

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	EXPEDITED ACTION REQUESTED
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals with)	
Hearing and Speech Disabilities)	
)	
Structure and Practices of the Video Relay)	CG Docket No. 10-51
Service Program)	

REQUEST FOR INTERIM WAIVERS

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REDACTED – FOR PUBLIC INSPECTION

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)	

REQUEST FOR INTERIM WAIVERS

Pursuant to sections 1.1, 1.3, and 1.41 of the Federal Communications Commission’s (“FCC’s” or “Commission’s”) rules,¹ Sprint Corporation (“Sprint”) hereby requests that the Commission issue the waivers requested below, to the extent necessary, in order to permit Sprint to recover the costs it incurs as the sole provider of IP Relay service.

I. INTRODUCTION AND SUMMARY

IP Relay is a valuable form of Telecommunications Relay Service (“TRS”) that is uniquely beneficial to certain user populations. For example, IP Relay does not require the user to know American Sign Language (“ASL”), a feature that makes the service especially useful for those with hearing loss who lack the ASL skills to use Video Relay Services (“VRS”). As a result, IP Relay frequently is used by those who lose hearing later in life and “is often the only way someone who is deaf or hard of hearing can reach 911 while outside of the home.”² IP

¹ 47 C.F.R. §§ 1.1, 1.3, 1.41. *See also* 47 U.S.C. § 225.

² Letter from Andrew S. Phillips, National Association of the Deaf, to Marlene H. Dortch, FCC Secretary, CG Docket Nos. 12-38 and 03-123, at 1 (Aug. 23, 2012).

Relay also is uniquely beneficial to DeafBlind users. IP Relay does not require the ability to see an interpreter on a screen; the service can be enhanced with adaptive technologies, such as Braille or screen readers; and high-speed internet is not required to use the service.³

Notwithstanding the importance of IP Relay, the service is on the verge of disappearing. Due to the lack of adequate compensation under the current price cap methodology, one provider after another stopped providing IP Relay, leaving Sprint as the only remaining provider in late 2014. Since that time, Sprint has continued to provide this important service pursuant to a series of temporary, inadequate rates, with the expectation that the Commission would restructure the IP Relay compensation structure to be sustainable over the longer term. Without a sustainable rate structure, Sprint will no longer be able to provide this service.

In view of these circumstances, and until such time as the Commission establishes a longer-term, compensatory rate methodology, Sprint urges the Commission to waive existing TRS rules and/or policies that preclude compensation for outreach, marketing, a portion of overhead expenses, research and development, and an operating margin. Below, Sprint provides detailed cost and other information establishing that issuance of the requested waivers until a sustainable rate methodology is adopted is plainly warranted. Sprint also demonstrates that, for the 2019-20 funding year, these waivers would result in an IP Relay rate of \$1.85 per minute.⁴

³ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 29 FCC Rcd 16273, ¶ 7 (2014) (“*2014 IP Relay Rate Order*”) (further finding that “certain categories of consumers currently rely upon IP Relay service as their sole or primary means of communicating by telephone, including consumers who are deaf-blind or have speech disabilities, as well as deaf or severely hard-of-hearing consumers who do not know or are not comfortable with the use of American Sign Language”).

⁴ Sprint’s underlying calculations are set forth in the attachment hereto. For purposes of these calculations, Sprint has rounded to the nearest dollar in the “IP Relay Costs” columns.

This interim rate will allow deaf, hard-of-hearing, and DeafBlind consumers continued access to a critical form of relay service, consistent with the tenets of the Americans with Disabilities Act, while also reasonably compensating Sprint for the costs it incurs in providing that service.⁵

II. THE COMMISSION SHOULD GRANT THE WAIVERS NECESSARY TO ENSURE THAT SPRINT IS COMPENSATED FOR THE REASONABLE COSTS OF PROVIDING IP RELAY SERVICE

Sprint wishes to continue providing IP Relay and to work with the Commission on a long-term strategy that is based on a sustainable business model and will ensure a high-quality service for Americans who need this vital link to the hearing world. That is Sprint’s ultimate goal in these docketed proceedings – a goal that we believe the Commission shares.⁶ Until this objective can be achieved, however, Sprint urges the Commission to grant the interim waivers necessary to permit Sprint to both: (1) be compensated for the actual costs of providing IP Relay, including the costs of outreach, a portion of overhead, and research and development; and (2) generate an operating margin.

