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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, Charles McKee¹, and the undersigned counsel on behalf of Sprint Corporation (“Sprint”) met in separate meetings with Claude Aiken advisor to Commissioner Clyburn, Travis Litman advisor to Commissioner Rosenworcel, and Zenji Nakazawa advisor to Chairman Pai. And on November 29, 2017, Claudia Gordon and the undersigned counsel met with Nirali Patel advisor to Commissioner Carr.

The purpose of the meetings was to discuss IP-based Captioned Telephone Service (“IP CTS”). Sprint recognized the Commission’s desire to restructure IP CTS, but urged the Commission to do so carefully and holistically. Sprint noted that the IP Relay market collapsed through similar regulatory interdiction and hopes lessons learned there will be applied to IP CTS restructure. Sprint urged the Commission to maintain the MARS rate-setting methodology rather than adopting an artificial rate through, for example, a cost-based methodology.

Sprint strongly urged the Commission to refrain from adopting an interim, reduced rate while the Commission examines a host of issues including, importantly, quality of service. Aside from legal/procedural concerns, an interim, reduced rate could be highly

¹ Charles McKee attended meetings with Claude Aiken and Travis Litman but not with Zenji Nakazawa.

disruptive to both providers and users of IP CTS. As an example, promising automatic speech recognition technologies could be a casualty of rate reduction if IP CTS providers either exit the business altogether or are unable to conduct research and development and make capital investments to improve the service. Finally, consumers could see a drastic reduction in the quality of service – possibly at levels below functional equivalency.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules.² 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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cc: Ms. Zenji Nakazawa
Ms. Nirali Patel
Mr. Travis Litman
Mr. Claude Aiken

² 47 C.F.R. § 1.1206(b)(2).