

DT 00-184

SPRINT COMMUNICATIONS COMPANY, L.P.

Petition to Increase Price for Telecommunications Relay  
Service

Order Approving Increase in Price for Telecommunications Relay  
Service

O R D E R    N O.   23,702

May 10, 2001

**I.    BACKGROUND**

On September 6, 2000, Sprint Communications Company, L.P.(Sprint) filed with the New Hampshire Public Utilities Commission (Commission) an application to modify its Provision of New Hampshire Telecommunications Relay Service (TRS).

In its petition, Sprint requests a one-time payment or an increase in the price per minute because of recent changes in the provision of TRS mandated at the federal level. The Federal Communications Commission (FCC) has mandated the expansion of the requirements for TRS services, which will cause Sprint to incur additional costs.

TRS transmits messages between individuals with speech and/or hearing difficulties and those without such difficulties, typically using a highly trained individual known as a Communications Assistant (CA) as an intermediary. The objective of the service is to make the system as smooth and transparent to the users as reasonably possible. In an effort to improve the quality of the service, the FCC has

recently dictated increases in the typing speed of CAs from an average of 45 words per minute to 60 and imposed requirements to reduce any disruption of calls by requiring that CAs will be available for the full duration of the call, or a minimum of 10 minutes. The FCC also now requires that TRS include speech-to-speech relay service through which individuals with speech disabilities can communicate through CAs trained to understand uncommon speech patterns.

The Sprint filing requests authority to provide the proposed enhanced services and requests reimbursement through either a one-time payment of one-hundred-fifty-seven-thousand-three-hundred-twenty dollars (\$157,320) from the relay service fund, or an increase of 10 cents per session minute to 86 cents for the next 3 years. The proposed increase equates to approximately one cent per access line per month for basic exchange service.

## II. HISTORY

On September 10, 1991, the Commission awarded Sprint the franchise to provide TRS in Re: Dual Party Relay Service-Telecommunications Relay Service, 76 NHPUC 593, 597 (1991). Since then, the Commission has dealt with the Telecommunications Relay Service in several other cases. Re Relay New Hampshire, 79 NHPUC 451 (1994)(reducing the

surcharge from 10 cents per access line to two cents to bring collections into line with expenditures); Re Relay New Hampshire 80 NHPUC 566 (1995)(enhancing the service to provide both voice carry over (VOC)-to-VCO service and VCO-to-text telephone service); Re Sprint, 81 NHPUC 592 (1996) (approving modification of outreach program and single line answering service); Re Relay New Hampshire 83 NHPUC 83 (1998) (to fund the Legislatively-mandated telecommunications equipment distribution program); Re Relay New Hampshire, Order Number 23,178 in docket DE 98-182 (approving an increase of 10 cents per session minute to cover the expenses associated with improvements to the system and increasing costs).

Sprint committed to maintaining the new rate, at a minimum, for a period of three years, barring the imposition of pending federal and state mandates that could require Sprint to increase its relay rate to comply with those obligations. Just such an event has now occurred, prompting Sprint to make the instant request.

Sprint's current position is based upon FCC Rules and Orders Published June 21, 2000 [CC Docket No. 98-67; FCC 00-56] and specifically 47 CFR 64.603 and 604. Section 64.603 imposes the requirement for Speech-to-Speech relay service. Section 64.604 requires 60 words per minute typing speed;

minimum CA time per call availability; automatic handling of emergency calls; and other requirements of lesser impact.

Staff has conducted an analysis of the cost of incorporating these new requirements into the present system and has concluded that Sprint's request is reasonable. Staff further concluded that increased costs could be covered without any increase in basic exchange rates for TRS currently set at eight cents per access line per month and recommends the costs be reimbursed through a one-time payment rather than an increase to the price per minute for TRS.

### **III. COMMISSION ANALYSIS**

The Commission's goal is to ensure that all citizens of New Hampshire have easy access to the telecommunications system regardless of any physical challenges they may face. The Commission agrees with the FCC that the enhancements discussed above will help meet that goal by reducing barriers to effective telecommunications.

Only two years ago, the Commission concluded in Order No. 23,178, that Sprint was providing the highest possible level of service and that there was no advantage to opening a bid process and thereby subjecting the service users to potential service interruption problems. Nothing has

occurred which would suggest reopening that issue but the Commission will continue to monitor service to determine whether a re-examination of the franchise is reasonable and will seek input from the Advisory Board regarding service quality.

The Staff has determined that the costs of these improvements are reasonable and that they can be met without an increase in basic exchange rates.

We believe these service improvements are necessary to maintain a certified state TRS program and therefore will approve the request.

**Based upon the foregoing, it is hereby**

**ORDERED,** that Sprint's request for a one-time payment of \$157,320 to cover the costs of the FCC mandated system enhancements is approved; and it is

**FURTHER ORDERED,** that Sprint upgrade the Telephone Relay Service to be compliant with the new Rules and Orders mandated by the FCC as soon as possible; and it is

**FURTHER ORDERED,** that the amount collected in basic exchange rates be unchanged at eight cents per month and the amount collected in seasonal rates, during the off season, if applicable, remain unchanged at four cents per month.

By order of the Public Utilities Commission of New  
Hampshire this tenth day of May, 2001.

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Douglas L. Patch  
Chairman

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Susan S. Geiger  
Commissioner

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Nancy Brockway  
Commissioner

Attested by:

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Thomas B. Getz  
Executive Director and Secretary