



Marybeth M. Banks  
Director

**Federal Regulatory Affairs**  
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June 2, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Internet Relay and Video Relay Service Annual Progress Report

Dear Ms. Dortch:

Sprint Corporation hereby files its first annual Internet Relay and Video Relay Service Annual Progress Report, as required by the Commission.<sup>1</sup>

Sprint apologizes for the lateness of its first report and any inconvenience it may have caused. Sprint misread the calculation of the due date, as specified in Paragraph 76 of the Commission's Second Report and Order. Sprint assures the Commission that future reports will be filed in a timely manner, annually on April 16.

If you have any questions concerning this report, please contact me.

Very truly yours,

A handwritten signature in cursive script that reads "Marybeth Banks".

Attachments

cc: Thomas Chandler  
Gregory Hlibok

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<sup>1</sup> *In the Matter of Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities and Americans With Disabilities Act of 1990, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking (Second Report and Order), CC Docket No. 98-67 and CG Docket No. 03-123 (FCC 03-112), released June 17, 2003.*

**FCC Internet Relay Annual Progress Report  
June 1, 2004**

Current waived items by FCC	Current TRS Rule Applied to SRO	Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
911 Emergency Calls	"Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP".	Internet Protocol network (IP network) does not support the Automated Number Identification information. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to the nearest PSAP.	Sprint implemented a "manual" (directory assistance lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.
900 Pay-per-calls	"Relay services shall be capable of handling pay-per-calls".	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call to an IP address. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.
Carrier of Choice	"TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users".	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for toll calls, Sprint can not support COC calls.	The technical challenge remains of tying an exact location (and billing) to an IP address. No additional development has been made that would allow Internet Relay end users to be billed for preferred carrier of choice.
VCO	"TRS providers are required to provide the following types of TRS calls: Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO".	<p>That is not possible over the internet. That is one reason why earlier attempts of carrying voice traffic over the internet failed. VoIP</p> <p><b>**REQUIRES**</b> Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p>	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.

**FCC Internet Relay Annual Progress Report  
June 1, 2004**

Current waived items by FCC	Current TRS Rule Applied to SRO	Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
HCO	"TRS providers are required to provide the following types of TRS calls: Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO".	<p>That is not possible over the internet. That is one reason why earlier attempts of carrying voice traffic over the internet failed. VoIP  <b>**REQUIRES**</b> Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p>	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.
STS	"Speech-to-speech relay service and interstate Spanish language relay service shall be provided by March 1, 2001.	<p>That is not possible over the internet. That is one reason why earlier attempts of carrying voice traffic over the internet failed. VoIP  <b>**REQUIRES**</b> Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p>	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.

**FCC Video Relay Service Annual Progress Report  
June 1, 2004**

Current waived items by FCC	Current TRS Rule Applied to Video Relay	Current Technology Issues/Limitations	Progress and steps taken to meet the requirement (Notes from CSD)
911 Emergency Calls	"Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP".	Internet Protocol network (IP network) does not support the Automated Number Identification information. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer VRS 911 calls to the nearest PSAP.	The technical challenge remains of tying an exact location to an IP address. As a result of the reduced VRS rates (July 1, 2003) no additional investment has been made in researching technology that would bridge this emergency services gap. The ability to accurately pass a caller's ANI/ALI to the PSAP based on IP addressing, unless the customer voluntarily shares their inbound phone number or physical location through a database entry, continues to be technically infeasible. Some end user equipment does allow for the pre-loading of a corresponding PSTN ANI that would assist the VRS agent in completing an emergency call to the correct PSAP. However, this pre-loading of the corresponding PSTN ANI is often inaccurate, or artificially created when in fact there is no actual corresponding PSTN ANI. The technical challenge remains of tying an exact location to an IP address.
900 Pay-per-calls	"Relay services shall be capable of handling pay-per-calls".	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location to an IP address. As a result of the reduced VRS rates (July 1, 2003) no additional investment in the switching technology has been made that would allow for end users to be billed for access to 900 services.
Carrier of Choice	"TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users".	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for toll calls, Sprint can not support COC calls.	The technical challenge remains of tying an exact location to an IP address. As a result of the reduced VRS rates (July 1, 2003) no additional investment in the switching technology has been made that would allow for end users to be billed for access to their carrier of choice. Additionally, the very nature of the internet, makes billing for toll calls obsolete. The technical challenge remains of tying an exact location to an IP address.

**FCC Video Relay Service Annual Progress Report  
June 1, 2004**

Current waived items by FCC	Current TRS Rule Applied to Video Relay	Current Technology Issues/Limitations	Progress and steps taken to meet the requirement (Notes from CSD)
<b>Call Types (VCO, HCO)</b>	"TRS providers are required to provide the following types of TRS calls: Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO".	It is not possible over the internet. VoIP Quality of Service issues (see SRO notes). However, Sprint offers alternative VCO & HCO solution by using second line (analog line) where the Video Interpreter ask for second number to call back using three way call feature. The procedure is similar to Two-Line VCO or HCO call	We are currently able to process VCO and HCO calls through VRS using external telephone line and routinely do compete these types of calls. We are also technically able to complete VRS to TTY calls, VRS to STS calls and VRS to IP Relay Calls, however we do not allow these calls to be processed at this time.
<b>Speed of Answer</b>	"85% of all calls answered within 10 seconds daily. Abandoned calls included in the speed of answer calculation. Daily P.01 standard."	Commission did not want to take action that would keep potential competitors from entering the VRS market. In addition, the FCC waived this requirement because of its interest in stimulating VRS growth	We are currently able to provide a consistent 20 second ASA or less when averaged over a period of 30 days (monthly). However, as a result of the reduced VRS rates (July 1, 2003), hours of operation have been curtailed (overnight). Additionally, prior to the interim rate taking effect, occupancy rates and corresponding ASA were at more attractive levels approaching 10 second ASA when averaged over a period of 30 days (monthly). So our service level, while good, has deteriorated since July 1, 2003, and the percentage of time VRS agents are working (occupancy) has had to increase significantly, sometimes to levels that are not acceptable.