Sprint
Together with NEXTEL

Sprint Nextel
2001 Edmund Halley Drive
Reston, VA 20191
Office: (703) 592-5112 Fax: (703) 433-4804

Michael B. Fingerhut
Director
Government Affairs

May 19, 2008

BY E-MAIL

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *EX PARTE* PRESENTATION --*Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67; CG Docket No. 03-123

Dear Ms. Dortch:

At the April 29, 2008, Stakeholder Workshop on Ten-Digit Numbering Solutions for Internet-based Telecommunications Relay Services, Paul Ludwick, Business Development Manager for Sprint Nextel, informed Nicole McGinnis, Deputy Bureau Chief (Policy) of the FCC's Consumer and Governmental Affairs Bureau (CGB) that Sprint Nextel and other providers of Internet-based relay services have had several meetings since the beginning of the year to identify the technical issues involved in implementing a numbering solution for such services and to determine if they could come reach consensus on the design of the solution. Ms. McGinnis asked that Mr. Ludwick submit a document into the record of this proceeding summarizing the issues discussed at these meetings and the progress, if any, toward consensus.

Attached is the requested document. The providers of Internet-based relay services listed therein agree that the information contained "accurately summarizes [the] discussions" that have taken place thus far. Some, however, do "not necessarily agree[] with the majority position in those cases where there was one."

If you have any questions, please contact me.

Sincerely,

Attachment

cc: Cathy Seidel, FCC (by email)
Nicole McGinnis, FCC (by email)
Thomas Chandler, FCC (by email)

IP Based Relay Provider Numbering Discussions

Introduction

Beginning in February 2008, a number of IP based relay providers have held discussions to identify the technical issues involved in the implementation of a 10-digit NANP number capability for IP-based relay services. The purpose of these meetings has been to determine the degree of consensus that could be achieved on the separable design decisions as opposed to the particular proposals that have been offered by various parties. This document summarizes those discussions with a view to informing other stakeholders of where the industry believes decisions are required to move forward with the implementation of the kind of capabilities we all believe critical to achieving the goal of functional equivalence.

Not every issue is included in this document, only those discussed by the providers.

Participants

The following providers of IP-based relay services agree that this document accurately summarizes our discussions, but not necessarily agreeing with the majority position in those cases where there was one.

AT&T
Sorenson Communications, Inc.
SNAP
Sprint
CTI, Inc.
Hamilton
CSDVRS
UR Relay
Viable
GoAmerica / Hands On

Number Assignment and Acquisition

The first topic addressed was how 10-digit geographic NANP numbers would be provided to deaf and hard of hearing users. All but one provider favored users obtaining numbers through their chosen relay provider for reasons of user convenience (one-stop shopping), cost, and ease of implementation.

Subsequent discussion addressed how relay providers would acquire the numbers they would assign to users, since relay providers do not generally qualify to obtain numbering resources through NANPA or the pooling administrator. Providers generally favored following the VoIP example where VoIP providers obtain numbers on a wholesale basis from voice service providers such as local exchange companies. Relay providers were divided on whether they should band together and have a master contract under which all relay providers would obtain numbers from such wholesalers or whether each should make its own arrangements as is the case with VoIP.

It was understood by all that numbers would be portable between relay providers and that users who obtained their own numbers would be able to move them to the relay provider of the end user's choice.

Customer Registration

All providers agree that registration will be required to issue 10-digit numbers and to support E911 and other functions.

Number Reclamation

In order to responsibly manage numbers, a subgroup was formed to address procedures for number reclamation. It was agreed that some minimal guidelines in this area should be established by the FCC.

The Subcommittee outlined a draft process to reclaim numbers:

1) Monitor/recognize no usage for a period of 6 months
2) After 6 months, the provider would attempt to contact the customer.
3) 6-9 months no usage, the provider would attempt again.
4) 9-12 months no usage, the number is suspended (90 days placed in aging).
5) After 12 months the number could be returned to provider for reuse.

The customers will be educated or informed about the reclamation process when they contact their provider for a number.

Centralized Database

There was agreement by providers on the need for a central database that would map relay users 10-digit telephone numbers to some form of Internet address. This is needed to allow any relay provider to reach any relay user and to support point-to-point calls. This discussion assumes that 911 location information is not included in this database.

1. What Does the Database Contain?

The crux of this issue is whether the database should include information that would allow a querying party to directly access the VRS user associated with a particular number (e.g., the user IP address or a URI that can be resolved to it) or the URI of the relay user's designated relay provider through which calls would be routed to the user.

The providers remained divided on this issue but agree this is a critical design decision that must be made in order to move forward.

2. What Party Provisions the Database?

The issue is whether this information is put into the database by the end user's equipment directly or through the relay provider.

Most providers believed that the central database should be provisioned through the user's designated relay provider but two favored direct provisioning by the end user's equipment.

3. What Parties May Query the Database?

The database provides access to call routing/user address information, either directly or indirectly. The primary purpose is to provide access to routing/address information that enables a voice caller to place a call through a relay provider to an ASL VRS user. In this case a relay provider may query the database for information to complete the call to the ASL VRS user. Another case requiring a central database query is where a point to point, peer to peer, call is placed from one video user to another, using 10 digit addressing.

Citing their concerns about security issues, the majority of providers believed that only relay providers should be able to query the database but some parties argued that security concerns were manageable so that relay users should be able to query the database as well.

4. What is the Appropriate Database Technology?

Although there were differing views as to the implementation and contents of the central database, it was agreed that a DNS-like protocol was more appropriate for access to the information in that database.

Support for Multiple Services

The industry understands the end users desire for multiple relay services on a single telephone number. Providers believe that it is probably not feasible in the YE2008 timeframe.

Implementation Activities

Providers discussed the activities required to achieve an implementation. An initial list included:

1. Architecture selection
2. Requirements document development
3. Selection of contracting entity and establishment of a governance structure
4. Vendor Selection Process
5. Development (vendor, service provider, relay provider, other), user equipment)
6. Business process definition