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December 5, 2011

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, DC 20554

Re: Internet-based TRS Certification Application of Sprint Communications Company L.P., CG Docket No. 10-51, File No. _____

Dear Ms. Dortch:

Sprint Communications Company L.P. is today filing its application in the above-referenced docket as required by 47 CFR § 64.606(a)(2)(i)-(iv) so that it can continue to provide its Internet-based IP Relay and IP Captioned Telephone Service and receive compensation from the Interstate TRS Fund. Sprint is submitting a public version of the filing into the CG Docket No. 10-51 through the FCC's Electronic System. Sprint is also hand delivering a confidential version of its Application to FCC staff named below.

Sprint respectfully requests that the confidential version be withheld from public inspection. It contains proprietary materials that, inter alia, explain in detail the methods and procedures employed by Sprint to provide its IP-based TRS services and that Sprint would not in the normal course of business make available to the public. 47 CFR §0.457(d). In short, the materials are "privileged and confidential," 5 U.S.C. §552(b)(4).

If you have any questions or need additional information, please contact me.

Respectfully submitted

cc: Karen Strauss
Michael Jacobs
Greg Hlibok
Eliot Greenwald

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Internet-based TRS Certification) CG Docket No. 10-51
Application of Sprint Communications) File No. _____
Company L.P.)
)

APPLICATION OF SPRINT COMMUNICATIONS COMPANY L.P.

Sprint Communications Company L.P., (“Sprint”), a wholly-owned subsidiary of Sprint Nextel Inc., and the provider of Sprint’s Telecommunications Relay Services (“TRS”) hereby respectfully submits its Application supplying the information required by 47 CFR § 64.606(a)(2)(i)-(iv) to continue to provide its Internet-based TRS services and receive compensation from the Interstate TRS Fund. Sprint’s Application here is limited to the provision of its IP-Relay Services (“IP-Relay”) and its Internet-based Captioned Telephone Service (“IP CTS”).¹ Because Sprint would have to abandon the “resale” business model it has used for years in providing VRS service and instead become a facilities-based provider of such services forcing it to expend resources that could be used to modernize its wireless network and expand the reach of its wireless broadband services, Sprint has decided to exit the VRS segment of the market.²

¹ The requirement to become apply for and receive a certificate from the Federal Communications Commission (“FCC” or “Commission”) to provide Internet-based TRS services in order to continue to receive compensation from the TRS Fund was imposed by the FCC in its July 28 2011 *Second Report and Order* in CG Docket No. 10-51 (FCC 11-118) (*In the Matter of Structure and Practices of the Video Relay Service Program*). Sprint is currently eligible to be compensated by the TRS Fund for its provision of these services by virtue of the fact that it is a common carrier providing TRS service and because it provides traditional TRS services in a number of states pursuant to contracts with those states. 47 C.F.R. § 64.604(c)(5)(iii)(F).

² VRS users who have selected Sprint as their default VRS provider are being notified as of today that they will have to select another default VRS provider within the next 30 days.

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I. INTRODUCTION

Sprint is a common carrier providing interstate and foreign wireline telecommunications services under the jurisdiction of the FCC and in accordance with the rules and regulations imposed by the FCC.³ Sprint's affiliates within the Sprint Nextel family of companies hold licenses issued by the FCC to provide interstate and intrastate wireless telecommunications services⁴ and such affiliates hold certificates enabling them to provide offer foreign telecommunications services to their wireless customers. Sprint also provides information services over its SprintLink network and is a Tier I Internet backbone provider. Consistent with its obligations as a common carrier and an FCC licensee, Sprint has always endeavored to offer its services in compliance with the Communications Act and the FCC's regulations issued thereunder.⁵

Sprint has been providing TRS services as required by Section 225 of the Act (47 U.S.C. § 225) and in accordance with the regulations adopted by the FCC, *see* 47 USC § 64.601 *et seq.*, for over two decades. Currently 32 states as well as Puerto Rico have designated Sprint to provide traditional TRS and Speech-to-Speech services to the deaf, hard-of-hearing and speech impaired residents of those states.⁶

³ Sprint's affiliates also hold licenses issued by the various States (including the District of Columbia) Puerto Rico and the US Virgin Islands to provide intrastate toll and exchange services.

