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Department of
Regulatory Agencies

Public Utilities Commission

Colorado Public Utilities Commission
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Denver, CO 80202

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September 29, 2017

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: CG Docket # 03-123
2018 TRS State Certification Application- Colorado

Please find the 2018 TRS State Certification Application for the State of Colorado.
In addition to the certification application, please find supporting documention,
appedices A-M.

If I can be of further assistance, you can reach me via the contact information
below. Thank you.

Sincerely,

Holly Bise
State Relay Administrator-Colorado
Public Utilities Commision
Holly.bise@state.co.us
303.894.2024

Relay Colorado 2018 FCC Certification Renewal

Introduction

Relay Colorado, a program under the Colorado Department of Regulatory Agencies (DORA), Public Utilities of Commission (PUC), State of Colorado, has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the **FCC Public Notice DA 17-697, CG Docket No. 03-123** released on July 19, 2017. Included in the Public Notice are the minimum mandatory FCC Telecommunications Relay Service (TRS) requirements under **47 C.F.R. §64.604 and §64.606.** A copy of this Public Notice and these mandatory requirements are attached as **Appendix A. Relay Colorado** prepared this TRS Certification Renewal Application with the assistance of Sprint Accessibility.

DORA/PUC contracted with AT&T from July 1, 2013 to June 30, 2015. PUC contracted with Sprint Accessibility (formerly Sprint Relay) to provide Telecommunications Relay Service effective July 1, 2015 to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the RFP that was issued November 2014. All of the minimum mandatory TRS requirements are listed in the RFP and are attached as **Appendix B.** Please note that although Sprint Accessibility provides Internet Protocol (IP) and Captioned telephone web-based services, Relay Colorado does not contract to provide these services in Colorado, nor is Relay Colorado responsible for oversight of IP and VRS or to other Internet or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing Telecommunications relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

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<u>Operational Standards</u>
<u>A.1 Communication Assistants (CAs)</u>
§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.

<u>CA Employment Standards</u>
Relay Colorado contracts with Sprint to provide the hiring, training and oversight of Communication Assistants (CA) for Relay Colorado. Sprint has established a procedure to attract qualified applicants for TRS CA positions. Sprint's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a 12th-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute (wpm) on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language (ASL), or experience working with individuals who are deaf, hard of hearing or have a speech disability. All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history. After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements.

A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment.

Sprint TRS CA applicants are required to pass a valid and unbiased 12th-grade level spelling test to be considered for employment. Sprint TRS CA applicants must pass a valid unbiased 12th grade level grammar test to be considered for employment. Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality. If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

This process ensures only qualified applicants are hired to work at Sprint Accessibility centers as a CA.

Sprint provides an enhanced VCO service called Captioned Telephone (CapTel) Services. Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint ensures that all CapTel CAs are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. CapTel Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel CA Trainees spend 2-3 weeks training in a classroom setting.
- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel CAs are scheduled for one-week of transition training, while being monitored and supported by another CapTel CA or an Instructor.
- All CapTel CAs must continue to qualify for live call handling each month.

- Sprint CapTel CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel CA is evaluated on a minimum of one call each shift.
- There is also a monthly test each CapTel CA must pass in order to remain qualified to caption live calls.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Relay Colorado, through their contract with Sprint, has shown Sprint CAs have competent skills in typing, grammar, spelling, interpretation of written ASL, and familiarity with hearing and speech disability cultures, languages, and etiquette. Sprint requires all CAs to possess clear and articulate voice communications. CAs are given five written and three hands-on performance evaluations demonstrating the ability to process calls. Sprint CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate the following abilities.

- Sprint CAs must type 60 wpm prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test
- Sprint's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint's diversified culture program incorporates training includes the characteristics and of hard-of-hearing and late deafened users, deaf/blind and speech disabled users
- Demonstrate a professional and courteous phone image
- Process calls using live training terminals in an efficient and knowledgeable manner
- Role-play scenarios written in varying levels of ASL

Sprint provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA
- Recommendation and/or approval from supervisor or manager
- Attend and complete specialized STS training program including a written evaluation
- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories. STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on STS Services. Sprint's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy. The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE	
Sprint Values and Goals	
Training Agenda	
▪ Objectives / Training Outline	▪ Speech-Disabilities
▪ Introduction and History	▪ Attributes of Speech-to-Speech Relay CAs
▪ Video	▪ Speech-to-Speech verses Traditional Relay
▪ Service Description	▪ FCC Requirements

STS TRAINING OUTLINE	
Sprint Values and Goals	
▪ Characteristics of Customers ▪ Stereotypes	▪ Speech-to-Speech Variations ▪ Assessment
Work Performance Components	
▪ Basic Call Processing ▪ Call set up ▪ Customer Database ▪ Frequently Dialed Numbers ▪ Customer Requests ▪ Emergency Call Processing	▪ Confidentiality ▪ Transparency ▪ Personal Conversations ▪ Developmental Skill Practice ▪ Audio ▪ Observation
Participation	
▪ CA training ▪ Taking over calls – 15 minute ▪ CA work performance	▪ Call Focus ▪ Teamwork – support peer
Confidentiality and Transparency	
▪ Discuss call speech patterns ▪ Discuss techniques customer uses ▪ Have two CAs on one call, if necessary or customer requests.	▪ Unacceptable to: ▪ Have conversation regarding information discussed on calls ▪ Discuss customers in general

All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and speech-disabled cultures.

Personnel supporting CapTel have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Services in a professional manner. CapTel CA Trainees are screened on several skill-sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary
- Error Recognition - CapTel CAs must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during CapTel calls; therefore it is not necessary for the CA to interpret typewritten ASL.

CA Quality Assurance Programs
Sprint Accessibility Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in five Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: to provide excellent service to customers. In addition, Sprint listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Accessibility does not develop training and consumer education programs for TRS alone. Sprint Accessibility contracts with members of the deaf, hard of hearing, deaf-blind, and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Relay Colorado contracts with Sprint to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint conducts pre-employment testing and internal testing (quarterly) using a 5-minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint's CAs typed an average of 83.9 wpm, with at least 95 percent accuracy. In fact almost a third of Sprint's CAs type over 90 wpm.

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Relay Colorado Program does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, Sprint no longer provides VRS services.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

<u>In-Call Replacement of CAs</u>
Through their contract with Sprint, Relay Colorado exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken over unless it is absolutely necessary to do so. Sprint CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of 10 minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA
- Call requires a specialist (STS, Spanish, etc.)
- CA illness
- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of 10 or 15 minutes (for STS calls). These include:

- Shift change
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
  - Sprint attempts to honor any requests for a specific gender during call transitions.
  - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

As stated in 64.604 (a)(1) (v) Relay Colorado honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a

per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All conversations relayed between voice and TTY callers are transmitted in real-time. Relay Colorado uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer
- CA-initiated macros (44 macros)
- Function Keys (85 separate function keys)
- System-initiated macros
- On-line help panel
- Tone of voice pre-approved descriptions (almost 100)
- Automatic Error Correction Library (615 words)
- Background descriptions (over 250)

All of these features are available in all languages including English, and Spanish. CapTel is a transparent service. CapTel CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

DORA/PUC contracts with Sprint to oversee all TRS CAs, including CapTel CAs for the State of Colorado. In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes. The only exception to this policy relates to STS calls. Relay Colorado STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the outbound call.

Relay Colorado's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.

- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Accessibility Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Accessibility Center's Agreement Regarding Confidential Customer Information requires CAs to:
- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Relay Colorado CapTel CAs must comply with the same rules TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS. Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only. Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

The success of CapTel depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all CAs understand and abide by the confidentiality policy. Any CA who breaks this policy will be disciplined, up to and including termination. Please see Appendix C for the TRS pledge of confidentiality.

STS Limited Exception of Retention of Information
At the request of a caller, Relay Colorado Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Please see Appendix C for the TRS Pledge of Confidentiality form.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

Relay Colorado CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

STS and TRS Training: Sprint puts control of the call with the users.
- CAs accept their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

At the request of the relay user, Relay Colorado CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys. Relay Colorado CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

The State of Colorado does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

<u>STS Facilitation of Communication</u>
Relay Colorado STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Relay Colorado STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands each STS user may also find one technique to be most comfortable. Sprint STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

Relay Colorado STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message. When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:
- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask "yes" or "no" questions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user to spell the word

To ensure STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available, and observed by supervisors who are available in the STS CA work area to

monitor performance. If a development area is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls
§64.604 (3) (i) Consistent with the obligations of telecommunications carrier CAs, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Relay Colorado provides 24x7 TRS for standard (voice), Text Telephone (TTY), wireless, or personal computers users to place local, intrastate, interstate, and international calls. Relay Colorado also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Relay Colorado retain full control of the length and number of calls placed anytime through relay. Relay Colorado CapTel CAs are currently waived by the FCC for outbound calls because the CapTel CA is not involved in the call set up and cannot refuse the call CapTel users dial sequential calls directly therefore it is not possible for a CapTel CA to refuse sequential calls or limit length of calls. Relay Colorado CapTel CAs are not waived by the FCC for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to call.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

The following information is applicable for the timeframe through May 31, 2017:
Relay Colorado, through Sprint, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Relay Colorado will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and CapTel users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Relay Colorado gives users the option of billing their calls to a non-proprietary Local Exchange Carrier (LEC) or IXC (long distance) calling cards. Relay Colorado works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

The following information is applicable beginning June 1, 2017:
As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up.

In August of 2016, Sprint received a waiver, DA-16-963, of end user selection of carrier from the FCC. As a result, Sprint is offering ***domestic and international calling at no charge*** with no long-distance fees or long-distance call billing for all TRS and CTS users through Colorado Relay Service.

Sprint's approach as a global telecommunication provider includes the following benefits for Relay Colorado and its end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users – as is done for traditional phone users (i.e., non-relay callers).
- **Payphones:** Sprint will _**provide domestic and international calling at no charge**_ for Relay Colorado callers using payphones.
- **International Locations:** Sprint will provide _**outbound international calling at no charge**_ for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering _**access to Directory Assistance at no charge**_ through Relay Colorado.
- **Pay-Per-Call Services:** Sprint will continue to process calls to 900 access numbers. The 900 service providers may assess fees directly to relay users.

§64.604 (3) (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

The following information is applicable for the timeframe through May 31, 2017:
If a long-distance provider declines to complete a call because credit authorization is denied, Sprint Accessibility will relay the message verbatim to the relay user and follow the user's instructions.

The following information is applicable beginning June 1, 2017:
Due to the waiver described in the previous question, long distance billing is no longer applicable. Sprint is offering _**domestic and international calling at no charge**_ with no long-distance fees or long-distance call billing for all TRS and CTS users through Relay Colorado.

§64.604 (3) (iv) Relay services shall be capable of handling pay-per-call calls.

The following information is applicable for the timeframe through May 31, 2017:
Sprint Accessibility was the first provider to process pay-per-calls, beginning in 1996. Callers to Relay Colorado access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Because 900 blocking information is not available with CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

The following information is applicable beginning June 1, 2017:
Due to the previously described waiver, Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Relay Colorado provides access to all available relay call types. Through the state's contact with Sprint, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of standard services that are provided by Relay Colorado:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA

- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

Except where waived by the FCC, Relay Colorado CapTel users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality
Relay Colorado's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line. Relay Colorado adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the per-minute reimbursement. With 2-Line CapTel service, a CapTel user can release or receive captions at any time during a call.

Speed Dialing Functionality
Relay Colorado speed dialing functionality (frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel phone is equipped with the ability to program in three speed dial numbers, and a recently dialed number.

Three-Way Calling
Relay Colorado provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the Relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her LECs) can use this feature when placing a call through Relay Colorado. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method. TTY users may also use the relay to conference in another TTY user on the

line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line. Relay Colorado provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Relay Colorado, through Sprint, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint's hot key sends text to the user which says "(RECORDING)." Sprint's hot keys are available in all supported languages, including English, and Spanish. Relay Colorado has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information retained is information in the Call Detail Record necessary to bill the call.

Relay Colorado does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail and recordings which redials the call so the end user is not imposed charges for additional calls. Relay Colorado CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

<u>Retrieving Answering Machine and VoiceMail Messages</u>
Relay Colorado has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint Accessibility's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users. When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:
- The CA will inform the caller that an answering machine has been reached.

- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint Accessibility will use the touch-tone capability embedded in Sprint Accessibility's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, Relay Colorado uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail, and recordings which redials the call so the end user is not imposed charges for additional calls. The following information is applicable for the timeframe through May 31, 2017: If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call. The following information is applicable beginning June 1, 2017: Sprint is offering ***domestic and international calling at no charge*** with no long distance fees or long distance call billing for all TRS and CTS users through Relay Colorado.
- Sprint Accessibility's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

Like TRS users, Relay Colorado's CapTel users can retrieve answering machine messages from an answering machine near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users including the following:

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note, the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

A.4 Handling of Emergency Calls

§64.604(a)(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Relay Colorado accepts incoming emergency calls, and automatically and immediately transfers the call to the appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Relay Colorado has access to the largest footprint of coverage across the U.S. to terminate a 911 call.

Call Processing Procedures

Relay Colorado uses the following procedures to ensure TRS users requesting emergency services receive prompt assistance with their call.

1.	Relay Colorado CAs act upon the word "emergency". Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key ("hot key") which designates the call as an Emergency. This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Relay Colorado Service. They are calling from (caller's telephone number). This is CA # 1234, one moment please."
6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON LINE NOW)" and then types the way the 911 CA answered the phone.
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.

Back up Procedures

Through their contract with Sprint, Relay Colorado has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

- The CapTel phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone will display the typed responses from the PSAP and the caller will use their voice to communicate with the PSAP.
- The user will be connected to the proper 911 PSAP in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 PSAP.

Two-Line CapTel Emergency Calling

Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 PSAP. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

Relay Colorado CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures. Supervisors or Operations Administrators are available 24x7 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 PSAP
If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP. The CA or Supervisor will notify the PSAP of the premature disconnect and will provide any customer information that may assist the PSAP in resolving the emergency. If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint always connects the caller to the police. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls
If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to the appropriate PSAP near your assigned telephone number, but there could be significant delay in getting assistance." When the voice caller does not disconnect, requests further assistance, and/or remains online for more than five seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers
§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Relay Colorado offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Relay Colorado's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences, will be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated 10-digit telephone number without delay.

§64.604 (6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

Relay Colorado does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with

his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Relay Colorado does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards
B.1 ASCII and Baudot
§64.604 (b) Technical standards - (1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Relay Colorado contracts with Sprint to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use. Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected. Outbound calls are dialed out in voice mode so that both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA. If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

B.2 Speed of Answer
§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Relay Colorado contracts with Sprint, who currently has 13 TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each-15 minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in

conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

A requirement of the Relay Colorado contract with Sprint is 85 percent of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. Relay Colorado's CapTel speed of answer meets or exceeds the FCC's requirement to answer 85 percent of all calls within 10 seconds. Relay Colorado expects Sprint will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint develops a Network forecast for each upcoming scheduling week. Sprint also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint ensures total network traffic is accounted for by each of the centers. By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Relay Colorado considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center. Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Through its contract with Sprint, Relay Colorado includes abandoned calls in its daily speed-of-answer performance calculations.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Sprint measures its compliance with average speed-of-answer times on a daily basis and reports this information to Relay Colorado on a monthly basis.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Relay Colorado, through its TRS contract with Sprint, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each Colorado relay toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all

calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Relay Colorado does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other CA services, to the same extent that such access is provided to voice users.

The following information is applicable for the timeframe through May 31, 2017:
Relay Colorado TRS and CapTel users have equal access to their chosen IXC through Relay to the same extent access is provided to voice users. TRS and CapTel users are encouraged to register their preferred COC with Customer Service. Users who have not registered their preferred COC are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their COC preferences for CapTel calls. Voice-in users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

Relay Colorado relies on Sprint Accessibility to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint Accessibility's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint Accessibility provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint Accessibility routes calls to the designated carrier in as efficient a manner as possible. Sprint Accessibility includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone). Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint Accessibility provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

Sprint Accessibility encouraged all Carriers to participate in its COC program. When the requested Carrier was not a COC participant, Sprint Accessibility had established a procedure where the Carrier was notified, verbally and in writing, of its obligation to provide access to relay users and encouraged their participation.

Outlined below was the process used by CAs to process COC calls and subsequent instructions to relay callers:

- Sprint Accessibility CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either registered in the user database or for a specific call.

- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase: "I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."
- The user may choose to have another Carrier handle the call. Sprint Accessibility then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint Accessibility network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint had 260 carriers participating in the Sprint Accessibility's TRS COC program. Participation of Carriers in Colorado is dependent on whether carrier is authorized to provide service in Colorado and connectivity to the Sprint Access Tandem.

The following information is applicable beginning June 1, 2017:
As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering ***domestic and international calling at no charge*** with no long-distance fees or long-distance call billing for all TRS and CTS users through Relay Colorado. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Relay Colorado and its end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users – as is done for traditional phone users (i.e., non-relay callers).
- **Payphones:** Sprint will ***provide domestic and international calling at no charge*** for Relay Colorado callers using payphones.
- **International Locations:** Sprint will provide ***outbound international calling at no charge*** for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering ***access to Directory Assistance at no charge*** through for Relay Colorado.
- **Pay Per Call Services:** Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

B.4 TRS Facilities
§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Relay Colorado and Sprint Accessibility Customer Service are both available 24x7 for all TRS services. Relay Colorado, through Sprint, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. CapTel Relay Services are also available 24x7.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Relay Colorado contracts with Sprint's Relay centers, which are equipped with an UPS, generator, and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available. Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Accessibility system and routes the calls to other operating call centers. Relay Colorado Relay customers will be unaware of any system fault. In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms, and Call Detail Record recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored..

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities. Please see Sprint's Disaster Recovery Plan and the Network Support Plan in Appendix D.

§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

Relay Colorado does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

Relay Colorado does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology
§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Relay Colorado through Sprint, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability. In order to achieve functional equivalence, Relay Colorado will continue to provide Caller ID service where the 10-digit number of the calling party is passed through to the called-

party for local and long-distance calls. Relay Colorado receives calling party identifying information including blocking information, from all relay users. Sprint's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and other call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

As the provider of relay services for the State of Colorado, Sprint offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

Wireless Access – STS (*787)

In early 2012, Sprint announced the first wireless short-code solution for STS users. Sprint wireless customers are able to dial *STS (787) to reach an STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the state are automatically connected to an STS CA. This service is available to both callers with and without a speech disability who need to place an STS call. Voice callers needing to place a call to an STS user may also use this service. When Colorado TRS customers travel outside of the state, callers will automatically connected to STS based on their physical location. If they are in a state where Sprint is the Relay provider, the caller is connected to the State's STS. If not, callers are automatically transferred to Sprint's interstate STS, where they will be able to place interstate calls only. This enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

Sprint expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers

Sprint continues to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences, can be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated 10-digit telephone number without delay. Please see the following

graphic for the written Customer Profile form, which encourages STS users to register speed dial entries.

Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):
Note: Limit 30 characters per name

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

*If you need to add more information, go to the **Additional Information** section on the page 3.*

STS with Privacy Option
Sprint offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information
Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 711 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner, the inbound caller can be connected with the STS user at their location.

Emergency Numbers
In most emergency situations, STS callers dial 911 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to 10 additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID
§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Relay Colorado, through their contract with Sprint, provides true Caller ID service where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint will receive calling party identifying information including blocking information, from all TRS users.

Customer Control
With Sprint's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis. The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen. With Sprint's Caller ID, there are numerous benefits for TRS users, including:
- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen

- Phone numbers of hang-up callers
- Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

Technology
Sprint Accessibility offers True Caller ID for all local and long-distance calls to Carriers who have with Sprint. Sprint's SS7 network interfaces with all national long-distance Carriers and major LECs, CLECs, and ILECs. Sprint's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and other call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements
Many Caller ID enhancements are compatible with the Relay service and can be accessed by TRS users.

Selective Call Acceptance
Selective Call Acceptance allows a user to create a list of phone numbers so that the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by Relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

Selective Call Rejection
Selective Call Rejection enables the user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by Relay, it will be typed or spoken to the inbound caller.

Selective Call Forward
Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

Privacy ID (Anonymous Call Rejection)
Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as: "The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected." This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block, or send to voicemail. Realizing not all users will be able to hear this recording by the calling party, some companies have implemented additional enhancements.

Instant Access List (Preferred Caller List)
Users may designate a list of up to 10 numbers that can bypass the Sprint Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

Caller's Access Code
Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

Functional Standards
C.1 Consumer Complaint Logs
§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2008, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2008 shall indicate the number of complaints received from the date of OMB approval through May 31, 2012.

Relay Colorado has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

Relay Colorado works closely with their TRS provider (Sprint) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice, STS), customer contact information (when given), CA identification numbers, the call handling center and over 45 contact categories including: complaints, inquires and unsolicited commendations. Sprint submits reports detailing this information. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint's customer contact database.

Customer Contacts Online Database (CCOD)
To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts. The CCOD will automatically notify the TRS Sprint program manager assigned to the State of Colorado via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC. By approximately June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators. Relay Colorado reviews the log and then passed the complaint log to the FCC by July 1st of each year.

C.2 Contact Persons
§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY

telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Relay Colorado callers may file intrastate complaints and commendations regarding Relay Colorado services through the following contacts:

Kristine Shipley, Sprint Customer Relationship Manager
333 Inverness Drive South
Englewood, Colorado 80112
Email: Kristine.m.shipley@sprint.com
TTY: 800-676-3777
Voice and VP: 303-835-6433
Fax: 913-523-1127
VP: 720-210-5881
www.relaycolorado.com
www.facebook.com/relaycolorado

Holly Bise, State Relay Administrator, DORA/PUC
1560 Broadway, Suite 250
Denver, CO 80202
Email: Holly.bise@state.co.us
Website: http://www.colorado.gov/dora/puc
TTY: 303-894-2512
Fax: 303-894-2065
Voice: 303-894-2024
VP: 720-583-9879

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Information concerning TRS is published throughout the state of Colorado. Sprint Accessibility and the DORA/PUC also provide information on their websites. Sprint Accessibility provided a dedicated Relay Colorado website: www.relaycolorado.com that lists of all the toll-free numbers. Sprint Accessibility provided a dedicated Facebook page about the Relay Colorado Service and ongoing education and outreach programs with photos: www.facebook.com/relaycolorado. The Relay Colorado Specialist is available for community presentations. Sprint Accessibility also encourages the use of relay services by participating in various community activities such as advocacy meetings, school presentations and other forums.

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

Relay Colorado users are not charged more for services than for those charges paid by standard "voice" telephone users. TRS users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the Relay Colorado COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	N/A	50%
Evening (7 PM – 10:59 PM)	N/A	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	N/A	50%

March 17, 2016 through May 31, 2017
In states where Sprint is the contracted TRS provider, INTRAstate Sprint long-distance rates for TRS users were assessed at a rate of $0.03 per minute.

Effective June 2017, we provide long-distance at no charge. This is as result of CG Docket No. 03-123 granted by the FCC on August 24, 2016.

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Relay Colorado intrastate and interstate minutes are reported separately to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate TRS Fund administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free, and 900. In accordance with FCC rules, states only receive a 51 percent deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

ADA Requires TRS Services

In July 1990, the Americans with Disabilities Act (ADA) was passed by the United States Congress. Title IV of the ADA requires that all states provide relay services to deaf and hard of hearing people 24x7.

Colorado's Telecommunications Relay Service Program, Relay Colorado, was first established in 1989 by Colorado General Assembly Senate Bill 171 to enable citizens who could not use traditional

telephones to use TRS. Relay Colorado provided telecommunications access to citizens through the use of relay communication assistants.

Senate bill 89-171 also created the Colorado Disabled Telephone Users Fund, now named the Telephone Users with Disabilities Fund, to reimburse providers for TRS and to provide for the administration of the program. This bill also created a Commission for Disabled Telephone Users.

In 1992 Colorado General Assembly House Bill 92-1071 modified Colorado's program to conform to the exact requirements of the ADA, to transfer the program to the Public Utilities Commission, and to eliminate the Commission for Disabled Telephone Users. The Colorado PUC, by legislative statute, administers the relay program and has prescribed rules for the implementation of TRS as set in Article 17 of Title 40, C.R.S. found in **appendix J**.

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)((M) does not pertain to State programs. However, the state of Colorado contracts with Sprint who contribute and collect interstate funds through RLSA. It is the State's understanding that Sprint complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. The State of Colorado does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Relay Colorado works in conjunction with the TRS provider, Sprint, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments
- Handle all service type complaints
- Resolve complaints with Communication Assistants
- Follow up with customers if requested by the customers

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Colorado customers also have the option of calling Sprint's 24-hour Customer Service department (800-676-3777), the Sprint Accessibility Account Manager to file complaints or commendations. Relay Colorado has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. Relay Colorado submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Relay Colorado, through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format. Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint will not be sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

.§64.606 State Certification

3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

As previously stated, Relay Colorado was established in 1989 by Colorado General Assembly Senate Bill 171 which also created the Telephone Users with Disabilities Fund, previously the Disabled Telephone Users Fund, to reimburse providers for TRS and to provide administration of the program.

Rules for the implementation of TRS as set in Article 17 of Title 40, C.R.S. found in **appendix J** detail the power and duties of the Public Utilities Commission who contracts and administers for telecommunication relay services.

Article 17 of Title 40, C.R.S adopts the FCC's rules and regulations establishing mandatory minimum operational and technical standards found at 47 C.F.R. §64.601 and 64.604 (a) and (b) and details how the PUC shall resolve any formal complaints alleging a violation of this rule.

§64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

The FCC was notified of substantive changes to Colorado's relay service program within 60 days of when they occurred. Documentation can be found in **appendix K.**

DA 17-697

Released: July 19, 2017

**CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE
TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION**

CG Docket No. 03-123

Under Section 225, states wishing to operate their own telecommunications relay service (TRS) programs for the provision of intrastate and interstate TRS must have certification from the Federal Communications Commission (FCC or Commission) to do so.[1] Commission rules provide that states and covered territories may receive TRS certification in five year increments.[2] This Public Notice alerts states and territories that the certifications they now hold will expire on July 25, 2018. Under the Commission's rules, each certified state or territory may file an application for renewal of its certification one year prior to expiration, i.e., beginning July 25, 2017.[3] Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2017, to give the Commission sufficient time to review and rule on the applications prior to expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),[4] codified at Section 225 of the Communications Act of 1934, as amended (Act).[5] TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals.[6] Under the Act, the Commission must ensure that the provision of TRS is functionally equivalent to voice telephone services.[7] The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.[8]

All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and speech-to-speech relay (STS) service.[9] States may also offer captioned telephone relay service (CTS).[10] Each state seeking renewal of its certification must submit documentation to the Commission that describes its relay program and includes its procedures and remedies for enforcing any

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[1] 47 U.S.C. § 225(f). TRS are "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." 47 U.S.C. § 225(a)(3). *See also* 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, 12479, para. 3 & n.18 (2004) (describing how a traditional TRS call works). Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. *See* 47 U.S.C. § 225(d)(3).

[2] 47 CFR § 64.606(c)(1). The Consumer and Governmental Affairs Bureau (CGB or Bureau), under delegated authority, issued its last round of certification grants in July 2013. *Notice of Certification of State Telecommunications Relay Services (TRS) Programs*, Public Notice, 28 FCC Rcd 9987, 9987 (CGB 2013).

[3] 47 CFR § 64.606(c)(1).

[4] Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

[5] 47 U.S.C. § 225.

[6] *Id.* § 225(a)(3).

[7] *Id.* § 225(a)(3).

[8] *See* 47 CFR § 64.604.

[9] *See* 47 CFR § 64.603.

[10] Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speec*h *Disabilities*, Declaratory Ruling, 18 FCC Rcd 16121 (2003).

requirements that the program may impose.[11] In addition, a state must establish that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.[12] This certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The Commission's TRS rules further explain that documentation should be submitted in narrative form, and that the Commission shall provide the public with notice of and an opportunity to comment on such applications.[13]

Per the following schedule, the Bureau will release for public comment each application for renewal, after which it will review each application to determine whether the state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules.[14] The state must also establish that the program does not conflict with federal law.[15] In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program.[16] The Bureau will release public notices of renewal of certification for each state on a rolling basis.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	FCC ACTION	PROCESS
Beginning July 2017	CGB will issue Public Notices seeking comment on state TRS applications that have been filed.	Comments are due within 30 days of release of the Public Notices; reply comments are due within 15 days thereafter.
July 2017 - May 2018	CGB will review applications for TRS recertification for compliance with 47 CFR §§ 64.604 and 64.606.	If necessary, the Bureau will send deficiency letters requesting additional information from states to ensure compliance with TRS mandatory minimum standards and other certification requirements.
May 2018 - July 2018	CGB will issue certification renewals on a rolling basis.	

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned "TRS State Certification Application."

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission's electronic comment filing system (ECFS): http://apps.fcc.gov/ecfs/. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and CG Docket No. 03-123.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filing for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554.

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[11] 47 U.S.C. § 225(f); 47 CFR § 64.606(a).

[12] 47 CFR § 64.606(b)(1)(ii).

[13] *Id.* § 64.606(a).

[14] 47 U.S.C. § 225(f)(2)(A). *See* 47 CFR § 64.604.

[15] 47 CFR § 64.606(b)(1)(iii).

[16] 47 U.S.C. § 225(f)(2)(B).

The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.

- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

- U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs/ (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice) or e-mail at Dana.Wilson@fcc.gov.

<div align="center">-FCC-</div>

Appendix B – FCC Matrix, TRS, STS, CapTel Training Outlines

Please see the following table for a point-by-point explanation of how we meet and/or exceed each of the minimum federal standards.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint offers a comprehensive training program designed to offer the best quality to all relay users. Sprint's 2-3 week program includes training on Diversified Culture, compliance with regulatory requirements, & the operation of Sprint's systems.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS, IP Relay (Partially waived for CTS, IP CTS)	Exceeds	Sprint ensures all CAs are skilled in typing, grammar, spelling, & interpretation of typewritten ASL (as applicable), familiar with hearing & speech disability culture, language, & etiquette; & have clear & articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS, IP Relay (Waived/partially waived for CTS, IP CTS)	Exceeds	Sprint's CAs type &/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	As a general rule, Sprint allows CA takeovers only when necessary. Sprint's CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation &/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's sophisticated software enables real-time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, IP Relay, CTS, IP CTS)	Meets	Sprint offers STS users the option to mute their voice so the other party to the call will hear only the CA & will not hear the STS user's voice.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has systematic & operational processes intended to prevent disclosure of call content &/or Customer Proprietary Network Info (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain info from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint bars its CAs from intentionally altering the conversations they relay, except to the extent necessary to: (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide info to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint never limits the length of a Relay call.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Except to the extent the requirements are waived, not permitted, or as the FCC determines that it is not technologically feasible to do so, Sprint services are capable of handling any type of call normally provided by telecommunications

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
			carriers.
Credit Authorization 47 C.F.R. § 64.604(a)(3)(iii)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Meets	Sprint understands it is permitted to decline a call if the user cannot pay or because a credit authorization for toll calls is denied.
Pay Per Calls 47 C.F.R. § 64.604(a)(3)(iv)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Sprint processes pay per calling for TRS & CapTel users with blocks available via the Customer Profile.
Call Combinations 47 C.F.R. § 64.604(a)(3)(v)	TRS (Partially waived for CTS, IP CTS, IP Relay)	Meets	Sprint's Relay services support all mandatory FCC call types.
Call Release 47 C.F.R. § 64.604(a)(3)(vi)(1)	TRS (Waived for CTS, IP CTS, IP Relay)	Meets	Sprint provides TTY-TTY call set-up which allows the CA to set-up the call & drop off the line, if not needed to facilitate conversation.
Speed Dial 47 C.F.R. § 64.604(a)(3)(vi)(2)	TRS, STS, CTS, IP Relay (Waived for IP Relay)	Meets	Sprint's TRS/CTS speed dial is available with a Customer Profile. CapTel users can select 3 speed dial buttons & a phone book for contacts.
Three-Way Calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	TRS, STS, CTS, IP Relay (Waived for IP CTS)	Meets	Sprint supports LEC-based three-way calling for its customers.
Interactive Menus & Voicemail 47 C.F.R. § 64.604(a)(3)(vii)/(viii)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint electronically captures recordings & makes interactive recordings & voicemail/ answering machines available to Relay customers. Sprint supports Sprint IP Text Mail so Sprint IP users can receive voicemail messages via email, when unable to answer.
Emergency Calls for TTY-based providers 47 C.F.R. § 64.604(a)(4)	TRS, STS (N/A for CTS, IP CTS, IP Relay)	Meets	Sprint automatically & immediately connects emergency calls to an appropriate Public Safety Answering Point (PSAP) which is capable of dispatching emergency services.
STS Called Numbers 47 C.F.R. § 64.604(a)(5)	STS (N/A for TRS, CTS, IP CTS, IP Relay)	Exceeds	Sprint allows STS users to register a Customer Profile which includes Speed Dial & other enhancements.
Privacy Screens 47 C.F.R. § 64.604(a) (6)	VRS	N/A	This requirement is not applicable to the services being offered.
International Calls Non-reimbursable 47 C.F.R. § 64.604(a)(7)	VRS, IP Relay (N/A for TRS, STS CTS, or IP CTS)	N/A	This requirement is not applicable to the services being offered. Sprint IP has procedures in place to prohibit international usage.
ASCII & Baudot 47 C.F.R. § 64.604(b)(1)	TRS, STS (Waived for CTS, IP CTS) (N/A for IP Relay)	Exceeds	Sprint's TRS (TTY) platform supports all communication modes generally in use including Baudot (domestic & international), ASCII, Turbo Code, & Enhanced Turbo Code (E-Turbo).
Speed of Answer & Blockage 47 C.F.R. § 64.604(b)(2)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint Relay answers at least 85 percent of all calls on a daily basis within 10 seconds, including abandons. Sprint's systems exceed the P.01 standard.
Equal Access to Interexchange Carriers (IXCs) 47 C.F.R. § 64.604(b)(3)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Except to the extent the requirements are waived, Sprint's TRS & CTS platforms support the billing & rating of toll calls through other carriers.
TRS Facilities 47 C.F.R. § 64.604(b)(4)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides mandated services 24/7 using redundant facilities functionally.
Technology 47 C.F.R. § 64.604(b)(5)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint exceeds the minimum mandatory services & routinely upgrades its products to increase functional equivalency.
Caller ID 47 C.F.R. § 64.604(b)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides Caller ID. If not blocked by the customer, the number of the calling party is transmitted.
STS 711 Calls 47 C.F.R. §	TRS, STS (N/A to CTS, IP CTS, or IP	Exceeds	Sprint offers multiple solutions to meet this requirement include: Auto 711 Routing for STS

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
64.604(b)(7)	Relay)		users connects callers with a Customer Profile directly to STS CAs. CAs answering 711 for callers without a profile will immediately transfer the caller to a STS CA. Sprint offers a wireless short code to STS for Sprint wireless users. Sprint's 711 Interactive Voice Response (IVR) allows connectivity directly to an STS CA using the same level of prompts the IVR uses for other forms of TRS.
Consumer Complaint Logs & Procedures 47 C.F.R. § 64.604(c)(1)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint maintains 24/7 Customer Service & logs all complaints received. Sprint provides the State a summary that meets FCC standards.
Contact Persons 47 C.F.R. § 64.604(c)(2)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's point of contact for complaints is Customer Service at: Sprint Relay Customer Service PO Box 29230 Shawnee Mission, KS 66201-9230 800-676-3777 (English) 800-676-4290 (Spanish) 877-787-1989 (Speech to Speech) 877-877-3291 (Fax)
Public Access to Information 47 C.F.R. § 64.604(c)(3)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint provides innovative Outreach services through state programs. The FCC does not allow IP Relay providers to include the cost of outreach in their yearly costs. Sprint continues to publicize the availability of IP services through promo materials, on-line marketing, & public service announcements. (Sprint does not include the cost of these activities in its yearly cost submissions to the FCC).
Rates 47 C.F.R. § 64.604(c)(4)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint ensures TRS/CTS users, who rely on Sprint's Relay platforms to establish billing for toll calls, are charged no more than traditional phone users.
Cost Information & Data Submission 47 C.F.R. § 64.604(c)(5)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint contributes to the Interstate TRS Fund & submits the required cost data to the FCC & to the Fund administrator to receive reimbursement.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(M)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has provided copies of the whistleblower protections to all of its employees including instructions for reporting noncompliance to the FCC's whistleblower hotline.
Complaint Resolution 47 C.F.R. § 64.604(c)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint supports timely & effective complaint resolution.
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint does not offer incentives to IP CTS users directly/indirectly. Sprint prohibits incentives to hearing health professionals & does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration & Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint complies with the final FCC rule requiring the collection of each new customer's name, address, telephone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
			maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification information, except as required by law/regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint's default setting for the IP CapTel phone is to have captions on.
IP CTS Equipment Fee & Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling on Sorenson v FCC & no longer applies. Sprint fully complies with the remainders of the order to provide a warning label on all IP CTS equipment & software.
TRS calls requiring multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint complies for VCO-VCO calls between multiple captioned telephone relay service users, IP CTS/CTS users & IP CTS users; CTS/IP CTS users & TTY users; CTS/IP CTS users & VRS users.
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	Meets	Sprint's emergency calling service is in full compliance with the FCC's rules. For Sprint IP, Sprint handles & routes emergency calls to the applicable PSAP; immediately attempts to re-establish contact in the event of disconnection; automatically places 911 calls at the front of call queues; & obtains registered location info from its users. For IP CTS calls, Sprint provides captioning for emergency calls, & the customer's underlying carrier handles call routing & delivery to/from the PSAP. Sprint provides its users with methods of updating their registered locations.
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	Meets	Sprint provides IP users the ability to register Sprint as their default provider. Sprint assigns 10-digit local numbers, routes, & delivers inbound & outbound calls. Sprint updates the TRS Numbering Directory for users who select Sprint as their default IP provider, as required under the FCC. Sprint complies with all porting requirements. Sprint's promo materials include advisories for E911, processes for obtaining a number, number portability, & updating location information.

