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February 18, 2010

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

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

Dear Ms. Dortch:

On February 17, 2010, Sprint's Michael Ellis and the undersigned met with Mark Stone, Deputy Chief of the FCC's Consumer and Governmental Affairs Bureau to discuss the fact that the TRS Fund Administrator – the National Exchange Carrier Association (NECA) – was, without justification, withholding payment for certain VRS calls that Sprint handled during the period beginning in August 2009 and continuing to the present as well as the fact that NECA had yet to pay Sprint for the costs it incurred during 2009 in implementing and promoting the Commission's 10-digit numbering plan for IP-enabled Relay services. During the meeting Sprint provided Mr. Stone with information (a redacted version of which is attached) showing, *inter alia*, the impact of NECA's unjustified action here on Sprint.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "M. B. Fingerhut", written over a diagonal line that extends from the top right towards the bottom left.

Attachment

cc: Mark Stone, FCC, (by email, w/o attachment)



Sprint Relay

NECA Discussion

Mike Ellis, Sprint Relay National Director
Mike Fingerhut, Sprint Regulatory

February 17, 2010

Agenda

- *Sprint's unique role in the Relay industry*
- *Sprint's VRS presence in the VRS industry*
- *Sprint's Video Care Service Center*
- *Conference Bridge Reimbursement*
- *Current VRS funds/minutes withheld from Sprint and Convo Relay*
- *10-digit Outreach Expenses*
- *Wrap-up*

Sprint's Role and commitment to the Relay Industry

- 1. Fortune 60 company*
- 2. Significant financial contributor to the Relay fund*
- 3. Relay provider for 20 years (TRS, IP, CapTel, VRS)*
- 4. The only Relay Wireless provider with thousands of customers utilizing our famous Data Only Plan*
- 5. Provide wireless and wireline tech support, credit, rebates, Customer Care, etc. – all non-related to VRS*
- 6. Only comprehensive Relay provider with 30+ Deaf/HOH Managers of Relay as employees (not contractors)*

Sprint's VRS presence in the market *[REDACTED]*

History of Sprint VRS Minutes of Use [REDACTED]

Sprint Video Care Service

Value added service

Key Features:

- *Unique Video Care Service to resolve the following:*
 - > *BlackBerry Technical Support*
 - > *Sprint Billing and Credit Questions*
 - > *Rebates, Port-in, Set-up, trouble-shoot, etc*
 - > *Sprint and Sprint Relay Wireless General Questions*

Benefits:

- *One-on-One communication using ASL with a Sprint Relay representative*
- *Reduces calls through Video Relay Service providers*
- *Reduces customer frustration*
- *First Call Resolution approx 75% of the time*
- *Customer Resolution Expedited due to VCS expertise in working with Technical Support and Billing representatives.*
- *Reduces Churn and improves C-SAT results*

Issue:

- *NECA has withheld minutes to technical support and customer service used by VCS.*
- *If VCS is not allowed to connect with a hearing caller (i.e. BB technical support and Sprint Billing) when an issue requires escalation, this could potentially increase VRS minutes of use.*
- *What is the desire of the FCC?*

Conference Bridge Reimbursement

Issue:

- Currently, [REDATED] withheld from Sprint for August, September and October 2009.
- Sprint validated approximately [REDACTED] of minutes withheld included a hearing caller.
 - Unable to capture all conference bridge data on attendees due to time period requested.
 - Due to IP address changing (on videophone equipment), it is not possible to capture all calls.
- No clear process outlined by the FCC and/or NECA
- Sprint have no control if third party conference call is being utilized by users – Sprint is still being penalized.
- As of 1/13/10, NECA has indicated that the FCC has not approved reimbursement of withheld minutes.
 - No timeline given to receive funds for these minutes of use.

Financial Impact of withheld minutes

REDACTED

- January 21, 2010, signed a joint VRS provider letter urging the FCC to issue a notice of proposed rule making on this issue.

Convo Relay – Withheld Minutes

REDACTED

	Convo Relay	Convo Reimbursement Withheld
August-09	REDACTED	REDACTED
September-09	REDACTED	REDACTED
October-09	REDACTED	REDACTED
November-09	REDACTED	REDACTED
December-09	REDACTED	REDACTED
TOTAL	REDACTED	REDACTED

10-digit Outreach Expenses

- *Per FCC order – FCC 08-151, requested internet based TRS providers to provide education/outreach to users about 10-digit numbering.*
- *Significant number of hours and expenses incurred to support this request.*
- *Sprint has not been reimbursed for the work and expenses during 2009.*
- *On May 13th 2009, NECA asks for supporting documentation for 4Q 2008 10 digit numbering outreach expense reimbursement, which was submitted on Jan 29th, 2009.*
- *Sprint received 10 digit outreach reimbursement in Aug, 2009*
- *Sprint has been reimbursed only for 4Q 2008.*
- *NECA owes Sprint almost [REDACTED] for all of 2009 10 digit outreach expenses.*

Next Steps

- *Establish a timeline for providers to receive guidelines on processing conference bridge calls, technical support and CARE related VRS calls.*
- *Gain clarification of timeline for reimbursement of VRS minutes withheld and 2009 Outreach Expenses.*
- *Establish VRS call policy (for Sprint)*
 - *Block internal Sprint conference bridge number?*
 - *Block all third-party conference bridge numbers?*
 - *Refer customers to technical support and billing for escalated issues resulting in increase of VRS minutes billed to fund*
 - *Point Sprint Relay employees and customers to other VRS providers for conference calls and calls to Sprint Support services with uncertainty that their calls may be blocked?*
- *Develop communication plan to Deaf and Hard of Hearing community.*
- *Action items....*