⁴ The Title III licenses issued to Sprint by the FCC enables Sprint to provide wireless services throughout the United States and its territories.

⁵ Like most, if not all, major carriers subject to the FCC's jurisdiction, Sprint has been the subject of various enforcement-based inquiries by the FCC, although such inquiries have been infrequent. The important point here is that none of these inquiries ever called into question Sprint's basic qualifications, including its character qualifications, to be a Commission licensee or authorized common carrier or to hold Commission authorizations.

⁶ Sprint also provides traditional TRS and STS services to the Federal Government as well as in New Zealand pursuant to contract entered into with those entities.

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Sprint was also the first FCC-compliant provider of PSTN-based captioned telephone services (“CTS”) in the United States. It launched CTS in the state of Hawaii on January 1, 2004. It now provides PSTN-wireline CTS service in 31 states as well as to the Federal Government.⁷

Moreover, Sprint was among the first TRS providers to begin to offer Internet-based services. With respect to the services that are the subject of this Application, Sprint began offering its IP Relay service in 2002 shortly after the FCC determined that providers of such services were eligible to be compensated by the Fund.⁸ In March 2008, Sprint has begun to offer the Internet-based version of its CTS service to wireline customers and earlier this year it launched a downloadable mobile application for Android 2.2 and higher devices.

Sprint is also one of the relatively few providers of Internet-based TRS services whose wireless and wireline customers must support the TRS Fund through the charges they pay for their services. In this capacity, Sprint has been and continues to be one of the few providers of Internet-based relay service that consistently urges the FCC to ensure that the rates the TRS Fund must pay for Internet-based Relay services – especially VRS services – be based on the allowable and reasonably incurred costs of providing such services.

⁷ Sprint’s provision of CTS services to the Federal Government is paid for by Federal Government and not by the TRS Fund Administrator.

⁸ Sprint, has consistently brought to the Commission’s attention “TRS-minute pumping” schemes and other nefarious acts that have plagued the Internet-based TRS segment of the market. For example, it was the first provider to alert the FCC to the fact that individuals in foreign countries, such as Nigeria, were using Internet Relay to fraudulently obtain goods from businesses in the US. See Letter dated February 18, 2004 from Michael B. Fingerhut, Attorney for Sprint to Marlene Dortch, Secretary to the FCC in CG Docket No. 03-122 and CC Docket NO. 98-67 detailing an *ex parte* presentation Sprint made to FCC staff the previous day. And it explained to the FCC the actions it was taking or was considering taking to minimize the extent of such fraud.

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In short, given Sprint's long involvement in the provision of TRS services, it is clear that Sprint possesses the necessary qualifications to be certified by the FCC in order to continue to provide its IP-Relay and its IP CTS services. Below and in the attached Exhibits, Sprint sets forth the specific information and documentation required by 47 C.F.R. §64.606 of the FCC's Rules as applicable to these Internet-based services offerings.

II. REQUIRED INFORMATION FOR CERTIFICATION

A. Description of Sprint's Internet-based TRS Offerings (47 C.F.R. §64.606(a)(2)(i))

As stated, Sprint seeks a FCC certification to be able to continue to offer its IP-Relay and IP-Captel services and as required by §64.606(a)(2)(i) of the Rules, Sprint provides here a description of each of these services.

1. IP Relay

Sprint's IP Relay service can be accessed on any computer through Sprint's website, www.sprintip.com or by using AOL Instant Messenger (AOL IM) or Google Talk (GTalk). The user needs an Internet connection (Dial-up, DSL, Cable, T1 etc.) and an Internet browser (Microsoft Explorer 5.5 and higher, Netscape 6.1 and higher, Firefox 1.0 or Safari). Sprint's IP Relay service can also be accessed on any wireless device that enables the user to connect to the Internet. In fact, Sprint's wireless customers with Android 2.1 or higher mobile devices are able to download free of charge the Sprint Mobile IP Relay Application ("App"). Such App enables users to place and receive Sprint IP Relay calls within the United States (including its territories) regardless of whether the user is on either Sprint's 3G or 4G networks or on a WiFi network. The App also provides users the ability to set up contact lists as well as the ability to retain and retrieve a history of the calls they made and the calls they received.

