

ORIGINAL

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July 30, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
TW-A325
445 12th St., SW
Washington, D.C. 20554RECEIVED
JUL 30 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYRe: EX PARTE PRESENTATION
CC Docket No. 92-105

Dear Ms. Salas:

Sprint hereby respectfully submits its comments on the implementation of 711 access to TRS as requested in the Public Notice released June 16, 1999 (DA 99-1170).

Sprint strongly supports the implementation of 711 access to TRS. The benefits of using this abbreviated dialing code are clear: it is easy to remember (as opposed to a toll free access number, which varies by TRS center), simple to understand and use, and can be used across the country, no matter who the relay provider happens to be in any given state. The attractiveness of this abbreviated dialing code to the calling public can be seen in Sprint's experience as the TRS provider in Maryland. 711 access was introduced in Maryland in February 1999; by June 1999, approximately 44% of total Maryland relay service calls were placed by dialing 711. Furthermore, Sprint believes that implementation of 711 access will stimulate TRS usage by both hearing and speech impaired customers, and non-impaired consumers who wish to communicate with impaired individuals. Again, our experience in Maryland suggests that 711 access has contributed to an increase in voice-initiated traffic: voice-initiated calls increased 7 percent over a recent 3 month period, significantly higher than historical overall TRS growth rates.

Sprint applauds the Commission's decision to allocate the 711 code to TRS access, and believes that the Commission should take the lead in establishing broad guidelines to govern nationwide implementation of this code, for example, by setting a date by which 711 access must be implemented. However, the Commission should allow the states to decide specific implementation issues relating to 711 roll-out. States need some flexibility to accommodate differing circumstances in their region, such as the number of carriers and end-user requirements. The differing (but equally valid) approaches in Maryland and New York are a case in point.

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Ms. Salas
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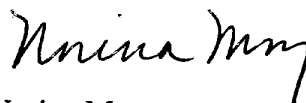
Maryland was able to implement 711 access to TRS fairly quickly, in part because of the relatively small number of local exchange carriers and wireless service providers involved. It is the local service provider which translates the 711 code to the relay provider's toll free number. Therefore, it was relatively easier to arrange for the deployment of the necessary intelligence in each LEC's central office switch, and to coordinate the transfer of calls between the LEC and the TRS provider, in Maryland than in New York, which has numerous providers of local telephone service.

Maryland and New York have also taken somewhat different approaches to how 711 TRS calls are initially answered. Maryland has decided to have 711 relay calls answered by a relay operator, keeping the 711 call processing as closely aligned with current relay procedures as possible. New York, on the other hand, appears to be leaning towards having 711 relay calls answered by a voice response unit (VRU), in order to weed out misdialed or misrouted calls before the call is handled by a relay operator. By passing only TRS calls to the relay operators, speed of answer times are not negatively impacted, and call volumes are not artificially inflated, by non-TRS calls. Decisions about the initial answer sequence must take into account service level requirements, so that relay providers are not penalized in those jurisdictions which elect to route 711 calls to VRUs rather than to a relay operator in the first instance.

Sprint looks forward to participating in the Commission's September 8, 1999 forum on 711 access to TRS. Should you have any questions regarding our comments, please feel free to contact me at (202) 828-7444, or Paul Ludwick at (913) 661-8927.

An original and one copy of this letter are being filed.

Sincerely,



Norina Moy
Director, Federal Regulatory
Policy and Coordination

cc: Anna Gomez
Helene Schrier Nankin
David Ward