A. Outreach

In 2013, the Commission prohibited IP Relay providers from including the costs of outreach in their yearly cost submissions.⁷ The Commission granted Sprint a “temporary,

⁵ See 47 U.S.C. § 225.

⁶ Toward that end, Sprint filed a Petition for Rulemaking with the Commission in November 2018. Petition for Rulemaking of Sprint Corporation, RM-11820 (Nov. 1, 2018). See also *Consumer and Governmental Affairs Bureau Seeks Comment on Petition for Rulemaking by Sprint Corporation to Establish a New Ratemaking Methodology for IP Relay Service*, Public Notice, DA 18-1137 (Nov. 7, 2018).

⁷ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618, ¶ 192 (2013)

limited waiver” of this prohibition on “recovery of provider-directed outreach for Fund Year 2016-17, to permit Sprint to recover the costs ... for outreach activities and dedicated staff specifically targeted at outreach to the deaf-blind community.”⁸ The waiver was extended again for the 2017-18 and 2018-19 funding years.⁹ Pursuant to this waiver, Sprint has been able to: (1) provide outreach on a local level in the 35 states and territories where Sprint is the 7-1-1 provider, including attendance at hundreds of local events alone at which it distributed informational materials on IP Relay and assisted potential DeafBlind users with the registration process; (2) provide outreach on a national level, including attendance at over 50 deaf-centric events to disseminate information about IP Relay and assist DeafBlind individuals with the registration process; and (3) promote the availability of IP Relay through social media outlets targeted to the DeafBlind community.

Sprint urges the Commission to expand this waiver to cover outreach to the entire IP Relay user population. As noted above, IP Relay often is used by those who experience hearing loss later in life or have a speech disability and is the most useful form of TRS for certain individuals, such as the DeafBlind. Unfortunately, there is a profound lack of understanding in

(“2013 Reform Order”).

⁸ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, Order, 31 FCC Rcd 7246, ¶¶ 18-19 (2016).

⁹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, Order, 32 FCC Rcd 5142, ¶¶ 11-13 (2017); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, Order, 33 FCC Rcd 6300, ¶¶ 8-11 (2018) (“2018 Rate Order”).

the potential user community about the availability of IP Relay – what it is, how it is used, and how it can benefit people seeking to communicate with the hearing world. Indeed, Sprint continues to find individuals, including former IP Relay users, who are not aware that IP Relay is still being offered despite the transformative benefits of the service. As one new user told Sprint just weeks ago: “I recently lost my speaking ability and have felt trapped, unable to easily make phone contact. I just stumbled upon and used Sprint’s IP Relay for the first time and I’m crying from the joy and relief you just brought me.” Potential users should not be relegated to “stumbling” upon IP Relay only after unnecessarily experiencing a period of isolation without access to a functionally equivalent communications technology.

When the Commission eliminated compensation for outreach costs, the decision largely was premised on transferring outreach activities from the hands of the many VRS and IP Relay service providers to the hands of a government-based neutral third party – *i.e.*, the iTRS National Outreach Program. It is Sprint’s understanding, however, that the iTRS National Outreach Program has concentrated on educating hearing individuals about TRS and why they should accept incoming relay calls. Although these are important aspects of TRS outreach and education, they do not address the critical need to inform and educate those who would benefit most from IP Relay service – individuals with hearing and speech disabilities who are not likely to learn about IP Relay through normal outreach channels to the deaf community.