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Links on the sprintip.com opening web page enable the user to obtain additional information about Sprint IP Relay service, including a link for users of Sprint's Android-powered phones to access to obtain information on the Sprint IP Relay Mobile App as well as to download the App to their phones. There is also a link for first time users (www.mysprintrelay.com) to obtain a 10-digit number as required by FCC rules.⁹ Moreover the opening web page informs the user that although he or she can use Sprint's IP Relay service for emergency calling, such "emergency calling may not function the same as traditional 911/E911 calling." And it tells the user that Sprint IP Relay service is only available in the United States and its territories and that international calls with either be blocked or terminated. A detailed confidential description on how non-emergency calls are made by and to a deaf or hard-of hearing individual is attached as Exhibit A [Redacted].

2. IP CTS

Sprint has been a provider of FCC-complaint IP CTS service nationwide since March, 2008. As is the case with its provision of the PSTN-based CTS service Sprint offers its IP CTS through CapTel Inc. a Wisconsin company and subsidiary of Ultratec Inc. the company that developed and implemented the computerized voice recognition innovation technology used in the provision of captioned telephone service. Sprint's IP CTS service allows a deaf or hard of hearing person to make or receive phone calls where a Communications Assistant (CA) can nearly simultaneously transcribe the speech of the non-CTS party to a telephone call into text

⁹ Users of Sprint's Mobile IP Relay must obtain a 10-digit number for using the device to make and receive Sprint IP Relay calls (and for 911/E911-purposes) so that the user can port the number if he/she wishes select another default mobile IP-Relay provider but still retain Sprint's wireless service.

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and then send that text to one or more devices that display the text.¹⁰ Sprint's IP CTS users are able to access the service through the following Ultratec manufactured devices or other devices with Internet access:

- **Sprint CapTel 800i devices:** Ultratec supplies a desk or wall-mounted phone with a tiltable 5" display, a phone jack, a Ethernet jack, and a variety of buttons and other connections that allow the CapTel 800i user to make and receive CTS calls. The Ethernet jack connects to the user's Internet connection. The phone jack connects to the user's phone service. When the user makes or receives a call, the Internet connection routes the other party's voice over the Internet to the CapTel call center(s). Upon reaching the CapTel center, the CA will transcribe the speech into text then transmit that text back to the CapTel 800i over the Internet.
- **Sprint WebCapTel** – A user with an Internet-enabled web browser goes to <http://www.sprintcaptel.com> and registers for Sprint WebCapTel service. Upon registration, which requires that the user supply his/her location information; that the user certify that he/she has hearing disability and that the user agree to the Terms and Conditions of Sprint WebCapTel service, the user will be able to log in and make and receive WebCapTel calls.

The user must have a phone that is capable of receiving incoming calls for the user to speak to and hear the voice of the other party. This requirement also enables the CA to hear and transcribe the conversation of the non-WebCapTel user. The phone connection routes the other party's voice to the CapTel call center(s). The CA will transcribe the speech into text then transmit that text over the Internet to the WebCapTel user's Internet enabled device with a web browser. The captions are sent over a secure HTTPS connection to the user for privacy and security.

- **Wireless CapTel by Sprint:** A user with a mobile device equipped with Android OS 2.2 or higher can download the Wireless CapTel by Sprint ("WCS") Application from the Android Market. The App enables the user to make and receive CTS calls. After downloading the App, the user must register for WCS providing generally the same information as required for registering to use Sprint IP Relay service. This includes obtaining a 10-digit number for receiving CapTel calls. After registration, as long as the

¹⁰ Unlike a TTY or IP Relay CA who types the words of the hearing person and transmits the message to the device being used by the deaf or hard-of-hearing individual, *e.g.*, a TTY machine, a computer, or a wireless device the CapTel CA repeats the words being spoken by the non-CapTel party to the telephone conversation and voice recognition software converts the words into text. Thus a CTS user who may be hard-of-hearing not only can hear the conversation but also read it. The conversation between the parties to the call proceeds as it would between hearing individuals and the CapTel CA is transparent to the call.

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user has the App running in memory on their Android device, he/she can make and receive Captel calls.

B. Description of How Sprint's Internet-based TRS Offerings Meet All Non-Waived Mandatory Minimum Standards (47 C.F.R. §64.606(a)(2)(ii)).