Training

Communications Assistant (CA)/CA Training

Sprint knows a well-trained CA/CA has the skills and tools to provide the best customer experience. The education and continued development of all CAs/CAs is an investment. Sprint's training has evolved over 26 years in the relay industry, however, Sprint's commitment to quality service has never wavered. Sprint's reputation as a TRS provider within the deaf, hard of hearing, DeafBlind, speech-disabled communities, and the general public comes from our CAs'/CAs' commitment to providing quality service.

Training has been developed in coordination and cooperation with the relay user communities. CA/CA trainees must complete a series of scenario-based assessments, culminating in an on-the-job final assessment before graduating from initial training and handling relay calls. Training does not stop after the initial push. Employees continue to receive regular ongoing training to improve their skills and knowledge. Ongoing training and Quality Assurance programs are used as incentives to encourage competition between individual CAs/CAs and call centers and encourage continued industry-leading quality.

Sprint listens to customers' feedback and takes proactive steps to implement changes to address suggestions and feedback. Sprint does not develop training and consumer education programs for the TRS in isolation. Sprint Accessibility contracts with members of the deaf, hard of hearing, and DeafBlind communities and individuals with a speech disability to jointly develop and present training for TRS. This is an important Sprint advantage. Sprint provides ongoing training to our CAs/CAs on state-specific information including the names of local organizations, cities, and other common terms specific to the State. Sprint welcomes feedback from the State and its end-users.

During initial training, CAs/CAs are trained and evaluated on how to accurately reflect the TTY user's intent and the CA's/CA's role in the Relay process. Training is provided on various levels of English/Spanish/ASL during initial training and throughout employment. In order to successfully complete initial training, the CA/CA must demonstrate competent skills to translate calls as requested. When training is complete, a CA/CA continues to be evaluated on translation skills through individualized monthly surveys.

Relay trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls.

Sprint incorporates various instructional methods to enhance the trainee's ability to learn:

- ♦ Lectures
- ♦ Visual graphics
- ♦ Flow charts
- ♦ Videos
- ♦ Role-play scenarios
- ♦ Simulated on-line call handling
- ♦ Observation of live-call handling

Our policies and standards manual has been developed over the past 26 years. Sprint stresses the importance of all Relay policies and procedures at the interview/selection process and continues through initial and ongoing training and is currently being utilized and available for the Sate to review. An outline of these expectations is provided in the following table. This list is not meant to be a complete source and is subject to change.

POLICY AND PROCEDURE TOPICS		
Orientation	♦ Welcome and Introductions	♦ Internet Services

POLICY AND PROCEDURE TOPICS		
	- Introduction to Each Other - Sprint (or Vendor Company) - Sprint Values - Sprint Corp Overview - History of Sprint Corporation - Local Telecommunications - Wireless	- Product Distribution - The Sprint Campus (if applicable) - Telecommunications Relay Service - What is Relay? - Relay Agent Training - Relay - Connect to Your Future Video - Observation Guidelines - How a Call Reaches Sprint Relay
Connecting to Relay	- The Role of a Relay Agent - Connecting to Relay 711 - Dedicated Toll-Free Numbers - Equipment - TTY - TTY Basics - TTY Etiquette - Closing a Conversation - Agent Responsibility - Call Set Up - Call Closing - TTY to Voice Closing a Conversation - CA Role Closure - CA Close Protocol Guide: - Disallowed Calls - Glossary of Abbreviations & Terms - TTY Practice Session - Auto-Corrected Abbreviations - Standard Abbreviations - Typing Variations - Internet Characters - Non-Baudot Supported Characters - Verbatim - Style - Contraction Spelling - Punctuation - Agent/CA Role - SKSK - Background Noises while TTY user is Typing - Typing Monetary Units 711 - TTY Garble During Typing - XXX to Correct Typing Error - Other Communication Devices - Data Transmission Speed - Turbo Code - Turbo Code Interrupt - Enhanced Turbo Dial Thru - (ETurbo) - Disable Turbo Code Mode - American Standard Code Information Interchange (ASCII) - ASCII Interrupts - Sprint IP - Internet Relay - Sprint IP call processing - Internet Relay variations 'GA' is optional - Sprint IP Standard Svc Explanation - Text Flow - Interruptions without garble - Conversational flow - ASL Emoticons – Text Message Abbreviations - IP Acronyms - Sprint IP Variations	- Sprint IP user connects to Agent but wants Customer Service - Sprint IP Two Line VCO - Fed IP Relay - Fed IP Relay call processing - Fed IP Relay Reporting - Fed IP Relay variations - Sprint/Fed IP Relay International Calling - Sprint/Fed IP Variations - Sprint/Fed IP Fast Busy - Sprint/Fed IP 2-Line VCO - Sprint/Fed IP Conversation Lag Time - Sprint/Fed IP Interrupts - Voice Mail Greeting - Cellular & Wireless Phones - Video Relay Service - Devices & Pagers - TTY Public Payphone - Sprint National Relay - Sprint International - Inbound international calling - Sprint International Variations - Non-Standard TTY - Outbound International calling - Transfer Menu - Reseller call processing - CapTel - Relay-CapTel - CapTel-Relay - CapTel Transfers - Dedicated State CapTel Transfer - Alternate Languages - Spanish Language Customer Service - Relay Caller ID - True Caller ID - Per Call Block - Per Line Block - Permanent Call Blocking - Caller ID Blocking - True Caller ID - Connecting Variations - Misdialed Relay Phrase - Dialed 711 Instead of 911 711 Spanish - Request for Relay Numbers - Cellular/Wireless problem reaching 711 611/811 (LEC Service Access) 700 900 Numbers & Call Processing - Correctional Facility/Prison Calls - Use of Relay through Correctional Facilities: Correctional Facility Call Processing, Relay Abuse - Spanish & French Language Service - International calling restrictions

POLICY AND PROCEDURE TOPICS		
		♦ Info Digit list ♦ 911 Emergency Calls
Overview of System & Equipment	♦ System Overview ♦ Login/Logout ♦ Agent Profile ♦ Clicking the Mouse ♦ Dragging/Dropping ♦ Copy/Paste ♦ Drop Down Boxes ♦ Lists ♦ Radio Button ♦ Scroll Bars ♦ Sliders ♦ Tables ♦ Accessing a Program ♦ Screen Displays ♦ Call Handling Screen ♦ Title Bar ♦ Banner ♦ Conversation Area ♦ Disconnect Message Status ♦ Color Scheme ♦ Agent Text Transmission ♦ Cancel Key ♦ Information Bar ♦ Profile ♦ Help ♦ Call Type	♦ Dial Window ♦ Scratch Pad ♦ Transfer Panel ♦ Headset Panel ♦ Status Bar ♦ Record Feature ♦ Function Keys ♦ Block ♦ Ctrl-Switch ♦ Switch ♦ The Keyboard ♦ Alpha Keys ♦ Call Handling Keys ♦ Numeric Keys ♦ Cursor Movement Keys ♦ Arrow Keys ♦ Backspace ♦ Error Correction Function ♦ Single Word Edit Function ♦ Word Substitution Feature ♦ Macros Table ♦ Ctrl-Function Keys ♦ Glossary of Telephony Terms ♦ Background Noises ♦ Voice Tones/Descriptive Words ♦ Standard Abbreviations
Phone Image (Tone of Voice)	♦ Professional Phone Image ♦ How phone image is created ♦ Provide warm & friendly greeting ♦ Conversational Tone ♦ Voice Inflection ♦ Audibility & breath control ♦ Pitch ♦ Quality ♦ CA Role ♦ Relay Role ♦ Relay Skills ♦ Conversational Flow ♦ Staying focused ♦ Listening skills ♦ Customer service skill ♦ Coping skills ♦ Phrases ♦ Background Noises ♦ Voice Tones/Descriptive Words	♦ Voice Person Speaking in Third Person ♦ Pacing the Voice Customer ♦ Brief pacing phrases ♦ Repeating information ♦ Voice Customer does not say "GA" ♦ Handling Interruptions ♦ Voice Tone ♦ How Phone Image is Created ♦ Why Conversational Tone? ♦ Transparency, Caller Control & Confidentiality ♦ Rudeness ♦ Create an Exceptional Customer Experience ♦ Announce ♦ Closing ♦ Suggested Redirect Phrases ♦ Transparency & Caller Control
TTY-Voice & Voice-TTY	♦ TTY to Voice Introduction ♦ Connecting to outbound customer ♦ Announcement ♦ Explanation of service ♦ Deaf or Hard-of-Hearing Explanation ♦ International Announcement ♦ TTY-Voice Procedures ♦ TTY-Voice Specific Person Request ♦ Variations Specific Person Request ♦ TTY-Voice Answered TTY ♦ Voice Person Not Available ♦ TTY-TTY Call Release ♦ TTY-Voice Answer TTY (TTY-TTY) ♦ TTY-TTY Specific Person Request	♦ TTY-Voice Busy Signals ♦ Regional 800 ♦ Voice-TTY ♦ Voice-TTY Introduction ♦ Connecting to the outbound customer ♦ Voice Greeting ♦ Voice call progress ♦ Announcement ♦ Voice-TTY call (Hearing Person Answer) ♦ Explanation of service ♦ Voice-TTY Procedures ♦ Voice-TTY Specific Person Request ♦ Voice-TTY Answered Voice ♦ Voice-TTY No Answer

POLICY AND PROCEDURE TOPICS		
	♦ TTY-Voice No Answer ♦ Types of Busy Signals ♦ Redialing	♦ Voice-TTY Busy Signal
Branding	♦ Inbound Answer Type Branding ♦ Database Branding	♦ Branding procedures
Recordings, Answering Machines, Pagers, & Answering Machine Retrieval (AMR)	♦ Introduction ♦ Recording Feature ♦ Information Line Recording (TTY/ Voice) ♦ Touch Tone Dialing ♦ Using Touch Tones (TTY/Voice) ♦ Audio text interaction ♦ Variations for Recordings ♦ Record Feature Tips ♦ TTY-Voice Recordings ♦ TTY-Voice Recording Information ♦ TTY-Voice Answering Machine ♦ Variations: Answering Machine/ Recording/Pagers ♦ Voice Mail Retrieval	♦ AMR ♦ TTY-Voice Pager/Beeper (known) ♦ TTY-Voice Pager/Beeper (unknown) ♦ Voice-TTY Pager ♦ Voice-TTY Answering Machine ♦ Other Recording Variations ♦ Voice Mail System ♦ Privacy Manager/Call Intercept ♦ Automatic Redial System Recordings ♦ Switchboards ♦ Redialing Voicemail through Switchboard ♦ TTY-Voice Asking for Specific Person ♦ Live person On Answering Machine Redial
VCO (Voice Carry-Over)	♦ VCO Introduction ♦ VCO Announcement ♦ VCO Service Explanation ♦ VCO Equipment ♦ Non-Branded VCO ♦ Branded VCO ♦ VCO No Answer ♦ VCO Busy ♦ VCO Privacy ♦ VCO Answering Machine ♦ Voice-VCO Answered TTY ♦ Voice-VCO Answered VCO ♦ Two-Line VCO (2LVCO) Intro	♦ Reverse 2LVCO Intro ♦ Reverse 2LVCO Procedure ♦ VCO Variations ♦ VCO comes in Voice Line ♦ 2LVCO Conference Calls ♦ VCO Requests Relay to give Relay # ♦ VCO Privacy while leaving message ♦ VCO Voice Mail Retrieval ♦ 2LVCO Voice Mail Retrieval ♦ VCO Types and Voices ♦ Inbound Customer Requests VCO/HCO ♦ VCO Requests CA gives name in notes ♦ 2LVCO Procedure
Billing	♦ Introduction ♦ Local call description ♦ Paid by Inbound ♦ Toll Free Calls ♦ Calls that Cannot Be Processed ♦ Specific Person Request	♦ Inbound tells wrong # ♦ Agent dials wrong # ♦ Marine ♦ Roaming Feature ♦ Restricted Roaming ♦ Unrestricted Roaming
HCO (Hearing Carry-Over)	♦ HCO Intro ♦ HCO Announcement ♦ HCO Service Explanation ♦ People with speech disabilities "S" ♦ Non-Branded HCO ♦ Branded HCO ♦ HCO with Privacy ♦ HCO No Answer ♦ HCO Busy ♦ HCO-Voice Answering Machine	♦ Voice-HCO Answered ♦ Voice-HCO Answered TTY (1) (2) ♦ Voice-HCO recorded message answers ♦ 2LHCO Intro ♦ Two-Line HCO Procedure ♦ Reverse Two-Line HCO ♦ HCO Variations ♦ Inbound requests VCO/HCO ♦ HCO User Requests to Speak
Customer Database	♦ Enhanced Customer Database Profile ♦ Household Profile ♦ Edit Household Profile ♦ Navigating Customer Database ♦ Household Profile Panels ♦ Frequently Dialed Numbers ♦ Preferences ♦ Restrictions ♦ Blocked ♦ Emergency Numbers ♦ STS ♦ STS Messages	♦ Customer Profile Introduction ♦ Use/Edit/New/Delete Customer Profile ♦ Verify Customer Password for Agent ♦ Verify Customer Password – CSR Only ♦ Customer Profile Panels ♦ Personal Information ♦ Notes ♦ Frequently Dialed #s ♦ Emergency #s ♦ STS ♦ STS Messages ♦ Database Profile Macros
Directory Assistance	♦ DA Intro	♦ Call Processing -- Calling from International

POLICY AND PROCEDURE TOPICS		
(DA)	♦ Interstate DA ♦ Intrastate DA ♦ Automated DA ♦ DA City & State Given; Area Code Unknown ♦ DA Variations ♦ International Transfer Menu ♦ Call Processing -- Calling Intl	♦ Number ♦ Sprint International Variations ♦ Non-Standard TTY ♦ Answered Foreign Language ♦ Transfer Menu ♦ 900 # Call Processing ♦ 211/311/511 Requests
Device-to-Device Calls	♦ Device to Device Intro ♦ Function Keys & Banner Messages ♦ VCO-TTY & TTY-VCO ♦ VCO-VCO ♦ TTY-HCO & HCO-TTY	♦ VCO-HCO & HCO-VCO ♦ HCO-HCO ♦ Device to Device Variations ♦ Alternate Call Type reaches recording
Call Processing Variations	♦ CA information ♦ Area Code Only In From Number ♦ Conversational Flow ♦ Static or Poor Connection ♦ Profanity towards Agent ♦ Redialing ♦ Young Children ♦ Inbound Does Not Connect ♦ Inbound ASCII ♦ Tone Judgments ♦ Repeating Information ♦ Restricted Calls ♦ Two calling from numbers ♦ LEC Service Office ♦ 611/811 ♦ Double Letters ♦ Call Waiting Feature ♦ Conference Calls ♦ Party Line Calls ♦ Three-Way Calling ♦ Hard of hearing customer Answers TTY Line ♦ Spanish Calls to Spanish Speaking Agents ♦ Request for Alternate Language ♦ Caller Types in Alternate Language ♦ Voice Customer Hangs Up During Call ♦ Variable Time Stamp ♦ Customer Misdialed Phrase ♦ TTY Customer Hangs Up During Call ♦ Non Standard TTY Capability ♦ Relaying Internet Characters ♦ TTY User Does Not Type GA ♦ Dispatch Calls – Pizza, Taxi, etc. ♦ Customer Referral Guidelines ♦ V-T Calls answered by Fax ♦ Customer Requests ♦ Holding for Inbound prior to out dial ♦ Request for Company Information ♦ Request for M/F Agent ♦ Request Specific Agent ♦ Agent Knows Customer ♦ Request for Relay Number ♦ Customer Requests to Call Relay Service ♦ Request for Calling From Number ♦ Request Telephone Number Referral ♦ Request for Date/Time ♦ User Requests Agent to Modify Call	♦ Request for Length of Call ♦ T-V Call & V Requests Supervisor Call Backs for TTYs ♦ Multiple Calls ♦ Sensitive Topics ♦ Suicide ♦ Abuse ♦ Illegal Calls ♦ Answering Machines ♦ Hangs Up Before Message Left ♦ Do Not Type Recorded Messages ♦ Answering Machine Full ♦ Change Answering Machine Message ♦ VCO Requests Leave Message 1st out dial ♦ Leaving a Message V-TTY Ans V ♦ Retrieving Messages from TTY V Answering Machine ♦ TTY Screener ♦ Request to Leave TTY Message on Answering Machine ♦ Recordings ♦ Regional 800 ♦ TTY Requests "Dial That Number" ♦ Recording with Relay Option ♦ Alternate Call Recording Reached ♦ English/Spanish ♦ Pound ♦ Touch Tone Phone ♦ Advertisements ♦ Do Not Type Recordings ♦ Get Live Person/Rep ♦ Conversation Being Recorded ♦ Dial Number from Recorded Announcement ♦ VCO ♦ Conference Calls ♦ Leave Relay Number ♦ Voice Mail Retrieval ♦ VCO Types & Voices ♦ Prompting ♦ Data Transmission Box ♦ Prompting VCO on Hold ♦ Requests VCO/HCO ♦ HCO ♦ Requests VCO/HCO ♦ Alternate Call Type Recording ♦ Bridge Left Open
Call Take Over Procedures	♦ FCC Rule ♦ Protocol & process flow ♦ TTY-Voice and Voice-TTY	♦ VCO ♦ VCO-VCO ♦ HCO

POLICY AND PROCEDURE TOPICS		
	◆ ASCII	◆ VCO-TTY & TTY-VCO
Customer Service	◆ Functions ◆ Language Services	◆ Procedures
Transparency	◆ Non-Emergency Calls ◆ Emergency Center Evacuation	◆ Network Failure
Emergency Call Procedures	◆ Emergency Calls Intro ◆ Emergency Services ◆ FCC Requirements ◆ Emergency Call Processing ◆ Emergency Reporting ◆ TTY-Emergency	◆ TTY-Emergency TTY Call Release ◆ Internet-Emergency ◆ Instant Messenger (IM) Emergency ◆ Emergency Call Processing Variations ◆ Emergency Form ◆ Voice-Emergency
Federal Relay Service	◆ FedRelay Intro ◆ FedRelay Announcement ◆ FedRelay Service Explanation ◆ FedRelay Procedures ◆ FedRelay call types	◆ FedRelay Confidentiality Policy ◆ FedRelay Customer Information Requests ◆ FedRelay Customer Contacts ◆ FedRelay Reporting
STS (Speech-to-Speech)	◆ STS Introduction & History ◆ STS Description ◆ Disabilities ◆ Characteristics of STS users ◆ Stereotypes ◆ Clarifying Phrases ◆ Phrases to Avoid ◆ STS Phone Image ◆ STS Agent Tools ◆ Consistency ◆ Patience ◆ Ask Yes/No Questions ◆ No Personal Conversation ◆ Phrases ◆ STS Alphabet ◆ Transparency/Call Control/ Confidentiality	◆ Ways to Reduce/Streamline Notes ◆ Standard Abbreviations (STS) ◆ STS-Voice ◆ Voice-STS ◆ STS VCO-Voice ◆ Voice-STS VCO (TTY answer) ◆ Voice-STS VCO (VCO answer) ◆ STS VCO -- 2 Line VCO ◆ TTY-STS ◆ STS-TTY ◆ Non-branded HCO-STS ◆ STS-HCO ◆ STS Hold Message ◆ STS Call Takeover ◆ Confidentiality & Transparency ◆ Personal Conversations requests ◆ STS Variations
Healthy Detachment	◆ Healthy Detachment Intro ◆ Objectives ◆ Survival Skills ◆ Relay Traps	◆ Perception ◆ Ways to Reduce Stress ◆ Hospitality ◆ Phrases
Healthy Relay	◆ Introduction ◆ Objectives ◆ Ergonomics ◆ Stretching Exercises ◆ Agent Reinforcement ◆ Ergonomic Review	◆ Setting up Workstation ◆ GUAM - Get Up and Move ◆ Ergonomic Relief ◆ Slowing the Customer Down ◆ Overtime ◆ Relaxation
Adult Learner	◆ Understanding the Needs of the Adult Learner ◆ The Learning Continuum ◆ Use of Different Modalities ◆ Edgar Dale's Cone of Experience ◆ Elements of Lesson Design ◆ Focus ◆ Objective & Purpose ◆ Input ◆ Trust in Management	◆ Modeling ◆ Checking For Understanding ◆ Guided Practice ◆ Independent Practice ◆ Summary ◆ Evaluation ◆ How to Give Effective Instruction ◆ Questioning Guidelines ◆ Feedback - Training & Coaching Technique
Assessing Performance	◆ The Assessment Process in Training ◆ Assessment - What is involved? ◆ Practice Time ◆ Spelling Test ◆ Written tests ◆ Side by side evaluations ◆ Typing	◆ Acceptable Time Frame ◆ Acceptable Is Relative ◆ Ways to "Coach" ◆ Feedback ◆ Maintain Self-esteem & Motivate ◆ Pass/Fail Guidelines ◆ Introduce Assessment Form ◆ Form Set-Up
Introduction to	◆ Introduction to Diversified Culture	◆ Why is there Deaf Culture?

POLICY AND PROCEDURE TOPICS		
Diversified Culture	♦ Diversification ♦ Who Uses Relay ♦ Understanding Our Customer ♦ Special Communication Needs ♦ Pathological vs. Cultural View of Deafness	♦ What Do You Know About Deafness ♦ Myths About Deafness ♦ Two Views of Deafness ♦ Loudness Levels ♦ Characteristics of Deafness ♦ The Deaf Community
Deaf Heritage	♦ History in Europe ♦ History in North America ♦ Alexander Graham Bell	♦ Edward Miner Gallaudet ♦ Oral/Combined Debate ♦ Timeline of Deaf History
The Deaf Community	♦ Introduction to the Deaf Community ♦ National Association of the Deaf ♦ Contributions to Society ♦ Mainstreamed Schools ♦ Sign Language Interpreters ♦ Different Communication Systems ♦ Exposure to English ♦ DEAF President Now ♦ Attitude Changes toward the Deaf Community	♦ American Athletic Association of the Deaf ♦ National Theatre of the Deaf ♦ Assistive Devices ♦ Gaining Acceptance in the Deaf Community ♦ Changes in the Deaf Community ♦ Working with a Sign Language Interpreter ♦ Interpreting Standards ♦ Equal Access ♦ Cochlear Implant Controversy
American Sign Language (ASL) Pt. 1	♦ What is ASL? ♦ History of ASL ♦ ASL Recognized as Language	♦ Rules of ASL ♦ Five Parameters of ASL ♦ English vs. ASL Idioms
American Sign Language (ASL) Pt. 2	♦ Evolution of ASL ♦ ASL Syntax	♦ Translate ASL to English and Vice Versa
TTYPhony & TTY Courtesy	♦ First Teletypewriter ♦ Evolution & History of the TTY ♦ Telecom Laws of Accessibility	♦ TTY Courtesy ♦ Development of Relay Service Market
Deaf Customers	♦ Statistics from NIDCD	♦ Relaying for Deaf Customers
Hard of hearing & Late-Deafened Customers	♦ Characteristics of Deaf Customers ♦ Assistive Devices for Deaf Customers ♦ Establishment of Assoc. of Late-Deafened Adults	♦ Establishment of Hearing Loss Association of America ♦ Deaf Seniors ♦ Military Veterans ♦ Relaying for Late-Deafened Customers
DeafBlind Customers	♦ What Does DeafBlind Mean ♦ Assistive Devices for the DeafBlind ♦ Relaying for the DeafBlind	♦ DeafBlind Pacing – Allows the CA to slow down the transmission to the Braille machine
Relaying for Speech/ Cognitively Disabled Customers	♦ Speech-Challenged Customers ♦ Assistive Devices ♦ Physically &/or Cognitively Challenged Customers	♦ Traumatic Brain Injury ♦ Stroke ♦ Communication Related Effects
Relaying for Hearing Customers	♦ Statistics	
Ethics & Confidentiality	♦ Interpreting Standards ♦ ADA & FCC regulations for the Provision of TRS ♦ Regulations pertaining to call content	♦ TRS Rules – CA Standards ♦ Relay Center Agreement Regarding Confidential Customer Info

On-Going Quality Focus Skill Training

Continuous skill training is the cornerstone of Sprint's training program. Core relay processing skills are continually reinforced throughout employment and as a part of supplemental training programs. Sprint develops skills training programs and on-going training labs to ensure skills are maintained and remain consistent with basic relay training. Refresher training is provided on correct relay procedures including system navigation, standard procedures, professionalism, and ethics. Depending upon the complexity of the training a decision is made to determine the appropriate delivery. Our on-going skill training program includes:

- ♦ Quality Focus Skill training - monthly
- ♦ Diversified Culture Awareness training - monthly

- ◆ Customer Service Initiative – monthly
- ◆ Check for Understanding – monthly
- ◆ Grammar and Spelling Rules - bi-annual

Quality Focus Skill Training topics from 2016/2017:

Jan 2016	Dialing the correct number within 5 seconds
Feb 2016	Typing the Voice/TTY greeting verbatim, Announcement protocol including a prompt state-specific announcement/greeting used/ ID number given
Mar 2016	Call processed according to procedures, specifically following Customer Note instructions
Apr 2016	State-specific announcements/greeting/ID given, Call closing protocol, Appropriate closing and macro for call type
May 2016	Specific person request announcements, Progress of call/Customer Informed
Jun 2016	Call transfer procedure, Adapting to call procedures changes as directed by the customer.
Jul 2016	Typing greeting verbatim, Typing message verbatim, Voicing the complete message
Aug 2016	Maintaining transparency maintained, Typing messages verbatim
Sept 2016	Dialing efficiency and protocol
Oct 2016	Typing/reading voice/device answer greetings verbatim, Call closing procedure, Relay mode closing protocol, CA mode closing protocol
Nov 2016	Changing call procedures as directed by customer, Appropriate macros use., Non-branded VCO call type setup
Dec 2016	Call type standard procedure, Modifying call procedure as directed by the customer, Transferring (711 customer request)
Jan 2017	Dialing the correct number within 5 seconds
Feb 2017	Determining familiarity with relay services, Call type appropriate service explanations, Appropriate macro use (EXPLAINING RELAY)?
Mar 2017	Following customer note and customer typed Instructions
Apr 2017	Announcement protocol including a prompt state-specific announcement/greeting used/ID number given, Call closing protocol, Appropriate closing and macro for call type.
May 2017	Specific person announcement procedure
Jun 2017	Call transfer procedure, Adapting to call procedures changes as directed by the customer, 711 transfer compliance

Ongoing Diversified Culture Awareness Training

Training continues to bring focus to serving relay customers and disability awareness. Sprint provides additional training in Diversified Culture in conjunction with each state's local deaf, hard of hearing, Deafblind, late deafened and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with trainers ensure all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness. Sprint will utilize live presentations, videos, audio recordings, role-plays, group activities, written materials, and/or discussion groups to deliver ongoing Diversified Culture training. As a part of ongoing Diversified Culture Training, each employee is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding.

Diversified Culture Awareness Training topics from 2016/2017:

Jan 2016	Diversified Culture-What's That? Diversification in Communication, Considerations, Who uses the relay service? Why is it important for us to understand our customers? Why is it important for us to recognize their special communication needs?
Feb 2016	The History of Deafness
Mar 2016	Ways to Detach
Apr 2016	Deaf Nation Expo is…
May 2016	American Sign Language is…, CODA means…
June 2016	All About CapTel, How it works
July 2016	Baseball Signs originated from Sign Language
Aug 2016	Accessibility for All, Sprint corporate responsibility
Sept 2016	Diversity-Equality-Inclusion

Oct 2016	Disability is Diversity, Stretches to do at your desk
Nov 2016	Disability Awareness
Dec 2016	Disability Advocacy
Jan 2017	View of a person's abilities
Feb 2017	Highlight: Edward Verne Roberts – American Disability Activist
Mar 2017	Disability Awareness
Apr 2017	Parkinson's Awareness Month
May 2017	Limb Loss Awareness Month

The following is an example of the monthly Quality Focus Check for Understanding from March 2017.

Check For Understanding
Quality Focus March 2017

Please return to your supervisor by March 7, 2017.

Name _____ Supervisor _____

1) What is the first thing an agent should look at when a call comes to their station?
   _____

2) If a customer requests that the agent verifies the Calling To number before dialing out the agent should type or say something like, _____

3) The IP Call number to dial is entered by the inbound, therefore you DO NOT need to verify the Calling To number before outdialing on an IP call, even if it's in the Customer Notes to do so.
   TRUE   FALSE

4) The record feature may be used on conference calls.
   TRUE   FALSE

5) If the customer has TYPE RECORDINGS as a preference or instruction the agent should not transmit _____. This instruction indicates that the customers the agent to type the _____ recording.

6) If a device user requests that you do not announce relay, the agent should:
   a) Not identify that this call is through a relay service or ask if the voice person has had a relay call before.
   b) Inform the customer they must answer the question (HOW WOULD YOU LIKE YOUR CALL ANNOUNCED Q) GA.
   c) Inform the caller they are required to announce the call.

7) What is the purpose of the customer notes?
   a) To assist the agent in processing the call how the customer prefers.
   b) To annoy the operator.
   c) To ensure the customer does not have to repeat their instructions before every call.
   d) Both A and C.

8) When using <ALT .>, agents should send it:
   a) Only once and then pause a few moments before sending it again.
   b) Twice and then pause a few moments before sending it again.
   c) As many times as they want since they are in the buffer and can be canceled when the phone is answered.

TTY/ASL Refresher	Provide examples of how to relay the statements
¨ TIME WHAT Q	
¨ GO PARTY YOU Q	

Customer Service Initiative (CSI) program: A discussion of support techniques to enhance service for customers and an avenue for sharing relay agent peer to peer suggestions toward accomplishing superior service. 2016/2017 CSI topics are provided in the following table.

Jan 2016	Use of "Deaf/hard of hearing" and/or "internet service" in announcements.
Feb 2016	Outdial time, Inappropriate use, Veterans and hearing loss
April 2016	Sprint IP go ahead, Keeping the caller informed, Facilitate communication
May 2016	Procedure for recordings, Chemotherapy and hearing loss
Jun 2016	Caller control, Keeping the caller informed, Announcements, FCC verbatim requirement, State requirement call customization request
Jul 2016	Solicitation for agent process improvement suggestions, Caller control
Aug 2016	Call closure, Equal communication access
Sep 2016	Call processing reference information, Sprint Relay customer care, Speed of service recognition
Oct 2016	Brief service explanations, Call handling tips from agents
Nov 2016	Customer commendations, States and capitals review
Dec 2016	System enhancement prioritization
Jan 2017	Customer instructions, FCC call take over rule, Transparency
Mar 2017	Transparency, Caller control
Apr 2017	Customer notes, CA/Relay mode, Call handling tips from agents
May 2017	Stress management

The following is an example of our bi-annual Grammar and Spelling Rules from 2016/2017.

GRAMMAR MATTERS

Homonyms (also called homophones) are words that sound like one another but have different meanings. Some homonyms are spelled the same, like bark (the sound a dog makes) and bark (the outer layer of a tree trunk).

I and Me Usage

	When to Use	Example Sentence	How to Test
I	When you're referring to the subject of a sentence or clause	Julia (subject) and I (subject) always go together.	To know if you should use "I" or "me" take the other pronoun out of the sentence and see if it still makes sense.
Me	When you're referring to the object of a sentence or clause	Will you (subject) be coming with me (object) to the store?	

Examples:

I
1. Harry and I/ me went to the store.
Test: Me went to the store. (Incorrect!)
Test: I went to the store. (Correct!)

2. Jake invited Brian and I/ me over for dinner.
Test: Jake invited I over for dinner. (Incorrect!)
Test: Jake invited me over for dinner. (Correct!)

Me
1. Will you take my brother and I/me to the movies?
Test: Will you take I to the movies? (Incorrect!)
Test: Will you take me to the movies? (Correct!)

2. Sam, Jennifer, and I/me went to the beach.
Test: Me went to the beach. (Incorrect!)
Test: I went to the beach. (Correct!)

There, Their, and They're Usage

pronounced the same	When to Use	How to Test
There	Naming a place, a thing, or the existence of something	If you can replace "there" with "here" you have it right!
Their	Showing possession	If you can substitute "their" with "our" you have it right!
They're	Combining the words "they" and "are"	"They" is a pronoun and "are" is the verb. If you can substitute "We are" you have it right!