Sprint wishes to address this gap by building upon the activities it has undertaken pursuant to the DeafBlind outreach waiver. In particular, the costs Sprint wishes to incur fall into five categories: (i) salary and benefits for dedicated employees, including two employees devoted to DeafBlind outreach, as well as one employee and one contractor dedicated to broader

IP Relay outreach; (ii) travel and related expenses; (iii) professional fees/interpreter support; (iv) advertising/promotional outreach; and (v) miscellaneous direct costs such as print materials in alternate formats.

Sprint has calculated that these costs will amount to **[BEGIN HIGHLY CONFIDENTIAL]** ██████████ **[END HIGHLY CONFIDENTIAL]** for calendar year 2019 and **[BEGIN HIGHLY CONFIDENTIAL]** ██████████ **[END HIGHLY CONFIDENTIAL]** for calendar year 2020. Assuming that these costs are incurred evenly throughout the year, Sprint estimates that it will spend **[BEGIN HIGHLY CONFIDENTIAL]** ██████████ **[END HIGHLY CONFIDENTIAL]** during the 2019-20 funding year – *i.e.*, six months of costs in 2019 and six months of costs in 2020.

Sprint estimates that there will be demand for **[BEGIN HIGHLY CONFIDENTIAL]** ██████████ **[END HIGHLY CONFIDENTIAL]** minutes of IP Relay use in calendar year 2019 and **[BEGIN HIGHLY CONFIDENTIAL]** ██████████ **[END HIGHLY CONFIDENTIAL]** minutes in 2020. Again, assuming that these minutes of use are spread evenly throughout the year, Sprint estimates that it will carry **[BEGIN HIGHLY CONFIDENTIAL]** ██████████ **[END HIGHLY CONFIDENTIAL]** minutes of IP Relay in the 2019-20 funding year. Dividing Sprint’s outreach costs by this estimated number of minutes produces an estimated per-minute cost for Sprint’s outreach expenses of slightly less than \$0.12 for the upcoming funding year.

Importantly, the concerns that led the Commission to eliminate outreach funding no longer exist in the IP Relay marketplace, rendering IP Relay unique among the current TRS offerings. The Commission suspended all outreach funding based on a finding that TRS providers had devoted money “to individual branded marketing campaigns, which . . . focus

primarily on efforts to win back TRS users from competitors, often in conjunction with expensive and enticing giveaways of free products, such as iPads and TV sets.”¹⁰ Given that Sprint is the only remaining IP Relay provider, the Commission’s concern regarding this use of outreach funding can no longer justify precluding Sprint from receiving outreach-related support.¹¹

B. Overhead

In 2007, the Commission concluded “that indirect overhead costs are not reasonable costs of providing TRS,” finding that “indirect overhead costs may not be allocated to TRS by an entity that provides services other than TRS based on the percentage of the entity’s revenues that are derived from the provision of TRS.”¹² Instead, the Commission allowed providers to recover only “those costs that are directly related to, and directly support, the provision of relay service.”¹³

For more than a decade, Sprint has faithfully complied with this directive. As a result,

¹⁰ *2013 Reform Order* ¶ 31.

¹¹ In providing this outreach, Sprint should be permitted to identify the company as the sole remaining IP Relay provider in its materials. Traditionally, providers such as Sprint have distinguished between outreach activities – *i.e.*, those that generally promote a given service – and marketing activities – *i.e.*, those that promote a particular provider’s offering of the service or encourage consumers to switch providers. With only one remaining IP Relay provider, however, “marketing” inherently involves “outreach,” and “outreach” inherently involves “marketing.” Accordingly, there is no logical reason to require Sprint to distribute incomplete IP Relay materials that do not indicate that Sprint is the only available provider of this service.

¹² *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Declaratory Ruling, 22 FCC Rcd 20140, ¶¶ 74-75 (2007).