As set forth below, Sprint has designed its IP Relay and IP CTS service offering to meet or exceed the FCC's minimum mandatory standards required for these services as set forth in Section 64.604(a) of the FCC's Rules, 47 C.F.R. § 604(a).

1. IP Reply

a. Minimum standards applicable to CAs

Sprint employs CAs who it determines after the interview process, testing and training "have competent skills in typing, grammar, spelling, interpretation of typewritten ASL and familiarity with hearing and speech disability cultures, languages and etiquette" and possess clear and articulate voice communications."¹¹ 47 C.F.R. § 604(a)(1)(ii). Sprint employs a number of measures to evaluate CA competency skills in typing, grammar, spelling, interpretation of typewritten ASL, familiarity with hearing and speech- disability cultures, languages, etiquette and clarity of voice communications. CAs are continuously evaluated through individualized monthly surveys. Surveys include an evaluation of the CA's typing speed and accuracy in the performance of actual Relay calls. Supervisors provide survey feedback to CAs and arrange for additional training and practice as necessary to improve skills.

Applicants are required to pass a computer-based, valid and unbiased typing test. Applicants who fail to achieve the required typing speed are not considered for employment. During training, CAs are required to demonstrate that they are able to quickly and accurately

¹¹ Sprint also acts to ensure that the CAs of the sub-contractors with whom Sprint has entered into contracts to supplement its TRS offerings are competent in these areas.

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type TTY messages and to pass an oral-to-text typing test at 60 net words per minute (wpm) or better. 47 C.F.R. § 604(a)(1)(iii).

Prior to graduating from initial training, CAs are also required to pass a series of written and skills-demonstration tests and process live calls unassisted. If a CA trainee cannot pass all required examinations, the CA will not be used to process calls. After initial training, Sprint conducts ongoing testing throughout a CAs employment to ensure proficiency is maintained.

Sprint's training of its newly hired CAs is design to ensure that CAs develop a better understanding of the deaf and hard of hearing individuals with whom they will be dealing by providing information on the culture of those who are deaf or hard-of hearing. Such training includes instructions on the language and syntax used by those who are deaf or hard-of-hearing and seeks to ensure that CAs will accurately reflect the user's intent in conveying the typed message to the other party. It also includes instructions on etiquette, ethics and the fundamental difference between American Sign Language (ASL) and spoken English. A copy of the Deaf Culture training manual used by Sprint is attached as Exhibit B. [Redacted]

Because of the critical role ASL plays in the lives of the deaf and hard-of-hearing community, Sprint teaches its CAs to translate ASL text to conversational English. CAs are taught and evaluated on how to accurately reflect the user's intent, and the CA's role in the relay process. Sprint uses a workbook, created by a deaf instructor, to train CAs in the translation of ASL and incomplete English to conversational English. In addition, all role-plays are "written in ASL" and CAs must translate these role-plays from ASL to conversational English. This skill is evaluated and tested throughout training. Of course, the CAs' education in this regard does not end upon completion of the initial training course. Sprint continues to evaluate each CA's ability to translate ASL syntax/usage to English by conducting through individualized monthly surveys.

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Sprint's IP Relay CAs meet the other standards applicable to their interaction with the IP Relay users as well. Importantly, Sprint ensures as part of their training that CAs understand their obligation maintaining the confidentiality of any conversation and "are prohibited for disclosing the content of any relayed conversation regardless of content, and ... from keeping records of any relayed conversation beyond the duration of a call even if to do so would be inconsistent with state and local laws." 47 C.F.R. § 604(a)(2)(i). Indeed, any CA that violates the confidentiality of a conversation is subject to dismissal with cause. CAs are also taught that they cannot alter a relayed conversation and "if the conversation does not violate any federal, state or local law regarding the use of phone company facilities for illegal purposes" they "must relay all conversation verbatim unless the relay caller the relay user specifically requests summarization." 47 C.F.R. § 604(a)(2)(ii). If a CA has any questions in this regard, the CA will consult a supervisor.

