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July 31, 2001

RECEIVED

JUL 31 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas,
Secretary
Federal Communications Commission
445 12th Street SW,
Washington D.C. 20554

Re: Errata to Comments filed July 30, 2001 in *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities* CC Docket No. 98-67.

Dear Ms. Salas:

Footnote 3 of the comments filed on July 30, 2001 in the above-referenced docket contains an incorrect statement. Specifically, the sentence that reads "[t]he only major difference -- and even this difference is not great -- is that the CAs [communications assistants] for STS are paid at a higher rate than traditional CAs because of their special skill set" is wrong. Traditional CAs and STS CAs are paid at the same rate. The sentence should be deleted in its entirety.

Sprint has attached a corrected copy of its comments with the incorrect statement removed and respectfully requests that the corrected copy replace the comments Sprint filed yesterday. Sprint apologizes for any inconvenience its error here causes you or your staff.

If you have any questions or need further information, please contact me.

Respectfully submitted,

Attachment

c: All parties

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Telecommunications Relay Services	)	
And Speech-to-Speech Services for	)	CC Docket No. 98-67
Individuals with Hearing and Speech	)	
Disabilities	)	
	)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), pursuant to *Public Notice* DA 01-1555 released June 29, 2001 ("*Public Notice*"), hereby respectfully submits its comments on the petition by WorldCom seeking clarification that the provision of Telecommunications Relay Service ("TRS") via the Internet ("IP Relay") "is eligible for reimbursement from the Interstate TRS Fund." *Public Notice* at 2. WorldCom originally filed its petition on December 22, 2000. Subsequently, in May, 2001, representatives from WorldCom met with the Commission staff to discuss the petition. Representatives from Communications Services for the Deaf also have met with the Commission staff to discuss the provision of IP Relay. *Id.* at 3. In light of these meetings, the Commission has determined that more information is needed before it can make a final determination on the merits of IP Relay. Thus, the *Public Notice* asks a series of question designed to obtain such information. Sprint addresses these questions *seriatim* below. As discussed, Sprint strongly supports WorldCom's request that the provision of IP Relay be funded through the Interstate TRS Fund.

A. The Benefits of IP Relay (*Public Notice*, p. 3).

In its filings with the Commission, WorldCom explains that IP Relay has the potential to provide the TRS user community with a number of important features that will greatly enhance the communications services they receive through TRS.[1] Sprint agrees. Americans are increasingly using the Internet to meet many of their communications needs, and IP Relay offers those with hearing and speech disabilities the opportunity to use the Internet for similar purposes. While IP Relay is simply an access method for reaching a center of a relay provider, it does offer the potential for users to enjoy many new services and features. *Public Notice* at 3. Assuming the proper funding mechanism and the adoption of appropriate minimum standards, Sprint believes that IP Relay should be added to the family of access methods that TRS providers offer users of the TRS.

B. Cost Recovery (*Public Notice*, p. 3).

Sprint also agrees with WorldCom that providers of IP Relay should be reimbursed from the TRS Interstate Fund. As WorldCom points out, using the TRS Interstate Fund as the reimbursement mechanism is the only way the providers of IP Relay service can recover their costs since at the present time there is simply no way to identity the geographic location of the person making the IP Relay call. *See* WorldCom's March 30 Letter at 2 ("...the service's use of IP makes the originating caller's geographical location impossible to determine"). Moreover, to Sprint's knowledge, there is no mechanism in development that would enable a provider of IP

[1] *See* WorldCom Petition at 3-4; March 30 2001 Letter to Karen Peltz-Strauss, Deputy Bureau Chief, Consumer Information Bureau, FCC from Larry Fenster, WorldCom at 3.

Relay service to automatically "determine the geographic location of the originator of the call." *Public Notice* at 3.

Thus, currently and for the foreseeable future, the only possible way to make such jurisdictional determination is either to have the caller establish a profile which would specify the geographic location of the caller or to assign some percentage of the calls to the interstate jurisdiction. Creating the systems to establish customer profiles to enable jurisdictional determinations is likely to be expensive: the use of such profiles is likely to delay the TRS call process and thereby increase the cost of providing service through IP Relay; the profile itself may be inaccurate given the increasing use of wireless phones to access the Internet; and, in any event, TRS users do not like to establish such profiles even for calls originating from their phones over the public switched network. Picking a percentage of calls to assign to the interstate jurisdiction is clearly arbitrary and will result in calls that are jurisdictionally interstate being assigned to intrastate jurisdiction and *vice versa*.