Have and Has Usage

	Singular	Plural	Hint
1st Person	I have	We have	"Have" and "has" are both present tense conjugations of the verb "to have", and we use "have" or "has" depending on the subject. If the subject is 3rd person singular, then you use "has". All other subject take on "have".
2nd Person	You have	You have	
3rd Person	He/she/it has	They have	

It's and Its Usage

	When to Use	How to Test	How to Test
It's	When you're about to describe something	Replace with "it is"	If you can replace "it's" with "it is" you have it right! Otherwise do not use punctuation.
Its	When you want to indicate ownership of something	Replace with another possessive adjective ("her," "his," "their") or "the"	

Ten Common Spelling Rules

Rule	Examples	Memorize
1. 'ie' or 'ei' ❶ Write i before e, except after c ❷ Write ie after c for words with a sh sound. ❸ Write ei when the vowels sounds like an a as in 'weigh'	❶achieve, believe, friend receive, receipt, perceive ❷ancient, efficient, sufficient, conscience ❸neighbor, vein, reign, rein, deign	**Exceptions:** Words like counterfeit, either, neither, height, leisure, forfeit, foreign, science, species, seize, weird
2. 's' or 'es' ❶ Add es if a word ends in ch, sh, ss, x or z ❷ Add es for most words ending in o	❶arch > arches, clash > clashes, class > classes, box > boxes, quiz > quizzes ❷tomato > tomatoes, hero > heroes, go > goes, do > does, echo > echoes	**Exceptions:** Words like altos, duos, pianos, radios, solos sopranos, studios, videos, typos
3. 'y' to 'i' or not ❶ For words ending in y preceded by a vowel, retain the y when adding s or a suffix. ❷ For words ending in y, retain the y when adding ing. ❸ For words ending in y, preceded by a consonant, change the y to i before any other suffix	❶ convey > conveys, employ > employer ❷ try > trying, justify > justifying, certify > certifying, study > studying ❸ try > tried, justify > justifies, certify > certifiable, mystify > mystified, laboratory > laboratories	**Exceptions:** Words like dryness, shyness
4. drop the final 'e' ❶ DROP the e when the suffix starts with a vowel. ❷ DROP the e when the word ends in dge. ❸ DROP the final e when adding -ing	❶save > savable, use > usable ❷judge > judgment ❸save >saving, manage > managing, trace > tracing, emerge > emerging	**Exceptions:** DO NOT DROP the e if the word ends in ce or ge (e.g. manage > manageable, trace > traceable)
5. 't' or 'tt' when adding -ing, -ed and some suffixes to verbs ❶ DOUBLE the t for verbs of one syllable with a single vowel, or a short vowel sound. ❷ DOUBLE the t for verbs of more than one syllable when the stress is on the last syllable.	❶rot > rotting, rotted, rotten fit > fitting, fitted knot > knotting, knotted ❷abet > abetting, abetting allot > allotting, allotted commit > committing, committed emit > emitting, emitted forget > forgetting, forgotten (but forgetful)	**Exceptions:** DO NOT DOUBLE the t for verbs of one syllable with a double vowel or a long vowel sound (e.g. treat > treating, treated; greet > greeting, greeted)
6. 'r' or 'rr' when adding -ing, -ed and some suffixes to verbs ❶DOUBLE the r for verbs of one syllable when the final r is preceded by a single vowel. ❷DOUBLE the r for words of more than one syllable when the stress does not fall on the first syllable.	❶star > starring, starred, starry tar > tarring, tarred war > warring, warred (but warfare) scar > scarring, scarred stir > stirring, stirred ❷concur > concurring, concurred, concurrence occur > occurring, occurred, occurrence defer > deferring, deferred, (but deference) deter > deterring, deterring, deterrent infer > inferring, inferred, (but inference) prefer > preferred, preferring, (but preference) refer > referred, referring, referral	**Exceptions:** DO NOT DOUBLE the r for verbs of one syllable when the final r is preceded by a double vowel (e.g. fear >fearing, feared) DO NOT DOUBLE the r for words of more than one syllable, when the stress falls on the first syllable (e.g. prosper > prospered, prospering)
7. 'l' or 'll' when adding -ing, -ed and some suffixes to verbs DOUBLE the l when it is preceded by a single vowel.	cancel > cancelling, cancelled, cancellation fulfil > fulfilling, fulfilled, fulfilment level > levelling, levelled travel > travelling, travelled, traveller /traveler	**Exceptions:** DO NOT DOUBLE the l when it is preceded by a double vowel (e.g. conceal > concealing, concealed)

Staff Training

Our entire Accessibility team exists for our customers. Training on all aspects of ASL, deaf culture, the needs of hearing, speech and dual sensory impaired users, ethics and confidentiality is vital to our success. These topics and others help us to be able to meet and exceed customer expectations and requirements.

All Sprint employees are required to take ethics and confidentiality training. The Sprint Code of Conduct is applicable to Sprint employees and its controlled subsidiaries, the Sprint Board of Directors and anyone we authorize to act on Sprint's behalf. The Code establishes the basic foundation of Sprint's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders, and the communities in which we do business. The Sprint Code of Conduct outlines our ethical and legal responsibilities as employees, as well as our interactions with customers, competitors and suppliers. One of our most valuable assets is our reputation for honesty and fairness, and our commitment to uphold this responsibility. The Code is a go-to resource when questions of legal or ethical appropriateness arise. We are bound by the Code and the specific operational policies of Sprint. Annual Code certification is required. Sprint also maintains an Ethics Helpline, a 24-hour resource for

employees and other stakeholders to confidentially and safely seek advice or report any suspected violation of the Code of Conduct, such as fraud, sexual harassment, discrimination, or any illegal conduct in the workplace.

Sprint staff members are also required set annual corporate training and development goals. Individual performance is measured and tied to compensation. Ongoing Staff Development is also key to overall staff performance. Sprint's Accessibility Customer Solutions (ACS) group hosts an interactive meeting called the Sprint Accessibility Café. This monthly meeting is an opportunity for the Accessibility Team to share market and industry product updates. Presenters from outside the group and subject matter experts from the Relay industry also provide updates.

Appendix C: TRS Pledge of Confidentiality

Sprint's reputation as an ethical company is the key to enabling us to be the preferred communications company – a place that delivers the best experiences for employees, end users, and state customers. Throughout initial and on-going training, communications assistants (CAs)/CAs receive information and guidelines on professional conduct with an emphasis on ethics and confidentiality, based on Sprint's "Relay Center Code of Ethical Conduct" and "Principles of Business Conduct." CAs/CAs are presented with possible situations involving ethical issues and are taught how to apply the conduct guidelines to each situation.

All Relay center personnel are required to sign and abide by a pledge of confidentiality that promises not to disclose the identity of any caller or any information learned during the course of relaying calls. In conjunction with signing Sprint's confidentiality agreement, as a part of training, CAs/CAs role-play various scenarios which teach the correct way to ask for assistance from a supervisor without divulging call-specifics. Examples of confidentiality breaches are reviewed and discussed with the CAs/CAs.

Sprint strictly enforces confidentiality policies in the center, which includes the following:

- Prospective employees are screened during the interview process on issues regarding ethics and confidentiality.
- On day one of training, employees must sign a Pledge of Confidentiality Agreement Form.
- During initial training, employees are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive three hours of training on healthy detachment.
- After graduation from initial training, employees are reviewed yearly on the Pledge of Confidentiality and are required to re-sign promises not to disclose the identity of any caller or any information learned during the course of relaying calls.
- Breach of confidentiality may result in termination of employment.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in work areas.

Sprint Code of Conduct

The Sprint Code of Conduct describes the ethical and legal responsibilities of employees of Sprint and anyone we authorize to act on Sprint's behalf. Sprint and all TRS employees (including Communication Service for the Deaf [CSD] staff) are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an investigation may be subject to corrective action up to and including termination. This information is contained within Sprint's Code of Conduct all employees are required to complete annually.

There is a TRS whistleblower protection notification posted at Sprint TRS call centers in accordance with FCC rules. CSD also obtains a signed acknowledgement of the receipt of the Whistleblower Policy from all employees upon hire, and annually thereafter.

Training on Ethics

Sprint Relay employees receive training on the appropriate protocol to protect relay users' privacy and how to prevent the unintentional disclosure of relay communications. When trainees observe calls and ask questions once back in the training room, trainers lead a discussion on the appropriate method to seek clarifications without divulging confidential information. CAs/CAs may also role-play various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Examples of ethical issues and challenging circumstances are reviewed and discussed with CAs/CAs. During initial training, CAs/CAs are required to pass a series of written and skills-demonstration tests, which include their understanding of the Relay Center Code of Ethics and how to apply the Code to hypothetical situations. Trainees who do not pass these tests are not utilized as CAs/CAs.

Sprint's high-performance culture focuses on accountability, first and foremost, along with open communication and innovation. Within these traits, integrity and ethics are critical success factors. Amidst unprecedented change and technological advancement, acting with integrity is not just the right thing to do; it is the unwavering foundation for Sprint.

Confidentiality

Sprint believes measures to ensure confidentiality are crucial to the success of TRS operations and has implemented procedural and environmental measures to safeguard customer and call information. Sprint has policies in place to protect users' confidentiality. These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

Sprint employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs/CAs are taught using various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs/CAs annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through our CAs'/CAs' participation in an interactive training program focusing on scenarios that they are likely to encounter when relaying calls.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without elaboration. Maintain a professional and friendly image with customers.	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.
It is appropriate to discuss with a member of management technical or procedural components of a call. For example, to say you had problems placing a calling card call from a pay phone.	It is not appropriate to discuss call content or conversations with others, ever.
It is appropriate to call for a Supervisor to look at your screen for assistance with the call.	It is not appropriate to request assistance from the agent sitting next to you.

All relay center personnel are required to sign and abide by the Sprint Relay policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this

policy during and after their period of employment. The relay center Code of Ethics requires the following:

- Keep all TRS call-related information strictly confidential.
- Keep no records of customer information or content of any TRS call.
- Refrain from editing or omitting anything from the content of the conversation or the spirit of the speaker.
- Refrain from adding or injecting into the content of the conversation or the spirit of the speaker.
- Assure maximum customer control.
- Strive to further skills and knowledge through training, workshops, and reading literature available in the field.

In accordance with the FCC, all information utilized for call set up, including customer database and preferred call type information remains confidential and cannot be used for anything but the call. Once the inbound party disconnects, all information pertaining to that call disappears from the CA's/CA's terminal. The required confidentiality and security of the customer preference data is covered during training of all employees and reinforced throughout employment. Sprint takes the following steps to ensure Customer Profile information remains secure:

- Sprint does not modify a customer's record based on experience.
- All Customer Profile database entries contain time and date stamps and note the identification number of the CA/CA who processed the request.
- Relay users register a username and password/PIN. Sprint also asks customers to register a security question and answer only known to them in case the username and password is lost or forgotten.
- Sprint's Customer Profile information is encrypted and protected from outside access by firewalls.

CTI Confidentiality Form

Consumers need to be confident that their personal and professional calls are kept in the strictest confidence. It is crucial that all employees understand and abide by this Confidentiality Policy.

All information obtained during a CapTel call is to be kept strictly confidential. The only person(s) to whom information obtained during a call may be divulged is a member of the administrative team (i.e. supervisors, trainers, HR representatives, the Floor Operations Coordinator, or the Call Center Director). Only specific, pertinent information relating to Training, Call difficulty, Technical difficulties, Emergencies or Customer service issues may be disclosed to the appropriate personnel, and this must be done in private.

Under no circumstance are identifiers to be used while discussing a call (terminology that would identify personal information about a caller including, but not limited to, gender, name, address, and business information). The standard, objective way off referring to callers is to identify the person using the captioned telephone as the "client," while the other party or parties are referred to as the "doc(s)." Furthermore, any person not employed by CapTel, Inc. or its parent company shall not be allowed on or near the call floor. Nor shall information regarding CapTel clients be discussed or posted in any public forum.

Employees agree to abide by the following:

- I shall only discuss the content of a CapTel call (production, training, timing, or otherwise) with a member of the administrative team under the guidelines provided above. I will not discuss the content of a CapTel call with other persons (CAs, friends, family members, etc.).
- I shall disclose only appropriate information regarding a training/timing call to a member of the administrative team according to the guidelines documented above.
- I shall not divulge specific information related to the work or calls I have heretofore processed, upon termination of my employment at CapTel or at any time thereafter.
- I shall not disclose information which could be used to identify specifics about a particular consumer to anyone except a member of the administrative team according to the guidelines documented above.
- I shall not act upon any information received via a CapTel call.
- I shall not listen to, get involved in, or position myself to observe a CapTel call being processed by another employee.
- I shall not disclose information which could be used to identify specifics about any employee including,

but not limited to, name, CA number, and schedule, except as is necessary to appropriate individuals and/or institutions or services.

- I shall not divulge my personal CA number in conjunction with my name except as required by a member of the administrative team.
- I shall not disclose the technical aspects of my position to anyone not employed by CapTel/Ultratec.
- I shall not bring visitors, including children, onto the call floor.
- I shall remain off of the call floor if I am not scheduled to be at work.

_____
Employee Name (please print)
_____
Employee Signature and Date

Sprint Confidentiality Form

IN CONSIDERATION of: (1) my employment with Sprint or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation, (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

1 **ALL TELECOMMUNICATIONS RELAY SERVICE (TRS) CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL.** I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.

2 **NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TRS CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES.** I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.

3 **NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER**. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.

4 **NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER**. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.

5 **TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.**

6 **I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.**

7 **ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.**

I have read and understand the Sprint Relay Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

_____
EMPLOYEE SIGNATURE AND DATE

_____
MANAGER/SUPERVISOR SIGNATURE AND DATE

Sprint Federal Confidentiality Form

The Federal Relay provides a transparent link of telecommunication between typed/signed/voice (disabled) and voiced (non-disabled) messages. As part of the relay services organization all employees and subcontractors are bound to the following rules and regulations:

- All Federal Relay call related information is to be strictly confidential.
- Nothing is to be edited or omitted from the content of the conversation or the spirit of the Federal Relay user.
- Nothing is to be added or interjected into the content of the conversation or the spirit of the Federal Relay user.
- To assure maximum user control, the employee will be flexible in adapting to the caller's needs.
- Employees and subcontractors will strive to further competency in skill and knowledge through continued training, workshops and reading of current literature in the field.

~ Employee and Subcontractor Role ~

1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as $5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than $1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(I)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than $5,000.00.
8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.
9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).
10) This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

I have read and fully understand the Federal Relay Code of Ethical Behavior. I agree that failure to do so will lead to disciplinary action that may include termination. I agree to process calls in the manner required by the Federal Government as detailed in the Federal Relay contract. I agree to abide by this Code of Ethics even after my employment with Sprint and/or subcontractor ends.

_____

Employee/Subcontractor Signature   Date

_____

Supervisor Signature   Date

_____

Company Name (Print or Type)

Service Type *(check one)*

_____ Captioned Telephone/CapTel

_____ Relay Conference Captioning/RCC

_____ Telecommunications Relay Service/TRS and/or Internet Relay (a.k.a. Federal IP Relay)

Note: All of Sprint's Employees and subcontractors working on this contract will be acquainted with the applicable portions of FIRMR, the Privacy Act of 1974, and the Freedom of Information Act, and implementing regulations and policies. The employees and subcontractors will also be given copies of the following criminal and civil disclosure and inspection penalties, in full text, IRC 7213, IRC 7213A, and IRC 7431.

<u>Appendix D: Disaster Recovery</u>

Sprint offers emergency options and uninterruptible power that exceeds the State's minimum requirements by offering an end-to-end approach that is unmatched in the relay industry. Sprint has emergency operations and uninterruptible power systems (UPS) supporting relay call centers, the TRS switches (located at wireline switch sites). Sprint knows a large-scale loss of commercial power is one of the most critical factors impacting access to communication. We have proven programs to keep that from impacting relay services. Both TRS and CapTel offer uninterruptible power supplies and generators to ensure relay users will continue to have access to the service in the event of power outages.

Call Center Power Solutions

Sprint provides a cost effective solution with a UPS using a combination of standard battery backup and an auxiliary generator to provide uninterrupted power for an unlimited duration for key components.

- ♦ The switch peripherals
- ♦ Switch room environment, including:
- ♦ Air conditioning, if required to maintain service
- ♦ Fire suppression systems
- ♦ Emergency lights and system alarms
- ♦ CA consoles/ terminals
- ♦ CA work site emergency lights
- ♦ Call Detail Recording (CDR)

Sprint ensures the UPS system capacity is sufficient to operate the call center during busy season and busy hour load. Sprint has installed power-generating equipment capable of operating call centers for extended periods. In the event of a power outage, the UPS and back-up power generator ensure seamless power transition until normal power is restored. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. Backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. Generators can stay in service for longer periods of time as long as fuel is supplied. As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental controls until commercial power is restored.

Emergency Procedures Training

All Sprint Relay employees are trained on emergency procedures to minimize or prevent disruption to relay users. Sprint instructs its staff on the procedures to be followed in the event of an emergency or service impacting issue. Sprint provides annual training to ensure familiarity with systems and processes. Ad-hoc training is conducted for new procedures or team members.

Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with Federal Emergency Management Agency (FEMA), the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster.

- ♦ Tabletop Exercises: In a round-table setting, members of the response team meet to discuss responsibilities and describe how to react as a team in an emergency.
- ♦ Walk-Through Drills: Both the response team and management perform their emergency functions within the emergency response location.
- ♦ Functional Drills: Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness.

Often, these functions are tested separately to help identify improvement areas and to eliminate confusion.

♦ Full-scale Exercises: Exercises simulated to be as close as possible to a real-life disaster. They may involve a combination of response teams, management, field operations, and outside agencies.

♦ After Action Reviews (AARs): Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.

♦ Maturity: Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Business Continuity

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, FEMA, Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301, and several Military Specifications (Mil-Spec) standards. Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Relay network has a Business Continuity (BC) plan to deal with all types of natural and man-made problems which may prevent calls from reaching the relay center or impact the operation of the TRS platform. The plan identifies how Sprint minimizes impact to relay users and restores relay services. Sprint brings more value when it comes to maintaining operations during natural and man-made events. Sprint's BC methodology and implementation standards are consistent with industry-wide best practices and trusted by experts in the field. The Sprint dedicated BC Teams (BCTs) participate in government-provided and private sector training, and maintain certifications from:

♦ DRII
♦ International Association of Emergency Managers (IAEM)
♦ DHS
♦ Business Continuity Institute (BCI)

Sprint understands the BC challenges faced by government organizations and has designed state relay services accordingly. Sprint has experience in serving more than 160 federal entities and more than 150 military bases worldwide including the Department of Defense (DOD), State/Local Governments, Law Enforcement, and DHS.

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, Telecommunications Service Priority (TSP) and Critical Life Circuits are re-established.

All departments within Sprint, including the Sprint Relay program, follow these well-established programs to ensure top-notch support for our customers.

Call Center Evacuation Events

Sprint has plans in place to deal with call center events such as fires. Each call center has a designated Safety Marshal and clear chain of command. As a first step, the situation is identified and the threat is assessed. If evacuation is necessary, the local authorities (e.g., 911) are immediately alerted along with

the Call Center Service Assurance Center (CCSA) and the Traffic Management Control Center (TMCC). Call center management and Sprint Corporate Security are also alerted.

Traffic will be re-routed immediately to other call centers not impacted and work with those call centers to increase staffing, as needed. Once the issue is resolved, all communication assistants (CAs)/CAs return to the center and the incident is fully documented.

Proactive Measures

Over the past 26 years, Sprint Relay users have rarely experienced any type of inability to place calls. Sprint's backup capabilities are unmatched in the TRS industry with 6 call centers (including the location at Sprint headquarters in Overland Park, KS) capable of handling TRS calls and multiple switch locations supporting the TRS platform.

Sprint's switches and call centers are staffed with spare positions and platform components to deal with all types of technical issues. The TRS platform offers automated alarming to notify personnel of issues.

Redundancy is built into our infrastructure to deliver outstanding performance for all of our TRS customers. These attributes will ensure functional equivalency for state relay service callers during disasters. The benefits of our leading-edge platform and flexible configuration include:

♦ Switches, call controllers, and databases are housed in geographically-dispersed locations that conform to "critical" grade physical security requirements. Sprint's switches and peripherals are located at switch sites in telecom bunkers.
♦ Redundant connections between switch sites, 800 network, and call centers
♦ If the problem is within Sprint's TRS center, maintenance can usually be performed from Sprint's centralized center, the CCSA.
♦ Sprint retains hardware spares at each center to allow for the most common type of repair required without the ordering of additional equipment (except for complete loss of a building).
♦ Centralized routing and reporting systems enables Sprint to treat the entire call center complex as a single virtual call center rather than standalone call centers
♦ All TRS positions are capable of handling calls for any State customer.
♦ All training seats are configured and immediately ready to take production traffic.
♦ Sprint has pre-established plans for all types of outages.
♦ Sprint automatic routes calls away from a center undergoing a service recovery event. For example, if a fire drill forces CAs/CAs to evacuate, the call router automatically sends calls to other relay centers.

Sprint has historically been the best at dealing with natural and man-made disasters that have caused outages. With each incident Sprint has managed to be prepared, respond and ensure ongoing service delivery. Sprint's processes as detailed here take into consideration every aspect of an outage and/or natural disaster that includes a higher call volume likelihood due to the natural disaster. Some examples of disasters that affected Sprint facilities in the past are:

♦ Wind burst that blew off a portion of the roof of our Syracuse, NY call center
♦ Farmer cuts Fiber Optic cable servicing Lubbock, TX when burying a cow
♦ Hurricanes that impacted call centers in Miami and Jacksonville
♦ Tornado warnings impacting upper Midwest call centers. One evening, 37 Tornadoes were within range of our call center. Our center had to be evacuated. Sprint continued to provide service without interruption.

These list just a few of the natural and man-made disasters we faced, and with each one we were able to maintain our service levels with the processes we have in place. Our employees are the best at ensuring we maintain these service levels.

TRS Data Center Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

TRS Winter Preparedness Plan

Sprint has processes in place if a known weather event is encountered. These known contingency plans are designed to mitigate our customers' degradation of service and are maintained by the TMCC. Each service has back-up locations to ensure redundancy.

Known Event

- Four days prior - TMCC and Ron Peay (Operations Manager) will make a determination as to the severity and number of centers which might be affected.
- Three days prior - TMCC and Ron will verify previous day's potential impact and begin calling to non-effected centers to post overtime (OT). All centers will be advised to put a list together of employees who will work overnight and weekends. TMCC will notify John Moore (Manager - Customer Relations) and CCSA of our "game plan"
- Two days prior - TMCC will meet with Ron to update impacts and plan. All non-impacted centers will be called to update OT requirements and overnight requests.
- One day prior - TMCC will meet with Ron to update impacts and plan.
- Day of Event - TMCC will invoke emergency call routing as required. TMCC will be the point of contact for all notifications. Affected centers will update TMCC every four hours. TMCC will update Ron who will update Business Continuity Manager through executive level. Management is also responsible for notifying the Business Continuity Team.

Unknown Event

The Activation Criteria Plan will be used when either weather or other events cause potential significant (excess of 25 percent) increase in call volumes or one or more TRS call centers is off-line for more than two hours, using the following procedure:

- Automated alarming and/or TRS call center notifies TMCC
- TMCC contact CCSA
- CCSA sends notification to a pre-established distribution list
- CCSA establishes a conference call to work on resolving the issue with impacted groups

After fix agencies are unable to re-establish center operations – the Business Continuity Plan (BCP) is invoked and Management will notify the Business Continuity Management Team.

CapTel-*Specific Disaster Recovery Information*

CapTel, Inc. (CTI) and Sprint have worked together to develop a complete plan for dealing with all types of natural and man-made problems including but not limited to terrorism and phone line cut accidents. Performance at the CapTel call center is monitored continuously by CTI technicians 24/7. Sprint will be notified by the CapTel Service Center Manager immediately upon determination of any type of natural or man-made problem that causes disruption either:

CapTel has established contingency plans in the event of a complete and extended loss of a CapTel call center. The plan includes a number of steps based on the estimated duration of the outage and takes advantage of the relative short travel time between the Wisconsin CapTel call centers. The first phase is

organized to initiate the recovery process within hours and can be fully completed within days. This involves expanding service into available space in the operating call center locations and other CapTel facilities

- ◆ All training seats are configured and immediately ready to take production traffic.
- ◆ Additional production seats are established in unused and available space within the existing facilities.
- ◆ Regular shuttle services are established to transport qualified CapTel CAs/CAs and staff from the outage area to and from the expanded facilities.

The recovery plan includes a second phase for extended outages. To support this longer duration, CapTel has identified additional disaster recovery locations with appropriate facilities in the metropolitan area of each of the call centers.

The addition of the Orlando, FL and Sprint's TRS/CapTel call centers has alleviated many of the inclement weather challenges presented by the winter season. However, if inclement weather affects the CapTel staffs' ability to arrive to work, in most cases, with minor adjustments, CTI can still meet the call volume demand with enough staff coverage in a wide range of snow fall amounts. However, if necessary, Sprint and CTI will institute proven tactics, as necessary, to motivate, encourage, and enable CapTel CAs/CAs to be present or to pick up additional hours so CTI can meet its service level requirements during inclement weather

Customer Notification Procedures

Sprint will inform the state contract manager of any major interruptions to the TRS/CapTel service that exceeds five minutes in duration or isolates part of the state. To provide the contract manager with the most complete and timely information on problems affecting relay service, Sprint's trouble reporting procedure for TRS and CapTel includes multiple levels of response:

- ◆ Immediate notification of events that last 5 minutes or isolate part of the State
- ◆ Notification when the issue is resolved and/or status updates (every 24 hours)
- ◆ Comprehensive final report within 3 days

Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals the problem has been corrected and full relay service has been restored. The state contract manger (or designate) will receive this notification from your Sprint Customer Relationship Manager (CRM). He/she and/or a member of the management team will provide the final report and follow up on steps Sprint will take to ensure we can minimize the likelihood of this event occurring again.

Final reports include a comprehensive look at the event, including the following:

- ◆ How the problem occurred
- ◆ When the problem occurred
- ◆ The number of impacted customers (if known)
- ◆ What was required to correct the problem
- ◆ Time and date the relay service resumed full operation
- ◆ Avoidance plan for future (if applicable)

Temporary Delay Message

If approved by the state, Sprint can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack or natural disaster that significantly increased the number of calls to the relay center, Sprint can add a temporary recording that alerts voice and TTY users, such as:

"THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER."

Telecommunications Service Priority (TSP)

All of Sprint's circuits supporting TRS and CapTel services have qualified for priority restoration under the TSP program. Sprint's participation in the TSP Program strengthens our robust reliability. If a national or regional emergency causes service to be disrupted and the call center cannot receive or place calls, Sprint's participation in the TSP program means Local Exchange Carriers (LECs) would be required to restore service as rapidly as possible consistent with the priority status assigned. Sprint's reliable network and TSP participation ensures Sprint's disaster recovery ability is unmatched by any Relay provider in the world.

Appendix E: Colorado TRS Information in Telephone Directories

Appendix F: Relay Colorado Service Compliant logs from 2013-2017

Complaint Tracking for Colorado (6/01/2012-5/31/2013). Total Customer Contacts: 1

Colorado	2012							2013					TOTAL
	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	0	0	0	0	0	0	0	0	0	0	0	**0**
TTY	0	1	0	0	0	0	0	0	0	0	0	0	1
TOTAL	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	1

Colorado
Complaint Summary by Category

Complaint Category	2012							2013					TOTAL
	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													**0**
Confidentiality													**0**
Verbatim													**0**
Typing Issues													**0**
In Call Replacement													**0**
Answer Performance		1											**1**
Gender Accommodation													**0**
Total	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**1**

June 2012: Nothing to report
July 2012:
Voice   2012, July 7
The customer reported difficulty reaching 711
Category: Other (misc)
Escalation: Received by the National Customer Care Center and handled by the same.
Resolution: Apologized and advised we would forward this issue to the technical team.
Contact Closed: 2012, July 7
FCC: Answer Performance
August 2012: Nothing to report.
September 2012: Nothing to report.
October 2012: Nothing to report.
November 2012: Nothing to report.
December 2012: Nothing to report.
January 2013: Nothing to report.
February 2013: Nothing to report.
March 2013: Nothing to report.
April 2013: Nothing to report.
May 2013: Nothing to report.

Complaint Tracking for Colorado (6/01/2013-5/31/2014). Total Customer Contacts: 5

	2013							2014				
Colorado	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	1	0	0	0	0	0	0	0	0	0	0	**1**
TTY	0	1	1	0	0	0	0	0	1	0	1	0	**4**
TOTAL	**0**	**2**	**1**	**0**	**0**	**0**	**0**	**0**	**1**	**0**	**1**	**0**	**5**

Colorado
Complaint Summary by Category

	2013							2014				
Complaint Category	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency		1							1		1		**3**
Confidentiality													**0**
Verbatim													**0**
Typing Issues		1											**1**
In Call Replacement													**0**
Answer Performance			1										**1**
Gender Accommodation													**0**
Total	**0**	**2**	**1**	**0**	**0**	**0**	**0**	**0**	**1**	**0**	**1**	**0**	**5**

June 2013: Nothing to report
July 2013:
Voice   2013, July 10
The caller complained that the CA was not transparent during call.
Category: Attitude and Manner
Escalation: Received by the National Customer Care Center and handled by the same.
Resolution: Apologized for any inconvenience. Caller did not have CA number. Call trace inclusive.
Contact Closed: 2013, July 10
FCC: Transparency
TTY   2013, July 10
The customer complained that the CA had too many typing errors; did not provide his/her ID and did not keep him/her informed of call progress.
Category: Typing Skill/Speed
Escalation: Received by the Pennsylvania Relay Center and handled by the same.
Resolution: Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly.
Contact Closed: 2013, July 10
FCC: Typing Issue
August 2013:
TTY   2013, August 26
The customer complained that he/she experienced delays in reaching a CA.
Category: Answer/Wait Time
Escalation: Received by the National Customer Care Center and handled by the same.
Resolution: Apologized and advised we would forward this issue to the technical team.
Contact Closed: 2013, August 26
FCC: Answer Performance
September 2013: Nothing to report
October 2013: Nothing to report
November 2013: Nothing to report
December 2013: Nothing to report
January 2014: Nothing to report
February 2014:
TTY   2014, February 25
The customer complained that the CA did not keep him/her informed of the progress of his/her call.
Category: Other (CA/OPR)

Escalation: Received by the Pennsylvania Relay Center and handled by the same.
Resolution: Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly.
Contact Closed: 2014, February 25
FCC: Transparency
March 2014: Nothing to report
April 2014

TTY   2014, **April 3**
The customer complained the CA did not follow instructions.
Category: Other (CA/OPR)
Escalation: Received by the Pennsylvania Relay Center and handled by the same.
Resolution: Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly.
Contact Closed: 2014, April 3
FCC: Transparency
May 2014: Nothing to report

Complaint Tracking for Colorado (6/01/2014-5/31/2015). Total Customer Contacts: 0

COLORADO	2014							2015					
	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	0	0	0	0	0	0	0	0	0	0	0	0
TTY	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0

COLORADO RELAY SERVICE
Summary by Category

CATEGORY	2014							2015					
	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
AVAILABILITY	0	0	0	0	0	0	0	0	0	0	0	0	0
SPEED OF ANSWER	0	0	0	0	0	0	0	0	0	0	0	0	0
CA CHANGE	0	0	0	0	0	0	0	0	0	0	0	0	0
CA GENDER	0	0	0	0	0	0	0	0	0	0	0	0	0
VERBATIM	0	0	0	0	0	0	0	0	0	0	0	0	0
REAL TIME	0	0	0	0	0	0	0	0	0	0	0	0	0
60 WPM	0	0	0	0	0	0	0	0	0	0	0	0	0
911	0	0	0	0	0	0	0	0	0	0	0	0	0
COC	0	0	0	0	0	0	0	0	0	0	0	0	0
CA SPELL-TYPE-GRAMMAR	0	0	0	0	0	0	0	0	0	0	0	0	0
SEQUENCE	0	0	0	0	0	0	0	0	0	0	0	0	0

3 WAY	0	0	0	0	0	0	0	0	0	0	0	0	0
CALL RELEASE	0	0	0	0	0	0	0	0	0	0	0	0	0
SPEED DIAL	0	0	0	0	0	0	0	0	0	0	0	0	0
RATES	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0

Complaint Tracking for Colorado (06/01/2015-05/31/2016). Total Customer Contacts: 7

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	07/08/15	Customer Complaint: The customer called Customer Service to report that for the last several days when he dials the toll free number for Relay Colorado voice number (800-659-3656), he is unable to be heard by the relay operator. After the operator announces the greeting, his voice cannot be heard to tell the operator the number to dial. The operator repeats the greeting again, then tries to switch to the TTY tones when she apparently is unable to hear him speaking. Customer Service response: While the customer was still holding on my computer, I placed two test calls from my desk phone and had the same result. I entered trouble ticket to report the problem. No follow up request	07/08/15	Customer requested no follow up contact. IT needs to provide a status report of the ticket.
2	07/13/15	Customer reports his TTY calls go to Baudot, and the Communication Assistant cannot fix it. Apologized. Program Manager will be notified. Follow up requested. Internal Update Performed.	07/13/15	Customer Relationships Manager sent an email to the customer on July 14 via email and notified him that the Sprint Customer Service has been in touch with the Engineer team . They conducted TurboCode call tests with no error is found. Customer Relationships Manage sent another email to the customer to request additional information about the TTY, i.e., name of model and how it is set up. No replies as of yet. Sent on 7/15. I would consider case is closed.
3	07/15/15	The Operator did not inform the customer of entries made into the prompt. It caused confusion for the customer. The Supervisor met with the Operator and coached them on keeping the customer informed.	07/15/15	
4	08/28/15	The Operator was causing garbling to come across the line and could not fix it. The Assistant Supervisor explained that the garbling may be due to other issues, like static that was outside of the Operator's control. They also apologized for the inconvenience and assured the customer that the information would be forwarded to the appropriate person in management.	08/28/15	
5	12/08/15	Customer indicated that they had a 'horrible time' with this Operator with whom they had placed multiple calls with. There were significant delays that ranged from 1-4 minutes and the call processing was just poorly handled. When they requested a new Operator, the Operator stated that the system prevents them from transferring calls and they were unable to get a new Operator. Customer wanted to note that they have placed hundreds of calls through relay and felt it was	12/13/15	The Operator was coached by the quality supervisor on proper pacing techniques so that everything is typed verbatim. The Operator stated they had a difficult time pacing the caller due to the voice party becoming agitated when paced. The Operator was reminded to call for assistance on difficult calls. Phone calls were made to the customer 12/10/2015;12/11/2015/;12/13/2015. Voice mail messages with contact information for the quality supervisor.

		necessary to let a supervisor know that the Operator's service was not up to par with the service that they normally received through relay. Assistant supervisor apologized for the inconvenience. Customer wishes a follow up via phone.		
6	12/29/15	A Voice Carry Over (VCO) user stated that the Operator would give the "go ahead" for the caller to speak and then would start typing at the same time. Caller found this to be extremely frustrating. Assistant Supervisor documenting the concern apologized for the inconvenience. Follow up letter requested to be sent via email.	12/29/15	Supervisor coached the Operator to make sure not to type while the Voice Carry Over (VCO) user is speaking. Follow up letter sent via email as per request.
7	12/31/15	Customer was trying to place a call for 2 hours and could not complete the call without significant garbling. The customer stated it was a federal and state violation and not only the Operator but the Assistant Supervisor took control from him. The Assistant Supervisor explained that turbo code had been disabled, but apologized for the incident. Follow up requested.	12/31/15	The Supervisor met with the Operator and coached them on the proper procedure for dealing with garbling. The Supervisor also spoke with the Assistant Supervisor and coached them accordingly as well. Follow up sent via email.

Complaint Tracking for Colorado (06/01/2016-05/31/2017). Total Customer Contacts: 7

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/26/16	Customer reported having inaccurate captions on the CapTel 840.	06/28/16	Customer Service Representative apologized for the incident and thanked customer for the feedback. Call detail was shared with Call Center management for follow up with the Communication Assistant by the Communication Assistant's supervisor. Communication Assistant supervisor increased monitoring frequency for the Communication Assistant to ensure consistent quality performance.
2	07/05/16	Customer's son reported that the captions on the CapTel 800 are not always correct.	08/06/16	Customer Service Representative apologized for the incident and thanked the customer's son for providing this feedback. Customer's son did not have specific call detail to share. Customer Service Representative suggested that the customer document the date time and Communication Assistant's # of any future calls to allow us to take specific action to further coach the Communication Assistant captioning the call. Customer Service Representative later sent a letter offering follow up provided further details.
3	07/28/16	Customer states that this Communication Assistant was rude and hung up on her. She sent in a record of the call and wanted to file a formal complaint. Relay Customer Service's response: Apologized for the problem that was incurred and assured that the complaint would be sent in as stated. No call back was requested.	07/28/16	Supervisor coached the Communication Assistant on the importance of transparency and professionalism. Also advised the Communication Assistant of the consequences of disconnecting calls. Appropriate action will be taken.