Further Sprint ensures that CAs know that they are required to stay with the call for a minimum of ten minutes 47 C.F.R. § 604(a)(1)(v) and that they are required to :make best efforts to accommodate a [] user's requested CA gender with the call is initiated and if a transfer occurs, at the time the call is transferred to another CA." 47 C.F.R. § 604(a)(1)(vi). And CAs understand that they cannot refuse to make single or sequential calls or limit the length of a call. 47 C.F.R. § 604(a)(3)(i)

b. Types of calls

Sprint's IP Relay service has been designed and implement to handle the types of calls available of traditional TRS service that have not otherwise been waived.¹² Of particular

¹² Currently IP Relay Service providers do not have to provide the following types of calls: (1) one-line Voice Carry Over (VCO), VCO-to-TTY, and VCO-to-VCO; (2) one-line Hearing

Footnote continues on next page.

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importance, users of Sprint IP Relay services are able to be connected to emergency services as required by FCC Rules. *See* 47 C.F.R. § 604(a)(4). A detailed description and diagram of the call flow and procedures employed by Sprint for handling such calls is set forth in Exhibit C.

[Redacted] Sprint IP Relay does not offer Spanish/English translations. Nor does it offer French/English translations. Nonetheless, users can select English, Spanish or French for their text/voice conversations prior to calling the CA.¹³

c. Technical Standards

Sprint's IP Relay network uses the ACSII format and has been engineered to a P.01 standard. Sprint also strives to staff its Relay Centers to ensure that 85 percent of all IP Relay calls to its centers will be answered within 10 seconds, measured daily. *See* 47 C.F.R. § 604(b)(2)(ii). Nonetheless, Sprint does not claim that it always meets or exceeds the 85/10 standard. To the contrary, it has on rare occasions fallen somewhat short of its obligation in this regard. Such "failures" are invariably due to factors beyond its control including unanticipated volumes (*e.g.*, volumes due to an influx of fraudulent IP Relay calls to its centers despite Sprint's best efforts to prevent such calls; severe weather (*e.g.*, hurricanes, tornadoes, earthquakes etc. where the safety of Sprint personnel may be at risk); man-made disasters (*e.g.* wild fires); or when many CAs become sick at relatively the same time (*e.g.*, a flu epidemic) and Sprint is "hard pressed" to find replacements. In short, no provider can ensure that it will meet the speed

Carry Over (HCO), HCO-to-TTY, and HCO-to-HCO; (3) pay-per-call (900) calls; (4) Speech-to-Speech: and Operated Assisted Calls and Long Distance Calls. Moreover, they do not have to provide equal access to interexchange carriers; or call release functionality. *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, 26 FCC Rcd 9449 (2011).

¹³ Conversations in Spanish and French are available to Sprint IP Relay users and conversations in Spanish are available to Sprint IP Relay IM users.

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of answer requirement at all times. The most that any provider can do is to put forth its best efforts to do so. And given Sprint's ability to meet the speed of answer requirements nearly all of the time, it certainly meets that standard.

Sprint's IP Relay service is available 24 hours a day 7 days a week. Sprint meets the 24/7 standard even though IP Relay is not a mandatory service and therefore providers need not make their service available at all times. *See* 47 C.F.R. § 604(b)(4)(i).

Sprint's IP Relay service is redundant. *See* 47 C.F.R. § 604(b)(4)(ii). Not only has Sprint ensured that its relay centers are equipped with generators so that operations can continue in the wake of a power outage but more importantly, Sprint had built a diverse IP Relay network such that if one center is "down" due to power or connectivity issues, Sprint is able to send the traffic to another center.

d. Ten-digit numbering

Sprint meets the requirements of 47 CFR § 64.611 for registering and assigning ten-digit telephone numbers based on the North American Numbering Plan to IP Relay Users who have selected Sprint as their default IP Relay default carrier. *See* www.mysprintrelay.com for detail on how Sprint's IP Relay register for and are assigned ten-digit numbers and Exhibit D [Redacted] for a detailed explanation of Sprint's procedures for verifying the information provided.¹⁴

2. IP CTS

a. Minimum standards applicable to CAs

Because IP CTS does not involve typed-text to voice and voice to typed-text communications, most of the standards imposed on CAs providing IP Relay Service are not

¹⁴ With the advent of ten-digit numbering for IP Relay service, Sprint is able to provide Caller ID if available from the called party's LEC.

