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October 31, 2002

BY HAND AND E-MAIL

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW,
Washington D.C. 20554

**Re: *EX PARTE PRESENTATION --Telecommunications Relay Services And
Speech-to-Speech Services for Individuals with Hearing and Speech
Disabilities, CC Docket No. 98-67***

Dear Ms. Dortch:

On October 30, 2002, Paul Ludwick, Senior Product Manager for Sprint and the undersigned met with the following staff members of the Consumer and Governmental Affairs Bureau: Margaret Egler, Tom Chandler, Greg Hlibok, Janet Sievert (via conference call) and Erica Myers. In addition, Maripat Breenan of NECA, the TRS Fund Administrator, participated in the meeting via conference call. At the meeting, Sprint reiterated the points it raised in support of its petition for reconsideration of the Commission's *Declaratory Ruling* (FCC 02-121) released April 22, 2002 in the above-captioned proceeding docket. In that petition, Sprint asked the Commission to reconsider its decision that TRS service provided via the Internet ("IP Relay") enable users to avail themselves of pay-per-calls services using the 900 prefix, and of one-line hearing carry over ("HCO") functionality. Sprint explained that such relief was necessary because current technology constraints prevent the offering of 900 service and one-line HCO capability to IP Relay users. Sprint provided each staff attending the meeting with the attached handout explaining Sprint's position.

At the meeting, Sprint emphasized that time was of the essence. When Sprint began offering IP Relay in July 2002, it told NECA that its IP Relay offering could not provide 900 pay-per-call service or one-line HCO functionality. NECA, in turn, informed Sprint that it could not reimburse Sprint for the IP Relay minutes Sprint has been and is providing. Thus, at the present time, Sprint is unable to recover any of the costs it incurs in furnishing IP Relay.

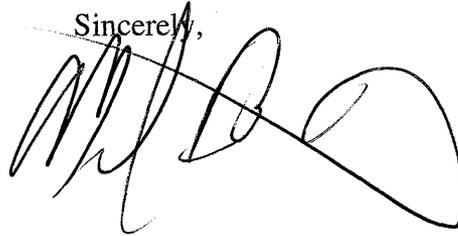
To make matters worse, Ms. Brennan told the Commission staff at yesterday's meeting that, under current rules, once the Commission grants Sprint's petition, Sprint's payment for the

Marlene H. Dortch
October 31, 2002
Page 2

past period would be limited to the three months immediately preceding the release of the decision. Thus, Sprint plans to file a request with the Commission asking that in granting Sprint's petition for reconsideration, the Commission also instruct the TRS Fund Administrator to compensate Sprint and other IP Relay providers that, like Sprint, has informed NECA that they can not offer 900 pay-per-call service and HCO functionality -- and based upon market tests conducted by Sprint no provider of IP Relay is providing these features as part of its IP Relay offering -- for the entire past period in which such carriers offered IP Relay.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Dortch', written over the word 'Sincerely,'.

Attachments

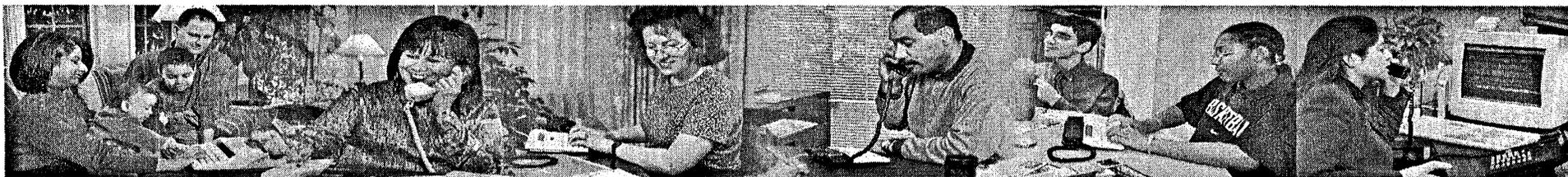
c: Margaret Egler (by e-mail)
Tom Chandler (by e-mail)
Janet Sievert (by e-mail)
Greg Hlibok (by e-mail)
Erica Myers (by e-mail)



Discussion of Petition for Limited
Reconsideration concerning the Declaratory
Ruling (FCC 02-121) released April 22, 2002
concerning Internet Relay

Mike Fingerhut

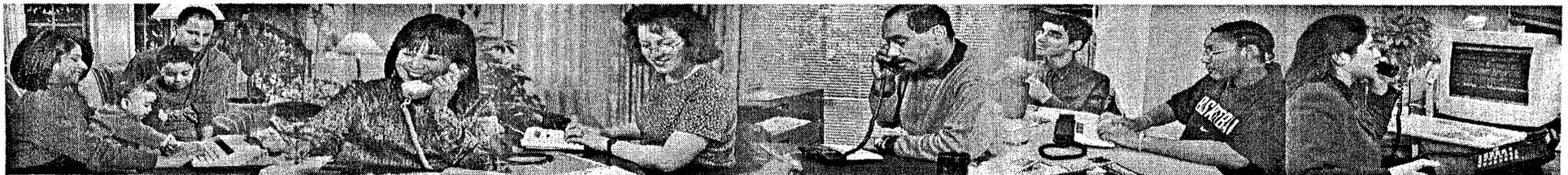
Paul Ludwick



Sprint Declaratory Ruling Requirements

Waived Minimum Requirements:

