

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	
Internet-Based Telecommunications Relay Service Numbering)	WC Docket No. 10-191
)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”) submits reply comments concerning its Petition for Limited Waiver (“Sprint Petition”) of the Federal Communications Commission’s (“Commission”) rules in order to permit federal video relay service (“VRS”) toll-free “front door” telephone numbers and ten-digit numbers into the iTRS Numbering Directory.¹ In order to accomplish this goal, Sprint requested a limited waiver of 47 C.F.R. § 64.613(a)(4).

Sprint has reviewed the comments filed in regards to its Petition. Two parties filed in support of Sprint’s Petition, and there were no comments filed in opposition. As stated in comments filed jointly by consumer groups, “[b]y allowing these federal numbers to be included in the iTRS database, the public policy goal of effectuating ‘functional

¹ See, Petition for Limited Waiver of Sprint Corporation, *In the Matters of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196; and *Internet-Based Telecommunications Relay Service Numbering*, WC Docket No. 10-191 (filed January 16, 2014)(“Sprint Petition” or “Petition”).

equivalency’ for deaf and hard of hearing people is enhanced. For this reason alone, the limited waiver should be granted.”² The consumer groups also noted that:

“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.”³

Sprint could not agree more with the consumer groups’ filing; indeed, their filing highlights precisely what drove Sprint to file its Petition. Granting Sprint’s Petition will be mutually beneficial across the board – to consumers, to the federal government, to Sprint, to the interstate TRS Fund, and the communications providers that contribute to the Fund.

In an *ex parte* filing, Convo Communications, LLC (“Convo”) also voiced its support for Sprint’s Petition. Indeed, it would appear that Convo believes Sprint’s Petition for waiver is perhaps too limited in its approach. Convo expressed its view “that the iTRS Directory should evolve to a universally designed database which allows the registration of anyone’s videophone number, whether they have a disability or not.”⁴ Sprint appreciates Convo’s perspective and believes a more expansive approach to the iTRS Directory is worth further consideration. However, Sprint believes a good first step is to begin with a limited, narrow waiver as outlined in its Petition. Sprint’s experience with an expanded iTRS Numbering Database hosting federal VRS numbers could serve as a springboard for further

² See, *Comments in Support of Sprint’s Petition for Limited Waiver*, filed on behalf of 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”), CG Docket Nos. 03-123, 10-51 and WC Docket Nos. 05-196, 10-51 (Sept. 30, 2014).

³ *Id.*

⁴ See, *Ex Parte Letter* from Convo Communications, LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CG Docket Nos. 03-123, 10-51 and WC Docket Nos. 05-196, 10-51 (Sept. 18, 2014).

expansion in the years to come.

For the foregoing reasons, Sprint requests that the Commission grant Sprint's Petition and permit Sprint to load federal video relay service toll-free "front door" and ten-digit telephone numbers into the iTRS Numbering Directory.

Respectfully submitted,

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October 7, 2014