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applicable. Nonetheless, given the fact that Utratec, CapTel's parent, has for over three decades been developing technological solutions that help ensure convenient and reliable access to communications for those individuals with hearing loss and given the fact that several of Utratec's employees, including members of Utratec's executive management team, are deaf or hard of hearing or have family members who are deaf or hard-of-hearing, there can be no doubt that CapTel ensures that its CAs have a deep understanding of deaf culture. Moreover, CapTel's CAs are fully aware of their obligation to maintain the confidentiality of the parties participating on the call and that they are not to disclose the contents of any relayed conversation regardless of content.

b. Operational and Technical Minimum Standard

Although several of the operational and technical standards set forth in the rules that providers of other forms of TRS relay services must meet are simply not applicable to the provision of IP CTS, Sprint's provision of IP CTS meet the following minimum operational and technical standards as set forth in the Rules:

- Sprint ensures that its network carrying IP CTS calls is designed network to a P.01 standard.
- Sprint ensures that the CapTel has staffed its centers to meet the 85/10 standard, although as explained above there may occasions, albeit infrequent occasions, that due to circumstance beyond CapTel's control the 85/10 standard cannot be met.
- Users of Sprint IP CTS services are able to be connected to emergency services as required by FCC Rules. *See* 47 C.F.R. § 604(a)(4). A description of the Sprint's processes for handling emergency calls by IP CTS users is set forth in Exhibit C [Redacted]
- Sprint IP CTS Service is available 24 hours a day, 7 days a week, 365 days a year. Sprint meets the 24/7 standard even though IP CTS is not a mandatory service and therefore providers need not make their service available at all times.
- Caller ID is available with Sprint's IP CTS, if the user's LEC supports it

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- Sprint provides users with the ability to use speed dialing from their IP CTS devices.
- Sprint provides Spanish-to-Spanish captioning 7 days a week, from 7 AM to 11 PM.
- Sprint provides the ability for IP CTS users to join three-way calls, and to initiate three-way calls when using CapTel 800i and Sprint WebCapTel.
- Sprint's IP CTS service is redundant. See 47 C.F.R. § 604(a)(4)(ii). Currently, CapTel operates two call centers located in Madison Wisconsin and Milwaukee Wisconsin. Both CapTel call centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network services and LAN gear. Thus most equipment failures can be corrected without the call center losing service completely. CapTel also operates two data centers co-located in telecom communications centers or "bunkers" that have redundant power, and switching equipment cooling. Moreover Sprint plans to begin operating its own CTS call centers around the country in the near future so as to enhance the redundancy and diversity of its IP CTS (and PSTN-based CTS) offerings.
- Because "IP CTS raises distinct technical and regulatory issues" the FCC has deferred requiring providers of IP CTS to register their users for purposes of assigning 10-digit numbers. See *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers* 23 FCC Red 11591, 11592 n.5 (2008). Nevertheless, users of Sprint's recently offered WCS are required to register and receive a 10-digit number separate from that of their mobile device so as to allow for porting.¹⁵

C. A List of Individuals or Entities That Hold At Least A 10 Percent Equity Interest in the Applicant; a Description of the Applicant's Organizational Structure and the Names of the Applicant's Executives, Officers, Members of its Board of Directors, General Partners (in the Case of a Partnership) and Managing Members (in the Case of Limited Liability Company). (47 C.F.R. §64.606(a)(2)(ii)(B)).

As stated, Sprint is a wholly owned subsidiary of Sprint Nextel Corporation which is a publicly traded corporation. No entity holds 10 percent or more of Sprint Nextel Corporation. A

¹⁵ Although the registration process is designed, in part, to enable the location information to be sent to the PSAP as well as provide the PSAP with a call-back number in the event that the caller and the PSAP are disconnected. WCS users can contact PSAPs directly by dialing 911. In such cases, ANE/ALI information is transmitted to the PSAP as would be the case when a hearing person dials 911 from his/her mobile device.

