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November 30, 2017

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 November 28, 2017, Claudia Gordon and the undersigned counsel on behalf of Sprint Corporation ("Sprint") met with Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau ("CGB"), Eliot Greenwald, Deputy Chief Disability Rights Office ("DRO"), Bob Aldrich, CGB, and Michael Scott, DRO.

Sprint discussed briefly its position regarding the restructure of IP-based Captioned Telephone Service ("IP CTS"). Sprint reiterated its concern that an interim rate cut could have unintended consequences and urged the Commission to refrain from taking such action. Sprint encouraged the Commission to retain the current MARS-based rate while the Commission examines a host of issues including, importantly, quality of service.

As a provider of traditional Telecommunications Relay Services ("TRS") as well as Internet-based TRS ("iTRS"), Sprint also discussed a number of regulatory matters impacting those services. Sprint understands that the Commission is considering taking action in 2018 to, in essence, clean-up and modernize the rules and regulations. Sprint provided the Commission with input on several items as detailed below.

- Sprint urged the Commission to take action to make permanent the temporary waivers of two mandatory minimum requirements that currently apply to the provision of

traditional TRS, speech-to-speech relay service (STS), captioned telephone service (CTS). The rules at issue require TRS providers to allow users to have long distance calls carried by their preferred long distance carrier and to offer the same billing options (such as collect, calling card, and third party billing) traditionally offered by wireline telephone companies. The temporary waiver are set to expire on August 24, 2018.

- Sprint discussed the requirement to provide on an annual basis summaries of complaint logs. Sprint argued that the requirement, while important 25 years ago when TRS was a nascent service, is not as useful today for these mature services. The burden of producing the information outweighs its value to the Commission, and it would appear to be duplicative as the Commission has its own complaint tracking mechanism. Sprint urged the Commission to reexamine the utility of this requirement.
- Sprint requested that the Commission consider changing the speed-of-answer (“SOA”) measurement for TRS, STS, and iTRS services. Presently, providers’ compliance with the rule is measured on a daily basis; whereas, for VRS speed-of-answer is measured on a monthly basis. Sprint urges the Commission to consider a monthly SOA measurement similar to VRS. Alternatively, the Commission could maintain the daily SOA measurement but modify the consequence for failure to meet the measurement. The current consequence – withholding revenue for an entire day of service – is quite punitive. Sprint urged the Commission to consider liquidated damages. Sprint shared that many of its state contracts have liquidated damage provisions which are equally effective without being unnecessarily draconian.
- Sprint discussed the growing challenge it faces with respect to recruiting and hiring agents that meet the 60 words per minute typing requirement on hire date. Due to societal advancements, many high schools no longer offer typing class or other means to enable students to hone their typing skills. In addition, technological advancement and the natural evolution in career choices provide little to no incentives for young adults to pursue training in traditional typing. Consequently, an increasing number of applicants for Communication Assistant positions show below level typing speed. Considering this challenge, Sprint discussed the notion of the Commission entertaining a waiver that would allow probationary hiring of Communication Assistants whose typing skills fall below the 60 words per minute threshold. The new hire trainee would be required to type 60 WPM by end of a 90 days probationary period during which time mandatory typing tutorial and monthly testing would be provided.

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

Respectfully submitted,

*/s/ Scott R. Freiermuth*

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*Counsel, Government Affairs*  
*Federal Regulatory*

cc: Ms. Karen Peltz Strauss  
Mr. Eliot Greenwald  
Mr. Bob Aldrich  
Mr. Michael Scott

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<sup>1</sup> 47 C.F.R. § 1.1206(b)(1).