

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

In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
Implementation of Sections 255 and 251(a)(2) of)	
The Communications Act of 1934, as Enacted by)	
The Telecommunications Act of 1996: Access to)	WT Docket No. 96-198
Telecommunications Service, Telecommunications)	
Equipment and Customer Premises Equipment by)	
Persons with Disabilities)	
)	
Telecommunications Relay Services and Speech-)	CG Docket No. 03-123
to-Speech Services for Individuals with Hearing)	
and Speech Disabilities)	
)	
The Use of N11 Codes and Other Abbreviated)	
Dialing Arrangements)	CC Docket No. 92-105
)	

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation, (“Sprint Nextel”) hereby respectfully submits its comments in response to the Commission’s *Order and Public Notice Seeking Comment*, DA 07-4178 (released October 9, 2007) (*October 9 Order/Public Notice*) in the above-referenced dockets.

In the *October 9 Order/Public Notice*, the Commission “recognize[d] that in certain circumstances there are technical challenges to the ability of interconnected VoIP providers to route 711 calls to an appropriate relay center.” *Id.* at ¶2. The Commission further “recognize[d] that in certain circumstances TRS providers receiving 711 emergency calls via an interconnected VoIP service may not be able to determine an appropriate PSAP to call in compliance with the TRS emergency call handling requirements” as set forth in section 64.604(a)(4) of the Commission’s rules. *Id.* (footnote omitted). Therefore, the Commission waived, for a period of

six (6) months, (1) the requirement it adopted in the *VoIP TRS Order*, 22 FCC Rcd 11275 (2007), that “interconnected VoIP providers must transmit 711 calls *to an appropriate relay provider*”; and (2) the requirement in section 64.604(a)(4) governing the “handl[ing] and rout[ing] of emergency 711 calls placed [to TRS providers] *via TTY* by interconnected VoIP customers.” *Id.* at ¶12.

The Commission has also requested comments on the petitions filed by the three parties seeking the waivers.¹ Specifically, the Commission asked for comments “on technical solutions to the ability of interconnected VoIP providers to route all 711 calls to an appropriate relay center ... and to the ability of a relay center to identify the appropriate PSAP to call when receiving an emergency call via 711 and an interconnected VoIP service.” *Id.* at ¶16.

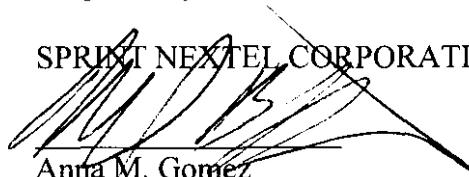
The ability of VoIP providers to route 711 emergency calls to a relay center with information giving the geographic location of the caller is the condition precedent for enabling State providers of traditional TRS services, such as Sprint Nextel, to route these emergency calls to the appropriate PSAP. VoIP providers, however, continue to encounter substantial technical and operational difficulties in ensuring that 711 calls are correctly routed and provide the correct location information. In addition to routing difficulties, the analog-based TTY Baudot tones may be corrupted or suffer degradation when passed through a VoIP provider’s packet-based broadband network. Thus, Sprint agrees with Hamilton (Petition at 3), that until such time that the interconnected VoIP industry is able to overcome these difficulties – and doing so is likely to take longer than the six month waiver period – providers of traditional relay services should not be required to meet their responsibility to immediately and automatically route 711 emergency calls from interconnected VoIP TTY users to the appropriate PSAP.

¹ Petitions for waiver were filed by the Voice on the Net (VON) Coalition, (“VON Coalition”) the United States Telecom Association (“US Telecom”) and Hamilton Telephone Company (“Hamilton”).

Sprint Nextel also agrees with the observation of the Wireless Communications Association International, Inc., that “a meaningful solution requires cooperation and dialogue among a variety of interested parties, including service providers, vendors, the disabled community, TRS providers and . . . the public safety community.” *October 9 Order/Public Notice* at ¶17 citing Letter from Andrew Kreig, President, WCA, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 04-36 *et al.*, at 2 (filed October 1, 2007). Sprint Nextel is willing to be a part of such dialogue; but it must emphasize that developing a solution will take longer than the current waiver period. Thus at a minimum Sprint Nextel recommends that the Commission extend the waiver an additional six months (*i.e.*, until October 5, 2008).²

Respectfully submitted,

SPRINT NEXTEL CORPORATION



Anna M. Gomez
Michael B. Fingerhut
2001 Edmund Halley Drive
Reston, Virginia 20191
(703) 592-5112

Scott R. Freiermuth
6450 Sprint Pkwy
Overland Park, KS 66251-6100
(913) 315-8521

Its Attorneys

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² During this extended period of the waiver, the Commission should require periodic reports, presumably from the VoIP industry, on the progress being made in developing a workable solution.