4	08/01/16	Customer stated that the Communication Assistant was using vulgar language about him or toward him when the Communication Assistant thought he was disconnected. Upon requesting further explanation on this situation, customer would not elaborate. Assistant Supervisor apologized for the inconvenience. Customer did not request for a follow up.	08/01/16	The Supervisor met with the Communication Assistant and although the Communication Assistant had no recollection of the call, the Communication Assistant was coached appropriately. No follow up requested.
5	05/10/17	Customer complained that she had received a call and when the Communication Assistant connected the phone line kept cutting out. When she tried to verify if the call was a video or TTY relay call, the Communication Assistant continued to interrupt her. Then during the conversation, the Communication Assistant's tone was condescending and attitude was flippant. Customer service apologized for the issue. Customer did not request follow up.	05/10/17	The Communication Assistant was coached by the quality supervisor over remaining patient and using a pleasant voice tone.
6	05/12/17	The caller reported that during her relay call with a patient, the Communication Assistant was "very rude and full of attitude". The caller asked the Communication Assistant to stop saying "Go Ahead" because that was not necessary since she was familiar with the service, but the Communication Assistant refused. When she asked for the number to CO Relay Customer Service, she would only give the number "711", so the customer looked up the number herself to call. When she asked to speak to a supervisor, the Communication Assistant told her the supervisor refused to take her call. Customer Service response: Apologized and thanked her for letting us know, told her report to be sent to call center supervisor. Follow up requested.	05/22/17	The Communication Assistant was coached by a supervisor about detaching their selves from calls in order to remain friendly and professional. The Communication Assistant was also coached on calling for supervisor assistance when requested. A follow up email was sent 5/22/2017.
7	05/22/17	Customer reported an inability to make long distance captioned calls in 1-Line mode.	06/07/17	Customer Service Representative determined that the customer was able to make local captioned calls successfully only and that long distance were failing. Customer Service Representative escalated the information to a telecom technical expert who made an adjustment that allowed the long distance calls to process through the carrier successfully. Customer Service Representative confirmed the customer can complete long distance captioned calls successfully from their CapTel 200.

Appendix G: Relay Colorado Service Marketing Materials

Relay Colorado Brochure: download full booklet, click here:
http://corelay.e3develop.com/sites/co_relay/files/pdfs/relay_colorado_booklet.pdf

TTY Flyer

Speech to Speech Flyer:

CapTel Flyer

Hearing Carry-Over Flyer

CapTel Advertisement

Speech to Speech Advertisement

Spanish Relay Service

Spanish CapTel Advertisement

Relay Colorado Presentation PowerPoint

CapTel Advertisement Senior Blue Book Statewide

CapTel Cart Advertising in Senior Community

CapTel Retirement Brochure

Appendix H: Colorado Relay Service Website and Facebook Screenshots

Relay Colorado Website: www.relaycolorado.com
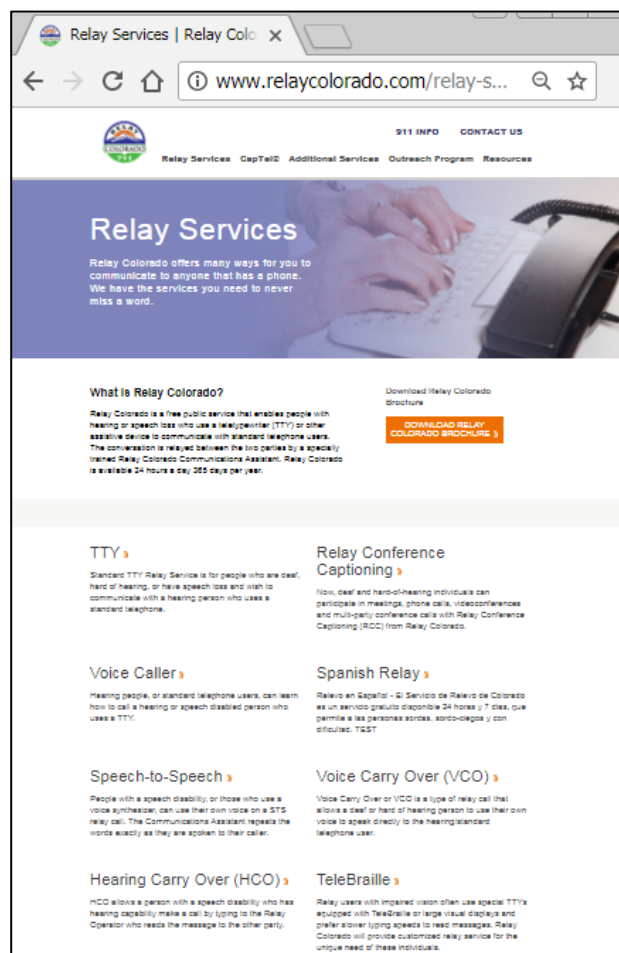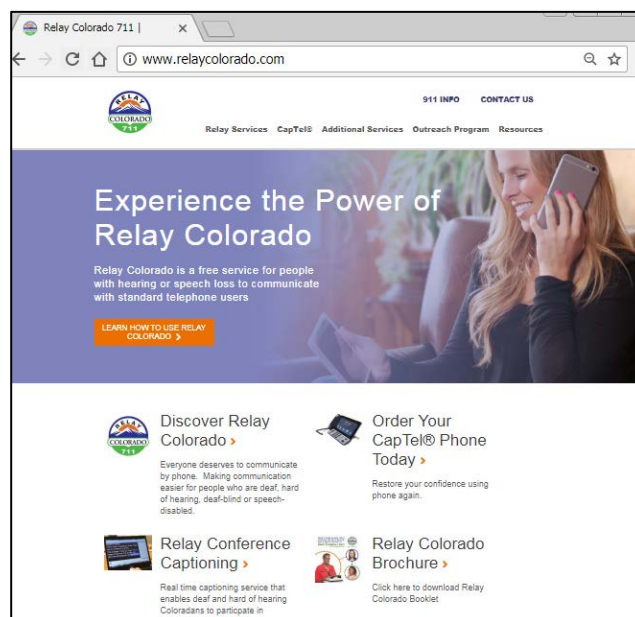
Relay Colorado Facebook Homepage and Photos: www.facebook.com/relaycolorado
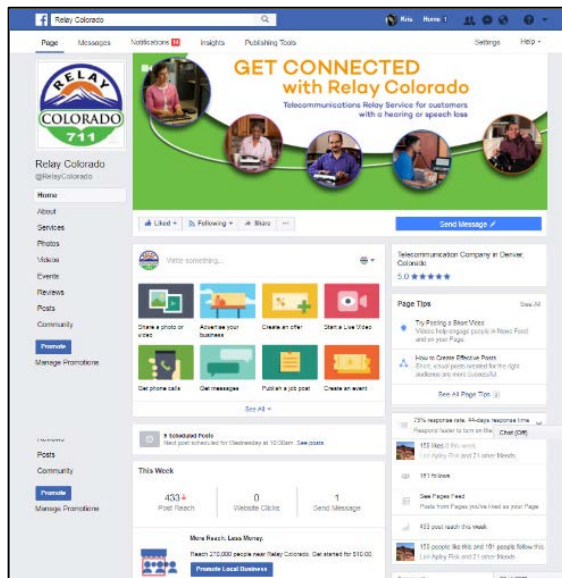
FC PUBLIC NOTICE

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

News Media Information 202-418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 13-1530
Released: July 8, 2013

NOTICE OF CERTIFICATION OF
STATE TELECOMMUNICATIONS RELAY SERVICES (TRS) PROGRAMS

CG DOCKET NO. 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Governmental Affairs Bureau (Bureau) hereby grants certification to the state telecommunication relay services (TRS) programs listed below,[1] pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 225(f)(2), and section 64.606(b) of the Commission's rules.[2] On the basis of the state applications received, the Bureau has determined that:

(1)   The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;[3]

(2)   The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs;[4] and

(3)   The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.[5]

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of ongoing compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states, as needed, to ensure compliance with such rule changes.

This certification, as conditioned herein, shall remain in effect for a five (5) year period, beginning July 26, 2013, and ending July 25, 2018, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2017, the states may apply for renewal of their TRS program

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[1] For purposes of this proceeding, the term "state" refers to states, U.S. territories, and the District of Columbia, where applicable.

[2] 47 C.F.R. § 64.606(b).

[3] 47 U.S.C. § 225(f)(2)(A); 47 C.F.R. § 64.604.

[4] 47 U.S.C. § 225(f)(2)(B).

[5] 47 C.F.R. § 64.606(d).

certification by filing documentation in accordance with the Commission's rules, pursuant to 47 C.F.R. §§ 64.606(a) and (b).

STATES APPROVED FOR CERTIFICATION

File No: TRS-46-12
Alabama Public Service Commission
State of Alabama

File No: TRS-19-12
Department of Commerce
State of Alaska

File No: TRS-47-12
Arkansas Deaf and Hearing Impaired
State of Arkansas

File No: TRS-02-12
Commission for the Deaf and Hard of Hearing
State of Arizona

File No: TRS-32-12
California Public Utilities Commission
State of California

File No: TRS-23-12
Colorado Public Utilities Commission
State of Colorado

File No: TRS-48-12
Connecticut Department of Public Utility
State of Connecticut

File No: TRS-35-12
Delaware Public Service Commission
State of Delaware

File No: TRS-49-12
Public Service Commission
District of Columbia

File No: TRS-50-12
Florida Public Service Commission
State of Florida

File No: TRS-51-12
Georgia Public Service Commission
State of Georgia

File No: TRS-22-12
Hawaii Public Utilities Commission
State of Hawaii

File No: TRS-43-12
Idaho Public Service Commission
State of Idaho

File No: TRS-10-12
Illinois Commerce Commission
State of Illinois

File No: TRS-08-12
Indiana Telephone Relay Access Corporation
State of Indiana

File No: TRS-03-12
Iowa Utilities Board
State of Iowa

File No: TRS-07-12
Kansas Relay Services, Inc.
State of Kansas

File No: TRS-52-12
Kentucky Public Service Commission
Commonwealth of Kentucky

File No: TRS-13-12
Louisiana Relay Administration Board
State of Louisiana

File No: TRS-53-12
Maine Public Utilities Commission
State of Maine

File No: TRS-33-12
Telecommunications Access of Maryland
State of Maryland

File No: TRS-34-12
Department of Telecommunications and Energy
Commonwealth of Massachusetts

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File No: TRS-54-12
Michigan Public Service Commission
State of Michigan

File No: TRS-39-12
Minnesota Department of Commerce
State of Minnesota

File No: TRS-55-12
Mississippi Public Service Commission
State of Mississippi

File No: TRS-15-12
Missouri Public Service Commission
State of Missouri

File No: TRS-56-12
Telecommunications Access Program
State of Montana

File No: TRS-40-12
Nebraska Public Service Commission
State of Nebraska

File No: TRS-25-12
Relay Nevada
State of Nevada

File No: TRS-42-12
New Hampshire Public Service Commission
State of New Hampshire

File No: TRS-45-12
New Jersey Board of Utilities
State of New Jersey

File No: TRS-14-12
Commission for the Deaf and Hard of Hearing
State of New Mexico

File No: TRS-16-12
New York State Department of Public Service
State of New York

File No: TRS-30-12
Department of Health and Human Service
State of North Carolina

File No: TRS-12-12
Information Technology Department
State of North Dakota

File No: TRS-37-12
Public Utilities Commission of Ohio
State of Ohio

File No: TRS-57-12
Oklahoma Telephone Association
State of Oklahoma

File No: TRS-36-12
Oregon Public Utilities Commission
State of Oregon

File No: TRS-58-12
Pennsylvania Bureau of Consumer Services
Commonwealth of Pennsylvania

File No: TRS-28-12
Telecommunications Regulatory Board
Puerto Rico

File No: TRS-59-12
Division of Public Utilities and Carriers
State of Rhode Island

File No: TRS-62-12
Micronesian Telecommunications Corporation
Saipan

File No: TRS-11-12
South Carolina Office of Regulatory Staff
State of South Carolina

File No: TRS-60-12
Department of Human Services
State of South Dakota

File No: TRS-20-12
Tennessee Regulatory Authority
State of Tennessee

File No: TRS-17-12
Texas Public Utility Commission
State of Texas

3

File No: TRS-61-12
Virgin Islands Public Service Commission
U.S. Virgin Islands

File No: TRS-09-12
Public Service Commission
State of Utah

File No: TRS-44-12
Vermont Department of Public Service
State of Vermont

File No: TRS-04-12
Department for the Deaf and Hard of Hearing
Commonwealth of Virginia

File No: TRS-27-12
Office of the Deaf and Hard of Hearing
State of Washington

File No: TRS-06-12
Public Service Commission of West Virginia
State of West Virginia

File No: TRS-01-12
Wisconsin Department of Administration
State of Wisconsin

File No: TRS-18-12
Division of Vocational Rehabilitation
State of Wyoming

The full text of this *Public Notice* and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Room CY-A257, Washington, DC 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their website: www.bcpiweb.com or call (202) 488-5300. Filings may also be viewed on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs// (insert docket No. 03-123 in the proceeding number fill-in block, and the state identification number, (*e.g.*, TRS-46-12) assigned for that specific state application in the bureau identification number fill-in block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* can also be downloaded in Word and Portable Document Format (PDF) at http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs.

For further information regarding this *Public Notice*, contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disabilities Rights Office, (202) 418-2247 (voice), or e-mail Dana.Wilson@fcc.gov.

- FCC -

4

C.R.S. 40-17-101

COLORADO REVISED STATUTES

TITLE 40. UTILITIES
PUBLIC UTILITIES
ARTICLE 17. TELECOMMUNICATIONS RELAY SERVICES FOR TELEPHONE USERS WITH
DISABILITIES

C.R.S. 40-17-101 (2017)

40-17-101. Legislative declaration

(1) The general assembly hereby finds, determines, and declares that many of Colorado's residents are unable to utilize telecommunications facilities without assistance and are therefore telephone users with disabilities. Telephone users with disabilities include people who are deaf, hard of hearing, speech-impaired, deaf-blind, blind and visually impaired, and those with central nervous system disabilities. Telephone users with disabilities constitute a substantial and valuable resource within the United States and the state of Colorado, and this segment of our population needs access to telecommunications facilities in order to be contributing and productive members of our society. The role of telecommunications in our world today is inestimable. Telecommunications is the primary vehicle of commerce and industry, the means to convey and receive information and knowledge, and is one of the ways we communicate with others on a personal as well as business level. Telecommunications results in greater independence and self-sufficiency by expanding the channels for employment opportunities, the market for goods and services, human contact, and fellowship. Telephone users with disabilities should have equal access to this critical tool, not only for their own sake, but for the benefit of society at large. The ability to use telecommunications will enhance the business and personal lives of telephone users with disabilities while stimulating and promoting economic development in Colorado. The general assembly recognizes the vitality and potential of Colorado's individuals with disabilities, including telephone users with disabilities. Telecommunications is vital to our society, and supporting its availability to telephone users with disabilities is a beneficial investment for all of Colorado.

(2) The general assembly therefore concludes that it is appropriate to provide access to telecommunications for telephone users with disabilities by establishing telecommunications relay services that replace and expand the dual party relay system required pursuant to this article as the article existed prior to July 1, 1992.

Source: L. 92: Entire article R&RE, p. 2132, § 1, effective July 1. L. 2016: Entire section amended, (HB 16-1414), ch. 155, p. 483, § 2, effective September 1.

Editor's note: This article was added in 1989 and was not amended prior to 1992. The provisions of this article were repealed and reenacted in 1992, resulting in the addition, relocation, and elimination of sections as well as subject matter. For the text of this article prior to 1992, consult the Colorado statutory research explanatory note and the table itemizing the replacement volumes and supplements to the original volume of C.R.S. 1973 beginning on page vii in the front of this volume. Former C.R.S. section numbers are shown in editor's notes following those sections that were relocated.

40-17-102. Definitions

As used in this article, unless the context otherwise requires:

(1) "Commission" means the public utilities commission of the state of Colorado.

(2) Repealed.

(3) "Telecommunications relay services" means any telecommunications transmission services that allow a person who has a hearing or speech disability to communicate by wire or radio in a manner that is functionally equivalent to the ability of a person who does not have a hearing or speech disability. Such term includes any service that enables two-way communication between a person who uses a telecommunications device or other nonvoice terminal device and a person who does not use such a device.

(4) "Telephone access line" means each voice grade channel or its equivalent assigned to a residential or commercial end user customer by a voice service provider, regardless of the technology used to provide the service.

(5) "Voice service provider" means a company that provides telephone access lines to members of the general public who are its customers for voice service.

Source: L. 92: Entire article R&RE, p. 2133, § 1, effective July 1. L. 2015: (4) amended, (SB 15-178), ch. 151, p. 457, § 6, effective July 1. L. 2016: (2) repealed, (4) amended, and (5) added, (HB 16-1414), ch. 155, p. 484, § 3, effective September 1.

40-17-103. Commission - powers and duties - rules

(1) The commission shall administer and contract for telecommunications relay services.

(2) The commission shall adopt rules for the implementation of this article. The rules shall:

(a) Conform with section 401 of the federal "Americans with Disabilities Act of 1990", 47 U.S.C. sec. 225, including provision for state application to the federal communications commission for certification;

(b) Be consistent with the commission's quality of service rules;

(c) Require that providers relay communicated messages promptly and accurately, maintain the privacy of persons who receive telecommunications relay services, and preserve confidentiality of all parties in connection with relayed messages;

(d) Specify the types of calls that are included as telecommunications relay services, specifically requiring that the costs of any long-distance service or any other service that is not a basic local exchange service be borne by the telephone user with disabilities.

(3) The commission shall, through the promulgation of rules, develop and implement a mechanism to recover its costs and the cost to voice service providers in implementing and administering telecommunications relay services required by this article. The mechanism must, at a minimum, provide for the following:

(a) (I) The assessment of a monthly surcharge not to exceed fifteen cents on each telephone access line, whereby each voice grade channel of a multiline voice communications service that is capable of simultaneous outbound calling constitutes a separate telephone access line; however, the number of telephone access lines for which a customer may be assessed a monthly surcharge cannot exceed the number of outbound voice calls that the voice service provider has enabled and activated to be made simultaneously.

(II) The monthly surcharge may be adjusted by the commission in accordance with paragraph (d) of this subsection (3).

(III) Without exceeding the maximum monthly surcharge set forth in subparagraph (I) of this paragraph (a), the monthly surcharge must be an amount sufficient to:

(A) Reimburse the commission for its costs in developing, implementing, and administering telecommunications relay services;

(B) Reimburse voice service providers for their administrative costs in imposing and collecting the surcharge;

(C) Cover the costs of providers in rendering the service;

(D) Pursuant to section 40-17-104, cover annual appropriations to the reading services for the blind cash fund and the Colorado commission for the deaf and hard of hearing cash fund; and

(E) Reimburse the department of revenue for its administrative costs in collecting prepaid wireless TRS charges on prepaid wireless phones pursuant to section 29-11-102.7, C.R.S.

(b) A requirement that the monthly surcharge be imposed upon and collected from each individual telephone access line provided by a voice service provider;

(b.5) With respect to prepaid wireless service, a requirement that a seller collect a prepaid wireless TRS charge from a consumer, as those terms are defined in section 29-11-102.7, C.R.S., and remit the charge to the department of revenue, which shall transmit the money to the state treasurer for deposit into the Colorado telephone users with disabilities fund created in section 40-17-104 (1);

(c) A requirement that the surcharge be listed or included as a separate item that appears on each customer's monthly billing statement;

(d) An annual adjustment to the surcharge by the commission when necessary to accurately reflect a change in the cost of providing telecommunications relay services;

(e) The authority of a voice service provider to deduct and retain as reimbursement for its administrative costs an amount not to exceed three-quarters of one percent of the amount of total monthly surcharges collected by a voice service provider. In addition, the mechanism must include a requirement that any remaining amount of money be transmitted to the state treasurer, who shall credit the money to the Colorado telephone users with disabilities fund created by section 40-17-104.

(f) A requirement that each voice service provider maintain a record of the monthly surcharge imposed on each customer and collected by the voice service provider. The record of any monthly surcharge imposed and collected shall be maintained for three years from the date of billing. The commission may require an audit of a voice service provider's records, which audit must be at the commission's expense.

(g) The surcharge imposed by this section shall not be imposed on the provider or the consumer with respect to federally supported lifeline service.

(4) Repealed.

Source: L. 92: Entire article R&RE, p. 2134, § 1, effective July 1. L. 93: (3)(e) amended,

p. 1794, § 93, effective June 6. L. 96: (4) repealed, p. 1225, § 32, effective August 7. L. 2001: (2)(a) amended, p. 1283, § 65, effective June 5. L. 2016: IP(3), (3)(a), (3)(b), (3)(c), (3)(e), and (3)(f) amended and (3)(b.5) and (3)(g) added, (HB 16-1414), ch. 155, p. 484, § 4, effective September 1. L. 2017: (2)(d) amended, (SB 17-294), ch. 264, p. 1415, § 111, effective May 25.

40-17-104. Colorado telephone users with disabilities fund - creation - purpose

(1) Except as otherwise authorized to be retained by section 40-17-103 (3)(e), all money collected by the voice service providers in accordance with section 40-17-103 shall be transmitted to the state treasurer, who shall credit the money to the Colorado telephone users with disabilities fund, which fund is hereby created and is referred to in this article as the "fund". The general assembly shall make annual appropriations out of the fund for the administration of the fund and shall make annual appropriations to the reading services for the blind cash fund, created in section 24-90-105.5 (5), C.R.S., for use by the state librarian in support of privately operated reading services for people who are blind. The money in the fund not used for administration of the fund, not used for the reading services for the blind cash fund, and not used for the Colorado commission for the deaf and hard of hearing cash fund created in section 26-21-107, C.R.S., is hereby continuously appropriated to the public utilities commission for the reimbursement of providers who render telecommunications services authorized by this article.

(2) and (3) Repealed.

(4) (a) Notwithstanding any provision of subsection (1) of this section to the contrary, the general assembly shall make annual appropriations from the Colorado telephone users with disabilities fund to the Colorado commission for the deaf and hard of hearing cash fund, created in section 26-21-107, C.R.S.

(b) to (d) Repealed.

(5) and (6) (Deleted by amendment, L. 2006, p. 1170, § 1, effective May 25, 2006.)

Source: L. 92: Entire article R&RE, p. 2135, § 1, effective July 1. L. 98: Entire section amended, p. 1361, § 122, effective June 1. L. 99: (1) amended and (3) added, p. 971, § 1, effective May 28. L. 2000: (1) amended and (4) added, p. 1628, § 4, effective June 1. L. 2002: (5) added, p. 159, § 20, effective March 27; (4)(c) added, p. 777, § 3, effective May 30; (2) and (3) repealed, p. 1006, § 2, effective August 7; (3) repealed, p. 261, § 2, effective August 7. L. 2003: (6) added, p. 459, § 21, effective March 5. L. 2006: (4)(a), (5), and (6) amended, p. 1170, § 1, effective May 25. L. 2007: (4)(d) added, p. 1222, § 4, effective August 3. L. 2013: (4)(d) repealed, (HB 13-1300), ch. 316, p. 1708, § 134, effective August 7. L. 2016: (1) and (4)(a) amended, (HB 16-1414), ch. 155, p. 486, § 5, effective September 1.

COLORADO DEPARTMENT OF REGULATORY AGENCIES

Public Utilities Commission

4 CODE OF COLORADO REGULATIONS (CCR) 723-2

PART 2

RULES REGULATING TELECOMMUNICATIONS SERVICES
AND PROVIDERS OF TELECOMMUNICATIONS SERVICES

*   *   *

[indicates omission of unaffected rules]

PROGRAMS

2800. – 2819.   [Reserved].

Telecommunications Relay Services for Telephone Users with Disabilities

Basis, Purpose, and Statutory Authority

The basis and purpose of these rules is to implement Article 17 of Title 40, C.R.S., Telecommunications Relay Services (TRS) for Telephone Users with Disabilities compliant with the federal Americans with Disabilities Act of 1990 and which are consistent with the Commission's quality of service rules; require relay-communicated messages to be delivered promptly, accurately, privately, and confidentially; specify the types of calls that are included as telecommunications relay services; and implement a cost recovery mechanism.

The statutory authority for the promulgation of these rules is found at §§ 29-11-102.7; 40-3.4-106; 40-15-502(3)(a); 40-17-103(2) and (3); and 40-2-108, C.R.S.

2820.   Applicability.

Rules 2820 through 2839 are applicable to all providers of voice services to the general public within the state.

2821.   Definitions.

(a)   "Telephone access line" means each voice grade channel or its equivalent assigned to a residential or commercial end user customer by a voice service provider, regardless of the technology used to provide the service.

(b)   "Telecommunications relay services" (TRS) means any telecommunications transmission services that allow a person who has a hearing or speech disability to communicate by wire or radio in a manner that is functionally equivalent to the ability of a person who does not have a hearing or speed disability. Such terms include any service that enables two-way communication between a person who uses a telecommunications device or other non-voice terminal device and a person who does not use such a device.

(c)   "Voice service provider" means a company that provides telephone access lines to members of the general public who are its customers for voice service.

(d)   "TRS contractor" means the company that provides telecommunication relay services in accordance with the state's TRS request for proposal and all Colorado Public Utilities Commission and Federal Communication Commission's rules and regulations for TRS.

(e)   "TRS custodial receiver" means a designee selected by the Commission that performs certain administrative functions of the TRS program under the direction of the Commission.

2822.   Incorporation by Reference.

References in rules 2820 through 2839 to Part 64 are references to rules issued by the FCC and have been incorporated by reference, as identified in rule 2008.

2823.   Conformity with the Federal Americans with Disabilities Act of 1990.

(a)   Adoption of federal regulations. For the purpose of providing telecommunications relay services in Colorado, the Commission adopts the FCC's rules and regulations establishing mandatory minimum operational and technical standards, found at 47 C.F.R. §§ 64.601 and 64.604 (a) and (b). These rules require that telecommunication relay service providers relay communicated messages promptly and accurately, maintain the privacy of persons who receive telecommunications relay services, and preserve confidentiality of all parties in connection with relayed messages.

(b)   Enforcement. The Commission shall resolve any formal complaint alleging a violation of this rule pursuant to its normal complaint process, except that the Commission shall take final action regarding such formal complaint within 180 days after the formal complaint is filed.

(c)   Public access to information. All voice service providers shall assure that callers in their service areas are aware of the availability and the use of all telecommunications relay services pursuant to the FCC's rules and regulations found at 47 C.F.R. §§ 64.604(c)(3).

(d)   The FCC has assigned the abbreviated dialing code 7-1-1 for access to telecommunications relay services. All voice service providers must allow for call completion using this abbreviated dialing code.

(e)   Jurisdictional separation of costs.

           (I)   Where appropriate, the costs of providing telecommunications relay services shall be separated in accordance with applicable federal separations procedures and agreements (see § 40-15-108(1)).

           (II)   Costs caused by interstate telecommunication relay services shall be recovered according to applicable federal rule. Costs caused by intrastate telecommunication relay services shall be recovered from the intrastate jurisdiction consistent with this rule.

2824.   Conformity with the Commission's Quality of Service Rules.

The provider of TRS in Colorado shall be subject to any applicable Commission quality of service rule(s). In the case of conflict between the Commission's rule and the federal rule incorporated by reference in rule 2822, the more stringent of the two shall apply.

2825.   Rates – Calls Included as Telecommunications Relay Calls.

Intrastate local, intraLATA interexchange, and interLATA interexchange calls shall be included as TRS. The costs of any toll service or any other service that is not a basic local exchange service is to be borne by the TRS user; however, the TRS user shall pay rates no greater than the rate paid for functionally equivalent voice communication services with respect to factors such as the duration of the call, the time of day, and the place of origination to the place of termination.

2826.   Commission Powers and Duties.

(a)   The Commission shall administer and contract for telecommunications relay services with a telecommunications provider (TRS contractor). The Commission, as Administrator, shall direct that the cost of these services shall be paid from the Colorado Telephone Users with Disabilities Fund. The contract shall conform to these rules, and shall make available adequate procedures and remedies for enforcing the requirements.

(b)   Each month, the TRS contractor shall request reimbursement of its expenses from the Commission. The Commission shall, upon its approval of the expenses, remit the approved amount to the Contractor and shall debit the approved amount from the Colorado Telephone Users with Disabilities Fund.

(c)   Each voice service provider shall maintain a record of the monthly surcharge imposed on each customer and collected by the voice service provider for a period of three years from the date of billing.

(d)   The Commission, at its own expense, may require an audit of a voice service provider's records for the sole purpose of ensuring compliance with §§ 40-17-101 through 105, C.R.S.

(e)   The Commission may annually adjust the monthly surcharge when necessary to accurately reflect a change in the costs of providing telecommunications relay services, pursuant to § 40-17-103, C.R.S.

2827.   Administration of the Colorado Telephone Users with Disabilities Fund.

(a)   Fund administration. The Commission shall determine, and by appropriate order, impose a uniform charge on each commercial and residential access line in a uniform amount. In order to adjust the uniform charge the Commission requires certain information.

   (I)   In compliance with annual state budget cycle timelines and requirements, the Commission shall estimate its administrative expenses incurred under §§ 40-17-101 through 104, C.R.S.

   (II)   The monthly uniform charge, per telephone access line, as determined by the Commission, shall not exceed 15 cents.

   (III)   All voice service providers must register and provide appropriate contact information to the Commission within 30 days of operating in the state of Colorado. A form is available from the Commission or on its website. Voice service providers shall provide an updated form within 15 days of any change in the information previously provided to the Commission including for any discontinuance of service. All TRS registration forms, including any updates, shall be filed in the Commission proceeding opened annually for such purpose.

(b)   Uniform charge.

   (I)   All voice service providers shall collect and remit the TRS charge assessed on each telephone access line.

   (II)   The uniform charge imposed pursuant to § 40-17-103(3)(a), C.R.S., shall be billed monthly to each access line provided by each voice service provider. Each multiline voice communication service that is capable of simultaneous outbound calling shall constitute a separate telephone access line; however, the number of telephone access lines for which a customer may be assessed a monthly charge cannot exceed the number of outbound voice calls that the voice service provider has enabled and activated to be made simultaneously.

   (III)   A seller of prepaid wireless service shall collect a prepaid wireless TRS charge from a consumer, pursuant to § 29-11-102.7, C.R.S. and remit the charge to the Department of Revenue. The Department of Revenue shall transmit the money collected to the State Treasurer for deposit into the Colorado Telephone Users with Disabilities Fund, created in § 40-17-104(1), C.R.S.

   (IV)   The TRS charge shall not be assessed or collected on any federally supported Lifeline service or customer. Each provider exempt from collecting the uniform charge on a

Lifeline customer shall maintain complete documentation and shall make such documentation available to the Commission upon request.

(V)   The uniform charge shall be listed as a separate item appearing on each customer's monthly billing statement as rendered by each voice service provider. The charge shall be listed as the "Colorado Telecommunications Relay Service Surcharge."

(VI)   Each voice service provider may retain, from the total charges collected, a vendor fee in the amount of three-fourths of one percent of the amount of total monthly uniform charges collected by such local exchange provider. The vendor fee is intended to reimburse voice service providers for administrative costs in imposing and collecting the uniform charge.

(VII)   Prior to January 1, 2017, each voice service provider shall remit no later than the last day of the following month and as directed by the Commission, the amount the provider collected for the previous month, less the applicable vendor fee.

(VIII) Beginning January 1, 2017, each voice service provider shall remit no later than 30 days after the end of each quarter and as directed by the Commission, the amount collected for the three months in the prior quarter, less the applicable vendor fee.

(c)   Colorado Telecommunications Relay Service Surcharge form.

(I)   Each remittance shall be accompanied by a completed Colorado Telecommunications Relay Service Surcharge form that includes information for each month remitted. This form is available from the Commission or its website.

(A)   The Colorado Telecommunications Relay Service Surcharge form must be signed and dated by a company representative authorized to do so. The name and telephone number of the most appropriate company representative to whom questions may be directed must also be included on the form.

(B)   The Colorado Telecommunications Relay Service Surcharge form shall be filed with the Commission through its E-Filings System into the proceeding opened for that purpose. The Commission, for good cause shown, may grant a waiver of the E-Filings requirement.

(C)   Voice service providers shall submit all surcharge remittances along with the Relay Service Surcharge form to the TRS custodial receiver directly. The Colorado Relay Service Surcharge form shall also be filed with the Commission through the E-Filings System.

2828. – 2839.   [Reserved].

*   *   *

[indicates omission of unaffected rules]

Appendix K: Notification of substantive change

COLORADO
Department of Regulatory Agencies
Public Utilities Commission

Joshua B. Epel, Chairman
Pamela J. Patton, Commissioner
Glenn A. Vaad, Commissioner
Doug Dean, Director

Joe Neguse, Executive Director
John W. Hickenlooper, Governor

Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202

August 26th, 2015

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: CG Docket # 03-123
Substantive changes to Colorado TRS program

Dear Ms. Dortch,

This letter is to inform the Commission that the Colorado relay provider as of July 1, 2015 is Sprint Relay. Colorado certifies that the state TRS program continues to meet federal mandatory minimum standards after implementing these changes.

If I can be of further assistance, you can reach me via the contact information below. Thank you.

Sincerely,

Holly M. Bise
State Relay Administrator
Colorado Public Utilities Commission
holly.bise@state.co.us
303-894-2024

6360 Sprint Parkway
Overland Park, KS 66251

January 6, 2015

Tammy Baca, Procurement Agent
Department of Regulatory Agencies
Procurement Office
1560 Broadway, Suite 1550
Denver, CO 80202

Subject: Proposal to Provide Colorado Telecommunications Relay Services
Reference: RFP-15-SGA Colorado TRS

Dear Ms. Baca:

Sprint Solutions, Inc. ("Sprint") is pleased to have this opportunity to submit a bid to the Colorado Public Utilities Commission and the Department of Regulatory Agencies for Telecommunications Relay Services ("TRS"). We have developed a comprehensive proposal that highlights the unmatched value we offer to the State and Colorado TRS users including an unbeatable combination of passionate staff and leading-edge technology.

While we have been a TRS provider since 1990, the service we provide today is much more advanced. The pursuit of functional equivalency between TRS and standard phone service has made many great strides in recent years and we have been at the forefront of these advancements. Our proposal includes the latest technology including Video-Assisted Speech-to-Speech Service and Captioning for Conference Calls.

As requested in the RFP, we affirm the following:

- Contents of Proposal: In compliance with RFP Section 1.111, we have provided blind copies of our proposal. In these responses, we have replaced all identifying information such as the name of our company, personnel, systems, and staff with generic terms.

- Parent Company: Sprint Solutions, Inc. is a wholly owned subsidiary of Sprint Corporation. No actual operations happen in the name of Sprint Solutions, Inc. It only negotiates and signs for its affiliates. The main office address for the Sprint Corporation is 6200 Sprint Parkway, Overland Park, KS 66251 and Federal Tax Identification Number: 46-1170005.

- Certification of Independent Price Determination: Sprint certifies that that, in connection with this procurement:
    a) The prices in this proposal have been arrived at independently, without consultation, communication, or agreement, for the purpose of restricting competition, as to any matter relating to such prices with any other Offeror or with any competitor;
    b) Unless otherwise required by law, the prices which have been quoted in this proposal have not been knowingly disclosed by the Offeror and will not knowingly be disclosed by the Offeror prior to opening, directly or indirectly to any other Offeror or to any competitor; and

c) No attempt has been made or will be made by the Offeror to induce any other person or firm to submit or not to submit a proposal for the purpose of restricting competition.

- **Authority**: I, William T. Esrey Jr., am the person in the organization responsible within the organization for the decision as to the prices being offered herein and have not participated, and will not participate, in any action contrary to Certification of Independent Price Determination (a) through (c) above.