¹³ *Id.*

Sprint has not been able to recover all of the costs of providing IP Relay, particularly overhead costs that are shared by multiple lines of business within Sprint. Unlike all other providers of TRS, Sprint operates an extensive portfolio of non-TRS communications offerings. In doing so, Sprint incurs general and administrative costs for departments that serve all of Sprint's lines of business, including IP Relay. For example, Sprint's human resources, finance, billing, tax, and legal departments plainly spend time and resources on matters related to IP Relay service. Nevertheless, Sprint has not been compensated for an adequate portion of the costs associated with these departments. The option of attempting to identify particular overhead costs that are directly incurred in providing IP Relay would be hopelessly complex and burdensome. For example, there is no reason for a human resources employee to count the minutes spent on payroll for each IP Relay employee so that Sprint can attribute a portion of that employee's salary to IP Relay, and the process of tracking time in this manner would undermine the employee's overall efficiency.

Given the unique nature of Sprint as an IP Relay provider, the Commission should recognize that Sprint needs these overhead services in order to provide a high-quality IP Relay service and should permit the company to recover a modest contribution to the recovery of those costs from its IP Relay service. In particular, the Commission should allow Sprint to recover a percentage of the overhead costs commensurate with the percentage of Sprint's revenues that are derived from providing IP Relay. Sprint estimates that this waiver would result in an approximately \$0.09 increase in the per-minute IP Relay rate in the 2019-20 funding year. For example, Sprint projects for 2019, using its 2019 fiscal year information, that: (1) it will expend approximately **[BEGIN HIGHLY CONFIDENTIAL]** [REDACTED] **[END HIGHLY**

CONFIDENTIAL] on general and administrative matters; (2) around **[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]** of Sprint's wireline revenues will stem from accessibility-related offerings; (3) IP Relay will represent approximately **[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]** of Sprint's accessibility offerings; and (4) there will be **[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]** IP Relay conversation minutes. After multiplying **[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]** and dividing that figure by the projected number of minutes, the result is a per-minute rate increase of approximately \$0.09.¹⁴

Notably, Sprint's calculations indicate that the company would incur approximately \$0.30 per minute in additional expenses if it were a standalone IP Relay provider. Put differently, the IP Relay rate would need to be at least \$0.30 higher to compensate a standalone provider, and the TRS Fund receives the benefit of the significant efficiencies Sprint realizes by operating multiple lines of business. Nevertheless, Sprint is prohibited from being compensated for the \$0.09 per minute it *incurs* as a provider of multiple services. This result is patently unfair and unreasonable.

¹⁴ Sprint has not yet created financial projections for its 2020 wireline costs. Accordingly, for purposes of the attached calculations, Sprint assumes that IP Relay will represent the same portion of Sprint's wireline revenues and accessibility offerings. As a result, Sprint forecasts its IP Relay-related overhead expenses for 2020 by taking the 2019 calculation and adjusting it to account for the projected increase in IP Relay minutes.

C. Research and Development

Sprint proposes to spend [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] on IP Relay research and development costs in calendar year 2019 and [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] in such costs in 2020. Currently, research and development costs for IP Relay may be reimbursed from the TRS Fund only to the extent that they relate to meeting the FCC’s mandatory minimum standards for the service.¹⁵ In establishing this limitation fifteen years ago, the Commission found that “costs directed at providing advanced . . . features that fall outside the functional equivalency mandate of section 225 are not compensable.”¹⁶ As described more fully below, Sprint respectfully submits that its proposed research and development efforts will permit Sprint to continue to meet the mandatory minimum standards for IP Relay. Further, Sprint regards these efforts as a means of more broadly bolstering “functional equivalence” and advance the public interest by providing enhanced service functionalities to all IP Relay users.

First, the majority of the proposed research and development funding – *i.e.*, [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] – would be used to update and upgrade the functionality and security of the IP Relay web portal and mobile application. iOS, Android, and the numerous available web browsers continually implement new features and updates. As a result, Sprint must continually

¹⁵ See, e.g., *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, ¶¶ 188-190 (2004).

