Waiver*, (filed by Hamilton Relay, Inc Aug 2, 2019) ("Petition").

² *Id.* at p. 2.



existed in 2016 – when the Commission first granted the waiver – remain in place now. Specifically, because Sprint does not charge any TRS users for long-distance services, the need for carrier of choice/equal access is unnecessary (and would only serve to confuse users). Similarly, the “billing options” for long distance and/or operator-assisted services remains an antiquated, unnecessary requirement with no public interest benefit. In short, Sprint urges the Commission to extend the current waiver.

Furthermore, Sprint implores the Commission to take action on the joint petition for rulemaking with respect to these requirements – it has been nearly four years since the joint filing.³ Rather than continuing the pattern of issuing temporary waivers, the Commission should either eliminate the rules or issue a permanent exemption.

Respectfully,

A handwritten signature in blue ink, appearing to read "Scott R. Freiermuth", written over a horizontal line.

Scott R. Freiermuth

Cc: Bob Aldrich
Eliot Greenwald
Michael Scott

³ See, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing or Speech Disabilities*, CG Docket No. 03-123, Joint Petition for Rulemaking to Reform the Commission’s Mandatory Minimum Requirements for Traditional TRS and CTS Providers (filed by Sprint and Hamilton on Sept. 23, 2015).