- ***Acknowledgement of RFP Amendments:*** *We have registered on the Colorado BIDS website and have received responses to the Questions and Answers (with RFP Modification) dated December 19, 2014.*

- ***Compliance with Terms of the RFP***: *We comply fully with the FCC requirements relative to the services offered. To the extent that we have clarified or taken exception to an RFP requirement, comments have been included only after careful consideration of the RFP requirements, company policies, and applicable law. Per RFP Section 5.1.3.2, we have submitted deviations to the general contract requirements separately. Please see below for a list of exceptions to the RFP language:*

RFP Area	Notes
Billing Adjustment for Missing ASA or Blockage	We agree with the stated billing adjustments and respectfully ask the State to add a provision that the daily, liquidated damages do not exceed the total amount of billed revenue for the day. In addition, our company eliminates the LEC as a point of failure on the TRS platform and provides IXC network reports to confirm compliance with blockage reporting.
Subcontractor terms	Copies of subcontracting agreements are proprietary and may not disclosed to third parties.
Audit Provisions	Our CTS subcontractor has very specific audit and inspection rights that it will agree to. We have taken an exception in order to comply with the subcontractor's terms.

Please contact your Senior Account Executive, Chris Smith at (913) 315-9545 or via email at Chris.Smith@sprint.com if you have any questions. We welcome the opportunity to provide additional information to the State regarding the products and services discussed within this document. We look forward to bringing knowledge, creativity and financial stability to this partnership.

Sincerely,

William T. Esrey Jr.
Regional Vice President

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TAB 1: EXECUTIVE SUMMARY

We welcome this opportunity to respond to the Request for Proposal (RFP) for the provision of Telecommunications Relay Service (TRS) and Captioned Telephone Service (CTS) in the State of Colorado.

We offer a comprehensive, life-cycle approach to managing the Relay Colorado program that will save you time, money, and help you solve technology challenges well into the future. Our flexible solution is completely scalable and addresses the significant challenges faced in State Relay programs. As demonstrated in our response, we have tailored our solution to meet your objectives, including the following:

- We provide **best-in-class technology and services** by incorporating:
  - o Reliable wireline networks and relay platforms to support specialized services
  - o Continual technology upgrades to improving the service
  - o Quality Assurance programs and a commitment to delighting relay users

- We offer a **superior customer experience** by focusing on:
  - o Key quality metrics that are meaningful to relay users such as typing speed, customer care, speed of answer, and efficiency
  - o 24/7 access to relay services and support
  - o Visible and effective outreach programs that reach both relay users and the general public

- We provide a **cost effective service** through:
  - o Streamlined operations to reduce the costs of a declining product
  - o Increased efficiencies through technology and operational practices (when it doesn't hurt the relay user experience)
  - o Greater value including access to all of the latest products and services without "nickel and diming" the State

- We offer **unmatched resources** that include the following:
  - o In-state Account Manager
  - o Full lifecycle team dedicated to providing relay services
  - o Experienced subcontractors who are experts in their relative field

Our TRS and CTS programs are supported by call centers operated by both our company and long-term subcontractors. We have 10 call centers geographically dispersed throughout the country that handle TRS, CTS, and/or Relay Customer Service calls. Each service is supported in multiple centers to ensure that service is always available.

We maintain the TRS platform technology, training, and workforce management for all TRS call centers. Our CTS subcontractor and technology provider maintains these items for the CTS service for all wireline CTS providers. Existing CTS features and services including access from the same specialized telephones will be available for users.

Our Technical Approach
We keep our State customers on the cutting edge of technology, ensuring connectivity for relay users across the State and around the world. First and foremost, we offer TRS and CTS that is functionally-equivalent to traditional telephone users. Our TRS and CTS solutions are in full-

compliance with the essential requirements of the State's RFP and federal guidelines. We offer these proven solutions in many states around the nation.
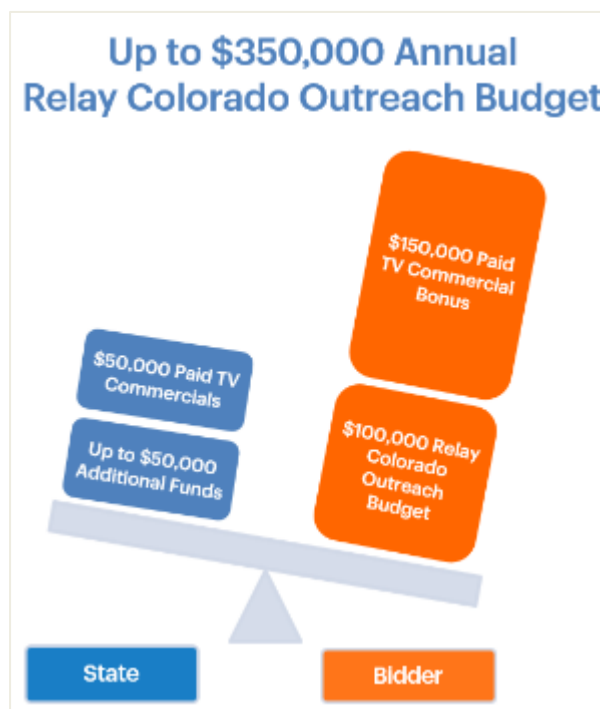
We meet all of the essential State and Federal Requirements!			
Colorado TRS Essentials	**Meet or Exceed**	**Colorado TRS Essentials**	**Meet or Exceed**
Consumer Complaint Handling	YES	Long Distance/Carrier of Choice	YES
Treatment of Customer Information	YES	Telecommunication Service Priority	YES
Proficiency Testing	YES	Independent Service Evaluation	YES
Staff Development	YES	Consumer Input	YES
Efficient Call Processing	YES	Additional Resources	YES
Redundant Call Centers	YES	Staffing	YES
Back-Up Systems	YES	Intelligent Call Router	YES
Account Representative	YES	Outreach Program	YES
Invoice	YES	Performance Reports	YES
TRS CA Qualifications	YES	Complaint Logs	YES
All TRS Call Types	YES	Confidential Service	YES
In-Call replacement	YES	Emergency Calling	YES
STS Called Numbers	YES	CA Gender	YES
Speed of Answer (85% within 10 seconds)	YES	Standard Product Features	YES
Spanish TRS including Translation	YES	Relaying Full Context	YES
Technology and Caller ID	YES	ASCII, Baudot, Turbocode access	YES
Pay Per Calls	YES	Voicemail and Interactive Menus	YES
Compatible with current CTS	YES	1-Line and 2-Line CTS	YES
Meet the Service Start Date: YES			

OUTREACH AND MARKETING PROGRAM

A relay service is not just hardware, software, or an operator in a call center. It is our customers, employees, and our communities in touch and in harmony working together for the betterment of the community. As a part of our commitment to the State and to the community, we will commit to providing an annual Outreach and Marketing budget of $100,000 plus budget-stretching bonus features. These combined investments will equate to an annual budget of up to $350,000 for Relay Colorado, including the following:

✓ **Paid TV Commercials:** Paid TV commercials are the fastest way to spread a consistent message. With $50,000 of the State's annual budget allocated to CTS commercials, we will provide an

Up to $350,000 Annual Relay Colorado Outreach Budget

$150,000 Paid TV Commercial Bonus

$50,000 Paid TV Commercials

Up to $50,000 Additional Funds

$100,000 Relay Colorado Outreach Budget

State

Bidder

additional annual investment of $150,000 – as a BONUS - at no charge. This investment in paid television commercials means we can reach more people in our target market, including the Latino/Hispanic market.

✓ **CTS** Outreach Expert: As a part of our contract with our CTS subcontractors, we will make a local, full-time outreach expert available in the State – at no additional charge. This CTS outreach expert will perform up to 3 outreach events or presentations per month supporting CTS users in the State. This bonus equates to 108 extra outreach events over the life the contract.   In addition, the CTS outreach expert will support approximately 25 CTS installations per month in the region.

✓ Special Veteran Captioned Telephone Offer: To recognize the service of our veterans, we offer presentations and captioned telephones to qualified veterans, at no additional cost. We have paid TV commercials that feature veterans. In addition to our Account Manager and Outreach Specialists, we also have a manager who is dedicated to providing support to federal employees, including veterans.   She will provide presentations, training, and one-on-one support for veterans and those who support them.

✓ Subsidized CTS Devices: We strongly believe that every person with a hearing loss who could benefit from a CTS phone should have access. Money should never be a barrier. Therefore, we offer highly subsidized CTS devices. With the new FCC rulings, we are happy to announce that if the Colorado Commission for the Deaf and Hard of Hearing (i.e., the Equipment Distribution Program provider) supplies a 3rd party certification for an IP CTS phone, we will provide a IP CTS phone at no cost to the user.

CALL CENTER QUALITY

We provide Communication Assistants (also known as CAs or Relay Operators) and relay call center staff who are experienced and passionate about serving relay users. Our CAs not only meets, but also often exceeds the minimum proficiency requirements for typing, grammar, spelling, written ASL-to-conversational English translation, familiarity with hearing and speech disability culture/language/etiquette, and clear and articulate voicing skills.

We have a Quality Assurance staff that oversees all areas of quality programs and works cooperatively to resolve any concerns.

CA TRAINING

Our initial and ongoing training programs ensure that CAs have all of the tools and skills necessary to succeed. Developed based on direct user

TRS Training Programs
✓ 80 hours of initial training
✓ 20 hours of User Culture training
✓ 53 hours annual ongoing training (average for company)

feedback, we customize our training to meet the needs of relay users.

We offer specialized training for STS, Spanish, and Customer Service. We will also provide Colorado-specific training to our TRS CAs. Our CA software is automated and intuitive which means CAs spend less time in training learning how to navigate the system and more time on customer-focused areas like Customer Service and User Culture training.

STAFF TRAINING

We provide 20 hours of initial User Culture training to all TRS call center staff that includes ASL, Deaf culture, the needs of hearing, speech and dual sensory impaired users, and ethics and confidentiality. In 2013, we expanded our User Culture training to include a new interactive "Beyond the Classroom" approach. As a part of this new program, relay call center staff to learn even more about our customers.

We develop our User Culture training in coordination with relay user groups including many national and local user organizations. This tradition will continue. With dozens of deaf and hard of hearing management level employees, we have an unmatched number of internal and external resources who serve as invaluable resources in the development and delivery of User Culture training.

We also provide mandatory annual training for all staff on ethics, confidentiality, diversity, and inclusion. We also sponsor an Employee Resource Group (ERG) to support our employees with disabilities and co-workers who support them.

COUNSELING FOR CAS AND RELAY CENTER STAFF

We recognize that processing relay calls can be emotional and stressful for all relay call center employees. We make assistance available for all CAs and relay call center staff. Supervisors and relay call center management staff are trained to assist CAs with the emotional aspects of processing relay calls in a manner that does not compromise customer confidentiality. Call center management is on-site to provide immediate assistance, as needed.

We also provide confidential Employee Assistance Programs with professional counselors who can provide more in-depth assistance while ensuring customer confidentiality. In addition, we provide a host of additional company benefits to promote a healthy work/life balance and provide support to families of our employees.

Because we are so committed to the well-being of our employees, they are just as committed to serving our customers.

COMPLAINT RESOLUTION

We will ensure that Relay Colorado users can ask questions, register compliments or complaints, or suggest improvements. We have a comprehensive customer contact reporting procedures in place. TRS users will have access to a supervisor while online without requiring the relay user in most cases to hang up and redial.

We also have a progressive customer contact tracking system that does much more than simply track customer complaints. The system assigns resources, generates automatic reminders, provides instant status, and offers detailed reporting that far exceed Federal and State reporting guidelines.

We will provide 24/7/365 access to nationwide general access Customer Service to be announced as "Relay Colorado Customer Service" (if desired). In addition, we will provide access to national specialized customer service and training lines for CTS, Spanish, STS, and VCO users. This approach has paid off. Out of every 100,000 calls processed by our TRS call centers, only about 3 complaints are received on a monthly basis.

Complaints at the TRS Center per 100,000 calls
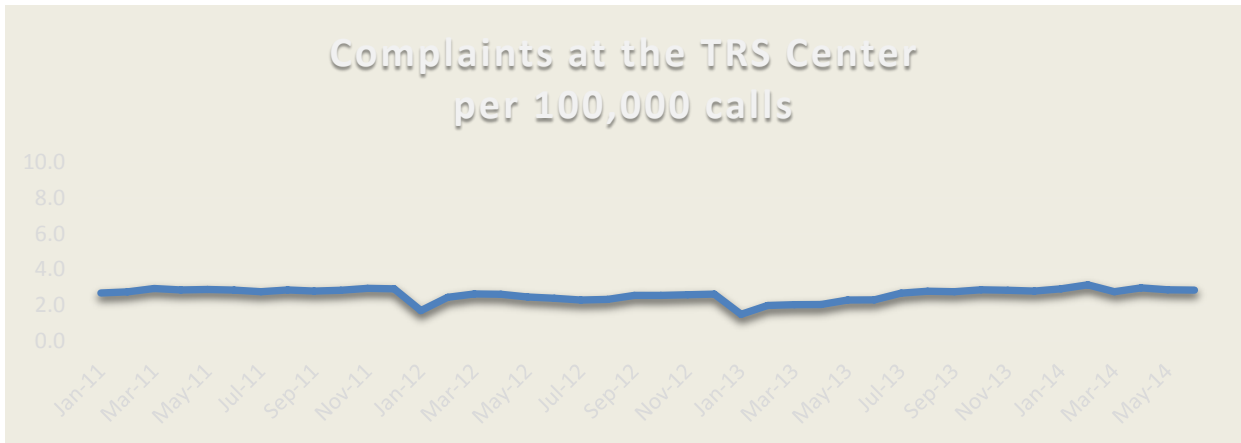
PROCEDURES FOR RELAYING COMMUNICATION

We provide a professional relay service operated by highly trained CAs who relay the full context, content, and spirit of the caller. We will follow all of the State's standard processes for relaying communication, as outlined in the RFP. Our sophisticated TRS software supports the State's objective for efficiency by making it easy for CAs to provide real-time status updates, background noises, tone of voice, and other enhancements.

TRS users will be in complete control over their calling experience and can modify how we process each call. Our CAs follow all caller instructions. We monitor compliance by remotely surveying CAs two (2) times each month. CAs are evaluated on their ability to process relay calls according to the State's preferences while remaining responsive to relay users' needs.

We also offer a Customer Profile to provide more flexibility and convenience for relay users. Using the Customer Profile, TRS users have access to customize their calling experience in ways not offered by the competition, such as up to 100 speed dial entries and toll carriers for each type of long distance call.

Throughout our proposal, we have offered examples of how we go the extra mile for relay users. Each feature and enhancement has been designed to offer the most flexibility possible based on direct user feedback. This approach empowers relay users to personalize their service.

TRS Features	Competitor Solution	Our Solution(s)
Carrier of Choice	• One preference per caller	• IntraLATA preference • InterLATA preference • Interstate preference • International preference
Redial functionality	• Available for 24 hours	• Available for up to 2 years
Speed Dial	• 50 speed dial entries	• 100 speed dial entries • 30 separate emergency numbers
Spell Check	• Word substitution	• Single-word edit • Word-substitution

TRS Features	Competitor Solution	Our Solution(s)
		• Colorado-specific words can be included
3-way calls	• LEC 3-way calling	• LEC 3-way calling • CA-initiated 3-way calling

Please see Appendix 6 for additional information on how we offer more value.

CALL RELEASE

We offer sophisticated technology and processes in place to support TTY-to-TTY Call Release that is in full compliance with Federal and State regulations. As a part of our process, we do not automatically assume that all TTY users who reach another TTY wish to use TTY-to-TTY Call Release; we have processes in place to ensure that the TTY user is in control of their call. We also protect the confidentiality of TTY users. Once the CA releases the call, we remove all information from the CA's screen.

SPEED DIALING

We offer TRS users the option to register up to 100 speed dial entries via the Customer Profile (twice as many as the competition).

TRS users can also enter up to 30 emergency speed dial entries. TRS users often register emergency contacts such as primary caregivers, home health nurses, doctor's office, local or poison control centers, and/or the local hospital.

3-WAY CALLING FUNCTIONALITY

We will support basic LEC-based 3-way calling for Relay Colorado users who wish to host or join a call. We have also upgraded our TRS platform and processes to support **CA-initiated 3-way calling** for TRS users which removes the challenge faced by many relay users in navigating audible prompts. Billing to the State is based on CA work time for all 3-way calls or conference calls.

VOICE MAIL AND INTERACTIVE MENUS

We have offered software-recording technology for its CAs since 1994 and we continue to offer the most flexible CA software recording solution. We have designed our policies for processing voicemail, interactive menus, and answering machine calls to allow each relay user control over how their call is processed, offering increased personal attention.

Our efficient call processing of recordings and interactive menus translate to fewer billable minutes per call. We do not charge TRS users if redials are necessary to process calls involving voicemail or interactive menus. We have stringent policies in place to protect customer information and to delete all selections and access codes are automatically at the end of each call.

VOICE CARRY-OVER (VCO) AND HEARING CARRY-OVER (HCO)

We designed our Carry-Over services to be simple and easy-to use. Carry-Over users can register permanent branding or simply ask for the service at any point before or during a call. We offer many enhancements for its Carry-Over users including voice call progression, direct VCO toll-free number, custom greetings, and custom announcements. Users can also request to modify the process based on their individual preferences.

We protect the privacy of its Carry-Over users. The privacy feature allows TRS users to have a more private conversation where the CA only hears the portion of the call necessary to relay the call. We also ensure that Carry-Over users can communicate with all other relay users.

SPEECH-TO-SPEECH (STS)

We serve a broad range of users with speech, cognitive, or mobility disabilities with patience and respect. A group of handpicked CAs processes all of STS calls. STS users have access to a range of features and enhancements including the ability to store **up to 100 speed dial entries.** Our customer-focused STS service complies with all State and Federal STS requirements including the FCC's 2013 increased standards.

We also offer many STS enhancements including items such as STS Customer Profile, Call Set-Up via E-mail, 711 Automated Call Routing. These enhancements speed up STS call processing providing a better call experience and fewer billable minutes.

FASTER PROTOCOLS

Our TRS platform supports all common TTY protocols including full Turbo Code functionality including the ability for real-time text transmission and interrupt capability. While any provider who offers Turbo Code can connect with E-Turbo TTYs, we have also worked to make sure we offer our relay users the full benefits of E-Turbo. We make using ASCII easy by supporting TTY users using default settings and support ASCII for computer users. All of the faster protocols noted in this section, including Turbo Code, E-Turbo, and ASCII support are included at no additional charge over basic relay price per minute.

Enhanced protocols make call processing faster which saves time for TRS users and results in fewer billable minutes to the State. Using these text protocols saves time (10% to 45%) per call.

PAY PER CALLS

We use the power of our resources as a telecom provider to deliver the most functionally equivalent pay-per-call service for relay users utilizing toll free 900 dedicated numbers. We do not mimic LEC functionality; we provide equal access. **Our pay-per-call solution offers five levels of protection against unauthorized or high pay-per-call services bills,** including:

- 900 Access Number
- Customer Profile Restrictions
- General 900 Advisory
- Specific 900 Advisory
- Pay-per-call billing separation

We provide the necessary network signals to support end user billing. Our pay-per-call services are rated and billed as if they were dialed directly from the originating user's telephone by the 900 service provider and 900-number carrier. This ensures functionally equivalent service.

CALLER ID

Using SS7 technology means faster call processing and fewer minutes billed to the State of Colorado. Relay Colorado users who have purchased Caller ID services from their phone company will be able to view the actual 10-digit number of the user when receiving a call. Likewise, users will have the ability to block Caller ID in the same way as traditional

phone users or use other Caller ID Enhancements that rely on SS7 Caller ID technology to function.

For TRS customers who need assistance with Caller ID blocking or unblocking, **our CAs have the ability to block or un-block Caller ID directly**. This eliminates the need for TRS users to disconnect from relay and call back in when placing multiple calls.

LAST NUMBER REDIAL

We will offer a last number redial feature for all TRS users that allows any caller to dial 711 (or other access number) and ask to redial the last call. Anyone calling TRS can benefit from this feature. We do not limit our redial feature to only registered users. We also store this information longer. TRS users will be able to access their last number called for a year (unregistered users) or two years for callers with a Customer Profile.

EMERGENCY CALLS

We encourage all TRS users to contact 911 directly for the fastest and most reliable emergency services. For customers who prefer to use relay, we will provide automatic and immediate critical emergency call processing using proven practices. We will route all emergency calls to an appropriate Public Safety Answering Point (PSAP) who can dispatch immediate assistance to the relay user. Even if a user hangs up before being connected to the PSAP, our CA will report the call to the PSAP and pass along the user's phone number. We have a documented and a consistent emergency procedure for other types of emergencies such as misdials to 711 when the caller intended to dial 911.

PLATFORM TECHNOLOGY AND PERFORMANCE

We provide reliable technology to help make the world a better place. We offer relay platforms and a network that will increase relay users' safety and security and contribute to sustainable living in an increasingly connected society.

BLOCKAGE

Our TRS platform is supported by switch technology developed by a respected leader in call center technology. Our digital advanced-technology switches provide unparalleled reliability and fault recovery including real-time alarming for capacity threshold limits to prevent blockage before it happens.

We conduct routine, periodic short- and long-term analysis of all components of the Relay Service and wireline network. We also work closely with the CTS technology provider to ensure that there are adequate CTS network facilities so that under projected calling volume, the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.

ANSWER TIME

We have a history of exceeding answer time expectations. Over the past 3 years, we answered 95% of our TRS customers' calls within 10 seconds or less (7/11-6/14) with each month above 90%. Even more importantly is our ability to meet our contractual requirements consistently. **In 2013 alone, we met 99.4% of all answer speed requirements for its government TRS customers**. This includes force majeure events, as we are responsive when weather or other staffing events occur.

Our unmatched technology and tools allow us to forecast the anticipated number of calls on a 15-minute basis (**4 times more detailed than the competition**). The traffic management group develops forecasts based on both historical trends and current events.

EMERGENCY OPERATIONS AND UNINTERRUPTIBLE POWER

Our TRS platform offers uninterruptible power solutions at both the TRS switch sites and call centers. Our TRS switches are located in telecom bunkers that offer additional security and reliability.   Our Business Continuity (BC) plans are based on industry-leading standards. The BC program supports the continued operations of critical services (such as TRS) and minimizes impact to the State, relay users, and employees.

We have designed our platforms with redundancy to minimize the impact of any issues. Redundant network connections, switches, call centers, and switches mean that when issues occur, relay users continue to receive service.

INTERCEPT MESSAGES

Our fault-tolerant and redundant platform virtually eliminates the need for intercept messages. We will provide appropriate intercept messages in both voice and TTY for callers who reach the TRS platform and experience a system failure.

At the State Relay Administrator's discretion, we have the ability to provide a temporary delay message for brief periods when callers may experience longer-than-average call wait times. The CTS technology provider's platform also provides intercept messages.

SERVICE EXPANSION

As a standard business practice, we offer **25% capacity threshold for all service elements**. When we reach the threshold, we begin expansion planning. We anticipate an additional staff of four TRS CAs to handle Relay Colorado calls. We do not anticipate the need for additional CTS staff.

We proactively track and forecast trunking capacity, CA workstations, personnel, and equipment capacity. On a biannual basis, all functional teams refine and modify short- and long-term plans. We will also work with the CTS technology provider, Equipment Distribution Program provider, and the phone manufacturer to monitor the number of phones distributed, active users, and call volumes to forecast future demand and ensure adequate capacity.

INVOICE AND REPORTING

We will also provide monthly invoice and performance reports to the State Relay Administrator by the 15th of each month. Our reports are accurate with validation systems in place. We calculate billable minutes and round them at the end of the month to the nearest 100th of a minute.

We will support the State by providing billing support and analysis to the State with all FCC reporting requirements in a timely manner. During contract implementation, we will work with the

SRA to determine the types of reports preferred for the final report package.

END-USER BILLING FOR INTRASTATE, INTERSTATE, AND INTERNATIONAL CALLS

Relay users will be able to place LD calls and use alternate billing arrangements including collect, person-to-person, third party, and calling cards. We will also ensure that TRS users can make calls to and from hotel rooms and pay phones.

Our billing process for relay users are functionally equivalent to traditional phone users with the relay user's long distance provider network controlling the timing of all long distance calls. We also have processes in place to avoid billing issues before they happen. We inform customers when we make toll calls and confirm the called number. We can also request immediate credits to avoid sending inaccurate bills to the customer.

CARRIER OF CHOICE

We have interconnection agreements with **over 250 carriers**. For TRS users who wish to use a different LD carrier, the relay user can give preferences to the CA at the time of the call or save this information as a part of the Customer Profile for each type of long distance toll call (e.g., intrastate, interstate, international). We provide the necessary interconnection and signaling required for carriers to accurately rate and bill toll calls including but not limited to collect calls, international calls, person-to-person calls, third-party calls, and calling cards. TRS users selecting another carrier will receive bills directly from the carrier according to their standard processes.

VALUE ADDED FEATURES

We believe that technology should not raise barriers. It should knock them down. That is why we constantly work to anticipate the needs of relay users and make our award-winning services accessible to all. We provide all standard TRS products and features in the most flexible manner possible to give users more freedom and flexibility in how they use the service.

As a part of our bid, we will provide all standard enhancements and the following additional value added features options:

- ♦ **10,000 annual minutes of Captioning for Conference Calls:** We are offering access to up to 10,000 annual minutes of our captioning for conference calls premium service. The same Captionists who perform television captioning power this service. Transcription rates for this service can reach speeds of up to 225 words per minute. Calls must be pre-scheduled and transcripts are available at no additional charge.

   We know that technology can greatly enhances lives. With our captioning for conference calls, users can receive live, real-time text captioning of multi-party conference calls using the same high-quality captioners that produce closed-captioning for live television. Our service offers:

- ♦ Increased understanding of meeting discussions
- ♦ Immediate delivery of live captioning
- ♦ Shorter calls than traditional Relay service
- ♦ No special software requirements

- ♦ **Video-Assisted Speech-to-Speech (VA-STS):** VA-STS is an enhancement to the traditional STS service that allows the STS caller using a webcam with video conferencing software to

connect with the Communications Assistant (CA) at the relay call center. During the call, the VA-STS user and CA will establish a one-way video connection that allows the CA to see the STS user as they are speaking. This one-way video provides the ability for the STS CA to see visual cues and increases understanding of speech.

♦ **Speech to Speech Call Set-Up via E-mail:** We are also offering an enhancement for STS users to email call set-up information and instructions directly to the STS CA prior to the call. In order to speed up the set-up of the call, we offer STS Set-Up via E-mail, at no additional charge to the State. STS users can email call instructions or information two (2) to 24 hours prior to the call. This can include information such as:

- ♦ Number to be dialed
- ♦ Name of the person being called
- ♦ Special instructions and the subject of the call
- ♦ Anything that makes it easier for the STS user to complete the call.

Please note that this feature cannot be used to request a specific relay operator, schedule an STS call, or be used in lieu of placing a live call.

EXPERIENCE

We have the necessary experience, skills, and resources available to fulfill all commitments made in our Technical Proposal. We are a proven, professional service provider of relay services with resources that are unmatched in the industry. We provide all of the products and services included in this bid to multiple State customers around the country.

- ♦ 115 years as a Telecommunications Provider
- ♦ 28+ years as a Long Distance Provider
- ♦ 24+ years as a TRS Provider with over 2 billion calls processed
- ♦ 23+ years as a Spanish Relay (TRS) provider
- ♦ 20+ years providing Operator Services for the Deaf
- ♦ 17+ years as a provider of Speech-to-Speech Relay
- ♦ 12+ years as a CTS Provider
- ♦ 11+ years as a provider of Captioning for Conference Calls

PERSONNEL

We will provide an experienced and passionate Account Manager to support the Relay Colorado TRS and CTS contract. Our Account Management team is comprised of highly skilled and passionate staff. Almost half of our Account Management team possess an advanced degree (i.e., Master's Degree) and most have over 10 years of experience with the company.

We will assign Kris Smith-Shipley who is Deaf, is fluent in American Sign Language (ASL) and is highly proficient communicating in written English. Our Account Manager has worked in the relay industry for over 24 years in various capacities and for 17 years with our company. The Account Manager will be fully responsible for the Relay Colorado contract and will serve as the point of contact between the Colorado Public Utilities Commission, the State Relay Administrator, the State Relay Advisory Committee, and our company. This greatly benefits the State, as the Account Manager is highly knowledgeable of all relay products, FCC updates, and the rules and regulations regarding their State contracts.

The Account Manager will lead a full lifecycle team to support Relay Colorado. Other key personnel will include the following:

- Chris Smith will serve as the Senior Account Executive for the State. He is responsible for TRS and CTS sales to State and federal customers. He has enjoyed a very successful career in sales and management including the management of one of our first TRS centers. Additionally, he built strong relationships within the community including a position with Gallaudet University. He has a Bachelor of Arts degree and a Master of Business Administration.

- Liz D'Anna, an experienced Implementation Program Manager, has over 20 years of experience in the Telecommunication industries. She provides pre- and post-sales support by defining and managing implementation of complex telecommunication products and services. The Implementation Program Manager has overall responsibility for implementation and project planning to ensure customer satisfaction and problem resolution.

SUMMARY

As the Relay Colorado provider, we will be an advocate and champion in the community. We use our resources – people, technology, and funds -- to enrich communities where we do business and where our employees live and work.

The State and relay users can have the peace of mind in knowing that we fully understand your requirements and will be very responsive to the State, State Relay Administrator, State Relay Advisory Committee, Equipment Distribution Program provider, and relay users' needs.

We are committed to providing the best technology and reliability. We will continue to make equal access a priority for the community. Exciting challenges and opportunities await the Relay Colorado program during the term of this next contract. We fully embrace the opportunity and stand ready to work with the State to ensure that we meet the communication needs within Colorado's diverse population, now and in the future.

A partnership for today and the future

TAB 2: TECHNICAL COMPONENT STATEMENT OF WORK

The purpose of this RFP is to procure TRS authorized by statute for a period of three years beginning TBA, with the provision for the State to elect to continue the service for an additional two (2) one-year extensions.

All Offerors must respond to Section 4.1 regardless for which service(s) they are responding.

Bidder response:

We have read and fully meet this requirement.

We understand the existing contract for Telecommunication Relay Service (TRS) and Captioned Telephone Services (CTS) services with AT&T will expire on 7/1/15. We look forward to working with the State and the incumbent provider to ensure that relay users are not disrupted by the transition. If the State would like to transition the service earlier than July, we would be happy to work together to put together a faster transition plan that meets both the needs of the State and allows plenty of time to prepare the necessary staffing, equipment, and telecommunications infrastructure.

We understand that the initial contract term will be for a period of three years. If the State and relay users are delighted with our service, we understand that the State may elect to renew the contract for two single-year extensions. Many of our current customers have similar contractual agreements with us to provide relay services. Very often, those States decide to extend our service rather than go through another procurement process.

Our proposal includes both TRS and CTS. Please see the detailed responses in each section for information on how we will meet or exceed the minimum requirements using proven technology, a strong commitment to quality, and our dedicated and passionate staff.

4.1 REQUIREMENTS FOR BOTH TRADITIONAL TRS AND CAPTIONED TELEPHONE SERVICES

4.1.1 Functional Standards

4.1.1.1 Consumer complaint handling. Offerors shall describe the steps to be taken in resolving complaints regarding services or personnel.

Bidder response:

We have read and fully meet these requirements.

Delighting our customers is our first priority and everyone on staff is committed to meeting that goal. We have detailed processes in place to ensure that when a TRS or CTS user has a complaint about our services or personnel, we are able to listen to the caller and address the issue quickly.

Our Quality Assurance staff reviews all complaints and resolutions weekly. They share this information with members of the relay management team monthly (including our National Director of Relay Services). We maintain a database that documents complaints, assigns resources, provides status, generates automatic reminders, and offers detailed reporting. This means quicker resolution and accurate reporting for Relay Colorado users.

From the technology used to our caring staff, we are dedicated to resolving issues and taking the necessary steps to make sure relay users are happy. We strive to address all complaints and compliments within 24 hours and to resolve the customer issue within 72 hours. We have a system in place that will trigger an alert if a complaint is not resolved within 72 hours. The system is closely monitored which helps address complaints in a timely manner. We have a well-documented five-step procedure for responding to a customer's feedback on the relay service.

STEP 1: CUSTOMER CONTACTS US WITH A COMPLAINT, INQUIRY, OR COMMENT.

We are always available to receive feedback from customers and address any questions or concerns. Relay users can contact us by:

- ♦ Asking for a supervisor while on a relay call (TRS users)
- ♦ Calling our Relay Customer Service
- ♦ Pressing the "CUST SVC" button on the CTS phone
- ♦ Contacting the Account Manager
- ♦ Writing us via mail, email, on-line forms, or fax
- ♦ Talking with one of our representatives during a community or outreach event

STEP 2: WE WILL LISTEN TO THE RELAY USER AND FULLY DOCUMENT THE ISSUE.

We know that it is important to make sure we fully understand the caller's concern or compliment. We gather as much information as possible and record all information provided by the relay user.

STEP 3: THE CUSTOMER CONTACT IS CLASSIFIED AND ASSIGNED (IF APPLICABLE).

Once we receive a customer contact, we classify the contact as either a compliment, a complaint, or an inquiry.

Compliments

Compliments for specific individuals are forwarded in our tracking system to the employee's call center. We formally recognize our CAs and other personnel who delight our relay users. In the past 12 months, we have received over 900 compliments on our service and personnel, such as the following:

> I have never had people who cared so much as you do. Everyone there is so kind. Everywhere else I call I get people who just don't care and don't want to actually help me but you are so nice and so helpful it really is something. You all have been so good to work with." (04/01/14)

> This operator did a marvelous job utilizing all the techniques and tools to make the call go smoothly." (03/19/14)

> I'd like to say kudos to the operator who has made my call more easy going and comfortable from beginning to the end. They were very helpful with the whole point which impresses me. Please acknowledge her wonderful job. Thank you." (03/13/14)

> CA makes me feel welcome to use services with good manners and sensitivity. It is important to me to get good kind smart operators. Very good operator makes me feel good. She was very kind and professional. Deserves a pat on the back." (01/27/14)

Compliments from users are posted on bulletin boards in the call center to recognize performance and motivate our employees. (Customer sensitive information such as names, telephone numbers, and other identifying information is removed prior to posting). Recognition comes in many forms such as balloons, candy, or other rewards for providing great service.

COMPLAINTS

We classify complaints by category (service, technical, or miscellaneous) and indicate subcategories for tracking and reporting. If complaints are not immediately resolved, personnel are assigned based on the complaint category.

Service Complaints

We direct feedback involving specific call center staff to the employee's manager through the tracking system. The manager will meet with the employee to discuss the relay user's complaint as soon as possible once a complaint is received to investigate the issue. The manager will verify that the employee understands the correct procedures and performance expectations. The manager may recommend coaching, re-training, or take disciplinary action depending on the nature of the complaint. If a technical issue impacted the call, the manager will immediately open a trouble ticket with the technical team.

Technical and Miscellaneous Complaints

The person who speaks to the relay user immediately documents all technical complaints in the tracking system. When the technical team needs to investigate, we enter a trouble ticket and note the corresponding number in the complaint system. The Account Manager will follow up with the internal teams for resolution. Likewise, when we receive a miscellaneous complaint, the Account Manager will take ownership of the issue and work with the appropriate internal staff and the State to resolve the issue.

STEP 4: WE FOLLOW UP WITH THE RELAY USER REGARDING THE RESOLUTION.

We ask each relay user when they file a complaint or compliment if they would like to be contacted once we identify a resolution. If so, we confirm how they would prefer to receive the information. Some relay users prefer to receive a letter in the mail (or e-mail) and some users prefer to have a telephone discussion. The relay user can decide how he or she would like to be contacted. Please note that we document all attempts to contact the caller with resolution. We try multiple times to contact the user. If the attempts are unsuccessful (e.g., changed address or multiple unanswered calls), we will also note that in the tracking system.

We want every caller to be happy with the resolution. If the relay user is not satisfied, we will provide information to the relay user on how they can escalate the issue to the State and/or the FCC. This information will also be included in outreach material.

Please see the sample letter (Appendix 1) that would be sent to a relay user who registers a complaint that explains the procedures for the resolution of complaints, including contact information for both the SRA and the FCC should they not be satisfied with the resolution of the complaint by the TRS vendor.

STEP 5: RECORDS ARE FINALIZED AND AVAILABLE FOR REPORTING AND ANALYSIS.

