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January 14, 2013

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 January 11, 2013, I spoke by telephone with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn and with Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel about the emergency order on Internet Protocol Captioned Telephone Service ("IP CTS") now on circulation before the Commission. The purpose of my call was to state that Sprint supports the position set forth by Hamilton Relay, Inc. ("Hamilton") in its *ex parte* filing dated January 10, 2013 in this docket regarding the temporary measures the FCC could take to guard against the apparent rise in the types of problems that have plagued the provision of VRS service. I further stated that any permanent regulatory framework for IP CTS to help ensure the sustainability of what could prove to be a vital service in meeting the communications needs of especially aging Americans with diminished hearing should be established in a rulemaking proceeding where full record could be developed and the issues examined in depth.

In particular, like Hamilton, Sprint "opposes any adoption of an across-the-board eligibility standard tied to dB loss." Rather, Sprint believes that a certification from an independent third party professional audiologist as to dB loss only be required from end users "who accept[] a free or *de minimis* cost IP CTS telephone" in order to be able to make and receive IP CTS calls. End users who purchase an IP CTS phone for more than a *de minimis* price would be eligible to use IP CTS without an audiologist's certification. Sprint's (and Hamilton's) recommendation here is based on the fundamental economic principle that price does a relatively good job of regulating marketplace behavior.

I also stated that Sprint is willing to implement a "Captions-off" feature at least on a going-forward basis even though the States where Sprint provides PSTN-based Captel service do not believe such a feature is necessary. And I endorsed a rule that would ban referral fees, kickbacks and the other "marketing" practices that have been used by VRS providers for years. I pointed out that Sprint often brought such VRS schemes to the staff's attention with the

Marlene H. Dortch
January 14, 2013
Page 2

expectation that the Commission would act to curtail, if not eliminate, their use. More recently, Sprint informed the staff of a VRS-type kickback scheme being employed by IP CTS provider.

Sincerely,

A handwritten signature in black ink, consisting of several loops and flourishes, positioned below the word "Sincerely,".

Angela Kronenberg (by email)
Priscilla Argeris (by email)