

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

In the Matter of)	
)	
Telecommunications Relay Services)	
And Speech-to-Speech Services for)	CC Docket No. 98-67
Individuals with Hearing and Speech)	
Disabilities)	
)	
Petition for Clarification of UltraTec, Inc.)	
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REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), on behalf of the Telecommunications Relay Services ("TRS") operations of its subsidiary Sprint Communications Company L.P., hereby respectfully submits its reply to the comments filed on the Petition for Clarification of UltraTec, Inc. ("UltraTec") in the above-captioned proceeding. As set forth below, Sprint agrees with nearly all of the commenting parties that UltraTec's petition should be granted.

UltraTec's petition involves the provision of Captioned Telephone ("CapTel") service. This service is a technologically advanced and innovative offering that provides users with residual speech and limited hearing near-functional equivalence with conventional voice service. Each such user is equipped with a telephone with a text display that enables him/her to directly dial another individual; listen to that individual voice; and at the same time read what the individual is saying on the telephone's built-in display. The text is generated by a communications assistant using state-of-the-art voice recognition technology developed by UltraTec for this service. See UltraTec Petition at 4-7. In effect, CapTel service is an enhanced version of the voice carry-over ("VCO") feature of conventional TRS. Petition at 9-11. But, of

course, the enhancements significantly improve the provision of VCO through conventional TRS. For example only one line is necessary to transport both voice and text with CapTel service instead of two lines as is the case with conventional two-line VCO. Moreover, because the CapTel user dials the called party directly, the CA does not have to set up the call. In fact, the CA's participation in the call is transparent to both the calling and called parties.

In its petition, UltraTec has explained that several Commission rulings are necessary in order to encourage the further development and widespread deployment of CapTel. Specifically, UltraTec asks that the Commission find that CapTel is a TRS service within the meaning of Section 225 of the Act and as such eligible for funding from the TRS Interstate Fund. Petition at 7-9. UltraTec also asks the Commission to take the same approach to the offering of CapTel as it has to the offering of Video Relay Service ("VRS"). *See, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 15 FCC Rcd 5140 (2000) (*Improved TRS Services Order*). Thus, the Commission should allow but not require TRS providers to offer CapTel, and it should waive certain minimum standards that are simply not applicable to CapTel. Petition at 20-21. Sprint, like virtually all those filing comments, including individual consumers, organizations representing the interests of the hearing-impaired community, *i.e.*, Telecommunications for the Deaf ("TDF") and Self-Help for the Hard of Hearing ("SHHH"), and TRS providers, Hamilton and WorldCom, agrees that UltraTec's requests here are reasonable and necessary. Indeed, these requests are consistent with the Commission's statutory mandate of ensuring the "availability of new services and the development of new technologies," *Improved TRS Services Order* at 5143 (¶4), so as to "increas[e] the availability and usefulness of the telecommunications system for Americans with speech and hearing disabilities." *Id.* at 5144 (¶8).

The only party to strike a discordant note is AT&T. Although AT&T states that it “supports the goal of deploying new and innovative technology for relay applications,” it argues that it would be “premature ... for the Commission to make any final determination of the status of CapTel under statutory and regulatory requirements for TRS in the absence of more definite information than is currently available.” Comments at 2. At the very least, or so AT&T’s argument goes, the Commission should await “the final results of pending state trials of CapTel service.” *Id.* AT&T claims that its suggested approach here “mirrors” the Commission’s approach to VRS and Internet Relay. According to AT&T, the Commission classified these services as TRS only after it conducted extensive proceedings and developed a full record evaluating the characteristics of these services based on the actual experience of providers of these services. *Id.* at 2-3.

AT&T’s apparent view that the Commission’s decision on VRS and Internet Relay came after exhaustive field trials of each of the services by various carriers is mistaken. The Commission’s findings on VRS were based upon limited tests conducted in one State, *i.e.* Texas, by one TRS provider, *i.e.*, Sprint. As for Internet Relay, the Commission’s decision was, as AT&T concedes, based primarily on WorldCom’s limited offering of the service. AT&T Comments at 3, fn. 5. In the case of CapTel, UltraTec has been field testing the service in the State of Wisconsin for some 9 months now and, as it has detailed in its petition, the service has been extremely well-received. Petition at 15-20. Hamilton, a participant in the Wisconsin trial, confirms that the CapTel “has met with encouraging success and acceptance.” Comments at 1. Tests are now underway in Maryland and Virginia.