Once the issue is resolved, the Account Manager reviews all records to make sure they are accurate and complete. All complaints will be documented (including resolution) and kept on file and available to the State upon request.

As a standard business practice, our Quality Assurance team will review all complaints on a weekly basis to ensure relay users are satisfied with the services provided and the complaint resolutions. We share the complaint report with the management team on a monthly basis, including our National Director of Relay Services.

The complaint procedures, or a reference to them, must be included in all printed materials about the relay service for the community outreach program and any material distributed for the public or relay users.

Bidder response:

We have read and fully meet these requirements.

In order to ensure that all Relay Colorado users understand the complaint procedure and their rights to quality service, we will include complaint procedures (or a reference to them) in all printed materials about the relay service including any material distributed for the public or relay users.

The Offeror shall ensure that any caller to the relay center will be able to reach a supervisor or administrator while still on line during a relay call if they have a complaint.

Bidder response:

We have read and fully meet these requirements with the clarifications noted below.

We ensure that if a relay user requests to talk to a supervisor, that we honor the request. We make supervisors and staff available all day, every day to assist callers. Callers are not directed to dial a different number to talk with a supervisor; it is done while on the call.

CLARIFICATIONS

If the inbound caller disconnects, our TRS platform terminates the outbound call to avoid inappropriate toll charges assessed against the calling party and inappropriate charges to the State for non-relay related functions. When this occurs, the supervisor will ask the outbound caller to redial the relay service or to call the Customer Service number.

Please note that due to the nature of CTS calling – which precludes the calling parties from speaking to the CA – CTS users cannot make requests directly to the CA. Instead, CTS users can simply press the "CUST SVC" button directly on the phone for questions, compliments, or complaints.

DEDICATED CUSTOMER SERVICE AND TRAINING LINES

We will also provide toll-free Customer Service that is accessible to all Relay Colorado users statewide 24/7, 365 days a year. This Customer Service number(s) will support all communication modes (e.g., TTY, ASCII, VCO, HCO, STS, Deaf-Blind Pacing, and CTS) and we can be answer these calls as "Relay Colorado Customer Service," if desired.

We also provide national, specialized Customer Service and training line options for Spanish-speaking users, STS, and VCO users. All of these Customer Service solutions are available from anywhere in the nation. We do not assess per-minute charges to the State for Customer Service Training Lines (STS or VCO). Additional information is provided below.

Spanish Customer Service and Training Line
We provide a separate national Customer Service number for all relay customers who speak Spanish. Answered 24/7, customers can request information on placing a relay call, tips for improving the efficiency of relay calls, information on new relay enhancements, changes in the service, and to accept commendations and complaints.

STS Customer Service and Training Line
We provide a nationwide STS Customer Service to assist STS users and caregivers such as family, friends, medical professionals, businesses, and organizations. This service is available 24 hours a day, every day of the year.

Our STS Customer Representatives assist people with the following:

♦ Understanding the basics of STS calls, including CA's role
♦ Establishing, explaining, or updating STS Customer Profile and call handling options
♦ Providing information on enhanced features such as Call Set-Up via E-mail or Message Retention
♦ Establishing long distance service accounts or assisting with billing inquiries
♦ Referring callers to the Equipment Distribution Program for questions on accessibility equipment
♦ Explaining the processes CAs will use to help clarify speech patterns
♦ Distributing STS brochures, call-me cards, promotional materials
♦ Referring customers to the STS website for more information
♦ Making practice calls

VCO Customer Service and Training Line
We will soon implement the industry's first national VCO-specialized Customer Service and Training Line. Our VCO Customer Representatives can help VCO users and/or advocates with the following:

♦ Understanding the basics of VCO calls, including TTY etiquette
♦ and abbreviations
♦ Establishing Customer Profile and branding as a VCO user
♦ Explaining VCO basics (access numbers, and call handling preferences)
♦ Educating users on enhanced VCO features such as
♦ 2-Line VCO and Privacy
♦ Empowering VCO users to personalize their service with examples such as leaving answering machine messages
♦ Establishing long distance service accounts or assisting with billing inquiries
♦ Referring callers to the State's Equipment Distribution Program for questions on accessibility equipment
♦ Distributing VCO brochures or other promotional materials
♦ Referring customers to the Relay Colorado website for more information
♦ Making practice calls

OUR CUSTOMER SERVICE PHILOSOPHIES

Customer Service is about taking care of the customer. It is about working together to improve the customer experience. We believe that our relay service is not just hardware, software, or an operator in a call center. It is our customers, employees, and our communities in touch and in sync working together for the betterment of the local community. An integral part of this is our Customer Service team. The following our principles that define our Customer Service approach.

Customer Service should be free.
We never charge our State customers or end users a per-minute fee for Customer Service. We believe that Customer Service is simply a part of doing the right thing for our customers and should not be a revenue generator.

Customer Service Staff should be empowered.
We empower our Customer Service Representatives with the ability to make real-time updates to Customer Profiles. Unlike the competition, which refers Customer Profile changes to their technical team, our Customer Service Representatives have access to the TRS Customer Profile database and can make real-time changes.

Customer Service should be available everywhere.
All of our Customer Service solutions are available from anywhere in the US. We do not limit access to Colorado residents. Therefore, if a family member or friend in another State has a question on how to use the Relay Colorado service, our team is ready to assist.

Proposals must guarantee that a consumer complaint log and that complaint resolution procedures meeting FCC requirements will be maintained by the TRS vendor. The log must include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. The Offeror shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the State by June 15 of each year. Proposals must include a sample of the written notification that will be sent to all consumers registering a complaint that explains the procedures for the resolution of complaints, including contact information for both the SRA and the FCC should they not be satisfied with the resolution of the complaint by the TRS vendor. To enable the State to both meet its complaint resolution responsibilities to the FCC and to monitor the TRS being provided to ensure that the Offeror is providing good TRS and making reasonable efforts to resolve complaints, the TRS vendor will make the full contents of the complaint log available, on request, and provide the names and address or phone numbers of any complainant available to the SRA upon request. Offerors shall propose a method to make the resolution of any complaint available for such review. One acceptable method is the issuance of a unique identifier (number) that will enable the SRA to request a sample of complaints and receive the details and contact information of the complainants from the TRS vendor. The SRA will protect this CPNI information from disclosure to the same extent required of the TRS vendor.

Bidder response:

We have read and fully meet these requirements.

As noted above, we have standard procedures in place to ensure that we thoroughly document each complaint or compliment and that they receive our attention. Our tracking database exceeds the FCC minimum standards and supports timely resolution of all issues. Our standard policy is to retain customer contact records for the life of the contract plus five years after the expiration of the contract. Our customer contact records include all of the minimum fields required for State and Federal compliance, including the following:

- Name of complainant
- Address of the complainant
- Date and time complaint received
- CA identification number
- Nature of the complaint
- Results of any investigation
- Disposition of the complaint
- Date of such disposition
- Tracking number
- Call Center receiving complaint
- Call Center handling the call
- Communication mode of caller

When we receive a complaint, we offer to follow-up in writing or direct contact (phone). We have provided a sample copy of the customer contact follow-up letter in Appendix 1, which includes contact information for both the FCC and SRA. If the customer is not satisfied with the provided resolution, they may choose to escalate the issue. Relay users can also submit an anonymous complaint. We take all complaints seriously, even if the relay user chooses to remain anonymous. We process these type of complaints in the same manner as those complaints that provide customer contact information.

OUR TRACKING SYSTEM

Our tracking system does much more than simply store customer contacts; it assigns resources, generates automatic reminders, provides instant status, and offers detailed reporting that far exceed federal and state reporting guidelines.

Notifications
When a customer contact is entered into our tracking system, a unique number identifier is assigned. The contact is assigned to someone for resolution and the system notifies the next person who needs to take action via email. These automated reminders are based on pre-determined thresholds to ensure that each caller receives timely attention. When our staff logs into the system, they are reminded of all customer contacts that have been assigned to them individually or to the associated work group (as pictured on the right).

Customer Contact System ?

In-Progress:	0
Pending:	0
Unassigned Pending:	0
Monitored:	0
Pending Authorization:	0
Monitored Past Due:	0
Due in Next 7 Days:	0
Due Tomorrow:	0
Due Today:	0
Past Due:	0
All Customer Contacts:	0

Detailed Reporting
Our tracking system also supports ongoing quality assurance efforts for both individual States as well as our performance from a network, CA, and call center level for both TRS and CTS. The resources will ensure that the State can closely monitor all complaints.

♦ **State Relay Service Report** includes monthly tracking number, date of complaint, CA identification number, type of complaint, nature of complaint, date of resolution and explanation of resolution, status (available upon request)
♦ **State Relay Service Tally Report** includes total commendations and total complaints by classification and category number (available upon request)
♦ **Total Tally Report:** This internal report is used as a part of our quality assurance program. It contains consolidated compliment and complaint information by category number for all products.
♦ **Global Call Center Report:** This internal report is used as a part of our quality assurance program. It contains compliments and complaints (by category) for each call center.

♦ **Account Report:** This internal report provides a snapshot of the State's total customer contact files, open and closed files for each month (available upon request)

♦ **Annual FCC Tally Report:** This report is shared with State for annual FCC reporting.
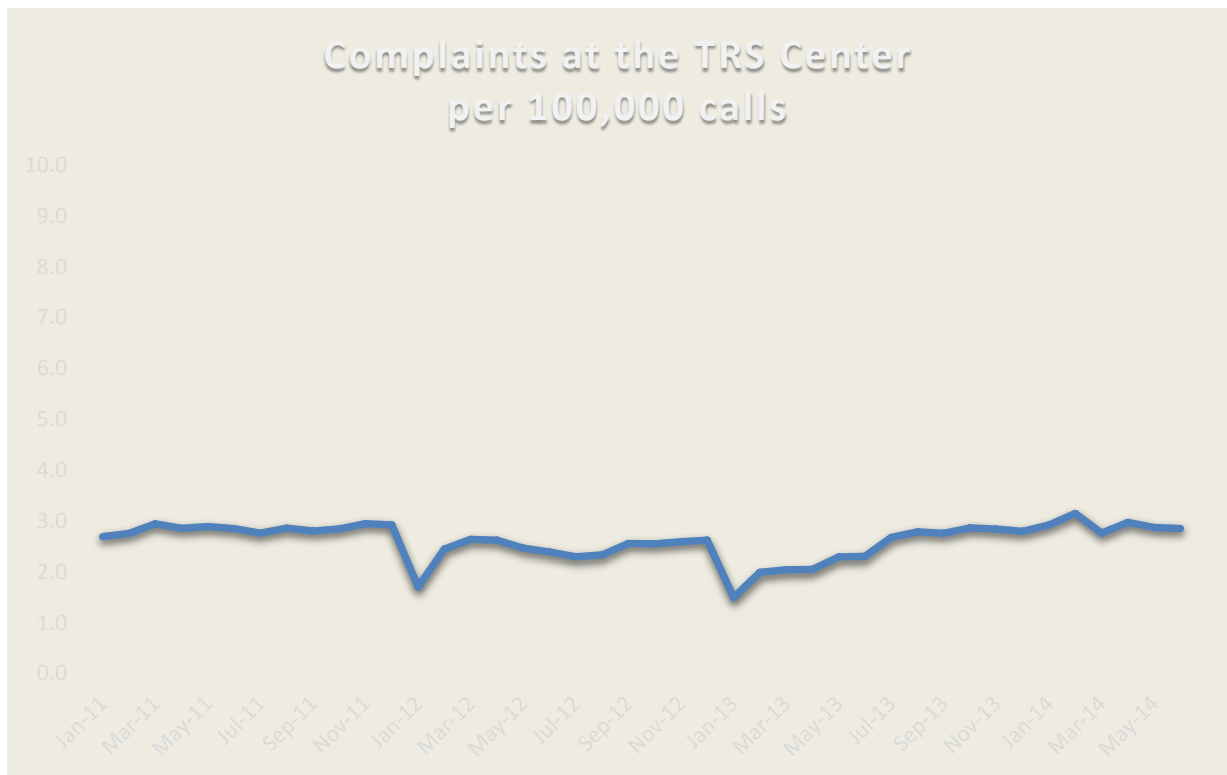
Security and Protection

Our complaint database provides confidentiality and security protections. Only authorized staff has access. Any changes and updates to customer contacts are recorded, along with the person making the change. Once a complaint has been added to the system, protections exist to keep it from being deleted. We also have systems in place to protect the integrity of contacts. We appreciate the State's recognition that they too will protect customers' sensitive information.

HISTORICAL PERFORMANCE

It is important to note that we routinely have a very low number of complaints. But, we do take each complaint very seriously – regardless of the issue being reported. We do everything in our power to quickly address any service or personnel issues.

This approach has paid off. As is demonstrated in the chart below, out of every 100,000 calls processed by our TRS call centers, approximately 3 complaints are received on a monthly basis.

Complaints at the TRS Center per 100,000 calls

<u>4.1.1.2 Long distance calls.</u> Offerors must provide a method for billing of long distance services and state how the FCC's carrier of choice requirement will be met. TRS users shall pay rates for intrastate and interstate long distance calls that are no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination. Offerors shall specify the long distance service to be used if the caller does not specify a carrier of choice, and whether any special discounts will be provided to TRS calls.

Bidder response:

We have read and fully meet these requirements.

With us, Relay Colorado users (including both TRS and CTS) will have access to more options for long distance carriers. We currently have over 260 carriers across the nation who offer long distance services through our platforms. Participation of these carriers for Relay Colorado will depend if the carrier is authorized to provide services in Colorado and require connectivity to one of the designated Access Tandem (i.e., telecom connection point).

To process these calls, we use the industry's standard solution for long distance calls (also known as Carrier of Choice or COC). Our long distance calling solution is in full compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006). This approach allows us to route calls over the carrier's network and provides the means for the carrier to bill and rate the call in real-time using factors such as:

- ◆ Duration of the call
- ◆ Time of the day
- ◆ Day of the week
- ◆ Distance between the calling and called party
- ◆ Designation as a relay call

This means that relay users (including CTS users) are billed in the same manner as all other callers. Relay users may elect to sign up for promotional plans or, if offered by the caller's long distance company, may be eligible for a relay discounted rate.

The TRS and CTS platforms both contain the necessary logic to determine if calls should be rated as local or toll. Local calls are free through the relay service. We do not charge relay users for calls originating and terminating within the same toll-free local calling area including all Extended Area Service (EAS) locations.

Relay Colorado users will be able to use any billing method or operator service made available by the requested carrier; including collect, third-party calling and pre-paid cards. Calls can also be placed to 1010 carriers.

TRS CARRIER OF CHOICE (COC)

Long distance rates can vary by the type of toll call so our systems allow relay users to enter multiple preferences in the Customer Profile (e.g., for intraLATA, intrastate, interstate, and international calls). For example, a caller may want to use one long distance for interstate calls and use another long distance provider for international calls.

If a TRS users wants to change carriers for a single call, they can. When a TRS user indicates their COC preference, the Relay Operator will verify that the requested long distance company is

a COC participant. If so, the call is routed accordingly. If not, the caller is informed and can decide how to proceed (e.g., using another carrier).

With us, the State can select which long distance company that it would like to serve as the default carrier for Relay Colorado (TRS and CTS) users. If not already a member of our COC program, we will attempt to obtain an authorization and interconnection agreements.

CTS CARRIER OF CHOICE

We also encourage our CTS users (including voice callers) to register a preferred COC directly with the CTS Customer Service. All of our CTS telephones (distributed since 2006) include an advisory about long distance selection. CTS users can fill out a card indicating their long distance company or by contacting Customer Service directly to register this information. Voice callers are also alerted via a recording on the inbound toll-free number.

Please note that one advantage of 2-Line CTS services is that long distance calls are not billed or rated through the relay service as the call between parties is direct with a separate line providing captioning.

OUTREACH

We will include an explanation of long distance options and the COC program in all appropriate Relay Colorado publications. A list of participating long distance carriers will also be available, upon request.

4.1.1.3   Treatment of TRS customer information. Consistent with FCC requirements, should a different TRS vendor be selected to provide TRS for the State in the future, the TRS vendor awarded a contract as a result of this RFP shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days before the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order. The vendor may not use any information obtained from relay calls to support other business interests.

Bidder response:

We have read and fully meet these requirements.

We comply with all FCC requirements regarding the treatment of our relay customer information. We have experience in working with other TRS vendors to coordinate the transfer of data in usable format at least 60 days before the last day of service. If awarded the contract, we will work with the existing provider to make sure all TRS and CTS customer preferences are entered into our systems.

Likewise, if it becomes necessary to transfer the customer information to a new provider at the end of the contract term, we will work cooperatively with the new provider and provide the information under the same terms.

We have a strong history of protecting our relay customers' information. It is never sold, distributed, shared, used for other business interests, or revealed in any way, unless compelled to do so by a lawful order. We have both systems and processes in place to protect customer data.

Every relay center employee also reviews our code of conduct annually and reaffirms that they will not release customer information.

4.1.1.4 Staffing. Offeror shall provide a listing of proposed additional staffing that will be required to handle the State's calls, either in a separate new relay center or additional staffing system wide, including, if appropriate, shift supervisors, clerical staff, CAs, management personnel and other needed positions on the various shifts during a week.

Bidder response:

We have read and fully meet these requirements.

Our centralized Traffic Management group and IT planning teams have carefully analyzed the current Relay Colorado call volume which was provided by the State as a part of the RFP. They have decades of experience in forecasting projected calling patterns and determining the number of CAs and facilities needed to process the calls.

Based on this experience, we anticipate that an equivalent of four full-time TRS CAs will be needed to handle the State's calls. We have existing CTS staff ready and available to absorb the Colorado CTS call volumes, without needing to hire additional staff. The existing staff (e.g., supervisors, administrative personnel, customer service, and management staff) can easily support Relay Colorado TRS calls.

We maintain a highly-efficient network solution for both TRS and CTS to make sure we are using our resources as effectively as possible. Our large and geographically-broad system of relay call centers, utilizing six domestic TRS call centers, five CTS-enabled call centers, and two Customer Service call centers, provides a completely redundant and secure relay system. This means that we will always be available for Relay Colorado users.

Include job descriptions and qualifications for the various positions that will be added.

Bidder response:

We have read and fully meet these requirements.

We recruit the most passionate and dedicated people to be a part or our team. Please see Appendix 3 for copies of the job descriptions for the various positions within the relay call centers.

Describe any efforts that will be made for the active recruitment of employees with ASL and relay service experience and with expertise working within the Deaf community.

Bidder response:

We have read and fully meet these requirements.

Diversity is a unique source of our energy, strength, and excellence and is reflected in all we do. We realize the importance of hiring employees who identify with the customers we serve and are committed to complying with the Americans with Disabilities Act (ADA). We proudly employ people with a variety of backgrounds, beliefs, and abilities. This diversity allows us to see the world from a fresh perspective and serve our customers in creative new ways. Our company's corporate culture helps employees to feel personally rewarded, perform at their best, and maximize their potential.

We are one of the leading employers of people who are members of the disability communities served and a key reason for our success at meeting the needs of our customers. We actively recruit people with disabilities for positions. Hiring preference is given to CAs or other applicants with relay experience, knowledge of American Sign Language (ASL), or experience working with deaf, deaf-blind, and hard of hearing or individuals with a speech-disability.

Our team reflects the faces of our relay customers. We not only *provide* relay, but a large percentage of our decision-makers are also daily users of TRS and CTS. We are the leading employer of people who are deaf and hard of hearing in the TRS/CTS industry, employing over a hundred deaf or hard of hearing team members and contractors throughout the country. These employees, along with their spouses, children, parents, and siblings, have the same communication needs and concerns as those of the communities we serve. Our employees are active members of the community and readily accessible to those who we serve. This is a significant difference between us and other providers.

Include an example of the form CAs will be required to sign pledging to protect the confidentiality of TRS users.

Bidder response:

We have read and fully meet these requirements.

We believe that measures to ensure confidentiality are crucial to the success of relay operations and have implemented procedural and environmental measures to safeguard customer and call information.

We have policies in place to protect users' confidentiality: These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

Our employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs are taught using various scenarios which demonstrate the correct way to request assistance from a Supervisor without divulging call-specifics.

Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through the CAs' participation in an interactive training program focusing on scenarios that they are likely to encounter when relaying calls.

CORRECT WAYS TO PROTECT CONFIDENTIALITY	EXAMPLES OF BREACHES OF CONFIDENTIALITY
To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Missouri again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without elaboration. Maintain a professional and friendly image with customers.	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.
It is appropriate to discuss with a member of management technical or procedural components of a call. For example, to say you had problems placing a calling card call from a pay phone.	It is not appropriate to discuss call content or conversations with others, ever.
It is appropriate to call for a Supervisor to look at your screen for assistance with the call.	It is not appropriate to request assistance from the agent sitting next to you.

All CAs and other relay center personnel are required to sign and abide by our policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment.

The relay center Code of Ethics requires the following of CAs:

♦ Keep all TRS call-related information strictly confidential.
♦ Keep no records of customer information or content of any TRS call.
♦ Refrain from editing or omitting anything from the content of the conversation or the spirit of the speaker.
♦ Refrain from adding or interjecting into the content of the conversation or the spirit of the speaker.
♦ Assure maximum customer control.
♦ Strive to further skills and knowledge through training, workshops, and reading literature available in the field.

Code of Ethics

We provide a transparent link of communication between typed and voiced messages. As part of the relay services organization all employees or contractors are bound to the following rules and regulations:

1. All dual-party call related information is to be strictly confidential.

2. Nothing is to be edited or omitted from the content of the conversation or the spirit of the speaker.

3. Nothing is to be added or interjected into the content of the conversation or the spirit of the speaker.

4. To assure maximum user control, the employee will be flexible in adapting to the consumer's needs.

5. Employees will strive to further competency in skill and knowledge through continued training, workshops, and reading of the current literature in the field.

EMPLOYEE ROLE

1. The employee or contractor shall not reveal any information about the call, including the fact that the call is being performed. Information learned from a call cannot be used for personal gain. All call related questions or problems are to be discussed with management.

2. The employee shall transmit exactly what is said in the way that it is said in the way that it is intended, including profanity, in the language of the consumer's choice.

3. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.

The items above were covered with me. I understand that failure to comply may result in corrective action.

_____   _____
Employee signature   Date

_____   _____
Supervisor signature   Date

CONFIDENTIALITY POLICY

We strictly enforce confidentiality policies in the center, which include the following:

- Prospective CAs are screened during the interview process on issues regarding ethics and confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Each CA must sign the Pledge of Confidentiality Agreement form
- Breach of confidentiality may result in termination of employment.
- All Relay Centers have security key access.
- Visitors are not allowed in CA work areas.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.
- Supervisors are present in the work area to observe behavior.

In accordance with the FCC, all information utilized for call set up, including customer database and preferred call type information remains confidential and cannot be used for anything but the call. Once the inbound party disconnects, all information pertaining to that call disappears from the CAs terminal. The required confidentiality and security of the customer preference data is covered during training of all employees and reinforced throughout employment.

We take the following steps to ensure that Customer Profile information remains secure:

- We do not modify a customer's record based on experience.

- All Customer Profile database entries contain time and date stamps and note the identification number of the Customer Service representative or CA who processed the request.

- Relay users register a username and password (also known as PIN). In addition, we ask customers to register a security question and answer that is only known to them in case the username and password is lost or forgotten.

- We encrypt certain Customer Profile information and protect it from outside access by firewalls.

CORPORATE SECURITY

Recognizing the importance of security to our customers, we have a dedicated Corporate Security organization with a continuous (24x7), managed security operations center and includes firewall engineers, incident response engineers, dedicated security consultants and risk managers for each business unit, a vulnerability assessment team, software security consultants, and various other functional security staff. We maintain one of the largest staffs of Certified Information Systems Security Professionals in the security industry.

To ensure the security of your data, we maintain a dedicated Corporate Security staff with top executive involvement. Our Corporate Security encompasses a wide range of functions, to include overseeing managerial policy decisions on security matters, employee background screening and separation activities; physical security, user access and authentication, hardening, backups, and maintaining file system integrity, monitoring processes, log keeping, and auditing. Corporate Security functions also include protecting network and telecommunications equipment, safeguarding network servers and transmissions, combating eavesdropping, and controlling access from un-trusted networks, firewalls and intrusion detection. Corporate Security also provides training and security briefings and reviews all new products and services, ensuring security is built-in from the ground up, not as an afterthought.

Our Corporate Security is divided into three functional directorates that provide the full realm of security support to the Corporation:

- Corporate Security – provides traditional security services and solutions
- Corporate Technical Security – provides technical security services and solutions
- National Security – provides national security compliance, policy, planning, and operations

Our Corporate Security is a dedicated department. It is staffed for all security functions across all business units. The group administers a continuous (24x7), managed security operations center and includes firewall engineers, incident response engineers, dedicated security consultants and risk managers for each business unit, a vulnerability assessment team, software security consultants, and various other functional security staff. We maintain one of the largest staffs of Certified Information Systems Security Professionals (CISSP) in the security industry.

The relay center shall not utilize volunteers as CAs.

Bidder response:

We have read and fully meet these requirements.

We do not use volunteers as CAs. As demonstrated above, our CA position is a career for many of our experienced personnel who have dedicated their lives to serving our customers.

4.1.1.5 Proficiency testing. _Provide an example copy or detailed description of a standardized, quantifiable, performance-based Relay Operator Proficiency Examination or other screening procedures that covers spelling, typing, dictation, procedures, characteristics of ASL as it may be reflected in the written language of TTY users, Deaf culture, ethics and confidentiality, and professional judgment that ensures that CAs hired and retained by the Offeror will meet or exceed the minimum qualifications identified in this RFP and/or established by the FCC._

Bidder response:

We have read and fully meet these requirements.

Our Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a Relay Operator (also known as a Communication Assistant or CA) and ensures all communications are of the highest quality. Employees continue to expand their knowledge of relay and the importance of providing quality services to the consumers they serve throughout their employment as a Relay Operator.

Our Quality Assurance Program incorporates four essential functions: Staffing, Developing, Evaluating and Giving Feedback. Each of these functions is briefly described in the following chart and is explained in detail elsewhere in this section.

Function	What We Do	How We Do It
Staffing	• Builds a diverse workforce from a broad applicant pool. • Screens applicants using reliable work-related selection tools. • Verifies information provided by candidates. • Confirms candidates understand the type of work to be performed and agree to standards of performance.	• Equal Opportunity Employer compliant with Affirmative Action Plan. • Posts all employment opportunities in conspicuous locations in accordance with EEOC and state regulations. • Distributes opportunity information to agencies and organizations that represent diverse populations, e.g. minorities, veterans, people with disabilities, unemployed and underemployed populations. • Recruits at colleges, universities and job fairs. • Encourages referrals by employees. • Requires resumes and comprehensive employment applications. • Manager or Human Resources personnel review resumes and applications for qualifications. • Preference is given for work experience with persons who are Deaf, hard of hearing or speech-disabled, have knowledge of American Sign Language or experience with Relay. • Manager or HR representative discusses job expectations with candidates, including confidentiality, ethics, courtesy, accuracy, and more; evaluates communication skills and administers pre-employment typing tests and verifies work, criminal and educational background. • Operational personnel, who have been trained in interviewing techniques, determine candidates' suitability in several work dimensions and discuss work expectations with candidates. • Operational personnel or HR representative administers pre-employment spelling and grammar test. • All applicants must agree to a drug test which scans for illicit drugs. • HR reviews work expectations, confidentiality, ethics, courtesy, training requirements, scheduling, work environment and compensation with candidates and secures understanding at time of job offer. • Confirms identity and employment eligibility and

Function	What We Do	How We Do It
		secures signed Relay Confidentiality Agreement on first day of employment.
Developing	• Continuously communicates work expectations. • Provides comprehensive, structured initial training using professionally recognized instructional methodologies. • Tests for understanding and mastery of training content. • Provides ongoing training opportunities and updates for continuous improvement and growth. • Communicates industry developments and customers' expectations. • Provides supervision and support for immediate assistance with service to customers.	• Proficient Trainers explain policies, practices and call procedures in detail during initial training period. • Trainers follow documented training curriculum addressing all information and skills required for Relay; apply adult learning methodologies including explanation, demonstration, guided practice, role-playing, correction and independent practice; administer series of written tests and skills demonstration to trainees. • Trainers develop monthly communications for revised procedures, review of critical procedures identified through data evaluation, and announcements of upcoming changes. • Based on data gathered through performance evaluation and customer comments, Trainers and Supervisors review and re-train Relay Operators on a specific training topic each month; Relay Operators are required to demonstrate their mastery of monthly training topic. • Trainers and Supervisors provide specialized or refresher training to Relay Operators referred for further development in call processing, typing speed and accuracy or any other aspect of Relay Operator performance. • Relay Operators may have access to an array of self-paced training and development courses for Relay Operators, support for participation in classes and seminars such as ASL, and tuition reimbursement for college degree programs. • Members of management distribute information and conduct meetings about customer concerns, developments in the TRS industry and state of the business. • Management solicits employee questions and ideas through surveys, group meetings, suggestion programs and "open door" practices, responding to all questions and suggestions. • Supervisors and resource staff with in-depth knowledge of call processes and ASL translation are located in the work Centers with the Relay Operators and are available for immediate assistance during all hours of operation.
Evaluating	• Directly observe work performance. • Collect customer feedback. • Analyze and interpret performance data from all sources to verify actual performance meets expectations. • Determine performance and processes to be changed.	• Each Relay Operator is observed at least twice monthly in the performance of actual Relay calls by a Supervisor using a Performance Survey that addresses 44 quality factors. • Trainers and Supervisors conduct scripted test calls of Relay Operators to evaluate specific performance indicators and overall performance. • Each Relay Operator is required to demonstrate typing speed and accuracy ability every calendar quarter. • Direct observation, internal and external customer testing results and customer feedback are analyzed and used to rate overall performance.
Giving Feedback	• Continuously communicate work expectations and performance measurements to individuals on a regular and ongoing basis. • Communicate new and revised processes and reasons for change.	• Supervisors and Trainers meet with Relay Operators to explain reasons for specific performance expectations, e.g. typing speed and accuracy standards due to FCC or contractual requirements, changes in call processes due to customer input, etc. • Supervisors meet with individual Relay Operators to review the results of each Performance Survey, test call and proficiency tests; based on results, Relay

Function	What We Do	How We Do It
	• Recognize exceptional performance. • Provide guidance and motivation for performance improvement. • Refer individuals for ongoing training and professional growth opportunities.	Operators are referred for additional training as necessary. • Center results of all monthly test call programs and quarterly typing tests are shared with Center staff. • All customer commendations and complaints are reviewed with appropriate Relay Operators; commendations are displayed in the Center. • Supervisors conduct team meetings and team building activities to encourage continuous improvement and peer support. • Relay Operator performance above and beyond the expected level is acknowledged with Center activities and incentive awards. • Supervisors and other members of management encourage employees to develop their Relay Operator skills as well as to create and pursue individual development plans to advance their careers in TRS or telecommunications.

Developing Quality Relay Operators

PRE-EMPLOYMENT TESTING

Relay Operator Applicants are required to pass several tests to be considered for employment, including the following:

Typing Test
Relay Operator Applicants must pass a computer-based, valid and unbiased typing test. Applicants who fail to achieve the required typing speed are not considered for employment.

Grammar Test
While some providers give reading tests as proof of grammar proficiency, we go a step further in ensuring that each candidate passes an actual high school level English comprehension and grammar test before being considered for employment. We know that many grammatical errors may be voiced correctly for the hearing caller, but maybe incorrectly typed for a text-based user.

A sample of the grammar test has been provided below.

GRAMMAR TEST

Name_____   Date_____

Homonyms and Other Confusing Word Pairs – Circle the correct word choice in each of the sentences below.

1. He can **except** **accept** a compliment fairly well.

2. She loves every dance **except** **accept** the polka.

3. The **affect** **effect** of the drug was apparent immediately.

4. The drug could **affect** **effect** her breathing.

5. I could **of** **have** died.

Spelling
We require all prospective Relay Operators to pass a written spelling test with at least 90% accuracy prior to graduating training.

Clear and Articulate Voice Communications
We stress the basic components of voice quality including articulation, inflection and pacing.

QUANTIFIABLE TESTING DURING TRAINING

We thoroughly test prospective Relay Operator's skills prior to allowing them to process calls unassisted. Our training includes five quantifiable, written and performance-based exams which cover the minimum requirements for proficiency outlined by the FCC and the State of Colorado as set forth in this RFP including spelling, typing, dictation, procedures, handling of emergency calls, ASL Gloss, Deaf culture, ethics and confidentiality and professional judgment.

Our tests are not available to prospective Relay Operators prior to testing and are changed periodically.

CTS OPERATIONS AND QUALITY ASSURANCE

Personnel supporting CTS have the requisite experience, expertise, skills, knowledge, training, and education to perform CTS in a professional manner. CTS CA Trainees are screened on several skill-sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

♦ Spelling
♦ Pronunciation
♦ Enunciation
♦ Reading Ability
♦ Vocabulary
♦ Error Recognition - CTS CAs must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call.

Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. CTS CA Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CTS calls.

Explain the provisions that will be taken to ensure that material from these tests are not available to CAs prior to taking the test and changes that are made to the tests to ensure that CAs are truly qualified, not just familiar with specific items that will be on the test. Describe the procedures that will be used to ensure that CAs continue to meet the minimum requirements after they are hired.

Bidder response:

We have read and fully meet these requirements.

Our tests are not available to prospective Relay Operators prior to testing and are changed periodically. Relay Operators are continuously evaluated through individualized monthly surveys. Surveys include an evaluation of the Relay Operator's typing speed and accuracy in the performance of actual Relay calls. Supervisors provide survey feedback to Relay Operators and arrange for additional training and practice as necessary to improve skills.

Applicants are required to pass a computer-based, valid and unbiased typing test. Applicants who fail to achieve the required typing speed are not considered for employment. During training, Relay Operators are required to demonstrate that they are able to quickly and accurately type TTY messages and to pass an oral-to-text typing test at 60 net words per minute (wpm) or better.

We thoroughly test prospective Relay Operators' skills prior to allowing them to process calls unassisted. Our training includes five quantifiable, written and performance-based exams which covers the minimum requirements for proficiency outlined by the FCC and the State of Colorado as set forth in this RFP including spelling, typing, dictation, procedures, handling of emergency calls, ASL Gloss, Deaf culture, ethics and confidentiality and professional judgment.

After initial training, we conduct ongoing testing throughout a Relay Operator's employment to ensure proficiency is maintained as noted below:

ONGOING TESTING	TESTING PERIOD
Typing tests	Variable (As described in Item 11. c below)
Individual surveys	At least twice a month (Each Relay Operator)
Internal Test Call Program	Monthly (Random Relay Operators)
Independent Compliance Verifications	Quarterly (Random Relay Operators at each call center)

Relay Operator Tests and Testing Periods

INDIVIDUAL SURVEYS

Once training is complete, the Relay Operator's performance is regularly evaluated through individualized surveys at least twice a month. Supervisors use a Performance Survey while observing Relay Operators process actual Relay calls. The Performance Survey is a comprehensive assessment tool designed to evaluate Relay Operator performance on over 40 aspects of Relay call processing. The Performance Survey addresses, among many aspects of quality Relay performance, appropriate grammar, spelling, voice clarity and articulation, typing speed and accuracy, TTY-ASL interpretation, etiquette, language and cultural understanding.

The Relay Operator Performance Survey provides a detailed perspective on individual performance and is used as a basis for feedback to the employee to identify strengths and weaknesses, and for employment and compensation decisions. Relay Operators are required to meet expectations in all areas of the Performance Survey. If a Relay Operator does not meet a specific expectation, additional training and an opportunity for improvement are offered.

INTERNAL TEST CALL PROGRAM (MONTHLY)

The Internal Test Call Program is conducted by center representatives across the nation. Specific scripts and survey forms are used to focus on the topic being tested. Trainers compile the information and supporting data. The information is sent to the Operations team where it is analyzed. Feedback is provided to the Trainers and a determination is made as to what action is required.

