



Scott R. Freiermuth
Counsel – Government Affairs
scott.r.freiermuth@sprint.com

Sprint Corporation
6450 Sprint Parkway
Overland Park, KS 66251
(913) 315-8521

August 5, 2013

Via Electronic Submission

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

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

Sprint Corporation (“Sprint”) appreciates the Federal Communications Commission’s (“Commission”) decision on Friday, August 2nd to grant a short-term waiver for August 1st thru August 12th and to give full consideration to Sprint’s waiver as originally requested from July 7th thru November 7th. To that end, Sprint below provides the Commission with responses to an email from the David Schmidt from the Office of Managing Directory (“OMD”) containing a list of fourteen questions in relation to Sprint’s Petition for Limited Temporary Waiver in which it seeks relief from the Commission’s speed-of-answer requirements governing the provision of IP Relay.

Sprint also notes that its state contracts for Relay services contain a provision that provides Sprint with a 16-week timeline for expansion (roughly the same four month time period that Sprint used in its Petition for Limited Temporary Waiver). Sprint’s standard “Expansion Plans” language for these state Relay contracts is: “Once capacity thresholds are breached and the determination is made that additional capacity is needed in the Sprint Relay network, approximately 16 weeks is needed to provide additional capacity in all areas.” Sprint believes this standard contract language is an important point because it is germane to the question of how long the waiver should be. In short, the language and the acceptance of this language by the states evinces that a reasonable, agreeable period of time for expansion of Relay services is 16 weeks.

- 1) At yesterday’s meeting, you indicated that Sprint’s CAs or call centers handle multiple types of TRS calls, in addition to IP relay calls. If so, what percentage does IP relay constitute of the volume of calls handled?**

As discussed at the face-to-face meeting on July 24th, Sprint informed the Consumer and Governmental Affairs Bureau (“CGB”) and the OMD that Sprint’s IP Relay CAs are not dedicated to serving IP Relay customers only. Sprint’s CAs also handle traditional TRS traffic (both federal and state). The percentage of IP Relay traffic handled by its CAs fluctuates and has trended downward over the last year due to a variety of factors. As discussed, however, Sprint expects an uptick in the amount of IP Relay traffic as a result

of Sorenson's decision to exit the IP Relay business. Given the sudden and unexpected departure of Sorenson, Sprint will not have a good grasp on the impact of its traffic volumes for some number of weeks as former Sorenson customers transition to new service providers. Finally, the precise percentage is confidential and competitively sensitive information and not germane to the question as to whether the speed-of-answer requirements should be suspended while Sprint ramps up to handle more IP Relay traffic. In other words, regardless of what percentage of IP Relay traffic is handled by Sprint's CAs, there is no debate that Sprint will get more of this traffic – it is only a question of how much and how long that transition takes.

2) How many IP Relay CAs does Sprint have on staff, by month, from June 2012 through present? How many full time, part time?

Sprint does not differentiate IP Relay CAs from those who handle state traffic as all CAs can handle both traditional TRS and IP Relay calls. Sprint utilizes both full-time and part-time CAs and staffs its call centers as efficiently as possible. Staff levels are designed to meet both state and federal quality of service levels including the federal speed-of-answer requirements for IP Relay (*i.e.*, 85/10 rule). Thus, while Sprint staffs efficiently, it must build into its staffing levels excess capacity to ensure that it can handle spikes in call volumes and “busy-hour” call traffic. Sprint fully expects this excess capacity to dissipate as a result of an influx of former Sorenson customers. In order to serve these customers, Sprint is in the process of hiring more CAs to handle this unknown amount of traffic and will adjust its staff levels over time once it has a better grasp on the volume of IP Relay traffic. Sprint has every incentive to staff as efficiently as possible as staffing is a major component of Sprint's costs in providing IP Relay services.

Finally, the precise number of CAs that Sprint had for the time period requested is confidential and competitively sensitive information. And Sprint does not believe such information is germane to the question as to whether the speed-of-answer requirements should be suspended while Sprint ramps up to handle more IP Relay traffic. Past staffing levels were under a different set of circumstances. Sprint now faces an unknown amount of incoming IP Relay traffic and its current staff will need to be increased to handle that traffic and to build in excess capacity for the reasons described above.

3) What is Sprint's turnover of CAs, by month, during the same period?

Such staffing information is confidential, competitively-sensitive information. There is nothing notable or unusual about the turnover and attrition of CAs. Moreover, such attrition is often driven by business decisions by Sprint to ensure efficient staffing levels and a high level of service quality. Such business decisions have included shutting down some call centers and reducing headcount to reflect declining traffic volume.

4) What is the average call volume (in both compensable minutes and session minutes) handled by each CA (per hour, and per shift)? What is the average volume during the peak hour of the day?

Call volume information is confidential, competitively-sensitive information. IP Relay calls consist of set-up time, conversation time, and wrap-up time. Set-up and wrap-up time are part of the overall session minutes, however, only the conversation minutes are compensable. There is a ratio of session minutes to compensable minutes that Sprint strives to achieve. This ratio is monitored to ensure efficiency in providing Relay services.

- 5) What is Sprint's total call volume per month (in both compensable minutes and session minutes) from June 2012 through present?**

Call volume information is confidential, competitively-sensitive information. Further, the Federal Communications Commission has ready access to such information via Rolka, Loube, Saltzer Associates (RLSA).