For its part, Sprint has been offering CapTel as part of Federal Relay on a trial basis for about two months and can report that the service has been enthusiastically received by federal

employees. Sprint also expects to begin offering CapTel service on a trial basis in the very near future to relay users in the States of Washington, Oregon, Illinois, Minnesota, California and Florida. But the Commission certainly need not wait until these or any of the other trials are completed before it takes the steps being requested by UltraTec and supported by Sprint and others. The data in the record, which are comparable to the information the Commission had before when evaluating VRS and Internet Relay, already provide ample justification for classifying CapTel as a TRS service. While the further trials may disclose a need for the Commission to fine tune its treatment of CapTel as a TRS service, *e.g.*, expanding or narrowing the minimum mandatory standards applicable to the service, Sprint strongly doubts that any of the trials will require that Commission to rescind such classification here.¹

Moreover, as UltraTec points out (Petition at 9), it submitted its petition “in accordance with the Commission’s directive in its *Improved [TRS] Services Order*” that parties should petition the Commission “[a]s new services develop ... for a determination as to whether a service falls within the definition of telecommunications relay service.” *Improved TRS Services Order* at 5148 (¶13). It is the approach taken by WorldCom in seeking to have the Commission clarify that Internet Relay is a TRS service eligible for reimbursement from the Interstate TRS Fund. And it is an approach that minimizes regulatory delay and the uncertainty caused thereby as to whether a new service “falls within the definition of telecommunications relay service.” In contrast, AT&T’s recommendation that the Commission follow the approach it took in coming to the conclusion that VRS is a telecommunications relay service is a recipe for inaction. The initial VRS field tests began in 1995. Yet the Commission did not classify VRS as a TRS

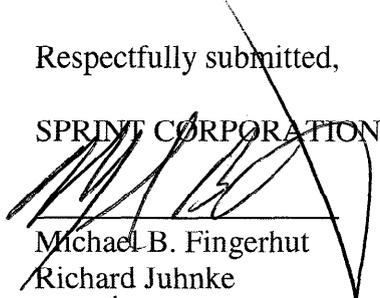
¹ Given UltraTec’s recommendation that CapTel be classified as a non-mandatory TRS offering, no TRS provider, including AT&T, will be required to provide the service.

service until 2000 in its *Improved TRS Services Order*. Such delay hardly enables the Commission to meet its statutory mandate of ensuring that those Americans who are hearing- or speech-impaired are provided with readily achievable services that bring them a step closer to achieving functional equivalence with hearing persons. See SHHH Relay Comments at 1. In short, the Commission should reject AT&T's suggestion that it table consideration of UltraTec's petition.

Finally, Sprint agrees with TDI (at 3-5) that for the present time the costs of providing CapTel service should be recovered from the Interstate TRS Fund regardless of the jurisdiction of the calls made using such service. This approach is consistent with the one taken by the Commission in funding VRS, *Improved TRS Services Order* at 5153-54 (¶¶25-27), and as TDI points out, should encourage the rapid proliferation of CapTel service throughout the United States. Indeed, given that the service will not be mandatory, some States may be reluctant to pay for it. Of course, the funding mechanism and CapTel's optional classification should be reviewed after the passage of a reasonable period of time. In this regard, Sprint support's TDI recommendation that the Commission should revisit these issues in three years.

Respectfully submitted,

SPRINT CORPORATION



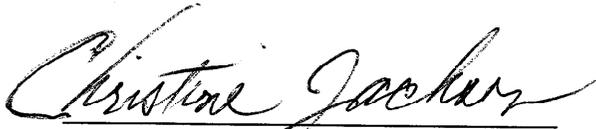
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August 12, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **REPLY COMMENTS OF SPRINT CORPORATION** was sent by hand or by United States first-class mail, postage prepaid, on this the 12th day of August, 2002 to the parties on the attached list.


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