¹⁶ *Id.* ¶ 188.

alter its IP Relay website and application in order for each to continue to function. Because bad actors continue to proliferate new schemes in the online sphere, Sprint also must update and modify its security controls to ensure that IP Relay is not rendered unavailable due to an online attack. These expenditures plainly will enable Sprint to meet the mandatory minimum standards. Absent these protections, Sprint's IP Relay service would not function at all, much less function in a manner that meets the FCC's requirements.

In addition, Sprint proposes to spend [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] in the second half of 2019 to improve the pacing functionality of its IP Relay service. The ability to easily adjust pacing – *i.e.*, the speed at which the words the relay operator types are transmitted to the user – is of critical importance to IP Relay users. For example, DeafBlind users who rely on a braille reader may require the normal pace to be decreased in order to effectively use IP Relay. Today, an IP Relay user may request that the agent increase or decrease the transmission speed on a per-call basis. A user also may add a note to his or her account with their preferred transmission speed. The user cannot, however, directly set or adjust pacing directly on his or her end and cannot set pacing for an extended period (*e.g.*, for 100 hours of IP Relay conversation). Sprint would like to correct these drawbacks, which would result in an improved user experience.¹⁷

Finally, Sprint would like to spend [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] in the second half of 2019 in order to allow users to more

¹⁷ The Commission implicitly recognized the importance of call pacing to functional equivalence when it adopted a mandatory minimum standard requiring that communications assistants “provide a typing speed of a minimum of 60 words per minute.” 47 C.F.R. § 64.604(a)(1)(iii).

quickly and conveniently place an IP Relay call by providing them with access to a list of their “frequently dialed” numbers via Sprint’s website. Because virtually all mobile phone users and many landline users have access to this capability when placing a call today, allowing IP Relay users to access this functionality would advance functional equivalence.

In sum, the majority of the research and development costs for which Sprint seeks compensation are designed to aid Sprint in continuing to meet and exceed the mandatory minimum standards for IP Relay. Nevertheless, to the extent that the Commission does not agree with that conclusion, Sprint requests a waiver of the Commission’s current reimbursement policy in order to permit it to recover the research and development costs outlined above during the 2019-20 funding year. Importantly, grant of such a waiver would not implicate the Commission’s previous concerns that “allowing providers to claim individual R&D costs as a cost of providing TRS . . . potentially could allow such funding to be unlimited and only end up benefitting that individual provider.”¹⁸ Recovery of Sprint’s proposed expenses would add only approximately \$0.01 per minute of IP Relay use for the 2019-20 funding year. Moreover, given that Sprint is the only remaining provider, *all* IP Relay users would benefit from these service enhancements.

¹⁸ 2013 Reform Order ¶ 21.

D. Operating Margin

Sprint currently is compensated pursuant to a price cap methodology when providing IP Relay.¹⁹ Because the “base rate” the Commission established under this ratemaking methodology does not include all reasonable costs of providing service, the company’s IP Relay division has been operating at or near cost during the entire period the base rate has been in effect. Sprint cannot function as a non-profit business and must be compensated in a manner that allows it to maintain the quality of its service while earning a reasonable profit.

Because the current three-year price cap period expires at the end of the 2018-2019 funding year, the Commission should grant the waivers necessary to implement an operating margin approach for IP Relay on an interim basis going forward. The Commission already uses an operating margin approach to compensate other forms of TRS, including VRS and IP captioned telephone service (“CTS”).²⁰ As a result, there is no legal or procedural barrier that would prevent the Commission from using this approach for IP Relay until a permanent, sustainable rate methodology can be implemented.

In addition, the Commission need not undertake any additional analysis to determine the appropriate operating margin for IP Relay. Instead, the Commission should apply the same

¹⁹ See, e.g., *2018 Rate Order* ¶ 7.

