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April 4, 2014

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: **EX PARTE PRESENTATION**

In the Matters of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; E911 Requirements for IP-Enabled Service Providers, WC Docket 05-196; and Internet-Based Telecommunications Relay, WC Docket 10-191

Dear Ms. Dortch:

On April 2, 2014, Mike Ellis and Scott Freiermuth from Sprint Corporation (Sprint) met with Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau (CGB), Greg Hlibok, Chief, Disability Rights Office (DRO), Eliot Greenwald, CGB/DRO, and Robert Aldrich, CGB/DRO.

The purpose of the meeting was to discuss three items in relation to Sprint Relay services. First, Sprint reviewed its recent written *ex parte* filing concerning unregistered Internet Protocol Relay (“IP Relay”) users make fraudulent or “spoofed” calls to 9-1-1 in an attempt to trick Public Safety Answering Points (PSAPs) into dispatching emergency services based on false reports of an emergency situation (*i.e.*, “swatting”). Due to the risk of life and safety to first responders and the public, Sprint urged the Commission to provide immediate relief on this matter – namely, waiving the requirement to handle calls to 911 from unregistered IP Relay users.

Second, Sprint discussed its Petition for Limited Waiver regarding the iTRS Numbering Database. Consistent with its Petition, Sprint outlined the need for relief of 47 CFR 64.613(a)(4) in order to permit Sprint to upload federal relay ten-digit and “front door” toll-free numbers into the Neustar-managed iTRS database. Sprint explained the benefits that this waiver would have including enhancing functional equivalency and decreasing the financial strain on the Interstate TRS Fund by permitting calls to be delivered directly to the federal government under Sprint’s federal relay contract.

Third and finally, Sprint sought an update from the Commission on Sprint’s Petition for Reconsideration of the July 1, 2013 Order in which the Commission adopted per-minute compensation rates to be paid from the Interstate TRS Fund. Sprint urged the Commission to

reconsider the IP Relay rate in light of drastic changes in the marketplace including the decisions of three IP Relay providers to discontinue service. Sprint also urged the Commission to restore the IP Relay rate to the previous \$1.28 level while it undertakes a review of the rate and rate structure. Sprint advised the Commission that it cannot continue providing service at the present \$1.01 rate which will soon decrease to \$0.95 per minute – as these rates are below Sprint’s costs to provide service at present service quality levels.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission’s rules. In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Scott R. Freiermuth

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