



Marybeth M. Banks  
Director

**Federal Regulatory Affairs**  
Voice 202 585 1908  
401 9th Street, Northwest, Suite 400  
Washington, D.C. 20004

December 1, 2004

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

Re: Annual Progress Report on the Waived IP Relay and VRS Requirements,  
CC Docket No. 98-67 and CG Docket No. 03-123

Dear Ms. Dortch:

Sprint Corporation hereby responds to the letter from Mr. Thomas Chandler, Chief, Disability Rights Office, Consumer & Governmental Affairs Bureau, dated October 22, 2004. Mr. Chandler requested information that was omitted in Sprint's June 2, 2004 progress report concerning call release, three-way calling, and speed dialing. The attached matrix provides this information.

Sprint apologizes that this information was omitted from its initial report. If you have any questions concerning this report, please contact me.

Very truly yours,

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

Attachment

cc: Thomas Chandler  
Gregory Hlibok

**FCC Internet Relay and Video Relay Service Annual Progress Report  
December 1, 2004**

<b>Internet Relay Service</b>			
<b>Current waived items by FCC</b>	<b>Current TRS Rule Applied to Sprint Relay OnLine (SRO)</b>	<b>Current Technology Issues/Limitations</b>	<b>Progress and steps taken to meet the requirements</b>
<b>Call Release</b>	<p>TRS providers are required to provide call release functionality. Call release is defined as a "TRS feature that allows the CA to sign-off or be 'released' from the telephone line after the CA has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard."</p>	<p>An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.</p>	<p>It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.</p>
<b>Three-way Call</b>	<p>TRS providers are required to provide three-way calling functionality. Three-way calling is defined as a "TRS feature that allows more than two parties to be on the telephone line at the same time with the CA."</p>	<p>The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via SRO.</p>	<p>It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator is not needed to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via SRO using user-initiated three-way calling.</p>

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<b>Speed Dial</b>	TRS providers are required to provide speed dialing. Speed dialing is defined as a "TRS feature that allows a TRS user to place a call using a stored number maintained by the TRS facility. In the context of TRS, speed dialing allows a TRS user to give the CA a short-hand name or number for the user's most frequently called telephone numbers."	There are no limitations today. Sprint currently offers this feature.	The customer can use the speed dialing feature via SRO. Customers can enter the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.

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<b>Video Relay Service</b>			
<b>Current waived items by FCC</b>	<b>Current TRS Rule Applied to VRS</b>	<b>Current Technology Issues/Limitations</b>	<b>Progress and steps taken to meet the requirements</b>
<b>Call Release</b>	<p>TRS providers are required to provide call release functionality. Call release is defined as a "TRS feature that allows the CA to sign-off or be 'released' from the telephone line after the CA has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard."</p>	<p>A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability. With regards to VRS, Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party that uses voice, TTY user, VCO, HCO or anything other than video because the videoconferencing via internet or ISDN protocols are not compatible.</p>	<p>It is not technically feasible at this time to provide call release features with VRS calls. However, Sprint will continue to investigate new developments to allow VRS customers to use this feature.</p>
<b>Three-way Call</b>	<p>TRS providers are required to provide three-way calling functionality. Three-way calling is defined as a "TRS feature that allows more than two parties to be on the telephone line at the same time with the CA."</p>	<p>At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.</p>	<p>The voice end customer is currently able to use the LEC-provided three-way calling feature without problem on the Sprint VRS. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. This feature is often used to support VCO and HCO callers through VRS today. The VRS agent platform is however, unable to support a three way call between two video customers and one voice user at this time.</p>

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<b>Speed Dial</b>	<p>TRS providers are required to provide speed dialing. Speed dialing is defined as a "TRS feature that allows a TRS user to place a call using a stored number maintained by the TRS facility. In the context of TRS, speed dialing allows a TRS user to give the CA a short-hand name or number for the user's most frequently called telephone numbers."</p>	<p>This service is currently available for VRS customers who choose to use our web-cam based product. They can create a speed dial list on-line and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based video phones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.</p>	<p>Individuals using TV-based video phones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.</p>