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diagram of the structure of Sprint Nextel and how Sprint fits within the Sprint Nextel Corporate structure is attached as Exhibit E.¹⁶ [Redacted] A list of the Sprint's Executive Team is attached as Exhibit F. [Redacted] A list of Sprint Nextel's Senior Executives is available at <http://newsroom.sprint.com/executive-team>. A list of the current members of Sprint Nextel's Board of Directors is available at <http://www.sprint.com/governance/board>. Sprint Nextel's Corporate Governance and Ethics Policies can is available at <http://www.sprint.com/governance>.

D. A List of the Number of Applicant's Full-Time and Part-Time Employees Involved in TRS Operations, Including and Divided by the Following Positions: Executives and Officers; Video Phone Installers (in the Case of VRS), Communications Assistants, and Persons Involved in Marketing and Sponsorship Activities (47 C.F.R. §64.606(a)(2)(ii)(C)).

Sprint is a common carrier provided a multitude of telecommunications services. It also provides a host of information services and is a Tier I Internet backbone provider. Sprint's provision of TRS services – and, as stated, Sprint is one of the relatively few TRS providers that offer the full panoply of TRS services, including traditional TRS, STS, PSTN-based CTS, IP Relay, IP CTS and for the next 30 days VRS – constitutes but a small part of Sprint's offerings to the public. Thus Sprint does not have any Executive or Officer whose only responsibility is to oversee Sprint's TRS operations. That said, Sprint does have one executive whose portfolio includes the managing Sprint's TRS marketing group.¹⁷ That group consists of a lead team (_ members); a sales team (_ members); a primary marketing team (_ members); a team of regional program managers (_ members) and a team involved in product development (_ members). All

¹⁶ As shown on page 6 of the Exhibit F [Redacted], Sprint's partners are US Telecom Inc., (the general partner with ___ ownership share); UCOM, Inc. (a limited partner with a ___ share of Sprint) and Utelcom, Inc. (a limited partner with a ___ share.) UCOM and the two general partners are wholly-owned subsidiaries of Sprint Nextel Corporation.

¹⁷ That executive – Bill P. White – has signed the declaration required by (47 C.F.R. §64.606(a)(2)(iv)). See Appendix A attached.

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of these individuals deal with most if not all of TRS service officers and none are exclusively assigned to Sprint Internet-based TRS services. As explained below, Sprint does not have any sponsorship arrangements.

There are ___ employees engaged in Sprint's call center operations, consisting of ___ full time CAs; ___ part time CAs, ___ call center managers and ___ members of the team dealing with operational issues. Only a small portion of their time is devoted to handling Internet Relay calls and other operational issues related to the service that may arise. Sprint IP CTS's offering is operated by Ultratec.

- E. Copies of Employment Agreements for all of the Provider's Employees Directly Involved in TRS Operations, Executives, and Communications Assistants, and a List of Names of Employees Directly Involved in TRS Operations, Need not be Submitted with the Application, But Must be Retained by the Applicant for Five Years from the Date of Application, and Submitted to the Commission Upon Request (47 C.F.R. §64.606(a)(2)(ii)(D)).**

Sprint employees "directly involved in Sprint TRS operations do not sign employee agreements.

- F. For all applicants, a list of all sponsorship arrangements relating to Internet-based TRS, including any associated written agreements (47 C.F.R. §64.606(a)(2)(ii)(E)).**

As stated, Sprint does not enter into "sponsorship agreements." Sprint does, however, make contributions to various organizations to support their tradeshow, receptions, annual dinners in honor of a leader in the deaf/hard of hearing community, etc. These contributions may take the form of purchasing a table at a dinner or placing an ad in the brochure produced by the organization for the occasion. Such ads have in the past promoted Sprint's TRS products generally and are not limited to its Internet-based offerings. Most if not all of the ads Sprint has

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placed this year have focused on Sprint's Internet-based CTS and WCS offerings. Sprint does have an informal understanding with _____ to contribute to its tradeshow.¹⁸

G. A Description of the Provider's Complaint Procedures (47 C.F.R. §64.606(a)(2)(iii)).

A description of Sprint's complaint procedures for its Internet TRS services for which it seeks certification are set forth in Exhibit G attached.

H. A Statement that the Provider Will File Annual Compliance Reports Demonstrating Continued Compliance with these Rules. (47 C.F.R. §64.606(a)(2)(iv)).

