

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

In the Matter of)
)
Telecommunications Relay Services and)
Speech-to-Speech Services for Individuals) **CG Docket No. 03-123**
with Hearing and Speech Disabilities)
_____)

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 *Further Notice of Proposed Rulemaking*, FCC 06-57 released May 9, 2006 (*FNPRM*) in the above-captioned docket.

The *FNPRM* was issued as part of a *Declaratory Ruling* in which the Commission concluded that the any Video Relay Service (VRS) provider that restricted the use of its service "including by blocking calls to other [VRS] providers or providing degraded service quality for connections to the service of other VRS providers" will not be eligible to receive compensation for its VRS services from the TRS Interstate Fund. *Declaratory Ruling* at ¶29. The Commission found that such practice "is inconsistent with the functional equivalency mandate, the public interest, and the TRS regime as intended by Congress." *Id.*

This *FNPRM* addresses two additional issues related to the issue decided by the *Declaratory Ruling*. First, the Commission requests comments on the "the feasibility of establishing a single global database of proxy numbers for VRS users that would be available to all service providers, so that a hearing person can call a VRS user through any VRS provider, and without having first to ascertain the VRS user's current IP address." *FNPRM* at ¶44.

Second the Commission asks interested parties for their views on “whether the Commission should adopt specific Internet protocols or standards to ensure that all VRS providers can receive calls from, and make calls to, any VRS consumer, and all VRS consumers can make calls through any VRS provider.” *Id.* Sprint supports the development of a global database of proxy numbers for VRS users. Such database is another step toward a functionally equivalent VRS service and is the logical follow-on step to the Commission’s findings in the *Declaratory Ruling*. On the other hand, Sprint does not believe the Commission should mandate the use of specific Internet protocols or standards. Such mandate could and likely would stifle the development of innovative technologies. Sprint addresses these two issues below.

A. The Development Of A Database of Proxy Numbers Would Promote Functional Equivalency And Thereby The TRS Regime Mandated By Congress.

Sprint believes that “a single open and global database of proxy numbers for VRS users that would be available to all service providers,” *FNPRM* at ¶47, is not only feasible, but also necessary if VRS is to be a truly functionally equivalent service. As the Commission points out, currently a hearing person wishing to talk to a VRS user often has to know the VRS user’s IP address so that she can provide it to the VRS CA and thereby enable the CA “to establish the video-to-video link with the VRS user.” *Id.* At ¶45. The problem is that because as a general matter “IP addresses are dynamic, the VRS consumer may not know the IP address of his or her VRS equipment at a particular time.” *Id.*

Some VRS providers have sought to overcome this problem by creating databases of “proxy” numbers that “associate with the IP addresses of their customers, even if a particular person’s IP address is dynamic and changes.” *Id.* at ¶46. Thus the hearing person only has to provide to the VRS CA what is a telephone-like number to enable the CA to call the VRS user

and establish the video-to-video link. However, because the providers who have invested the resources to develop these proxy number databases are not willing to share their databases with their competitors, the VRS user is tied to the provider from whom she obtained the proxy number. Such “tying arrangements” would appear to be at odds with Commission’s findings in the *Declaratory Ruling*. In contrast, a single database of proxy numbers administered by a neutral third party and available to all VRS providers would further the goals of the *Declaratory Ruling*.

The proxy numbers that would be assigned to VRS users and entered into the database should, as CSD suggests, be linked to North American Numbering Plan. *Id.* at ¶48. Such linkage will move VRS closer to functional equivalency since deaf and hard of hearing individuals will have “uniform and static end-point numbers ... that will remain consistent across all VRS providers so that they can contact one another and be contacted to the same extent that Public Switched Telephone Network (PSTN) and VoIP users are able to identify and call one another’.” *Id.* (quoting an October 20, 2005 *Ex Parte* submitted by CSD). This issue should, therefore, be referred to the North American Numbering Council.

Sprint also recommends that the database be administered by a neutral third party. Such entity would be able to recover its costs of establishing, operating, maintaining the database as well as assigning proxy numbers to those VRS users who wanted such numbers so as to be able to receive incoming calls by charging the VRS provider a fee every time its VRS CA accessed the database to determine the IP address of the VRS user the hearing person is trying the call.

VRS providers would be able to recover these fees directly from the Interstate TRS Fund.¹

Alternatively, the TRS Fund could pay the database administrator directly for the costs of developing and administering the database.

B. The Commission Should Not Mandate Specific Protocols To Be Used By VRS Providers.

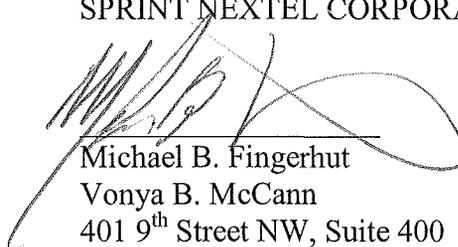
Because most, if not all, of the video equipment that is currently being made available to users of VRS service by VRS providers utilizes the H.323 protocol, there is no question that equipment can be used with any provider's service and any provider can establish a video link between the VRS center and the VRS user. *Id.* at ¶55. However, newer videophone equipment is beginning to be deployed with different protocols, *e.g.*, SIP, and absent a translation mechanism, the VRS user would be bound to the provider or providers that deployed such new equipment. *Id.* Thus the Commission has expressed concern that the deployment of videophones using protocols that are incompatible with existing equipment may "create[] a barrier" to achieving the goal of interoperability, *id.*, and has asked for comments on whether it "should mandate specific Internet protocols that VRS providers must use to receive and place VRS calls." *Id.* at ¶56. Although Sprint understands the Commission's concern here, it believes that the public interest would not be well served if the Commission were to require that all VRS equipment protocols be made publicly available. This requirement would stifle the development of the newer technologies that could benefit VRS users since the entity that has the foresight to spend the resources in order to improve its VRS service offering would be deprived of the benefits of its innovation. The only thing necessary to achieve interoperability is to require that

¹ Such fees should not be included in the average compensation rate so as to ensure that heavy users of the database are able to recover all of the fees paid and light users are not provided a windfall.

VRS providers continue to support the current protocol even if they even if they also offer a VRS service based on different protocols.

Respectfully submitted,

SPRINT NEXTEL CORPORATION



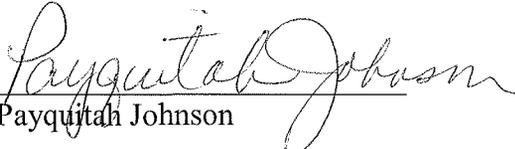
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July 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Comments of Sprint Nextel Corporation were delivered by electronic mail or First Class, postage prepaid, U.S. Mail on this 17th day of July, 2006 to the parties listed below.


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