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BY ELECTRONIC FILING

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

Re: EX PARTE PRESENTATION -- Structure and Practices of the Video Relay Service Program CG Docket No. 10-51

Dear Ms. Dortch:

On August 31, 2011, Sprint's Michael Ellis, Mark Tauscher and Holly Farrell (all via conference call) as well as Kevin Creed and the undersigned (both in person) met with Karen Peltz Strauss, Greg Hlibok, Eliot Greenwald and Michael Jacobs, all staff members of the FCC's Consumer and Government Affairs Bureau. The purpose of the meeting was to discuss the Commission's July 28, 2011 decision in the above referenced docket to require, *inter alia*, that all providers of VRS service must offer service through their own facilities and employ their own Video Interpreters (VIs). In other words, Sprint's long-standing business model for providing VRS service by sub-contracting with otherwise certified VRS providers would no longer be allowed.

Sprint explained that several issues had arisen as Sprint considers whether to become a facilities-based provider of VRS or exit the market. Specifically, Sprint explained that it believed the FCC needs to clarify (1) the definition of the term "employee;" (2) whether a certified VRS provider would be able to still enter into a contract with another certified VRS provider to handle surge traffic or on a temporary basis increased traffic to accommodate growth; (3) whether the actual location a leased automatic call distribution platform actually needed to be located on a VRS provider's premises; and (4) whether in light of the fact that the FCC denied Sorenson's request that waivers separate and apart from those to be submitted with a provider's application for certification "be granted to all iTRS providers, currently eligible...to receive compensation from the TRS Fund that are also in good standing," the FCC would not grant any such waivers.

If you have any questions, please contact me.

Respectfully submitted,

Karen Peltz Strauss (by electronic mail)
Michael Jacobs (by electronic mail)
Eliot Greenwald (by electronic mail)
Greg Hlibok (by electronic mail)