

Sprint



Together with NEXTEL

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April 14, 2006

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APR 14 2006

Federal Communications Commission
Office of Secretary

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Annual Internet Relay and Video Relay Serviced Progress Report
CC Docket No. 98-67

Dear Ms. Dortch:

Sprint Nextel Corporation hereby files its Annual Internet Relay and Video Relay Service Project Report, as required by the Commission.¹

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

Very truly yours,

Attachments

CC: Thomas Chandler
Gregory Hlibok

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List A B C D E

¹ *In the Matter of Telecommunications 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, CC Docket No. 98-67 and CG Docket No. 03-123 (FCC 03-112), 18FCC Rcd 12379 (June 17, 2003).*

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Waivers	IP Regulatory Status	IP Current Technology Issues/Limitations	Progress and steps taken to meet the requirement	VRS Regulatory Status	VRS Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	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.	Waived Indefinitely; No report required	NA	NA

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2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service; 24/7 not required	Sprint provides Spanish Video Relay Service with hours of operation from 6 AM to 7 PM CST due to the limited number of bilingual certified interpreters.	Sprint began offering Spanish Video Relay service on November 1, 2005 6 AM to 7 PM CST. Future plans including 24 hour Spanish video relay coverage.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	<p>Voice over IP (VoIP) requires 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 dissimilar 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</p>	We are currently providing two-line VCO and HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.

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					<p>deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.</p>	

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4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate 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.	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	No additional information to submit beyond our recent submission to the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/06- 80% of all calls within 180 seconds (monthly); 7/1/06- 80% of all calls within 150 seconds (monthly); 1/1/07- 80% of all calls within 120 seconds (monthly).	Currently, Sprint provides a consistent 20 second Average Speed of Answer (ASA) or less for VRS when averaged over a period of 30 days (monthly).	Sprint is exceeding the 80/180 requirement and on July 1, 2006 will be ready to meet the 80/150 requirement measured on a monthly basis.

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6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The 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 tolls calls, Sprint cannot support equal access to interexchange carrier features for Video Relay Service.	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete .
7. Pay-per-call (900) Service	Waived through 1/1/08	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. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	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. Given the minimum number of 900 service calls placed through VRS, Sprint has not devoted resources to this issue.

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8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.

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9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.

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10. VCO - to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because the videoconferencing via internet or ISDN protocols are not compatible.
11. HCO - to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.

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12. VCO - to - VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible
13. HCO - to - HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.

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14. Call Release	Waived through 1/1/08	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.	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.	Waived through 1/1/08	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	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

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15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not need 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 Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	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.	The voice customer is currently able to use the LEC-provided three-way calling feature. 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. The VRS agent platform is however, unable to support a three way call between two video customers and one voice user at this time.

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16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste 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.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones 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.	Individuals using TV-based videophones 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.

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Providers	IP Regulatory Status	IP Current Technology Issues/Limitations	Progress and steps taken to meet the requirement	VRS Regulatory Status	VRS Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	Sprint currently provides ASL to English VRS services 24 hours a day. However, due to the shortage of certified and qualified Spanish video interpreters, Sprint currently provides Spanish VRS from 6 AM to 7 PM CST.	As more Spanish speaking certified interpreters are available, Sprint will continue to evaluate the need to expand hours of operations for Spanish VRS.