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BY ELECTRONIC MAIL

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

**Re: EX PARTE PRESENTATION: Sprint Communications Company L.P.,
Application for the Section 63.71 Discontinuance of 900 Transport Service
WC Docket No. 08-116 Comp. Pol. File No. 871.**

Dear Ms. Dortch:

Sprint Communications Company L.P. (“Sprint”) believes that its Comments filed on August 6, 2008 in the above-referenced Docket needs to be clarified in one respect. At page 4 of its Comments, Sprint stated that it “intends to return all but one of the blocks of 900 numbers it has been allocated by NANPA to the pool” Sprint’s use of the term “blocks” may be confusing since the term could be interpreted as something less than all 10,000 numbers within a 900-NPA code. Thus, Sprint wishes to make clear that it intends to return all 10,000 numbers within each of the 900-NPA codes it has been assigned with the exception of the 10,000 numbers in the 900-230 code.

Sprint also wishes to correct Jartel’s apparent confusion as to Sprint’s use of 900 numbers to meet the requirement that traditional TTY-based users have the ability to access pay-per-call services through the Telecommunications Relay Service (“TRS”). Jartel argues that “Sprint is discriminating against its customers based on content of their services” because “Sprint wants to eliminate certain 900 services (information providers) but maintain other 900 services for other purposes (e.g., TRS).” Further Comments at 2. It also accuses Sprint of misleading the Commission as to the number of 900 customers it serves, arguing that “[t]o the extent Sprint provides TRS service, each state would be deemed to be a separate provider.” *Id.* at 3, fn. 7.

Neither Sprint nor any of the States where Sprint is the designated TRS provider offers pay-per-call services using the 900 numbers that Sprint has assigned to those States for TRS purposes. As Sprint explained in a June 27, 2008 letter to Marlene Dortch from the undersigned, Sprint must continue to self-provision 900 transport services for TRS in order to comply with the requirement that TRS providers ensure that the deaf and hard-of-hearing have access to pay-per-call services provided by others entities. *See* 47 C.F.R. §64. 604(a)(3)(iv). Sprint uses the service to ensure that a deaf or hard-of-hearing individual calling a Sprint TRS center and asking

to be connected to a pay-per-call provider is, in fact, allowed to make 900 calls from the phone he/she is using to call the center.

Specifically, the Communications Assistant (“CA”) instructs the caller seeking to access a pay-per-call provider to dial a 900 number assigned to the State from where the call originated from his/her phone. Sprint’s CAs take this action because under 47 C.F.R. §64.1508(a) of the Commission Rules, an end user can instruct his/her local exchange carrier “to block access to services offered on the 900 access code” from his/her phone. If the caller dials the 900 number and is connected to the TRS center, the CA knows that the 900 calling is permitted from the caller’s phone. The CA will then dial the 900 number of the pay-per-call provider that the deaf or hard-of-hearing individual is trying to reach regardless of the content offer by such provider.¹ None of the States is charged for this service and, thus, by definition it is not a telecommunications service offered on a common carrier basis. *See* 47 U.S.C. §§ 153(10) & 153(46).²

Respectfully submitted,



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¹ As it is, there is very little demand for pay-per-call services by the deaf and hard-of-hearing. In all of 2007, Sprint’s CAs made just 204 calls to providers of pay-per-call services for deaf and hard-of-hearing individuals using TTY-based TRS. For the first six months of 2008 CAs have made just 117 such calls. Again, Sprint does not know whether such calls went to providers of adult services or to providers of other pay-per-call services, *e.g.*, crossword puzzle hints.

² The fact that Sprint is correcting Jartel’s factually incorrect argument about TRS should in no way be interpreted as suggesting that Sprint agrees with Jartel’s other assertions of facts or arguments. Sprint believes that Jartel’s arguments are factually inaccurate and contrary to long-standing Commission precedent.