- Emergency Call Handling
- Equal Access to Interexchange Carriers
- Voice Initiated Calls, including VCO and STS



Sprint Non Waived Requirements in Question

Pay per Call services/900 number services:

- 900 services are always billed to the phone line
- 800 numbers often offer credit card billing

Issues:

- 900 calls cannot be billed to credit card
- 900 calls cannot be based on a caller provided phone number (tremendous fraud potential)

Non- Issue:

- 800 pay-per-call calls billed to credit card



Sprint Non Waived Requirements in Question

Hearing Carry Over (HCO):

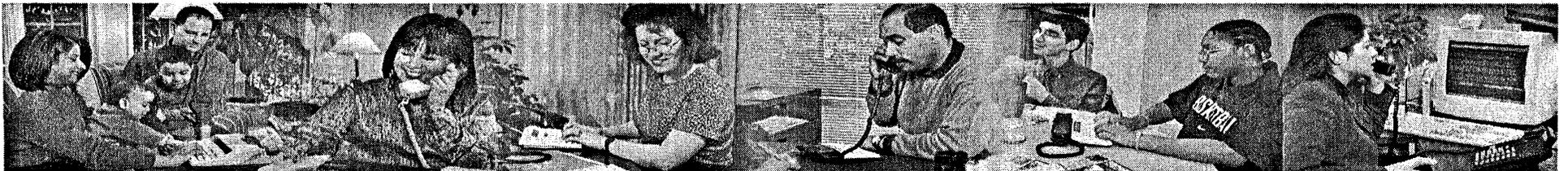
- Exactly the same technology/application as VCO

Issue:

- Both VCO and HCO (VoIP)

Non- Issue:

- 2 Line VCO and HCO calls processed today





Today

Sprint currently processes through Internet Relay:

- 2 Line VCO and HCO calls
- 800 Pay-per-call calls paid with credit card

Sprint currently does not process:

- VCO/HCO calls over IP
- 900 calls





Other Internet Relay Providers

Sprint has conducted monthly testing of other IP Relay service providers

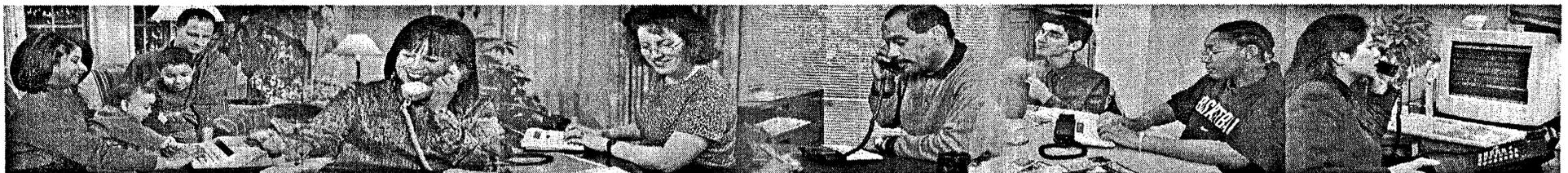
Two Internet Relay providers other than Sprint that we are aware of.

No provider provides HCO.

No provider places 900 calls.

Two providers are being reimbursed through the Interstate TRS Fund.

One of the providers being reimbursed supported Sprint's Petition and confirmed the technical issues.



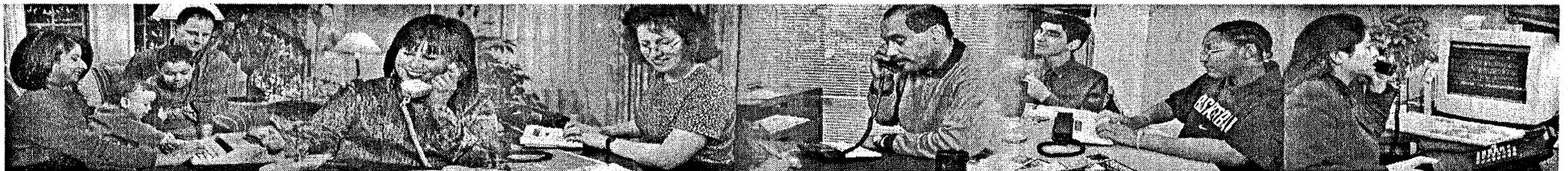


Immediate Action Needed

Respectfully request that you grant Sprint's petition for Reconsideration.

Respectfully request that you specifically permit Sprint to be reimbursed for past, unreimbursed, Interstate TRS Fund submissions for Internet Relay.

Respectfully request that the actions be taken quickly.





Or

Respectfully request that you indicate that the minimum requirements are being met so that Sprint can certify compliance and seek reimbursement for past and future Internet Relay minutes.





Alternatives for Sprint?

