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VIA ECFS

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

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

Dear Ms. Dortch:

On September 21, 2012, Pamela Y. Holmes, Director, Consumer and Regulatory Affairs for Ultratec, Inc. (Ultratec) filed document entitled IP Captioned Telephone Best Practices Policy ("Best Practices Policy Document") in the above reference docket. Sprint Communications Company LP ("Sprint"), a provider of IP Captel service ("IP-Captel")¹, strongly supports the Ultratec's recommendations and to the extent that the best practices set forth in the document apply to Sprint's provision of IP Captel services voluntarily agrees to follow them.

As Ultratec explains in the Best Practices Policy Document (at 1), IP-Captel "is completely different than other forms of [IP-enabled] relay" and has not been and is unlikely to be susceptible to the "misuse, fraud or criminal activity" that have plagued other IP-enabled relay services. This is so because of "the nature of an [IP-Captel] call" as well as the security measures that the IP-Captel service providers have implemented "at every stage, including marketing and outreach, within the consumer premises equipment, and throughout call center operations and training, to ensure that the IP Captel service, and the interstate TRS funds that support it, are used appropriately in full accordance with FCC regulations." *Id.*

The security measures for IP-Captel that Sprint has implemented and will continue to abide by as "best practices" are explained in the Best Practices Policy Document and Sprint need not repeat them here. Sprint would only point out that its decision to employ the IP-Captel security measures as set forth in Best Practices Policy Document was an "easy call" for Sprint. Implementing measures to minimize the misuse of IP-enabled relay services to ensure the continued viability of such services and to protect the integrity of the TRS Fund is engrained in

¹ Sprint offers IP-Captel service which is a form of IP-based Captioned Telephone Service (IP-CTS) pursuant to an agreement with Captel, Inc. ("CTI"), a wholly-owned subsidiary of Ultratec. Hamilton Relay and AT&T Services, Inc. also provide IP-Captel service in association with CTI. See Best Practices Policy Document at footnote 1. Hamilton also supports the best practices policy. See Comments of Hamilton Relay, Inc. in Support of IP CTS "Best Practices" Policy filed November 1, 2012 in this proceeding.

Sprint's DNA. Indeed, Sprint's obligations as a common carrier, as a holder of wireline and wireless licenses and as one of the few providers of IP-enabled relay services that must pay into the TRS Fund, require that Sprint do everything that it can to minimize, if not eliminate, the use of IP-enabled services for fraudulent and other criminal activities.

Please contact me if you have any questions or need more information.

Respectfully submitted,



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