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**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

Re: ***Ex Parte Presentation***  
**CG Docket Nos. 03-123, 10-51**

On June 19, 2013, representatives of Sprint Nextel Corporation (“Sprint”) met with Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau (“Bureau”), Robert Aldrich, Consumer and Governmental Affairs Bureau, Elaine Gardner, Disability Rights Office, David Schmidt, Office of Managing Director, and Andrew Multz, Wireline Competition Bureau. In attendance for Sprint were Mike Ellis, National Director, Sprint Relay, Ray Rothermel, Counsel, Legal/Government Affairs, Scott Freiermuth, Counsel, Federal Government Affairs, and Angie Officer, Senior Program Manager, Sprint Federal Relay.

During the meeting, Sprint discussed its perspective on the proposal from Rolka Loube Saltzer Associates (“RLSA”) for the Interstate Telecommunications Relay Services Fund (“TRS Fund”) including proposed relay service rates, demand projections, overall fund size and the contribution factor. Consistent with its written comments, Sprint urged the Bureau to stay the rate for Internet Protocol Relay (“IP Relay”) at \$1.2855 and to consider adopting a tiered-pricing structure that takes into account the size (as measured by volume of minutes) and quality of service of the remaining IP Relay providers. With respect to demand projections, Sprint expressed its concern that the RLSA demand projection for IP Caption Telephone Services (“IP CTS”) was overstated and that the Bureau should utilize the industry projections which should more closely approximate actual demand. Sprint also urged the Bureau to carefully consider the proposed \$120M reserve fund, and that Sprint believes other measures could be utilized to adapt the Fund to demand including adjusting the contribution factor more often than annually.

Sprint also touched on its concerns with recent, and often times retroactive, requests for new CDR and other audit-type information from RLSA. Sprint is willing to provide such substantive information to assist RLSA and the Bureau in evaluating requests for compensation. Indeed, such information can also assist RLSA and the Bureau in differentiating providers based upon quality of service. However, Sprint believes due process requires advance notice and an appropriate amount of time to react

because such requests often require system/process changes and IT development. To that end, Sprint suggested that RLSA develop a structured process based upon advance notice and ample time to clarify and implement any such new requests for changes to CDRs or for new information.

Finally, Sprint discussed the concept of whether intrastate IP CTS minutes could be transitioned to and compensated by state TRS funds. Admittedly, however, this concept will require further study as there are a variety of factors that must be taken into account in order to properly determine the jurisdictional nature (interstate vs. intrastate) of IP CTS generated from a variety of platforms (*e.g.*, wireless, wireline, or web-based).

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let us know if you have any questions regarding this filing.

Respectfully Submitted,



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