

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

In the Matter of)
)
Telecommunications Relay Services)
and Speech-to-Speech Services for)
Individuals with Hearing and Speech)
Disabilities)
)
)
_____)

CG Docket No. 03-123

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation ("Sprint"), on behalf of the Telecommunications Relay Services ("TRS") operations of its subsidiary, Sprint Communications Company L.P., hereby respectfully submits its comments on the "annual provider payment formulas, fund size estimate, carrier contribution factor for the period July 2006 through June 2007" submitted by the National Exchange Carrier Association (NECA), the TRS Interstate Fund Administrator. Submission at 1.

NECA's submission demonstrates anew that the entire process for establishing the compensation rates to be paid by the Fund to TRS providers is seriously flawed. There is simply no predictability in the process. Costs and cost categories that have been accepted for years by NECA and the Commission have been eliminated or significantly reduced in the instant filing without much, if any, justification. In Sprint's case, for example, NECA has taken it upon itself to eliminate most of Sprint's costs despite the fact that Sprint used the same method to develop its costs for the 2006-2007 fund year that it has used for the past two years with Commission approval. It is simply impossible to expect TRS providers to provide the types of services that the deaf, hard-of-hearing, and speech-impaired communities have come to expect and, in fact,

deserve, if the providers do not know on a year-to-year basis which of the costs they can reasonably predict they will incur in providing such services will survive NECA's "axe."

In short, the process for establishing TRS rates is broken and the Commission must act quickly to remove any discretion now afforded NECA to disallow costs and cost categories by prescribing a detailed costing methodology for establishing compensation rates and the contribution factor for TRS. Pending such prescription, the Commission should order NECA to restore the costs of Sprint and other established TRS providers that NECA has inexplicably excluded and re-compute the compensation rates and contribution factor based on such submissions.

Respectfully submitted,

SPRINT NEXTEL CORPORATION



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