

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**NEW HAMPSHIRE TELECOMMUNICATIONS RELAY SERVICE  
REQUEST FOR RATE ADJUSTMENT**

Sprint Communications Company L.P. (Sprint) is proud to have served the citizens of New Hampshire by providing Telecommunications Relay Services (TRS) since 1991.<sup>1</sup> We value our longstanding partnership and look forward to continuing to provide functional equivalency for New Hampshire citizens who rely on relay service to communicate.

This letter is intended to provide the New Hampshire Public Utilities Commission (PUC) with new service options and update our pricing package for at least five years. Sprint is requesting rate adjustments for TRS and Captioned Telephone Service (CapTel) effective sixty (60) days after the PUC approves the rates.

One of Sprint's key strategies is to deliver the best-cost value and to ensure that customers know what to expect. Most State TRS contracts have guaranteed pricing for three (3) to five (5) years and the Federal Communications Commission (FCC) adjusts reimbursement rates on an annual basis. The current rate in New Hampshire went into effect over six (6) years ago, on March 1, 2014. As discussed below, there are new services and valid justifications for the proposed rate modification and increase.

**New Service Options**

Sprint is pleased to offer new service options to its New Hampshire customers. These include intrastate Spanish-Spanish relay services, Automated 711 and Relay Conference Captioning.

*Intrastate Spanish (offered at no additional cost)*

The FCC requires relay service providers to offer interstate Spanish-Spanish relay services. Additionally, many states have requested that providers offer intrastate Spanish-to-Spanish relay services. Sprint will provide New Hampshire Relay users with the ability to make Spanish relay calls to callers within New Hampshire. Sprint will provide the PUC with a dedicated toll-free number for in-state Spanish calling and will modify outreach materials to promote the new number. New Hampshire's monthly reporting package would include these calls.

*Automated 711 (offered at no additional cost)*

With Automated 711, New Hampshire Relay users who have registered a Customer Profile with Spanish or Speech-to-Speech (STS) preferences will automatically be routed to a Relay Agent

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<sup>1</sup> Please note that as of April 1, 2020, a transaction was completed by which Sprint Corporation ("Sprint"), the parent company of Sprint Communications Company L.P., merged into an indirect subsidiary of T-Mobile US Inc. ("T-Mobile"), with Sprint surviving as an indirect subsidiary of T-Mobile and by which Sprint Communications became an indirect wholly owned subsidiary of T-Mobile.



with those skills. This feature reduces customer wait time and saves New Hampshire money. New Hampshire's monthly reporting package would include these calls.

#### *Relay Conference Captioning (RCC) – See pricing listed in “New Pricing Options”*

New Hampshire Relay users who need to participate in conference calls, webinars, or online training sessions can join with RCC. RCC ensures meeting attendees who are Deaf, Hard of Hearing, or have a Speech Disability are in sync with their colleagues and can view content via transcripts. The same high-quality captioners who produce closed-captioning for television shows will deliver fast and accurate captions to New Hampshire Relay meeting attendees. RCC is available for meetings with two or more attendees and is intended for business purposes only. RCC participants have two options to speak directly or type their responses, and the captioner will speak directly through the conference bridge while viewing captions via an internet-connected computer or mobile device. For more information, please see the Appendix to this Request.

### **Rate Proposal Summary**

Sprint proposes an updated pricing structure and a rate change for New Hampshire Relay. Specifically, Sprint proposes updating the pricing structure from a combined per minute charge and monthly recurring charge to a monthly recurring charge only. This change is necessary and competitive, and details about these changes have been provided below.

#### *Transition to a Monthly Recurring Charge*

An MRC rate structure has become popular with some of our other state customers, including those with traffic profiles similar to New Hampshire. Our state customers find it beneficial to provide their budgets offices with more stable and predictable financials.

The MRC option is popular because charges are applicable throughout the contract term. A fixed pricing structure avoids rapidly increasing prices per minute incurred as minutes of use continue to decline and service-related costs (labor) increase.

