



30 August 2018

Mr Michael Scott
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th St., S.W.
Washington, D.C 20554

Dear Mr Scott

**COMMENT ON SPRINT PETITIONS REGARDING THE REPORT AND ORDER AND DECLARATORY
RULING ON INTERNET PROTOCOL CAPTIONED TELEPHONE SERVICE**

CG Docket Nos. 13-24 and 03-123

T-Meeting Global AB is an established provider of ASR IPCTS in Sweden (Swedish language) and Norway (Norwegian Bokmål language). Our system also handles U.S. English and this is currently used for demonstrations in English speaking countries as a prelude to making further country specific English versions of the dictionary.

We respectfully submit the following comments:

1. The FCC is the telecommunications regulator for the USA. It does not need to provide notice and opportunity for comment on all certification applications to provide IPCTS using ASR to existing legacy IPCTS providers or to ASR IPCTS providers.
2. Existing IPCTS providers that use a human for revoicing or stenography to convert speech to text and as a consequence have a high ongoing labour cost component in their price per minute have an interest in frustrating the introduction of new technology with improved privacy at lower cost into the U.S. market. This is not in the interests of the consumer or the Federal budget.
3. Existing IPCTS providers may or may not establish accuracy using live traffic. The consumer will either find the ASR speed and accuracy acceptable, ask the other party to repeat (as hearing persons do) or eventually abandon the service.
4. ASR offers a level of privacy not possible with legacy IPCTS systems that have a third party listening to the speech from a hearing person to a hard of hearing person. Using ASR, conversion of speech to text is done by a machine equipped with artificial intelligence. Call content is not stored anywhere in T-Meeting's infrastructure, only on the end-user's mass-market device.
5. The FCC already has minimum rules in place for emergency calling. It is competitively inappropriate for an existing legacy IPCTS provider to have any say on an ASR provider's application to the FCC for certification as an IPCTS provider.



6. We consider the compensation rate methodology in the ongoing rule making proceeding to be well argued and that there should be a move to cost based compensation without delay to eliminate excess profits and protect the American taxpayer. We consider the profit margin zone of reasonableness of 7.6% to 12.35% to be acceptable.
7. We consider the proposed compensation rate of \$0.49/minute for ASR based IPCTS to be fair.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Paul Buckrell", written in a cursive style.

Paul Buckrell CMEngNz
International Business Coordinator