

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Implementation of Sections 255 and 251(a)(2) of the	)	
Communications Act of 1934, as Enacted by the	)	
Telecommunications Act of 1996	)	WT Docket No. 96-198
	)	
Access to Telecommunications Service,	)	
Telecommunications Equipment, and Customer	)	
Premises Equipment by Persons with Disabilities	)	

**Reply Comments of Sprint Corporation**

Sprint Corporation hereby submits its reply comments in the above-captioned matter.<sup>1</sup> Sprint supports comments of the Telecommunications Industry Association (TIA) urging the Commission to reject the Council for Organizational Representatives' (COR) request that the Commission's receive volume control requirements be raised to a minimum of 20 dB of gain. Like TIA, Sprint encourages the Commission to retain its existing volume control requirements.

Loop powered telephones cannot achieve the receive volume control with 20 dB of gain above the normal receive level specified in ANSI/TIA/EIA-470-B, and referenced by the FCC rules, and thus, adherence to this requirement would eliminate loop powered telephones. Loop powered telephones are a critical emergency backup that offers

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<sup>1</sup>Report and Order, FCC 99-181, In the Matter of Implementation of Section 255 and 251 (a)(2) of the Communications Act of 1934, as enacted by the Telecommunications Act of 1996, Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities, WT Docket No. 96-198, released September 29, 1999.

communication during power failures. Telephones that are powered by the telephone company central office are the only phones that can be depended on for long-term service during power failures. During power failures, central offices have several hours of reserve battery power available and frequently also have electric generators. Few homes have either, and thus, the public depends on loop powered telephones to communicate during power outages.

Loop powered telephones are also used by many hotels that have PBXs and reserve batteries. Loop powered telephones not only offer greater safety and convenience to hotel guests during power failures, but also provide high quality service under normal circumstances. By contrast, AC power adapters can accidentally come unplugged. Hotels report that when telephones operate without an AC power supply, there are fewer everyday communications outages for guests. Furthermore, even if wireline telephones had backup battery power, batteries might have lost their charge when needed.

Loop powered telephones have limited power available and cannot provide significantly more undistorted output. If automatic reset were required, even for 12dB gain in a loop-powered set, this added circuit would consume a portion of the available energy. That energy would be better allocated to providing undistorted amplification.

Distortion in loop-powered sets increases to unacceptable levels when receive volume is more than 15 dB above nominal.<sup>2</sup> COR suggests using new technology to reduce distortion; however, electromagnetic receiver element designs are carefully balanced and cannot provide loop-powered telephones with significantly more acoustic and magnetic output than is currently provided.

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<sup>2</sup> "nominal" level as defined in 47 C.F.R. 68.317



## CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 7<sup>th</sup> day of August 2000, served via Hand Delivery and Facsimile, a copy of the foregoing letter," In the Matter of Implementation of Section 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996 and Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities", with the Secretary, Federal Communications Commission, to the persons listed below.

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