QUARTERLY INDEPENDENT SURVEYS

Each center's performance is evaluated quarterly through random surveys conducted by an independent, third-party. The auditors dial into Relay centers using TTY devices or ASCII

simulators and follow pre-approved scripts. Operators have no inside knowledge of either the script or when test calls will be placed. Relay Operators are evaluated on eleven areas of performance.

Below are recent performance results from the third quarter of 2014.

CENTER	ANNOUNCEMENT	AGENT ID NUMBER	ASKED IF USED RELAY BEFORE	VOICE INFLECTION	CLOSED CALL APPROPRIATELY	VOICED TYPED MSG VERBATIM	SPELLING	TYPOS	TYPED VOICE MSG VERBATIM
1	100%	100%	100%	100%	100%	99.6%	98.4%	98.5%	97.9%
2	100%	100%	100%	100%	85.4%	99.5%	97.1%	98.0%	92.6%
3	100%	100%	100%	100%	95.8%	99.9%	98.3%	98.4%	97.4%
4	97.9%	100%	100%	100%	100%	99.7%	98.2%	98.3%	96.7%
5	100%	97.9%	100%	100%	100%	99.8%	98.5%	98.9%	97.7%
6	100%	100%	100%	100%	97.9%	99.8%	98.1%	98.9%	96.1%
TOTAL	99.7%	99.7%	100.0%	100%	96.5%	99.7%	98.1%	98.4%	96.4%

CTS ONGOING TESTING AND TRAINING

All CTS CAs are required to satisfactorily complete a series of skills assessments to achieve the expertise and knowledge to adequately and accurately caption in a professional manner the words spoken by the hearing party without intervening in the communication between the parties. The evaluation process includes the quality of voice, clarity of speech and correct use of words and sentence structure.

Our CTS vendor has a detailed CA training plan in place to ensure that all standards as applied by the FCC to the provision of CTS are met by each CA, regardless if the call is processed at a CTS-dedicated call center or at a TRS collocated call center. All CTS trainees spend two to three weeks in a classroom setting. Any time a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group. Upon completion of classroom training, CTS CAs are scheduled for one-week of transition training, while being monitored and supported by another CA or an Instructor. CTS CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.

After initial training, CTS trainees are tested through the administration of timing scripts in a test environment. CAs must transcribe test calls at a speed of at least 125 wpm with an accuracy of at least 98%. Each CA is required to successfully pass two rounds of timings consecutively prior to handling live calls. In addition, trainees are required to meet specified monitor scores when being evaluated on live call processing.

We will ensure that CTS CAs receive all necessary ongoing training. CAs are monitored a minimum of one call on each shift. There is also a monthly test that each CTS CA must pass in order to remain qualified to caption live calls. If they are found to need additional training or re-training they are taken off line and given the necessary training. In addition, CAs are re-trained on new features and capabilities of the CTS platform including any new or improved voice recognition systems used in the platform.

INTERNAL QUALITY ASSURANCE TESTING:

As a part of our Quality Assurance programs, we also conduct internal testing monthly on CTS Key Performance Indicators. We were the first CTS provider to conduct this type of formal quality assessment program. We currently conduct test calls monthly to evaluate service and work directly with the CTS technology provider on the results. The CTS CA is timed and scripts are designed to give the CTS CA enough transmission time and a variety of words and phrases to test the speed and accuracy fairly. We focus on the following key performance indicators:

♦ **Accuracy:** This measurement includes system, process or CA errors and is calculated by dividing the number of errors by the total number of words. This measurement does not include errors that the CA is able to correct or proper names that may be misspelled.

♦ **Average Transcription Rate:** The average words per minute.

♦ **Average Delay:** The measurement of "lag" time between the word being spoken and the word appearing on the CTS device.

4.1.1.6 Independent Service Evaluation. The Colorado Public Utilities Commission reserves the right to contract with an independent entity to conduct a random proficiency evaluation of the services provided, including quality assurance reports.

Bidder response:

We have read and fully meet these requirements.

We understand and will cooperate with any evaluation brought forth by the State. Over the past 10 years, we have participated in many independent service evaluations in coordination with our State customers.

4.1.1.7 Staff development and American Call Center(s). Each Offeror shall demonstrate how they will provide ongoing staff training. The provisions for operator training shall include, but not be limited to, ASL "gloss" and grammar, Deaf culture, and operation of the relay telecommunications equipment. Offerors shall provide a description of their training plan in their proposals. In-service training for operators shall be provided by experts in the field of sign language interpreting, ASL and Deaf culture, or the Offeror must demonstrate that they have on their own staff such experts. This is to be considered only part of the in-service training program. Due to the complexity of ASL and Deaf culture, the importance of accurate translation, including clear and accurate voicing by CAs, the Offeror is required to route relay calls to calling centers located within the United States of America. Evaluation ratings for this section will be evaluated as poor for failure to meet this vital ASL and Deaf culture requirement. This requirement is waived in the event of overflow relay calls rerouted to other relay centers with sufficient capacity to handle the additional load, in the event of a power outage, fire, cut trunk line or other disaster, making the USA relay center inoperable for a period of time.

Bidder response:

We have read and fully meet these requirements.

Only American call centers will be used to process TRS and CTS calls for the State of Colorado. We know that a well-trained CA will have the skills and tools to provide the best customer experience. The education and continued development of all CAs is an investment. Our training has evolved over 24 years in the relay industry. However, our commitment to quality service has never wavered.

Our reputation as a TRS provider within the deaf, hard of hearing, deaf-blind speech-disabled communities, and the general public comes from our CAs' commitment to providing quality service.

We offer a Quality Assurance team and state-specific training to our TRS Relay Operators on state-specific information including the names of local organizations, cities, and other common terms specific to Colorado. Relay calls for such a wide variety of customers can be challenging and CA training tackles the challenge using an initial comprehensive training program, including classroom-based, computer-based, discovery-based, and experiential learning methods. CAs learn about relay users' cultures, the evolution of relay products, regulations, policies, procedures and - most importantly - customer conversation and satisfaction skills.

Training has been developed in coordination and cooperation with the relay user communities. CA trainees must complete a series of scenario-based assessments, culminating in an on-the-job final assessment before graduating from initial training and handling relay calls.

Training does not stop after CAs have started processing calls. CAs continue to receive regular ongoing training to improve their skills and knowledge. Ongoing training and quality assurance programs are used as incentives to encourage competition between CAs and call centers and encourage continued industry-leading quality.

Training rooms allow CAs to experience all types of mock relay calls from the CA and relay user's perspective.

These positions can also be configured to take live calls in the event of a disaster for additional capacity.

COLORADO-SPECIFIC TRAINING

As a part of our implementation of a TRS contract, we provide training to our CAs on state-specific information including the names of local organizations, cities, and other common terms specific to the State. We welcome feedback from the State Relay Administrator, State Relay Advisory Committee, and other organizations on the Colorado-specific training that will be given to all TRS CAs.

INITIAL TRAINING

Our initial comprehensive training program has been designed to provide CA applicants with the tools and skills necessary to successfully facilitate TRS calls. The CA software application is intuitive and contains on-screen prompts. This means CA trainees need less time to learn to navigate the system and we can spend more time on customer-focused activities such as deaf culture, translating ASL to English, ethics, confidentiality, and overall customer care – as outlined in the figure below.

Administration and Testing (5.5 hours)
From the first day of training, we want all CAs to know what is expected of them including ethics and confidentiality. This time is spent reinforcing all relay call center policies, as well as ensuring that each CA has mastered all objectives to process calls in accordance with contractual guidelines.
Call Processing (30.5 hours)
CAs fully understand the operation of the call processing terminal. This allows them to quickly and efficiently meet customer requests. Additionally, training focuses on teaching CAs to use correct procedures to process each call-type, billing methods, stress management, and how to handle emergency and hotline procedures.
Role-play and Practice (24 hours)
In order to become more proficient in the CA role, we dedicate training time for trainees to receive both simulated and on-line call processing experience.
User Culture Training (20 hours)
Our User Culture Training module represents a commitment to ensuring that employees develop a sensitivity and understanding to relay customers. The User Culture Training, updated last year, was initially researched and written by a deaf college intern and a number of additional organizations and individual contributors contributed to the ongoing updates. The User Culture Training module includes information about the needs of relay users.

INSTRUCTIONAL METHODS

We develop all of our training programs using adult learning theories. We incorporate various instructional methods to enhance the CA's ability to learn such as:

- Lectures
- Visual graphics
- Flow charts
- Videos
- Role-play scenarios
- Simulated on-line call handling
- Observation of live-call handling

TRAINING TOPICS

Please see the following comprehensive outline of topics covered during TRS CA training.

TRAINING TOPICS		
Orientation	• Welcome and Introductions • Introduction to Each Other • Corporation Information • Values • Overview • History of Corporation • Founders	• Other Services offered by Company • Telecommunications Relay Service • What is Relay? • Relay - Connect to Your Future Video • Observation Guidelines • How a Call Reaches Relay
Connecting to Relay	• The Role of a Relay Agent • Connecting to Relay • 711 • Dedicated Toll-Free Numbers • Equipment • TTY • TTY Basics • TTY Etiquette • Closing a Conversation • Agent Responsibility • Call Set Up • Call Closing • TTY to Voice Closing a Conversation • Operator Role Closure • Operator Close Protocol Guide: • Disallowed Calls • Glossary of Abbreviations and Terms • TTY Practice Session • Auto-Corrected Abbreviations • Standard Abbreviations • Typing Variations • Internet Characters • Non-Baudot Supported Characters • Verbatim - Style • Contraction Spelling • Punctuation • Agent/Operator Role • SKSK • Background Noises While TTY user is Typing • Typing Monetary Units • 711 • TTY Garble During Typing	• Voicemail Greeting • Cellular and Wireless Phones • Video Relay Service Overview • TTY Public Payphone • Interstate Relay Service • International Relay Service • Inbound international calling • International Variations • Non-Standard TTY • Outbound International calling • Transfer Menu • Reseller call processing • CTS • Relay to CTS • CTS to Relay • CTS Transfers • Dedicated State CTS Transfer • Alternate Languages • Spanish Language Customer Service • Relay Caller ID • True Caller ID • Per Call Block • Per Line Block • Permanent Call Blocking • Caller ID Blocking - True Caller ID – SS7 • Connecting Variations • Misdialed Relay Phrase • Dialed 711 Instead of 911 • 711 Spanish • Request for Relay Numbers • Cellular/Wireless problem reaching 711 • 611/811 (LEC Service Access)

	• XXX to Correct Typing Error • Other Communication Devices • Data Transmission Speed • Turbo Code • Turbo Code Interrupt • Enhanced Turbo Dial Through - (E-Turbo) • Disable Turbo Code Mode • ASCII - American Standard Code Information Interchange • ASCII Interrupts • Correctional facilities/Jails • Info Digit list	• 700 • 900 Numbers and Call Processing • Correctional Facility/Prison Calls • FAQs on the Use of Relay through Correctional Facilities: • Correctional Facility Call Processing • Relay Abuse
Overview of System and Equipment	• System Overview • Login/Logout • Agent Profile • The Mouse • Clicking the Mouse • Dragging/Dropping • Copy/Paste • Drop Down Boxes • Lists • Radio Button • Scroll Bars • Sliders • Tables • Accessing a Program • Screen Displays • Call Handling Screen • Title Bar • Banner • Conversation Area • Disconnect Message Status • Color Scheme • Agent Text Transmission • Cancel Key • Information Bar • Profile • Help • Call Type	• Dial Window • Scratch Pad • Transfer Panel • Headset Panel • Status Bar • Record Feature • Function Keys • Block • Ctrl-Switch • Switch • The Keyboard • Alpha Keys • Call Handling Keys • Numeric Keys • Cursor Movement Keys • Arrow Keys • Backspace • Error Correction Function • Single Word Edit Function • Word Substitution Feature • Macros Table • Ctrl-Function Keys • Glossary of Telephony Terms • Background Noises • Voice Tones/Descriptive Words • Standard Abbreviations
Phone Image (Tone of Voice)	• Professional Phone Image • How phone image is created • Provide warm and friendly greeting • Conversational Tone • Voice Inflection • Audibility and breath control • Pitch • Quality • Operator Role • Relay Role • Relay Skills • Conversational Flow • Staying focused • Listening skills • Customer service skill • Coping skills • Phrases • Background Noises • Voice Tones/Descriptive Words • Transparency and Caller Control	• Voice Person Speaking in 3rd Person • Pacing the Voice Customer • Brief pacing phrases • Repeating information • Voice Customer does not say "GA" • Handling Interruptions • Voice Tone • How Phone Image is Created • Provide a Warm Greeting • Why Conversational Tone? • Transparency, Caller Control & Confidentiality • Rudeness • Create an Exceptional Customer Experience • Greeting • Announce • Closing • Suggested Redirect Phrases
TTY to Voice and Voice to TTY	• TTY to Voice Introduction • Connecting to the outbound customer • Announcement	• TTY to Voice Busy Signals • Regional 800 • Voice to TTY • Voice to TTY Introduction

	• Explanation of service • Deaf or hard of hearing Explanation • International Announcement • TTY to Voice Procedures • TTY to Voice Specific Person Request • Variations Specific Person Request • TTY to Voice Answered TTY • Voice Person Not Available • TTY to TTY Call Release • TTY to Voice Ans. TTY (TTY to TTY) • TTY to TTY Specific Person Request • TTY to Voice No Answer • Types of Busy Signals • Redialing	• Connecting to the outbound customer • Voice Greeting • Vice call progress Announcement • Voice to TTY call (Hearing Person Answer) • Explanation of service • Voice to TTY Procedures • Voice to TTY Specific Person Request • Voice to TTY Answered Voice • Voice to TTY No Answer • Voice to TTY Busy Signal
Branding	• Inbound Answer Type Branding • Database Branding	• Branding procedures
Recordings, Answering Machines, Pagers and AMR	• Introduction • Recording Feature • Information Line Recording (TTY/Voice) • Touch Tone Dialing • Using Touch Tones (TTY/Voice) • Audio text interaction • Variations for Recordings • Record Feature Tips • TTY-Voice Recordings • TTY-Voice Recording Information • TTY-Voice Answering Machine • Variations: Ans Mach/Recording/Pagers • Voice Mail Retrieval	• AMR (Answering Machine Retrieval) • TTY-Voice Pager/Beeper (known) • TTY-Voice Pager/Beeper (unknown) • Voice to TTY Pager • Voice to TTY Answering Machine • Other Recording Variations • Voice Mail System • Privacy Manager/Call Intercept • Automatic Redial System Recordings • Switchboards • Redialing Voicemail thru Switchboard • TTY-Voice Asking for Specific Person • Live person On Ans Mach Redial
VCO (Voice Carry Over)	• VCO Introduction • VCO Announcement • VCO Service Explanation • VCO Equipment • Non-Branded VCO • Branded VCO • VCO No Answer • VCO Busy • VCO Privacy • VCO Answering Machine • Voice to VCO Answered TTY • Voice to VCO Answered VCO • Two-Line VCO (2LVCO) Intro • Two-Line VCO (2LVCO) Procedure	• Reverse Two-Line VCO Intro • Reverse Two-Line VCO Procedure • VCO Variations • VCO comes in Voice Line • 2LVCO Conference Calls • VCO Requests Relay to give Relay # • VCO Privacy while leaving message • VCO Voice Mail Retrieval • 2LVCO Voice Mail Retrieval • VCO Types and Voices • Inbound Customer Requests VCO/HCO • VCO Requests CA gives name in notes
Billing	• Introduction • Local call description • Paid by Inbound Over Default IXC • Toll Free Calls • Calls that Cannot Be Processed • COC (Carrier of Choice) • Paid by Inbound • Paid by Inbound Alternate Carrier of Choice	• Calling Card -- TTY Originated • Calling Card -- Voice Originated • Collect Calls • Collect Call Intro • TTY-Voice Collect • Specific Person Requested • Person-to-Person Call • Person-to-Person Call Processing • Collect Call -- TTY-Voice

TRAINING TOPICS		
	• Alternate Billing (Intro) • Billing Options • Collect • IXC Card Description • LEC calling card • Other long distance calling card • Paid by Inbound • Third Party • Carrier of Choice • Pre-paid calling cards • Billing Procedures • Calling Cards • Paid Billing with COC (TTY-Voice) • Paid Billing with COC (Voice-TTY) • TTY/Voice Pre-Paid Calling Card/800 Card • Voice/TTY Pre-Paid Calling Card/800 Card • Voice-TTY Collect • Specific Person Request	• Collect Call -- Voice/TTY • Third Party Billing • Third Party Billing Intro • 3rd Party TTY-Voice Billing Voice Number • 3rd Party TTY-Voice Billing TTY Number • 3rd Party Voice-TTY Billing TTY Number • Immediate Credit • Inbound tells wrong # • Agent dials wrong # • Marine • Roaming Feature • Restricted Roaming • Unrestricted Roaming • Billing Variations
HCO (Hearing Carry Over)	• HCO Intro • HCO Announcement • HCO Service Explanation • Speech Disabled "S" • Non-Branded HCO • Branded HCO • HCO with Privacy • HCO No Answer • HCO Busy • HCO-Voice Answering Machine	• Voice-HCO Answered • Voice-HCO Answered TTY (1) (2) • Voice-HCO recorded message answers • Two-Line HCO (2LHCO) Intro • Two-Line HCO Procedure • Reverse Two-Line HCO • HCO Variations • Inbound requests VCO/HCO • HCO User Requests to Speak
Customer Database	• Enhanced Customer Database Profile • Household Profile • Edit Household Profile • Navigating Customer Database • Household Profile Panels • Notes • Frequently Dialed Numbers • Personal Information • Preferences • COC • Restrictions • Blocked • Emergency #s • Speech to Speech • STS Messages	• Customer Profile Introduction • Use/Edit/New/Delete Customer Profile • Verify Customer Password for Agent • Verify Customer Password -- CSR Only • Customer Profile Panels • Personal Info • Notes • Frequently Dialed #s • Preferences • Emergency #s • Speech to Speech • STS Messages • Database Profile Macros
Directory Assistance	• DA Intro • Interstate Directory Assistance • Intrastate Directory Assistance • Automated DA • DA City& State Given; Area Code Unknown • DA Variations • International • International Transfer Menu • Call Processing -- Calling to International Number	• Call Processing -- Calling from International Number • International Variations • Non-Standard TTY • Answered Foreign Language • Transfer Menu • 900 # Call Processing • 211/311/511 Requests
Device to Device Calls	• Device to Device Intro • Function Keys and Banner Messages • VCO to TTY and TTY to VCO • VCO to VCO • TTY to HCO and HCO to TTY	• VCO to HCO and HCO to VCO • HCO to HCO • Device to Device Variations • Alternate Call Type reaches recording
Call Processing Variations	• CA information	• Request for Length of Call

TRAINING TOPICS		
	• Area Code Only In From Number • Conversational Flow • Static or Poor Connection • Profanity towards Agent • Redialing • Young Children • Inbound Does Not Connect • Inbound ASCII • Charges Refused 800 Number • Tone Judgments • Repeating Information • Restricted Calls • Two calling from numbers • LEC Service Office • 611/811 • Double Letters • Call Waiting Feature • Conference Calls • Party Line Calls • Three-Way Calling • Hard of hearing Customer Ans TTY Line • Spanish Calls to Sp Speaking Agents • Request for Alternate Language • Caller Types in Alternate Language • Voice Customer Hangs Up During a Call • Variable Time Stamp • Customer Misdialed Phrase • TTY Customer Hangs Up During a Call • Non Standard TTY Capability • Relaying Internet Characters • TTY User Does Not Type GA • Dispatch Calls – Pizza, Taxi, Carry-out • Customer Referral Guidelines • V-T Calls answered by Fax • Customer Requests • Holding for Inbound prior to out dial • Request for Company Information • Request for Information • Request for M or F Agent • Request Specific Agent • Agent Knows Customer • Request for Relay Number • Customer Requests to Call Relay Service • Request for Calling From Number • Request Telephone Number Referral • Request for Date/Time • User Requests Agent to Modify Call	• Request Long Distance Information • T-V Call and V Requests • Supervisor Call Backs for TTYs • Multiple Calls • Sensitive Topics • Suicide • Abuse • Illegal Calls • Answering Machines • Hangs Up Before Message Left • Do Not Type Recorded Messages • Answering Machine Full • Change Answering Machine Message • VCO Requests Leave Message 1st out dial • Leaving a Message V-TTY Ans V • Retrieving Messages from TTY V Ans Mach • TTY Screener • Request to Leave TTY Message on Ans Mach • Recordings • Regional 800 • TTY Requests "Dial That Number" • Recording with Relay Option • Alternate Call Recording Reached English/Spanish • Pound • Touch Tone Phone • Advertisements • Do Not Type Recordings • Get Live Person/Rep • Conversation Being Recorded • Dial Number from Recorded Announcement • VCO • Conference Calls • Leave Relay Number • Voice Mail Retrieval • VCO Types and Voices • Prompting • Data Transmission Box • Prompting VCO on Hold • Requests VCO/HCO • HCO • Requests VCO/HCO • Alternate Call Type Recording • Bridge Left Open
Call Take Over Procedures	• FCC Rule • Protocol and process flow • TTY-Voice and Voice-TTY • ASCII	• VCO • VCO to VCO • HCO • VCO-TTY and TTY-VCO
Customer Service	• Functions • Language Services	• Procedures
OSD	• Operator Services for the Deaf	• OSD to TRS

TRAINING TOPICS		
	• (OSD) Functions	• TRS to OSD
Transparency	• Non-Emergency Calls • Emergency Center Evacuation	• Network Failure
Emergency Call Procedures	• Emergency Calls Intro • Emergency Services • FCC Requirements • Emergency Call Processing • Emergency Reporting • TTY-Emergency • Voice-Emergency	• TTY-Emergency TTY Call Release • Emergency Call Processing Variations • Emergency Form
STS (Speech-to-Speech)	• Speech To Speech Training Outline • STS Introduction and History • STS Description • Disabilities • Characteristics of STS users • Stereotypes • Clarifying Phrases • Phrases to Avoid • STS Phone Image • STS Agent Tools • Consistency • Patience • Ask Yes or No Questions • No Personal Conversation • Phrases You Can Use • Speech to Speech Alphabet • Transparency/Call Control/Confidentiality	• Ways to Reduce/Streamline Notes • Standard Abbreviations (STS) • STS-Voice • Voice-STS • STS VCO-Voice • Voice to STS VCO (TTY answer) • Voice to STS VCO (VCO answer) • STS VCO -- 2 Line VCO • TTY-STS • STS-TTY • Non-branded HCO to STS • STS-HCO • STS Hold Message • STS Call Takeover • Confidentiality and Transparency • Personal Conversations requests • Speech to Speech Variations
Healthy Detachment	• Healthy Detachment Intro • Objectives • Survival Skills • Relay Traps	• Perception • Ways to Reduce Stress • Hospitality • Phrases
Healthy Relay	• A healthy approach toward Relay • Introduction • Objectives • Ergonomics • Stretching Exercises • Agent Reinforcement • Ergonomic Review	• Setting up Workstation • GUAM - Get Up and Move • Ergonomic Relief • Slowing the Customer Down • Overtime • Relaxation
Adult Learner	• Understanding the Needs of the Adult Learner • The Learning Continuum • Use of Different Modalities • Adult Learning - Edgar Dale's Cone of Experience • Elements of Lesson Design • Focus • The Adult Learner • Objective and Purpose • Input	• Modeling • Checking For Understanding • Guided Practice • Independent Practice • Summary • Evaluation • How to Give Effective Instruction • Questioning Guidelines • Feedback - Training and Coaching Technique • Trust in Management
Assessing Performance	• The Assessment Process in Training • Assessment Time - What is involved? • Practice Time • Spelling Test • Written tests • Side by side evaluations • Typing	• Acceptable Time Frame • Acceptable Is Relative • Ways to "Coach" • Feedback • Maintain Self-esteem and Motivate • Pass/Fail Guidelines • Introduce Assessment Form • Form Set-Up
Introduction to User Culture	• Introduction to User Culture • Objectives • Diversification • Who Uses Relay	• Why is there Deaf Culture? • Attachments: • What Do You Know About Deafness (Q)

TRAINING TOPICS		
	• Understanding Our Customer • Special Communication Needs • Pathological vs. Cultural View of Deafness • Characteristics of Deafness • The Deaf Community	• What Do You Know About Deafness (A) • Myths About Deafness • Two Views of Deafness • Loudness Levels
Deaf Heritage	• History in Europe • History in North America • Alexander Graham Bell	• Edward Miner Gallaudet • Oral / Combined Debate • Timeline of Deaf History
The Deaf Community	• Introduction to the Deaf Community • National Association of the Deaf • Contributions to Society • Mainstreamed Schools	• American Athletic Assn. of Deaf • National Theatre of the Deaf • Assistive Devices • Gaining Acceptance in the Deaf Community
The Deaf Community	• Sign Language Interpreters • Different Communication Systems • Exposure to English • DEAF President Now • Attitude Changes toward the Deaf Community	• Changes in the Deaf Community • Working with a Sign Language Interpreter • Interpreting Standards • Equal Access • Cochlear Implant Controversy
American Sign Language Pt. 1	• What is ASL? • History of ASL • ASL Recognized as Language	• Rules of ASL • Five Parameters of ASL • English vs. ASL Idioms
American Sign Language Pt. 2	• Evolution of ASL • ASL Syntax	• Translate ASL to English and Vice Versa
TTYPhony and TTY Courtesy	• First Teletypewriter • Evolution and History of the TTY • Telecommunications Laws of Accessibility	• TTY Courtesy • Development of Relay Service Market
Deaf Customers	• Statistics from NIDCD	• Relaying for Deaf Customers
Hard of hearing and Late Deafened Customers	• Hard of Hearing and Late Deafened Customers • Characteristics of Deaf Customers • Assistive Devices for Deaf Customers	• History/Establishment of SHHH (now HLAA)
Characteristics of late-deafened Customers	• Establishment of Association of late-Deafened Adults (ALDA) • Relaying for late-deafened Customers	• Deaf Seniors • Military Veterans
Characteristics of Deaf-Blind Customers	• What Does Deaf Blind Mean • Assistive Devices for Deaf-Blind Customers • Relaying for Deaf-Blind Customers	• Deaf-Blind Pacing – allows the CA to slow down the transmission to the Braille machine
Characteristics of Relaying for Speech/Cognitively Disable Customers	• Speech-disabled Customers • Assistive Devices • Physically- and/or Cognitively-disabled Customers	• Traumatic Brain Injury • Stroke • Communication Related Effects
Language Support	• Spanish Language Support	• Other
Characteristics of Relaying for Hearing Customers	• Statistics	• Relaying for Hearing Customers
Ethics and Confidentiality	• Interpreting Standards • The ADA and FCC regulations for the Provision of TRS • Regulations pertaining to call content	• TRS Rules – Operator Standards • Relay Center Agreement Regarding Confidential Customer Information.

Topics Covered During Training

INITIAL TRAINING SCHEDULE

Initial training for TRS CAs consists of 80 hours of curriculum, workshops, and exercises to train CAs to effectively meet the specialized communications needs of relay users who are deaf, hard of hearing, late-deafened, and those who have a speech disability.

TRS TRAINING SCHEDULE		
DAY 1	• Welcome Packet/Important Numbers/Confidentiality Forms • Building Tour, Lockers, Keycard check, Login Numbers • Training Goals and Expectations • What is Relay? • Video: Making the Right Connection • How We Got Here – Orientation - Why we're here. • Contract Information • Introduction of Training Workbooks • TTY Overview/Abbreviations, Descriptive Words/Background Noises	• ASL Introduction – ASL Workbooks • Overview of System and Equipment • Skills i.e. Typing, talking, listening, reading • Enter Tour Preferences: Admin Presentation • Connecting to Relay • Intro to User Culture • Deaf Culture • Deaf Heritage • Headset Orientation • Basic Call Processing Procedures (TTY - Voice) • Observe Calls • *Typing Practice/Tests if necessary
DAY 2	• (TTY – Voice) – continued • Role Play Introduction • Review (TTY - Voice) • TTY - VOICE PRACTICE • Phone Image/Rudeness • Detachment • Expressive Typing • Variations • User Culture: The Deaf Community • User Culture: Gaining Acceptance in the Deaf Community • Deaf Culture: Quiz about Deafness	• Observe Calls • Continue Call Processing (Voice - TTY) • User Culture: Hearing Customers • VOICE - TTY PRACTICE • HR – Orientation presentation • Review for Test #1 • Desensitization • *Typing Practice/Tests if necessary
DAY 3	• Review – Variations • Branding • Recording Feature • Answering Machines/Answering Machine Retrieval (AMR) • Control D Feature/ Pagers • Voice Mail	• Pagers/Beepers • Practice Role Plays • Observe • Administer Test #1 • User Culture: American Sign Language • User Culture: ASL Worksheets • *Typing Practice/Tests if necessary
DAY 4	• VCO - Non-Branded • VCO - Branded • Practice Role Plays • Privacy Feature (VCO) • VCO Answering Machines • Voice to VCO • Two Line VCO • Variations • User Culture: TTYphony & TTY History	• User Culture: Hard of Hearing Customer and Late Deafened Adults • Practice Role Plays • Observe • Review for Test #2 • Typing Practice/Tests if necessary
DAY 5	• Review • Surveys (TTY - Voice and Voice- TTY)/ Observe • Billing/ Immediate Credit • Prepaid Calling Cards • Roaming	• Deaf Culture: ASL Worksheets • ASL Workbook • Practice Role Plays • Administer Test #2 • *Typing Practice/Tests if necessary

	TRS TRAINING SCHEDULE	
DAY 6	• Review • Changing CAs - Video and Call Takeover Process • Directory Assistance • International/ 900 calls • HCO - Non Branded • HCO - Branded • Voice - HCO • HCO Answering Machines	• Practice Role Plays • ASL Translation – Presentation by staff interpreter or individual with experience • Observe - Type • Review for Test #3 • HR - Benefits • *Typing Practice/Tests if necessary
Day 7	• Review • Practice Role Plays • Customer Service • Operator Services for the Deaf (OSD)	• Device to Device • Administer Test #3 • Observe - Talk • *Typing Practice/Tests if necessary
DAY 8	• Review • Practice Role Plays - VCO • Final - VCO Surveys/ Observe • ASL Translation • Customer Database (CDB) Features	• Emergency/ Threats • Help Screen Review • Take Calls - assisted • Review for Test #4 • *Typing Practice/Tests if necessary
DAY 9	• Review • Variations • Practice Role Plays • Return ASL Workbooks and Discussion • Adherence/Trades/OT - OA Presentation	• Administer Test #4 • Take Calls - assisted • Review for Test #5 • *Typing Practice/Tests if necessary
DAY 10	• Administer Test #5 • Final Review/ Questions & Answers • Detachment • Life After Training • Complete Typing Tests if necessary	• Graduation • Take Calls • Take digital pictures for ID Badge •

Training Schedule

SPEECH-TO-SPEECH TRAINING

We are the nation's leader in the development and offering of Speech-to-Speech Services and offer comprehensive training based on that experience.

Qualifications
In order to be considered for a STS CA position, CA applicants must successfully achieve the following:

- 6 months of employment as a CA
- Recommendation and/or approval from Supervisor or Manager
- Proficiency in all areas of relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Our STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories.

Overview
STS applicants who meet all qualifications for the STS training program receive 8 hours of classroom training specifically on Speech-to-Speech Services.

Our STS training program has been developed based on direct experience and consultation with a STS expert obtained during the initial STS trial and conducted along with eight years of experience processing STS calls.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy.

Tools available to STS CAs and STS CA applicants include:

- Audiotapes and videotapes featuring a variety of STS users with speech disabilities (It is important to note that these STS users have voluntarily provided recordings in order to promote the ongoing training of STS CAs and represent a broad range of levels of speech disability and include augmentative devices.)
- STS CA training guide, which details the history of STS, the role of the STS CA, comprehension strategies and confidentiality concerns.
- 10 hours of additional live observation and mentoring by seasoned, professional STS CAs.

Please see an outline of our Speech-to-Speech training topics on the following page.

STS TRAINING TOPICS				
Values and Goals				
STS Requirements	• Audiologist testing		• Pre-Qualifications Met	
Introduction	• Introduction to STS • User Culture • Characteristics of STS users • Speech Impairments Causes and Effects • Assistive Technology • Language vs. Speech		• Deaf/blind • Cognitive Impairments • Physically Disabled • Speech Patterns • Mentoring • FCC Requirements	
Tools	• Consistency • Patience • Coping/Desensitization • Composure & Etiquette • Communication Techniques • Yes/No Questions		• Word Suggestions • Spelling • STS Alphabets • Note Taking • Phrasing	
Call Processing	• Transparency • Caller Control • Confidentiality • Call Set Up • Call Observation		• Listening Skill Practice • Voice Mute • STS Variations • Video Assisted STS • CA Change – *20 min. rule*	
Testing	• Skills Quiz • Written test		• Mentoring Evaluation	

STS Training Outline

STS CA EVALUATIONS

Hearing Acuity Testing
Prospective STS CAs are required to pass a hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test. Each potential STS CA is required to score 92% or higher in each ear using a 50 word, W-22 or NU6 speech recognition test. Each STS CA is required to possess a hearing acuity of 20dB or less in each ear using a pure tone sensitivity test at 250 Hz, 500 Hz, 1000 Hz, 2000 Hz and 4000 Hz. Our hearing tests are conducted by a state-licensed, professional Audiologist certified by the American Speech-Language-Hearing Association with a Certificate in Clinical Competence in Audiology (CCC-A) using calibrated equipment for the speech recognition test and pure tone test.

STS Training Final Test
In order to graduate STS training, trainees must demonstrate an understanding of all aspects of STS call processing as well as the ability to understand speech patterns of people with a variety of speech disabilities.

STS Performance Evaluation
Once training is complete, a STS CA's performance is regularly evaluated through individualized surveys at least twice monthly. Supervisors evaluate each STS CA using a Performance Survey form while observing actual calls. The STS Performance Survey addresses many aspects of quality STS CA performance including listening skills, caller control, focus, and professional phone image. It should be noted that one of the two monthly Performance Surveys is assessed on TRS calls as STS CAs must maintain typing proficiency.

Quarterly Typing Testing
As STS CAs may be required to process calls involving typing, we ensure that each STS CA demonstrates the ability to type 60 wpm with 95% accuracy quarterly.

STS Quarterly Refresher Evaluation
To ensure the STS CA understands the speech patterns of people with speech disabilities, an audio test is administered quarterly to all STS agents. This consists of CAs listening to audio spoken by individuals with a variety of speech disabilities. The audio listening refresher will test a STS CA's ability to understand a person with a severe speech disability, a moderate speech disability, a mild speech disability, and speech with an augmentative communication device.

ALTERNATE-LANGUAGE CA TRAINING PROGRAM

After completing initial training in English, bilingual CAs receive supplemental, specialized training to process Spanish calls. In order to be considered for an alternate language CA position, applicants must successfully achieve the following:

- Recommendation and/or approval from supervisor or manager
- Proficiency in all areas of call processing including grammar, enunciation and vocabulary
- Berlitz language assessment (see right)

ESPANOL
Examen de conocimiento / Proficiency Test
Benchmark Levels 2, 4, 6, 8 / Niveles de Referencia 2, 4, 6, 8

Querido Instructor,
Favor de evaluar el conocimiento del alumno

1 – bajo/poor; 2 – regular/fair; 3 – bueno/good; 4 – excelente, perfecto/excellent, perfect

Nombre del alumno / Student's name_____Fecha/Date_____

Nivel 2/ Level 2
¿Para qué va Ud. al aeropuerto/al banco?   1 2 3 4
¿Cómo se escribe su apellido?   1 2 3 4
¿Qué tiene que hacer Ud. si quiere aprender Español? 1 2 3 4
¿Qué hizo Ud. ayer? ¿Qué comió anoche?   1 2 3 4
Generalmente, ¿qué hace Ud. si tiene sed?   1 2 3 4
¿Qué tipo de comida le gusta a Ud.? ¿Por qué?   1 2 3 4
¿Qué hará este fin de semana? Explique en detalle. 1 2 3 4

Alternate Language Training Topics
The following topics are discussed during training:

Additional Foreign-Language Training Topics
Appropriate Terminology
Pacing Phrases
Explanation Phrases
Translations conveying the concept rather than word for word
Macros
Cultural discussion

CTS TRAINING

CTS CA training has been developed by the CTS technology provider and is **consistently delivered in all of our CTS call centers**, including the TRS call centers that process CTS calls.

