



Telecommunications for the Deaf and Hard of Hearing, Inc.  
8630 Fenton Street, Suite 121, Silver Spring, MD 20910-3803  
Video: 301-563-9112  
Email: cstout@tdiforaccess.org; Web: www.tdiforaccess.org

September 30, 2014

*Via ECFS*

Ms. Marlene Dortch  
Commission Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Structure and Practices of the Video Relay Service, CG Docket No. 10-51;  
Telecommunications Relay Services and Speech to-Speech Services for Individuals with  
Hearing and Speech Disabilities, CG Docket No. 03-123;  
E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196  
Inter-Based Telecommunications Relay Service Numbering, WC Docket No. 10-191

**Comments in Support of Sprint's Petition for Limited Waiver**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice,<sup>1</sup> Telecommunications for the Deaf and Hard of Hearing, Inc. ("TDI"), National Association of the Deaf ("NAD"), Association of Late Deafened Adults, Inc. ("ALDA"), Hearing Loss Association of America ("HLAA"), Cerebral Palsy and Deaf Organization ("CPADO"), California Coalition of Agencies Serving the Deaf and Hard of Hearing ("CCASDHH"), American Association of the Deaf-Blind ("AADB"), and Deaf and Hard of Hearing Consumer Advocacy Network ("DHHCAN") (collectively, the "Consumer Groups") respectfully submit these comments in support of the Petition for Limited Waiver filed by Sprint Corporation ("Sprint") in the above-referenced proceeding.<sup>2</sup>

Sprint requested that the Commission grant a limited waiver to allow Sprint, as a provider of Federal Relay services, to load federally assigned telephone numbers into the iTRS Numbering Directory, including "front door" toll-free numbers and ten-digit numbers. The Consumer Groups support the request for limited waiver for the reasons provided in the Sprint Petition. Granting the limited waiver will encourage "point-to-point" calls between deaf or hard

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<sup>1</sup> *Request For Comment On Petition Filed By Sprint Corporation Regarding Access to the Internet Based Telecommunications Relay Service Numbering Directory*, Public Notice, DA 14-1249 (August 27, 2014).

<sup>2</sup> *Petition for Limited Waiver of Sprint Corporation, In the Matter of Telecommunications Relay and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123 (filed January 16, 2014) ("Sprint Petition").

of hearing federal employees and between non-governmental individuals and deaf or hard of hearing federal employees and will advance the Consumer Groups' Core Functional Equivalency Principle for TRS:

- “The TRS experience for an individual who is deaf, hard of hearing, deaf-blind or speech-disabled ***must, at the minimum, be equivalent to that of a call between two hearing persons on the telephone network or over the Internet.***”<sup>3</sup>

Point-to-point video calls between two deaf or hard of hearing individuals are virtually equivalent to a call between two hearing persons. If the numbers associated with the Federal Relay service are not incorporated into the iTRS Numbering Directory, deaf or hard of hearing individuals working for the federal government will not be accessible except through the use of a VRS video interpreter. By allowing these federal numbers to be included in the iTRS database, the public policy goal of effectuating “functional equivalency” for deaf and hard of hearing people is enhanced. For this reason alone, the limited waiver should be granted.

Second, permitting these federal “front door” and ten-digit numbers to be included in the database will increase the ability of taxpaying deaf and hard of hearing Americans to reach federal employees. Third, granting the limited waiver will also support “[t]he commitment to uphold the integrity of the TRS Fund.”<sup>4</sup> Permitting point-to-point video calls to, from, and between deaf and hard of hearing federal employees will reduce the number of TRS calls that unnecessarily use a video interpreter. Reducing costs of such calls will allow the limited resources of the TRS Fund to be used more efficiently.

In short, a waiver is appropriate because it improves the functional equivalency policy underlying Title IV of the Americans with Disabilities Act, and a waiver will help to reduce calls that would otherwise be compensated out of the federal interstate TRS Fund. The Commission should grant Sprint's Petition for Limited Waiver.

Respectfully submitted,

/s/ Claude L. Stout  
Claude L. Stout  
Executive Director  
Telecommunications for the  
Deaf and Hard of Hearing, Inc.  
8630 Fenton Street, Suite 121  
Silver Spring, MD 20910

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<sup>3</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Notice of *Ex Parte* Meeting, Consumer Groups' TRS Policy Statement at 2 (Apr. 12, 2011) (the “Policy Statement”).

<sup>4</sup> *Id.*

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Howard A. Rosenblum  
Chief Executive Officer  
National Association of the Deaf  
8630 Fenton Street, Suite 820  
Silver Spring, MD 20910

Anne Gilmore Hall  
Executive Director  
Hearing Loss Association of America  
7910 Woodmont Ave, Suite 1200  
Bethesda, MD 20814

Cheryl Heppner  
Vice Chair  
Deaf and Hard of Hearing Consumer  
Advocacy Network  
3951 Pender Drive, Suite 130  
Fairfax, VA 22030

Sheri Farinha  
Vice Chair  
California Coalition of Agencies Serving  
the Deaf and Hard of Hearing  
4708 Roseville Road, Suite 111  
North Highlands, CA 95660

David Litman  
President  
Association of Late-Deafened Adults, Inc.  
8038 MacIntosh Lane, Suite 2  
Rockford, IL 61107

Mark Hill  
President  
Cerebral Palsy and Deaf Organization  
1219 NE 6<sup>th</sup> Street - Apt. #219  
Gresham, OR 97030

Mark Gasaway  
President  
American Association of the Deaf-Blind  
P.O. Box 8064  
Silver Spring, MD 20907-8064