²⁰ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Order, 32 FCC Rcd 5891, ¶¶ 23-26 (2017) (“*2017 VRS Order*”); *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd 5800, ¶ 23 (2018) (“*2018 IP CTS Order*”).

allowable operating margin used for VRS and IP CTS. For those services, the Commission found “that the range of 7.6% to 12.35% represents the ‘zone of reasonableness’ of an allowable operating margin,”²¹ particularly given that the bulk of costs for both services are “attributable to labor rather than capital.”²² Because the majority of Sprint’s costs for IP Relay similarly are “attributable to labor,” the same “zone of reasonableness” can and should be extended to this service. Applying a 12.35% margin to the rate in order to recover the margin cost would result in a per-minute rate of \$1.85 for the 2019-2020 funding year. Sprint believes that such a margin is appropriate given the inadequate IP Relay rate that has been applied to Sprint’s IP Relay business for the last several years.

III. GRANT OF THE REQUESTED WAIVERS IS IN THE PUBLIC INTEREST

Waiver of Commission rules is permitted upon a showing of “good cause.”²³

Specifically, the Commission may waive its rules where the particular facts would make strict compliance inconsistent with the public interest, taking into account, *inter alia*, considerations of “hardship, equity, or more effective implementation of overall policy on an individual basis.”²⁴

Waiver is particularly appropriate where “special circumstances warrant a deviation from the

²¹ 2017 VRS Order ¶ 26.

²² 2018 IP CTS Order ¶ 23.

²³ 47 C.F.R. § 1.3.

²⁴ *Numbering Resource Optimization; Petition of California Public Utilities Commission for Waiver of the Federal Communications Commission’s Contamination Threshold Rule*, Order, 18 FCC Rcd 16860, ¶ 9 (2003) (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972) (“*WAIT Radio*”); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990)).

general rule and such deviation will serve the public interest.”²⁵

In this case, grant of the waivers necessary to provide Sprint with the requested relief would not only clearly serve the public interest and advance the Commission’s general public policy objectives, but also unquestionably further the Commission’s overriding goal of ensuring that individuals with disabilities have unfettered access to functionally equivalent telecommunications. As the Commission has found, the “consequences of Sprint’s termination of IP Relay service would be severe for consumers who are deaf, deaf-blind, hard-of-hearing, or have speech disabilities.”²⁶ Moreover, today’s IP Relay marketplace is rife with “special circumstances,” including: (1) the departure of all other relay providers from the marketplace; (2) little to no outreach specific to IP Relay currently is being conducted; (3) the need to enhance IP Relay to ensure that the user community is able to meaningfully use the service in a changing technological environment; and (4) the Commission has yet to begin the process of reforming the IP Relay rate methodology, a step that would avoid ongoing hardships for the sole remaining provider of this much-needed service.

²⁵ *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d at 1166 (referencing *WAIT Radio*).

²⁶ *2014 IP Relay Rate Order* ¶ 7.

IV. CONCLUSION

For the foregoing reasons, Sprint respectfully requests that the Commission grant the interim waivers described herein in order to ensure that its IP Relay service continues to be a stable, functionality equivalent offering until the FCC adopts a sustainable longer-term rate methodology for this important service.

Respectfully submitted,

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Sprint Accessibility
IP Relay

		IP Relay Costs			Per Minute Costs			
		2019 Projections	2020 Projections	Average \$\$ Projection	2019 Projections	2020 Projections	Average Projection	
Conversation Minutes	[BHC]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
Base Allowable Cost		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
<u>Waivers</u>								
Outreach		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
Research and Development		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
Allocated Overhead		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
TOTAL COSTS		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
					[EHC]			
Operating Margin					12.35%	[BHC]	[REDACTED]	[EHC]
PROPOSED RATE							\$ 1.850	

Confidentiality designations in this exhibit are noted by: [BHC] for Begin Highly Confidential and [EHC] for End Highly Confidential, with the specific redactions highlighted in yellow.