Moreover, as the Commission has found, the plain language of Section 225(d)(3) "gives the Commission some discretion to fund intrastate service from the interstate jurisdiction." *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 15 FCC Rcd 5140, 5154, ¶26 (2000) (*Improved TRS Order*). Sprint believes that it is "an appropriate exercise of [the Commission's] discretion" (*id.*) in the case of IP Relay where it is impossible to determine the jurisdiction of the call to reimburse those providers offering such access method from the Interstate TRS Fund.[2] If in the future a method

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[2] Sprint does not, however, believe that there is any need to fund to computer-to TTY calls that do not involve the intervention of a communications assistant ("CA").

is developed to determine the jurisdiction of an IP call, the Commission can revisit the issue of how IP Relay is to be funded. But until that day the Commission will be furthering its statutory mandate "to encourage the use of existing technology and not to discourage or impair the development of improved technology in the delivery of relay services" (*id.*) by funding the provision of IP Relay through the interstate fund. At the very least, such funding will help ensure that IP Relay is available on a nationwide basis and not just in those States willing to absorb the extra costs (including the costs of calls that are jurisdictionally interstate) of enabling their residents to enjoy the benefits of IP Relay.[3]

C. Minimum Standards (*Public Notice* p. 3).

As is the case with VRS (*see* Sprint's Petition for Temporary Waiver filed June 4, 2001), many of the minimum standards prescribed for text-based relay and STS are not, at the present time, readily adaptable to IP Relay. For example, the requirement that CAs be able to provide the provide the caller's ANI to Public Switched Answering Points (PSAPs) is likely, as the Commission has recognized, to be impossible for IP Relay calls "[b]ecause IP Relay centers may not have access to the caller's ANI." *Public Notice* at 4. Hearing carry-over ("HCO"), voice carry-over ("VCO") and STS cannot, at the present time, be offered via IP Relay because of the technological limitations of IP Relay including limitations associated with modem transport.[4]

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[3] Sprint does not believe that the costs of providing IP Relay will differ much, if at all, from the costs of providing traditional text-based relay. This access method does not require special facilities or operators with special skills. And, the length of the respective types of calls appears to be about the same. Moreover, the costs of IP Relay compare favorably with the costs of STS relay. In contrast, the costs incurred in providing VRS are higher than the costs of IP Relay since VRS requires special equipment and CAs with highly specialized training.

[4] These limitations may eventually be resolve especially as IP Relay matures and more people using the service demand that HCO, VCO and STS be made available. But Sprint cannot predict whether the eventual provision of these services will require consumers to install

Footnote continues on next page

The provision of pay-per-call services should not be required since there is no way to accurately bill the end user for such calls. And, it is virtually impossible to develop any statistics on the blocking of IP Relay traffic since there is no end-to-end signaling as is the case with TRS services provided over the public switched network.

On the other hand, there are a number on minimum standards that can and should be applicable to IP Relay. For example, Sprint believes that IP Relay providers should be held to the requirement that 85% of the calls be answered in the 10 seconds; that CAs be able to type 60 words per minute for calls using IP Relay; and that callers to the IP Relay center be able to make their calls in Spanish.

D. IP Capabilities (*Public Notice*, p. 4)

The Commission asks whether IP Relay is capable of handling calls initiated by voice users. At the present time IP Relay is not capable handling voice calls. Voice calls over IP Relay may be feasible as a technical matter. But the ability of IP Relay providers to offer such capability is largely a function of the network architecture deployed by the IP Relay provider. Thus, Sprint believes that the offering of such capability should be left to the individual carrier and voice initiated IP calls should not be required by the Commission. Indeed, such requirement would mean that IP providers would have to expend resources on developing a capability that would likely be useful to only a small percentage of consumers.[5] Sprint believes that a relay provider's resources are better spent on developing IP Relay for the benefit of the vast majority

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additional software on their computers or whether any such software would be provided free of charge.

[5] Currently, voice initiated traffic accounts for approximately 15% of calls received at Sprint's TRS centers.

of users who are unlikely to access IP Relay via voice.

E. Security (*Public Notice*, p. 4).

Sprint believes that relay user information provided through IP Relay will be as secure as any as user information provided through the Internet.

F. Outreach (*Public Notice*, p. 4).

Sprint strongly supports outreach efforts to inform consumers about the availability of IP Relay. Assuming that the Commission agrees with Sprint and WorldCom that IP Relay should be provided on a nationwide basis funded by the Interstate TRS fund, Sprint recommends that any outreach program be the primary responsibility of the providers offering IP Relay. Such outreach efforts should be reimbursable from the interstate fund. In addition, Sprint believes that IP Relay be included in the planned national TRS outreach program currently being developed by the Commission's National Disability Advisory Committee.

Respectfully submitted,

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July 30, 2001

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **COMMENTS OF SPRINT CORPORATION** was sent by hand or by United States first-class mail, postage prepaid, on this the 30th day of July, 2001 to the parties on the attached list.

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July 30, 2001

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