



May 6, 2024

Mr. Curtis Williams  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

[Via Email cjwillia@psc.state.fl.us](mailto:cjwillia@psc.state.fl.us)

**RE: Docket No. 20240043-TP  
Request for Submission of Proposals for Relay Service  
Comments of T-Mobile on Proposed RFP**

Dear Mr. Williams:

Pursuant to your request at the Bidder's Conference held April 23, 2024, in the above-referenced docket, I am writing to provide you with T-Mobile's comments on the proposed RFP.

1. **Page 6, Paragraph 2 of Section A – Purpose**

T-Mobile requests to remove captioned telephone service (CTS) from the RFP. Note: Per the FCC, CTS is not a mandated service:

1. *In the [2018 IP CTS modernization and reform item](#), the FCC said: “Currently, all 50 states plus six U.S. territories have TRS programs certified by the Commission that offer the two forms of TRS currently required for state program certification: TTY-voice and speech-to-speech TRS. Additionally, all TRS state programs offer, oversee, and support a non-IP version of CTS on a voluntary basis.” (¶ 111) The FCC further indicated in a footnote that “although CTS is not currently required for state program certification, this form of CTS, like all other forms of TRS, is subject to the FCC’s minimum TRS standards when provided through state programs.” (¶ 111, fn. 318)*
2. *In a [2021 item regarding inmate calling services](#), the FCC reiterated that it “has not mandated the provision of the more advanced forms of TRS by state TRS programs or common carriers.” In doing so, the FCC further indicated that “their ‘non-mandatory’ status does not reflect a lower level of need for these forms of TRS,” because “among the general population of people with communication disabilities, there is far more demand for ‘non-mandatory’ than ‘mandatory’ relay services.” (¶ 270)*

**T-Mobile**



### **Alternative solutions for existing users**

- They can use their current CapTel phone with state relay VCO. They can access VCO by:
  - Using their CapTel phone and dialing 711
  - Turning on VCO mode from the menu of their CapTel phone and dialing 711 or the state toll-free number for VCO
  - Using a VCO phone and dialing 711 or the state toll-free number for VCO
- They can exchange their CapTel phone for any IP CTS device if they have internet access in their home. They do not need to select only a CapTel device. There are many internet captioning providers to pick from on the FCC website: <https://www.fcc.gov/consumer-governmental-affairs/internet-protocol-captioned-telephone-service-ip-cts-providers>
- They can acquire and use T-Mobile IP Relay to call their own phone such as a cell phone, then making a 3-way call to their called party (called 2-line VCO).

They can get and use free apps that are available, such as Rogervoice, Nagish, or Google Live Captions, on mobile devices that caption phone calls. T-Mobile does not endorse any specific apps or services.

### **2. Pages 10, Section 7 – Key Dates**

T-Mobile recommend extending the Clarifying Questions Submitted in Writing to PRC Chairman date to at least two weeks from the date the RFP is released.

### **3. Page 19, Paragraph 34 of Section A – Liquidated Damages**

As the industry has experienced significant declines in volume, the liquidated damages for service level performance now far exceed the cost to provide the service and therefore do not serve the best interest of our relationship. T-Mobile requests that the RFP reduce the amount of from \$5,000/day to \$250/day for the following:

- Meet Answering Time Requirement
- Meet Blockage Rate or Transmission Level Requirement





Thank you for the opportunity to provide comments on the proposed RFP. T-Mobile looks forward to reviewing the final RFP and submitting a competitive response.

Please contact me if you have any questions regarding this matter.

Respectfully Submitted,

Jeffrey Branch  
Account Executive

