

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

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

REPLY COMMENTS OF SPRINT CORPORATION

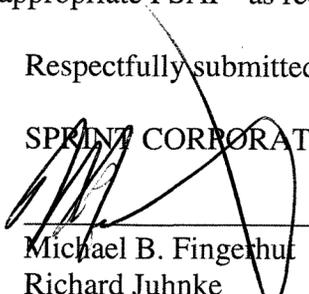
Sprint Corporation ("Sprint"), on behalf of the Telecommunications Relay Services ("TRS") operations of its subsidiary, Sprint Communications Company L.P., and pursuant to the Commission's *Public Notice*, DA 02-1826 released July 29, 2002, in the above-captioned proceeding, hereby respectfully submits this brief reply to the comments on the Commission's proposed clarification of the "procedures for routing emergency calls by telecommunications relay services (TRS) centers." The Commission's proposal would amend Section 64.604(a)(4) of the Rules, 47 C.F.R. §64.604(a)(4), to require that relay providers transfer the emergency caller to the "most appropriate Public Safety Answering Point (PSAP)" instead of the PSAP nearest the caller as currently required by such Rule.

In its comments, Sprint questioned why the Commission believes that a change in the wording of the rule is necessary, especially since the Commission has never explained what it considers to be the "most appropriate PSAP." In this regard, Sprint voiced its concern that the Commission would define "most appropriate PSAP" as the one to which the emergency call of a hearing person living in the same area as the TRS user is routed by that person's LEC. Sprint explained that a local jurisdiction may from time to time change the designated PSAP for a

particular area and so inform the LEC serving that area of the change. The LEC, in turn, will update the routing information in its switch. A relay provider, such as Sprint, does not have access to that type of information on a real time basis. Thus, Sprint and other relay providers would not be able to route an emergency call to newly designated PSAP, at least in the first instance. Of course, once Sprint is provided with the necessary information, usually by the previous PSAP, it will update its database accordingly.

In its comments, AT&T (at 2) agrees that its PSAP “database may not be fully up-to-date at any given time due to delays by state agencies in supplying required data.” But like Sprint, AT&T makes a good faith effort to update its database when it is supplied the necessary information. It, therefore, suggests that the Commission define the “most appropriate PSAP” for a particular emergency caller as the one resident in its database at the time of the call. *Id.* at 3. Sprint agrees that AT&T’s suggested definition would alleviate its concerns and, given that a relay provider’s lacks real-time access to the most up-to-date PSAP location information, is the only definition of “most appropriate PSAP” that can realistically be adopted. Thus, Sprint would support a change in the wording of the Rule from “nearest PSAP” to “most appropriate PSAP” as long as the Commission defines the “most appropriate PSAP” as recommended by AT&T.

Respectfully submitted,


SPRINT CORPORATION

Michael B. Fingerhut
Richard Juhnke
401 9th Street NW, Suite 400
Washington, D.C. 20004
(202) 585-1909

Its Attorneys

September 13, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REPLY COMMENTS OF SPRINT CORPORATION was sent by e-mail or by United States First Class Mail, postage prepaid, on this the 13th day of September, 2002, to the following parties.


Sharon L. Kirby

VIA ELECTRONIC
MAIL

Ms. Erica Myers
Disabilities Rights Office
Consumer & Govern-
mental Affairs Bureau
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Margaret Egler, Esq.
Disabilities Rights Office
Consumer & Govern-
mental Affairs Bureau
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Janet Sievert, Esq.
Disabilities Rights Office
Consumer & Govern-
mental Affairs Bureau
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Pam Gregory, Esq.
Consumer Information
Bureau
Common Carrier Bureau
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Qualex
Room CY-B402
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

VIA U.S. MAIL

Margot Smiley Humphrey,
Esq.
Holland & Knight LLP
2099 Pennsylvania Ave.,
Suite 100
Washington, DC 20006

Claude Stout, Executive
Director
Telecommunications for
the Deaf, Inc.
8630 Fenton Street, Suite
604
Silver Spring, MD 20910-
3803

Mark Rosenblum, Esq.
Peter Jacoby, Esq.
AT&T Corp.
Room 1134L2
295 North Maple Avenue
Ave.
Basking Ridge, NJ 07920

Andrew D. Lipman, Esq.
Paul O. Gagnier
Edward W. Kirsh
Swidler Berlin Shereff
Friedman
3000 K Street, NW, Suite
300
Washington, DC 20007
*Counsel for
Telecommunications for
the Deaf, Inc.*

Larry Fenster, Esq.
WorldCom, Inc.
113 19th Street, NW
Washington, DC 20036

Ann H. Rakestraw
Verizon
1515 North Courthouse
Road, Suite 500
Arlington, VA 22201

Martha Jenkins, Senior
Director
Federal Regulatory Affairs
Intrado Inc.
1225 I Street, NW, Suite
500
Washington, Dc 20005

James R. Hobson
Miller & Van Eaton,
P.L.L.C.
1155 Conn. Avenue, NW,
Suite 1000
Washington, DC 20036-
4320
Counsel for NENA

Robert M. Gurss
Shook Hardy & Bacon,
L.L.P.
600 14th Street, NW, Suite
800
Washington, DC 20005
Counsel for APCO

Alfred Sonnenstrahl
Deaf Seniors of America
Representative
10910 Brewer House Road
Rockville, MD 20852