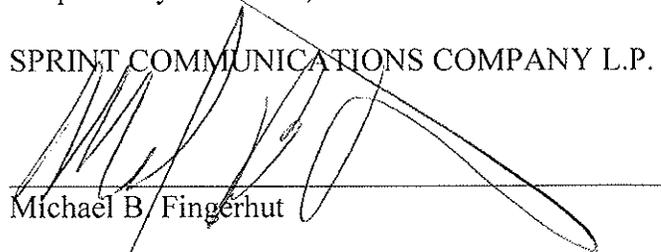
Sprint will "file an annual compliance report demonstrating continued compliance with the Commission's Certification Rules set forth in Section 64.606(a)(2)(iv).

I. Statement of Senior Executive of Sprint (47 C.F.R. §64.606(a)(2)(iv)).

See Appendix A attached.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.



Michael B. Fingerhut

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Its Attorney

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¹⁸ If the FCC believes it necessary Sprint will provide a list of the organizations to which it has made such contribution during 2011.

EXHIBIT A
Redacted

EXHIBIT B
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EXHIBIT C
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EXHIBIT D
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EXHIBIT E
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EXHIBIT F
Redacted

EXHIBIT G

Customer Complaint/Commendation Process

Sprint provides Customer Service that is available 24 hours-a-day, 7-days-a-week, 365 days-a year. The toll-free Customer Service number is available in all TRS communication modes including TTY, VCO, HCO, STS Voice, IP Relay PSTN-based CTS, IP CTS and for the next thirty days VRS. In addition, Sprint offers fax, email and dedicated Spanish options as well. In addition to Customer Service, Sprint has Operations Supervisors or Operations Administrators available 24 hours a day, 7 days a week who are trained to provide on-line assistance to customers with concerns, questions, complaints or commendations. This process enables the supervisors to provide immediate coaching, training, or feedback to CAs. Customer complaint issues are resolved within 3 days whenever possible. Sprint also provides additional support for mobile applications so users can receive technical assistance with mobile device troubleshooting.

All supervisors, customer service representatives, Contract Representatives, and other personnel who accept complaints or commendations will enter the complaint/commendation information into the Customer Contact Database. The database includes all FCC mandated information:

- ◆ Date complaint was filed
- ◆ Explanation of complaint
- ◆ Explanation of resolution
- ◆ Date of resolution
- ◆ Customer contact information (name, address, preferred contact method(s)), if provided by the customer.

If the complaint concerns a specific technical issue, a trouble ticket is submitted and the ticket number is documented along with the complaint information in the Customer Contact on-line Database. The ticket is then investigated and resolved by the site technician. The Account Manager is responsible for tracking all technical complaints and follow-up with customers on resolutions.

Customer Complaint Tracking

1. Customer complaint/commendation information is entered into the TRS Customer Contact form with its own tracking number.
2. Person taking complaint information determines who will be responsible for resolving complaint or processing the commendation. Then enters the appropriate information into the Customer Contact on-line Database.
3. Copy of complaint is e-mailed to the person responsible for resolution of complaint. The on-line system tracks the progress of the open ticket.
4. Person responsible for resolution documents all information pertaining to complaint resolution into the Customer Contact on-line database.
5. Complaint gets resolved and communicated to customer. Sprint will provide follow up in the customer's preferred contact method including mail within three (3) business days of resolution or within 10 business days from the date the issue was reported.
6. All updated information is entered into the Customer Contact on-line database.
7. Resolved complaints and commendations are saved in Sprint's Customer Contact on-line database. The system tracks complaints and commendations in data reporting logs.
8. The Customer Contact on-line database automatically generates a Monthly Log Report.
9. Account managers perform any follow-ups needed to ensure that all information is available and accurate.
10. Account managers deliver copies of all TRS Customer contacts a monthly tally report to contract administrators.

APPENDIX A

APPENDIX A

DECLARATION OF BILL P. WHITE

I swear, under penalty of perjury, that I am Bill P. White Vice President (Federal); that I am an officer of Sprint Communications Company L.P. ("Sprint"), an applicant before the Federal Communications Commission for authority to continue to provide its Internet-based TRS services and receive compensation from the Interstate TRS Fund; that I have examined the Application of Sprint; and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in the Application are true, accurate, and complete.



Bill P. White

Date 12/5/11