- 6) What is Sprint's estimate of its excess capacity – i.e., how many additional minutes/month does Sprint believe it can handle with current staff?**

As described above, Sprint must carry a certain amount of excess capacity to ensure that it can handle call volume spikes and “busy hour” call levels while meeting state and federal quality of service levels including the federal speed-of-answer requirements for IP Relay (*i.e.*, 85/10 rule). Prior to Sorenson's decision to exit the IP Relay business, Sprint was able to manage its staff levels to ensure an adequate amount of excess capacity. Now, however, Sprint is uncertain of the call volumes but Sprint is certain it must add additional staff to maintain an adequate buffer of excess capacity to ensure it meets quality of service measurements. .

- 7) At yesterday's meeting, you indicated that Sprint has begun the process of hiring additional staff to handle the influx of ex-Sorenson customers. When did this begin, how many will Sprint initially hire, and how long will it take to complete hiring and training (i.e., how long until new hires begin work)?**

Sprint has indeed begun the process hiring more CAs in anticipation of additional IP Relay minutes coming from former Sorenson, AT&T, and Hamilton customers. The decision to hire more staff has been a particularly difficult business decision in light of the reduction of the IP Relay compensation rate and outstanding payments from RLSA for IP Relay services rendered. The number of CAs that Sprint has targeted is confidential, competitively-sensitive information. As of this writing, the prospects have been screened and have begun training. Sprint utilizes a two-week training course.

- 8) It is our understanding that some IP Relay users register with several IP Relay providers as a default provider. What is Sprint's estimate of the total number of Sorenson's registered users who are also registered with Sprint?**

Sprint does not have an estimate of the total number of Sorenson registered users who are also registered with Sprint. We believe that Neustar could possibly provide this competitive data.

9) Has Sprint contacted Sorenson to discuss appropriate steps to mitigate any transitional issues? What if any steps have been agreed to?

Yes, Sprint contacted Sorenson to discuss to discuss appropriate steps to mitigate transitional issues. No steps have been agreed to at this point in time.

10) How many Sorenson subscribers have ported their numbers to Sprint in the last 30 days?

We have zero Sorenson subscribers who have ported their numbers to Sprint in the last 30 days. Indeed, Sorenson has yet to release pending port requests and believes they are holding these numbers until July 31st. Sprint contacted NeuStar in an effort to obtain a release of these numbers and Sprint believes it now has the ability to pull these pending reports through the numbering systems.

11) Can Sprint make use of Sorenson's (or AT&T's or Hamilton's) presumably now-unemployed IP Relay CAs/Call Centers?

Certainly, former CAs with Sorenson, AT&T, or Hamilton may apply at any of Sprint or our vendor's center locations. Prospective employees would, however, have to meet our employment criteria and go through Sprint-specific training. As with any employment decision, previous experience in this field would be viewed favorably, but it would not necessarily be the determinative factor in an employment decision.

Furthermore, as discussed in its Petition for Reconsideration filed on July 31st, Sprint cannot simply take over Sorenson's Communications Assistants (CAs) or call centers (and the same applies for AT&T and Hamilton) – nor would there be any cost savings or efficiencies gained by hiring former Sorenson CAs. To begin, Sprint and Sorenson's call centers are likely not geographically co-located. Sprint also utilizes different IP Relay platforms, equipment and technologies. Most notably, Sprint offers web-based services, whereas, Sorenson uses instant message (IM)-based services. Sprint, therefore, would need to train these former Sorenson CAs just as Sprint would a new hire – thus, there would be no cost savings if Sprint were to hire former Sorenson CAs.

12) How long does it ordinarily take for Sprint to register and verify a new user?

There is a tremendous variance in the amount of time it takes to register and verify a new user as Sprint is largely dependent on the applicant to provide all necessary information. Assuming, however, that all necessary documents and information (*e.g.*, government issued identification, utility bill, *etc.*) is provided at the outset of the application process, the registration process may take up to 3 days.

13) What does Sprint plan to do to make sure that all Sorenson ex-customers who register with Sprint are legitimate users?

All new users to Sprint will follow the same registration process. They must go on line to register at www.mysprintrelay.com.

a. Will Sprint re-verify them through its own process, or will Sprint accept them as already verified by Sorenson (or any other provider)?

Sprint will not accept an ex-Sorenson customers as “already verified.” Sprint will “re-verify” them through its own process. Any new customer to Sprint – whether they have never used IP Relay services or are former customers of one of Sprint’s competitors (be it Purple or Sorenson/Hamilton/ATT) – must follow the new user registration process as noted above.

b. Does this process go beyond simply dipping into the TRS numbering directory to see if the TDN is valid?

Sprint uses third-party vendor to verify address and date of birth. Sprint goes a step further and requests driver’s license or government issued identification card and/or utility bill. Sprint does not dip into the TRS numbering directory to see if the TDN is valid.

14) Is Sprint able to identify new registrants who are deaf-blind?

Sprint has no way to determine if an IP Relay user is deaf-blind unless the user self-identifies as deaf-blind. Sprint may then apply a branding type which can be applied if he/she calls into Sprint Relay via a TFN that looks at the ANI branding. Otherwise, the text is sent as fast as it comes in, unless the user, on a per call basis, tells the agent to slow down transmission.

Sprint is willing to have a more in-depth verbal discussion with the CGB and OMD to answer any remaining questions. However, due to travel schedules of key personnel, Sprint is unable to have such a discussion until the week of August 12th.

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

Respectfully Submitted,

/s/ Scott R. Freiermuth

Scott R. Freiermuth
6450 Sprint Parkway
Overland Park, KS 66251
Tel: 913.315.8521
E-mail: scott.r.freiermuth@sprint.com
Counsel for Sprint Corporation

cc: Karen Peltz-Strauss, (via e-mail)
David Schmidt, (via e-mail)
Greg Hlibok (via e-mail)
Bob Aldrich, (via e-mail)
Diane Mason (via e-mail)
Eliot Greenwald (via e-mail)