



Sprint Nextel
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Michael B. Fingerhut
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Government Affairs

May 22, 2008

BY ELECTRONIC MAIL

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

EX PARTE PRESENTATION --Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67; Petition for Declaratory Ruling on Video Relay Service Interoperability CG Docket No. 03-123

Dear Ms. Dortch:

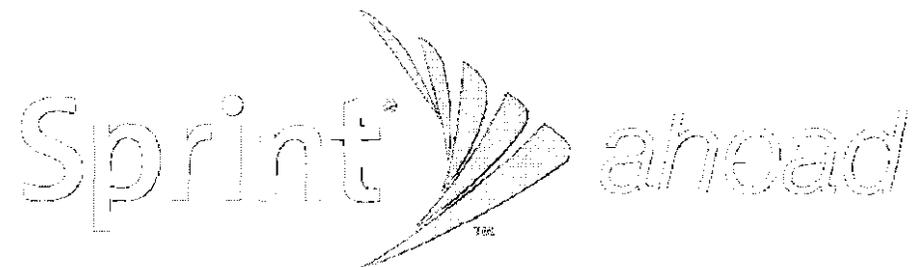
On May 21, 2008, Sprint Nextel held a conference call with members of the FCC's Consumer and Governmental Affairs Bureau (CGB) and Wireline Competition Bureau (WCB). Representing Sprint Nextel on the call were Paul Ludwick, Barbara Garcia, Scott Freiermuth, Joseph Hurlbert, Rosemary Emmer and the undersigned. Representing CGB were Michael Jacobs, Thomas Chandler and Alan Amann. Representing WCB was Nick Alexander. The purpose of the meeting was to enable Sprint Nextel to explain that it supports the Neustar numbering solution for VRS and other IP-based TRS services. The discussion was based on the attached power point presentation.

If you have any questions, please contact me.

Sincerely,

Attachment

Michael Jacobs (by email)
Thomas Chandler (by mail)
Alan Amann (by email)



Sprint Nextel Presentation to the FCC on 10 Digit
Numbering/E911 for Internet Based Relay Services

Mike Fingerhut, Barbara Garcia, Joe Hurlbert, Paul Ludwick
May 21, 2008

Purpose:

- **Discuss similarities/differences between the plans**
- **Share what we support in each of the proposals and/or the proposing firm(s)**
- **Share our reservations in each of the proposals and/or the proposing firm(s)**
- **Share our support for the best option on the table – Neustar**

Positions:

- **All 3 proposals are similar. The CSDVRS proposal is out of the mainstream.**
- **It is difficult/impossible to accurately understand the timelines required for any of the proposals. Estimates should not be a decision factor.**
- **It is difficult/impossible to accurately understand the costs of any of the proposals. Estimates should not be a decision factor. The cost of any system will be insignificant with respect to the costs for Internet, Video, and Captel Relay Services.**
- **Sprint supports the ATIS report and findings. Sprint supports the network grade solution offered by Neustar.**

CSDVRS “ONS”:

- **Proposal differs from existing telecommunication infrastructure**
- **Requires hardware and/or software modifications for every device or every VRS user. This requires development of a device or software for each device or application used in VRS.**
- **Huge job. Extended deployment timeframe/logistics nightmare.**
- **Security issues: magnitude of issue not clear.**
- **No input from other providers. A “take it or leave it” approach tailored to the CSDVRS organization**
- **Little thought given to integration with existing and future 911 systems.**
- **Pro: A central, neutral, entity that consumers contact to establish and port a 10 digit number**

Dash/HOVRs/ATT “ORD”:

- **Confusion as to who is involved in this proposal.**
- **Solution is not integrated into the telecommunications network and does not facilitate network integration in the future. A specialized, stand-alone, solution/architecture.**
- **Questionable system robustness, cost, and deployment time.**
- **Con: Supports acquiring numbers from providers.**
- **No input from other providers. A “take it or leave it” approach.**
- **Dash is not a neutral supplier having been engaged by HOVRs.**
- **Questionable financial stability of Dash:**
 - **Dun and Bradstreet report out of date / firm information inaccurate**
 - **Appears to have been late on supplier/debt payment as recently as 3/08 (30-90 days +) (Dun & Bradstreet)**

Neustar:

- **Proposal supports ATIS report and telecom industry processes**
- **PSTN network integration**
 - **911 – Current and future**
 - **Telco support**
 - **Designed to support demands of telecommunications**
 - **Robust– System in place. Little workload increase from TRS.**
 - **Scalable – Grows with the telecom network**
 - **Firm/Process Neutrality – Processes in place**
- **Supports security requirements**
- **Established public company with prior history**
 - **\$492MM revenue in 2007**
 - **4% debt to total capital**
 - **Performing contracts for telecom industry today.**
 - **Established relationships with industry and FCC.**
- **Supports cost distribution proportionally across providers**
- **Con: Supports acquiring numbers from providers.**

Closing / Questions:

- **CSDVRS “ONS” is an un-workable solution.**
- **Dash/HOVRs/ATT “ORD” solution is a stand-alone, non-integrated architecture.**
- **Neustar “TRU” solution is network integrated, robust, and scalable.**
- **Time and cost estimates are red herrings at this stage.**
- **A centralized type of number assignment should be considered because of the unique relay situation.**
- **Sprint supports the ATIS report recommendations and the Neustar proposal.**
- **Questions?**