#### *Adjustments due to Costs*

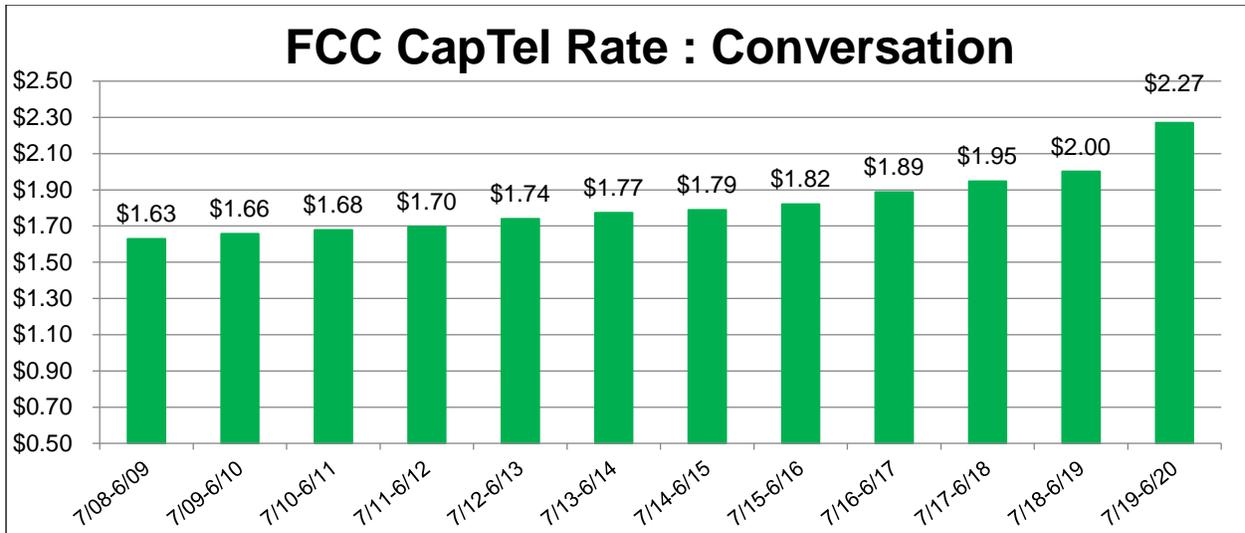
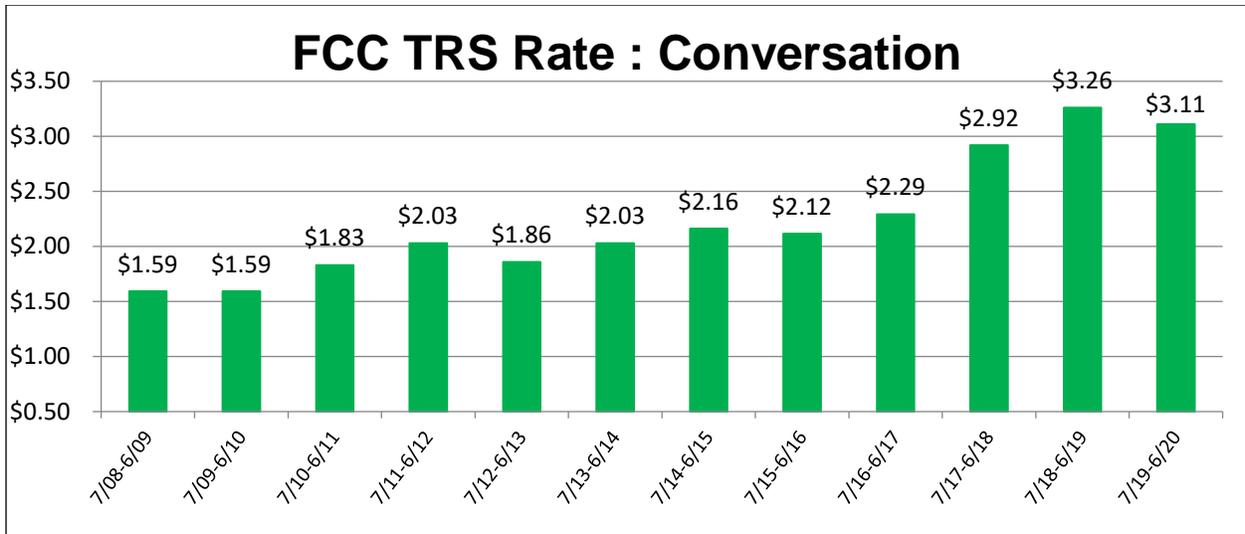
New Hampshire's TRS and CapTel usages have continued to decline. We anticipate this trend will continue because consumers are moving away from traditional TTY to wireless devices and other internet services such as IP Relay and IP CapTel. The FCC reimburses these services.

Sprint calculated its rate adjustments based on the following information:

#### ***1. The prices per billable minute for wireline relay services are increasing across the industry.***

The FCC utilizes the Multiple Average Rate Structure (MARS) reimbursement structure to reimburse providers for interstate minutes. The MARS reimbursement structure analyzes competitive prices paid by states to determine the national average rate. The Interstate TRS Fund rates for wireline TRS, CapTel, and STS have continued to increase in recent years. The most recent MARS is \$3.11 per conversation minute. MARS cost increases have accelerated over the last three years due to higher labor rates.





**2. As minutes of relay decrease and infrastructure costs increase, the per-minute cost of the service increases.**

While the number of intrastate billable minutes has decreased, infrastructure costs have increased. Infrastructure costs include account management, travel, billing, audit costs, lifecycle support staff, customer service, and network access. When higher fixed costs are allocated over fewer minutes, the overall per minute cost to provide the service increases significantly. As a global carrier and the largest relay provider in the industry, Sprint keeps its costs low across the network. New Hampshire Relay benefits from this efficiency.

**3. Labor costs have increased due to labor wage pressure.**

The highest cost of providing TRS and CapTel services is the labor cost to provide skilled employees who meet or exceed federal minimum standards. Over the past three years, the average labor cost paid to Sprint's subcontractors has increased significantly.



REDACTED

*4. Investments in technology are necessary to maintain communications on par with standard phone users.*

The FCC requires TRS and CapTel programs to provide functionally equivalent access to services and features available to traditional users. Sprint consistently invests in its relay products to ensure it fulfills its obligations.

**Proposed Rates**

TRS

[BEGIN CONFIDENTIAL]

[REDACTED]

[END CONFIDENTIAL]

CapTel

[BEGIN CONFIDENTIAL]

[REDACTED]

[END CONFIDENTIAL]

RCC (New Optional Service)

[BEGIN CONFIDENTIAL]

[REDACTED]

[END CONFIDENTIAL]

**Conclusion**

Sprint's goal is to work with New Hampshire towards mutually agreeable pricing. We value our relationship with New Hampshire and its user communities. We look forward to continuing our partnership with the New Hampshire PUC to continue to provide New Hampshire Relay service.



If you have any questions concerning this extension offer, please contact:

Andrew Brenneman, Senior Client Director

O: 703-592-4641

M: 703-786-9677

[andrew.brenneman@t-mobile.com](mailto:andrew.brenneman@t-mobile.com).

Or

Michelle Painter, Counsel

O: 571-287-8097

M: 703-201-8378

[michelle.painter@t-mobile.com](mailto:michelle.painter@t-mobile.com)