Orientation
Orientation consists of introductions, building tour, required employment paperwork, introduction to call center policies, confidentiality requirements, and expected standards that must be met to pass training. In addition, in our TRS centers, we have added **supplemental User Culture training** specifically targeted towards people who use CTS including seniors, veterans, and others with a hearing loss.

Training Class
Initial Training consists of 10 days of classroom and hands-on training. CTS training is an interactive class combining video and hands on instruction. Each class introduces a skill and allows time to practice the skill.

CTS training uses simulators that allow the CA to listen to pre-recorded scripts and hear the voice of the hearing person in order practice captioning. During week 2, timing tests are given each day to check CAs' transcription rate and accuracy. Improvement rate is evaluated.

Training Transition & Graduation
All CAs that pass two rounds of timing tests consecutively are paired with a mentor for a week. This mentor provides 1-on-1 coaching for every call. If the CA meets performance expectations on live calls, the trainee graduates and is allowed to process calls independently.

CTS Ongoing Training
We provide necessary ongoing training for CAs. CAs are monitored on each shift and if they are found to need additional training or re-training, they are taken off line and given the necessary training. In addition, CAs are retrained on new features and capabilities of the CTS platform including any new or improved voice recognition systems used in the platform.

User Culture Training
We offer initial disability training for Customer Service staff that includes information about various disability-related populations, differences in D/deaf cultures, how people refer to disability, speech pacing, tips, basic sign language, and accents/tones of voice. Ongoing new information is shared, as are experiences, subject matter materials, case studies, and more.

QUALITY ASSURANCE TESTING

CTS CA training has been developed by the CTS technology provider and is **consistently delivered in all CTS call centers**, including the TRS call centers that process CTS calls. CTS CAs will adhere to the following minimum standards:

- The CTS CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible without intervening in the communications. The CA is permitted to provide background noise identification;
- The CTS CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential;
- The CTS CA shall be required to meet the FCC standards for TRS minimum transcription speed;
- The CTS CA shall not limit the length of a call and shall stay with the call for a minimum of 10 minutes when answering and placing a call;
- CTS staff has the experience, expertise, skills, education, knowledge, and training to perform CTS in a professional manner.

CTS Testing

CAs are tested monthly through the administration of timing scripts in a test environment. In addition, CAs are periodically monitored while processing live calls. Only the scores of each CA are maintained in a database. No other information regarding conversations is kept at any time. On a monthly basis, the consolidated results of all CTS CAs are reported.

Month	WPM	Accuracy
July 2013	177.72	99.75%
August 2013	155.00	99.50%
September 2013	178.73	99.58%
October 2013	171.88	99.71%
November 2013	166.00	99.64%
December 2013	182.08	99.64%
January 2014	164.67	99.69%
February 2014	183.15	99.68%
March 2014	181.32	99.52%
April 2014	190.14	99.75%
May 2014	156.75	99.57%
June 2014	181.50	99.70%

CUSTOMER SERVICE TRAINING TOPICS

We will provide a Customer Service team that is knowledgeable about all TRS products and services. Our Customer Service team attends CA training and supplemental additional training addressing Customer Service specific duties, including, but not limited to the following:

General Information and Referral
♦ Provide referral information (e.g., websites or Account Manager contact)
♦ Distribute educational and outreach material
♦ Provide relay numbers for Relay Colorado or other states
♦ Provide appropriate phone numbers for employment questions
♦ Provide information on ADA and/or FCC rules regarding TRS

Customizing Relay Experience
♦ Enter preferred communication modes for TRS users
♦ Explain new enhancements offered by us that TRS users may not be aware of that may make Relay calls more productive and customized based on the information provided by the customers.
♦ Establish Customer Profiles and provide written documentation (via email, fax, or mail) of the Customer's Profile, upon request.

Equipment
♦ Refer customers to companies that sell TTY's and accessories or software that emulates TTYs
♦ Make test calls to check customer's TTY, software or other equipment
♦ Practice with new relay users to help them become more familiar with their equipment and how to use it
♦ Provide computer settings for ASCII users

Feedback on the Service
♦ Accept compliments for CAs
♦ Document relay users' suggestions to improve service or provide additional features
♦ Accept and document complaints. Note: Escalate complaints to call center and/or Account Manager for additional consultation if not resolved immediately
♦ Enter trouble tickets; follow up with trouble tickets to resolve issue

Long Distance Billing
♦ Quote long distance and international rates for calls placed through TRS
♦ Send credit memos to LEC to adjust casually billed customers billing errors
♦ Refer carriers to Account Manager to set up Carrier of Choice agreements

USER CULTURE

Our staff receive training on the unique nature of the relay industry and are sensitive to the culture, background, and language of the relay user communities. Our relay center staff, including management, participates in initial and ongoing training programs that emphasize inclusion and diversity.

The initial training program includes 20 hours dedicated to User Culture.

Our User Culture training represents a commitment to ensuring our employees have sensitivity and understanding toward our relay customers. User Culture training was researched and written by a Deaf college intern utilizing a number of organizations and individual members. The User Culture training module includes information about the needs of the deaf, hard of hearing, deaf-blind, seniors with a hearing loss, and people with a speech disability and was upgraded in 2013.

Topics Covered during User Culture Training

Please see the chart below for topics covered in User Culture Training.

Initial User Training Topics	
Introduction to User Culture	
• Introduction to User Culture • Objectives • Who Uses Relay • Understanding Our Customer • Special Communication Needs • Pathological vs. Cultural View of Deafness • Characteristics of Deafness • The Deaf Community	• Why is there Deaf Culture? • Attachments: 　▪ What Do You Know About Deafness (Q) 　▪ What Do You Know About Deafness (A) 　▪ Myths About Deafness 　▪ Two Views of Deafness 　▪ Loudness Levels
Deaf Heritage	
• History in Europe • History in North America • Alexander Graham Bell	• Edward Miner Gallaudet • Oral / Combined Debate
The Deaf Community	
• Introduction to the Deaf Community • National Association of the Deaf • Contributions to Society • Mainstreamed Schools	• American Athletic Assn. of Deaf • National Theatre of the Deaf • Assistive Devices • Acceptance in the Deaf Community
The Deaf Community	
• Sign Language Interpreters • Different Communication Systems • Exposure to English • DEAF President Now	• Attitude Changes toward the Deaf Community • Changes in the Deaf Community • Working With an ASL Interpreter • Interpreting Standards
American Sign Language Part 1	
• What is ASL? • History of ASL • ASL Recognized as Language	• Rules of ASL • Five Parameters of ASL • English vs. ASL Idioms
American Sign Language Part 2	
• Evolution of ASL • ASL Syntax	• Translate ASL to English and Vice Versa
"TTYPhony" and TTY Courtesy	
• First Teletypewriter • Evolution and History of the TTY • Telecommunications Laws of Accessibility	• TTY Courtesy • Development of Relay Service Market
Hard-of-Hearing and Late-Deafened Customers	

Initial User Training Topics	
• Hard of hearing and Late-deafened Customers • Characteristics of Deaf Customers • Assistive Devices for Deaf Customers • Relaying for Hard of Hearing Customers	• History/Establishment of SHHH (now HLAA)
Characteristics of Late-deafened Customers	
• Establishment of Association of Late-deafened Adults (ALDA) • Relaying for Late-deafened Customers	• Deaf Seniors • Military Veterans
Characteristics of Deaf-Blind Customers	
• What Does Deaf-Blind Mean • Characteristics of Deaf-Blind customers • Assistive Devices for Deaf-Blind Customers	• Relaying for Deaf-Blind Customers • Deaf-Blind Pacing – allows the CA to slow down the transmission to the Braille machine
Characteristics of Relaying for Speech and/or Cognitively Disabled	
• Speech-Disabled Customers • Characteristics of Speech Disorders • Assistive Devices • Characteristics of Cognitive Issues	• Traumatic Brain Injury • Stroke • Communication Related Effects • Physically disabled customers
Language Support	
• Spanish Speaking Customers	
Hearing Customers	
• Statistics	• Relaying for Hearing Customers
Ethics and Confidentiality	
• Interpreting Standards • The ADA and FCC regulations for the Provision of TRS • Regulations pertaining to call content	• TRS Rules – CA Standards • Relay center Agreement Regarding Confidential Customer Information.

User Culture Training Outline

"Beyond the Classroom" Training

In 2013, we implemented a "Beyond the Classroom" approach to expand our User Culture training program. As a part of this program, experienced CAs developed a list of questions for relay users about culture and experience. Our Outreach team took these questions to relay and CTS users across the country and videotaped their answers. **The results were informative and enlightening and led to the addition of segmented training on people with a hearing loss and veterans**.

This two-way communication between our CAs and customers ensure that we continue to build **greater understanding and sensitivity** to our diverse customer groups, including hard of hearing relay and CTS users. We also provide tools and resources on an ongoing basis for CAs to continue to expand their knowledge of our customers, including the following:

♦ A **written ASL workbook** allows the CA to practice their skill of translating written ASL to conversational English and get direct feedback on their effectiveness. The Supervisor and CA review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. CAs are supported by Supervisors who are trained and knowledgeable in deaf culture.

♦ **Movies highlighting deaf culture** are made available in training classes. We routinely sponsor movies highlighting deaf culture as a part of our national and local outreach. We make copies of these videos available to our CAs so they can get a better understanding of deaf culture.

♦ We also encourage CAs and other staff to take advantage of local resources (e.g., organizations, museums, festivals, outreach events) to increase their understanding of our customers.

Ongoing User Culture Training
User Culture is an integral part of ongoing Refresher Training including understanding the culture, history, technical advances, ASL, ASL translation, available equipment, relay users, articles from reliable sources and more. Depending on the topics covered, this Refresher Training may also contain a Checking for Understanding.

Organizations and Community Support
Throughout our history of providing relay, we have recognized one important fact: it is critical to build solid relationships with organizations that serve relay users. As a part of these relationships, we developed a comprehensive User Culture program based on the input of national organizations, local organizations, educational institutions, and other resources to develop a comprehensive User Culture training program that is still used today. These organizations include those seen in the figure below:

National Organizations	Local Organizations and Educational Institutions	Other Related Areas
• National Association for the Deaf • Silent News • Association of Late-Deafened Adults, Inc. • American Speech and Hearing Association • Hearing Loss Association of America • Deaf Nation • National Black Deaf Advocates • Winter and Summer World Games for the Deaf • Telecommunications for the Deaf, Inc. • United Cerebral Palsy • American Athletic Association for the Deaf • National Theater for the Deaf • Deaf Life	• Gallaudet University • National Technical Institute of the Deaf • Local and State Schools • Local Deaf Clubs • State Associations of the Deaf • Equipment Distribution Program Providers • Deaf/hard of hearing Programs (Mainstreaming)	• State Relay Advisory Boards • State Relay Administrators • Account Managers • Individuals representing Speech-Disabled Community (Speech-to-Speech Service)

RESOURCES

Diversity and inclusion are woven into every aspect of our workplace culture. They are clearly reflected in our non-discrimination policy and are a key focus of the Code of Conduct. Annually, **all employees receive mandatory training** in Inclusion and Diversity.

We also recently launched an Employee Resource Group for all of our employees with disabilities and their co-workers. The Employee Resource Group provides an opportunity for networking and interaction among those with common concerns or interests, and provides input and feedback to the company so we can better serve an increasingly diverse customer base.

Our team has dozens of management-level employees throughout the country that possess extensive experience in the field of deafness, are native ASL users, or certified Interpreters. In addition, we have over 100 contractors around the country supporting our teams. This combination of in-house expertise and external resources allows us to fully meet the needs of our training team. In addition, many of the centers have staff that can sign and are active in the communities we serve.

Please see the Management Proposal for additional information.

ONGOING CA TRAINING

Ongoing User Culture Training
To continue to bring focus to serving relay customers and disability awareness, we provide additional training in User Culture in conjunction with each state's local deaf, hard of hearing, deaf-blind, late deafened and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with the Quality Assurance Managers and local Trainers ensure that all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness.

We will utilize live presentations, videos, audio recordings, role-plays, group activities, brown bag seminars, written materials, and/or discussion groups to deliver ongoing User Culture training. As a part of ongoing User Culture Training, each CA is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding.

Relay Procedure Refresher Training
Core relay processing skills are continually reinforced throughout employment and as a part of supplemental training programs. We develop refresher-training programs and on-going training labs to ensure CA work skills are maintained and remain consistent with basic relay training.

CAs receive refresher training on correct relay procedures including system navigation, standard procedures, professionalism, and ethics. Depending upon the complexity of the training a decision is made to determine the appropriate delivery. We conduct ongoing training on many facets of TRS service, including, but not limited to:

• Interpersonal Skills	• Positive Phone Image
• Performance Coaching	• Organizational Communication
• Healthy Detachment	• Conflict Management
• FCC Mandates	• Voice Inflection Workshop
• Answering Machine Workshop	• HCO
• Operation of Equipment	• American Sign Language
• Calling Card/Prepaid (Debit) Card	• ASCII Split Screen
• Enhanced Turbo Code	• Specific Person, Dept., or Extension Requests
• Background noise	• Relay verbatim
• VCO Call Processing	• 2 Line VCO
• Reverse two-line VCO	• Information line recording
• Changing Relay Agents	• TTY-to-TTY
• Cellular/Wireless	• Alternate Billing
• Operator Services for the Deaf	

Ongoing Internal Development
We also provide additional training for CAs through our in-house training organization that provides internal and external training programs for all corporate employees. The foundation for all of the training courses comes from eight core dimensions, which reflect marketplace demands and define employee behavior, skills and knowledge necessary to our success:

- ♦ Leadership
- ♦ Communication
- ♦ Management
- ♦ Personal Effectiveness
- ♦ Professional Knowledge
- ♦ Global Awareness
- ♦ Customer Focus

♦ Team Approach

Many training and skill development tools are created and managed by our award-winning, nationally recognized learning, development, and performance organization. The in-house training organization offers employees leading-edge enrichment opportunities, as well as extensive training in areas specific to their job requirements.

The in-house training organization uses a blend of learning methods to enhance employee skills such as best-in-class performer-support solutions to imbed learning and tools into work flows for frontline employees to directly drive business performance improvement.

As a corporation, our employees average **53 training hours annually**. This is significantly higher than other relay providers.

Our in-house training organization supports **over 5,000 offerings** to all employees for personal, skill-based, and professional development available on demand, through an online training website. They support a specialized online training center specifically designed to prepare employees for industry certification in technical areas, process expertise and project management.

The table below lists a small sample of classes currently offered.

Leadership		
Motivating Employees	Leading Business Execution	Communicating Vision
Communication		
Interpersonal Communication Skills	Be a Better Communicator	High Impact Presentations
Customer Focus		
Creating the Exceptional Customer Experience	Professional Skills for Customer Service Agents	Speaking to Customers with Confidence
Customer Driven Service	Customer Service Over the Phone	Value of Listening
Team Approach		
All Inclusive Workplace	Being an Effective Team Member	Effective Intercultural Relationships

Sample Development Classes

Tuition-Reimbursement
We believe it is important to invest in the educational future of employees. We currently offer an Educational Assistance program, which encourages eligible employees to continue outside educational courses for qualifying undergraduate and graduate expenses with company reimbursement, one-on-one counseling with experienced advisors, and discounted rates to many popular colleges and universities across the country.

Internship Opportunities
Internship opportunities are offered throughout the company for college students who have demonstrated academic commitment and success, leadership, and organizational involvement. Our

internship opportunities are designed to provide individuals with first-hand experience in their area of study, as well as learn about business operations and culture. The interns are mentored and coached by individuals in their respective organizations, and have the potential for future internships or full-time opportunities within the company.

ADVANCED PLATFORM

We believes that TRS quality can only be as good as the training and tools provided to CAs. We have completely redesigned our call processing software to meet the needs of both CAs and relay users. Feedback from experienced TRS CAs and Trainers directly influenced the design of the CA call processing software.

The CA software is far more intuitive and automated than that used by some other TRS providers. Our system automatically detects sequences of events and provides automated prompts to the CA and/or to the customer. With our CA software, we are able to train CAs to process TRS calls more effectively in a shorter period than other TRS providers who require their CAs to process calls manually.

When a call arrives at the CA workstation, the CA software automatically displays a dialing window. The cursor is placed in the "To" field so the CA can immediately begin typing that number as the relay user provides this information. Billing options and carrier of choice are readily visible and the CA can easily modify, if needed. If the user has entered customer profile instructions, the CA software incorporates these preferences in the fields automatically as well.

CA SOFTWARE

Our CA software is sophisticated and Windows-based and incorporates the following enhancements:

- ♦ **Easy navigation:** CAs can manipulate the CA software through short-key keystrokes or a mouse, based on the preference of the CA. The CA software contains system-generated prompts, macros (pre-programmed phrases), and on-screen instructions.

- ♦ **Customizable:** CAs can select Color Themes, Font Sizes, Panel displays, preset volumes for Headset & Microphone Volume. These preferences are available immediately when the CA logs in.

- ♦ **Flexible:** CAs can adjust the CA microphone volume and each caller's volume independently.

- ♦ **Reliable:** Each CA position and server communicates with a central alarming system that is automated. Tickets are automatically created and technicians can be paged.

Online Help Screen
Our CA software also includes a "help panel" which enables the CA access to the information within a few seconds. While other relay providers direct their CAs to search for information in bulky binders, our CAs can easily access this information directly from their terminal, without lengthy delays.

Our online help screens provide a wealth of information for the CA, including the following topics:

▪	Contract Representative Info	▪	Macro Definitions
▪	CA Identifiers and State Order	▪	"Marine" Calls
▪	Auto Correct List	▪	CA Phrases
▪	Background Noise List	▪	Phone Numbers
	Branding Procedures	▪	Phrase Sheet
▪	Commonly Misspelled Words	▪	Referral Information
▪	Ctrl Keys	▪	Standard Abbreviation List
▪	Customer Service Info	▪	Standardized Notes
▪	DA Unknown Area Code	▪	State Abbreviation List
▪	Dial Window Abbreviations	▪	Three Digit Dialing
▪	Disconnect Procedures	▪	Time Zones
▪	Explanations	▪	Trouble Ticket
▪	IXC CARD	▪	Voice Tone List

CALL TYPE SCREEN

Our CA software also provides immediate access to call processing steps for specific call types. The screen shot (below) is an example of a CA-initiated 3-way call from a Voice user to a second Voice user to a TTY user (3rd caller).

Call type help can be displayed while actively processing a call or between calls. The CA can review call processing procedures at any time.

4.1.1.8 Consumer input. The State Relay Advisory Committee is established as one mechanism for consumer input on the operation and improvement of the State's relay program. The main mechanism for obtaining consumer input, obviously, shall be the Offeror's account representative meetings with community groups and the Offeror's consumer complaints system. Offerors are invited to provide other examples of how they would obtain and use consumer input (e.g., relay user or internal CA surveys, etc.).

Bidder response:

We have read and fully meet these requirements.

Our Account Manager will serve as the primary point of contact for the Outreach and will also lead the Consumer Input plan. We are committed to providing a robust Consumer Input program and will work closely with the State Relay Administrator and State Relay Advisory Committee to finalize the plan based on their preferences.

PROVEN ABILITY TO ACCEPT FEEDBACK AND IMPLEMENT CHANGE

We take very seriously all consumer input and proceedings. All input and feedback is researched and considered by our management team for incorporation and implementation into our relay operations. Our goal is to delight the State Relay Administrator, the State Relay Advisory Committee, and all Relay Colorado users.

Many improvements have been made to our relay services as a direct result of customer feedback. We have been successfully able to address concerns and implement changes, including the following examples:

♦ **CTS Task Force Meeting:** CTS Focus Groups were held to gather Consumer Input specifically relative to documenting service issues, identifying appropriate users for the phone, suggesting service improvements, and training for new users. In one state, we received a total of 423 responses which indicated the following results:

  - 88% of users liked using the CTS phone
  - 92% rated the CTS experience as average or better
  - 88% rated the CTS speed and accuracy as average or better
  - 30% of CTS users would like additional training

As a result of these studies, we began Quality Assurance testing on the CTS service. We continue to work closely with our vendors and independent testers to implement processes to improve both the speed and accuracy of the CTS service. In addition, we worked with the State's Equipment Distribution Program to refine procedures regarding identifying potential customers and educating them.

These CTS Task Force Meetings and follow-up changes were completed at no additional cost to the State.

♦ **Improving the Customer Experience:** We also held focus groups and interviews with end users and CAs to gather feedback on initiatives to improve the customer service part of relaying calls. Users and CAs told us they want a relay services that excels in the following areas:

- Quality
- Speed
- Reliability
- Ease of Use
- Mobility

We implemented many of the suggestions presented after researching the FCC requirements around the suggestions. Improvements included:

- **Friendly salutations and acknowledgements:** CAs were permitted more flexibility in greeting callers in a friendly manner (e.g., "Good Morning" at the beginning of a call or "Thank you for using relay" at the end of a call).
- **Flexible announcements and explanations:** Rather than following strict scripts, CAs were given the flexibility to modify announcements and greetings based on the individual call. For example, if a TTY user asks to call mom, the CA assumes that mom knows about relay and no longer provides the same announcement and explanation as would be given to a toll-free number or business.
- **More manageable recorded menus:** Interactive voice response units can be very challenging for TTY users to navigate through relay. Relay users felt that communication with a live person proves to be more effective and efficient in most cases. To accommodate this preference, the CA now immediately informs the TTY user that he or she has reached a recording by typing the business name, recording, and asking if the TTY user would like to hold for a live person.

CONSUMER INPUT PLAN

We will seek input from the State Relay Administrator, the State Relay Advisory Committee, consumer organizations, and relay users to gather feedback on the quality of services we provide. We will also solicit ideas and suggestions for relay center improvements and new products. We will use a variety of input methods, including the following strategies.

State Relay Administrator
We understand that the State staff and State Relay Administrator are knowledgeable and active in the relay industry. Members of our management team will frequently reach out to the State's staff (including the State Relay Administrator) to ensure that we are meeting or exceeding expectations as it relates to the service and staff performance.

State Relay Advisory Committee (SRAC)
Advisory committees offer some of the most productive feedback and ideas for improving relay services. We are very experienced in working with advisory committees. Our Account Manager and other members of staff may attend SRAC meetings and will be available, upon request. We are committed to working cooperatively with the State Advisory Committee in the upcoming contract term.

Equipment Distribution Program
We will work closely with the Colorado Commission for the Deaf and Hard of Hearing (CDHH) who acts as the State's Equipment Program provider. CDHH is an invaluable resource for consumer input. We will work closely with CDHH and our Account Manager will attend outreach events in coordination with CDHH. We will solicit feedback from CDHH and relay users.

Account Manager
Our Account Manager will be available for one-on-one discussions and available to accept feedback from customers. The Account Manager will also host or attend other community events to solicit feedback. He or she will be available via phone, video, e-mail, fax, videophone, as well as in person (when appropriate or necessary).

Customer Service
Our 24/7 Customer Service is always available to listen to customers. All feedback is documented and reviewed by the Quality Assurance staff and management team on a monthly basis to ensure that all relay user issues are resolved to the relay user's satisfaction.

Relay User Surveys
We will provide an online survey form or link on the Relay Colorado website (if approved by the State Relay Administrator). This online survey will be open to all Relay Colorado users. The content and design of surveys will be reviewed with the State Relay Administrator and State Relay Advisory Committee (if desired) and will be updated every six months or sooner, as deemed necessary.

Focus Groups
We may also host focus groups to gather input on the quality of the service and products. As a part of our outreach budget, we may target individuals, organizations, or specific user segments for Focus Group meetings for the purpose of seeking feedback and areas for improvement. We will collect and share the number of participants, feedback, and other mutually agreed-upon data. As a part of the focus group, participants will also be asked to provide feedback on the focus group and event facilitator.

Facebook and other social media
A growing number of individuals are using Facebook and other social media channels to ask questions or submit feedback. If approved by the State Relay Administrator and State Relay Advisory Committee, we will create Relay Colorado pages with routine updates. Relay Colorado users, government agencies, businesses, and the general public will be encouraged to visit and "like" the page to receive ongoing updates to the service – including, but not limited to upcoming outreach events, new products and services, and links to the Relay Colorado website.

Local Agencies and Organizations
We will solicit feedback from community agencies and community forums across the State of Colorado relative to the quality of our relay services, and will educate the users on new and emerging features and to respond to questions or issues. We will plan and conduct these forums in conjunction with organizations serving people with hearing loss and speech-disabilities in the State of Colorado. We have enjoyed great success in conducting community forums in many of the States we serve. These venues are excellent vehicles for collecting user feedback and responding to user questions and concerns regarding relay services.

Our Account Manager will work with local community agencies to schedule community forums in coordination with service agencies and organizations. In each community forum, the following information will be presented to the audience:

✔ Opportunities to submit consumer input and feedback on the spot

- ✔ Awareness of survey tools available to evaluate the Relay Colorado Service
- ✔ Better understanding of the relationship between the State, the Equipment Distribution Program, and us (as the Relay Colorado provider)
- ✔ Contact information for the Account Manager
- ✔ 'Hands On' demonstrations of our relay products and services, including:
    - o Traditional Relay Service
    - o Voice-Carry-Over
    - o Hearing-Carry-Over
    - o Speech-to-Speech
    - o CTS (and IP CTS)
    - o Captioning for conference calls
    - o Spanish Relay
- ✔ FAQs related to common issues encountered by Relay Colorado users

We will invite geographic and age-diverse user groups including individuals who are:

- ◆ Deaf
- ◆ Mobility-Impaired
- ◆ Deaf-Blind
- ◆ Hard-of-hearing
- ◆ Late-Deafened Adults
- ◆ Speech-Disabled
- ◆ Parents of deaf, hard-of-hearing and speech-disabled children
- ◆ Senior Citizens
- ◆ Speech-to-Speech users
- ◆ Hearing Individuals
- ◆ Veterans
- ◆ Latino/Hispanic
- ◆ Other potential users of Relay Colorado

Industry Forums
We are also active in relay industry events including the RL Interstate TRS Advisory Council, National Association for State Relay Administration, and national relay industry and accessibility tradeshows and expositions. Our Branch Manager of Program Management and Product Development, currently serves on the RL TRS Advisory Council.

CONSUMER INPUT MANAGEMENT

Our Consumer Input program will be led by the Account Manager. However, our support does not stop there. We will provide a full life-cycle team to support the Relay Colorado Service program. Based on over 24 years of experience in the industry, we feel strongly that these personnel will dramatically strengthen the input into service quality of Relay Colorado Services.

The Life-cycle Team will accomplish the following as a part of the Consumer Input Program:

- Work closely with the State Relay Administrator, SRAC, and the community on a regular basis
- Attend meetings of SRAC , workshops, and hearings relating to relay services
- Provide updates on evaluations of the relay system
- Be available to receive input from relay (TRS and CTS) users
- Develop the methodology to solicit consumer input in a timely manner
- Act as a liaison between the quality assurance team and relay users
- Compile a quarterly Consumer Input report which outlines all feedback received from all methods.
- Coordinate with, and support CDHH on all Relay Colorado outreach efforts
- Be an active member of the user community; maintain visibility and be readily available to respond to issues
- Work closely with the Quality Assurance team to identify quality issues gained from consumer input
- Conduct outreach for specialized services

INCORPORATING CHANGES INTO RELAY COLORADO

Customer input drives the evolution of our products and services. Quality is a continuous process and must be accomplished in a way that is sustainable. We provide a formal Quality Assurance program led by the Quality Management staff and supported by the entire Lifecycle team.

Quality and key performance indicators are closely monitored, tracked, and reported internally. Within the relay call centers, there are several important steps to ensure quality. First, representatives receive coaching and immediate feedback regarding world-class behaviors, call control, and any process related to the quality of a call. Next, supervisors receive tracking and trending information on common quality issues to develop plans for immediate improvement. Finally, follow-up action is taken to ensure corrective actions have been instituted.

We task our staff with improving the customer experience, to be team players, and to provide more effective and efficient processes and systems. By continuing to improve quality, we can become more customer-driven, make fact-based decisions through better measurement and focus on metrics, and create a culture of continuous improvement leading to better results and value creation.

As issues are raised, we follow standard procedures to understand and quickly address the problem, including the following approach:

- Gather detailed explanation of the issue
- Validate or recreate the issue
- Research possible solutions
- Determine impact of all proposed solutions
- Devise recommended approach
- Share findings with the State Relay Administrator, SRAC, and/or Equipment Distribution Program provider
- Implement solution, as applicable

We will also share any and all emerging technologies with the State. Depending on the outcome of feasibility studies and results of cost/benefit analysis conducted, new features or products will be implemented on case-by-case basis.

If the State elects to implement new technology for Colorado, we will obtain written permission prior to implementation. Again, the State will be fully apprised and approve of any and all new developments before they are fully installed for Relay Colorado.

4.1.2 Billing Adjustment For Missing ASA and Blockage Rate Standards

The SRA, at his or her sole discretion, may adjust the billing for a given month by reducing the payment by $2000.00 for any day in which the FCC standards related to blockage rate (less than one percent) or average speed of answer (at least 85 percent of calls within 10 seconds) are not met. If there is a reoccurrence of the same problem within ten calendar days, the SRA may adjust the payment by an additional $4000 for that day, $6000 for a third problem day within ten days of the second, etc. The SRA will assess the adjustment only after consideration of any natural or man-made problems (weather event, line cut, etc.), whether the Offeror is making reasonable efforts to restore service to established standards and whether there are indications that the State's service by the Offeror has fallen significantly below that provided to other states by the same Offeror. Offerors should comment on this provision, including describing any alternate mechanisms they feel would accomplish the same goals.

Bidder response:

We have read, understand and appreciate the State's willingness to consider alternate mechanisms. We agree with the stated billing adjustments and respectfully ask the State to add a provision that the daily liquidated damages do not exceed the total amount of billed revenue for the day. This will provision will protect the State while ensuring providers do not have to increase costs to cover potential excessive damages.

We are dedicated to ensuring the best possible service for our customers by ensuring that they reach the relay center without being blocked and they get answered in a timely manner. We understand that if we fail to meet these important service standards that our payments may be reduced by $2,000 and that further issues within 10 days may result in higher penalties. We take reasonable and preventive measures to make sure that we avoid missing ASA and blockage standards and take action quickly if issues occur. The Account Manager or a member of management will report problems to the State Relay Administrator and provide information on the causes to assist the State in determining if penalties should be assessed.

SPEED OF ANSWER

We are able to consistently meet speed-of-answer requirements for our State Relay customers. Last year[17], we met 99.4% of our TRS contractual speed-of-answer requirements. This includes force majeure events that were encountered such as hurricanes, tornadoes, and severe winter storms. We are able to achieve these industry-leading speed-of-answer results through the use of superior technology and people. All of our TRS

[17] January 1, 2013 through December 31, 2013

call centers are connected by a central call routing system, workforce scheduling system, and a workforce management team. This is a significant differentiator between providers.

Likewise, we proactively work closely with the CTS technology provider to ensure that we have enough CTS staff available to answer calls at all times. We do this by closely monitoring the number of active CTS users, current capacity utilization, and number of CTS phones distributed.

BLOCKAGE

As described in Section 4.2.3.2, we have virtually eliminated all causes of blockage in our service. We have upgraded many of our platform and telecommunication components to ensure that we directly connect to the IXC (removing LEC connections as a source of blockage) and have installed alarms on our TRS platform switches that alert our IT teams if we are reaching capacity thresholds – before coming close to the P.01 standard.

Likewise, we work closely with our CTS technology provider to make sure that we have enough facilities and resources available so that CTS users are not blocked from the service.

4.1.3 Call Efficiency

The reimbursement rate paid to the Offeror shall be on a cost per call-minute basis, but the ultimate cost of the TRS to the State will be based on three factors: the cost per call-minute, the number of calls and the efficiency of the TRS center in handling calls. It is anticipated that a more efficient TRS could handle calls more rapidly, perhaps resulting in fewer minutes per call and a reduced cost to the State per call. It is also anticipated that increased call efficiency would also make the TRS more attractive to both voice and TTY users, thus resulting in greater use of TRS and possible increased and very justifiable costs to the State. Lacking a way to measure call efficiency precisely, Offerors shall indicate the combination of hardware, software, staffing, training or procedural innovations they will use to maximize call efficiency. Offerors should report the results of any internal studies conducted to measure improvements made in call efficiency that could be expected as part of the proposed services.

Bidder response:

We have read and fully meet this requirement.

Relay Colorado users and the State will benefit from our efficient and smart approach to services. For the past 24 years, we have reviewed every facet of providing TRS and automated items that did not impact the customer experience. As a result, we continue to process calls more quickly and reduce the average call length. Over the past 12 years alone, we have reduced the average call handling time by 54.9%. This means faster service for TRS users, lower invoices, and allows money to be invested in Outreach and Community Support.

Our commitment to efficiency and quality is evident in both our Relay technology and practices. By processing calls more quickly and providing better quality, customers are more likely to utilize the Relay service for quicker calls at a greater frequency.

ACCURATE BILLING MEASUREMENT

We precisely capture and report billable minutes. Timestamps in the Call Detail Record (CDR) are rounded to the nearest second. Billable minutes on the invoice are computed to a 100th of a minute. No network transport time or time associated with calls waiting in queue is included in our invoice.

CALL PROCESSING EFFICIENCIES

We have implemented numerous time saving features as a part of our standard feature offering including, but not limited to:

♦ **ANI Temporary Branding:** When a user dials the relay service, the Relay platform automatically searches the database to determine the communication mode of the last call to the relay service and connects the user using the same communication mode. If it is the users' first time dialing Relay or if a new communication mode is used, the relay platform will automatically update the database based on the communication mode detected. This is done completely without human intervention. This feature may be turned on or off per toll-free number. In addition, a customer may to turn this feature off by registering a permanent communication mode in the Customer's Profile.

♦ **Dedicated Toll-Free Numbers and Automated 711 routing for STS and Spanish:** We recognize there are some households with multiple relay users. For this reason, we offer both dedicated toll-free numbers and the option to register as a STS or Spanish TRS user and be automatically connected to the right Relay Operator or in the right communication mode.

♦ **ANI based Customer Profile Information:** Many features implemented as a part of our Customer Profile are intended to allow relay service users to process their calls more efficiently, including:

   o Automated call routing for STS and Spanish users to CAs with the skills needed to handle the call.
   o Frequently Dialed Numbers - allows customers to "speed dial" **100** registered numbers by providing the name of the person or place they are calling.
   o Preferred Carrier-of-Choice for Interlata and Intralata toll calls.
   o Preferred Billing Methods.
   o Customer Notes – which allow the relay service user to customize how their call should be handled, including preferences for call announcement, background noises, tone of voice, etc.

♦ **Call Set-Up:** When a call arrives at the relay service Operator position, the terminal provides all necessary information for the Communication Assistant to process the call including:

   o Inbound ANI
   o Originating line information digits, indicating the origination information of the in-bound call, such as: restricted calls, pay telephone calls, wireless calls, correctional facility calls, etc.
   o City and State of both the calling and called party.
   o 'Calling to' number (when customer transmits using E-Turbo technology).

♦ **Outbound Call Connection:** Our TRS platform has been designed to quickly detect the called party's communication mode. When the Communication Assistant dials an outbound call, the inbound user (if voice) has the ability to hear the call progression. If the called party answers the

phone using text based communication, the system automatically connects without manual intervention.

♦ **Intelligent Communication Assistant Software:** Our Communication Assistant application has been designed to promote efficiency in call processing including:

o Extensive spell check library
o Ability to automatically expand common TTY abbreviations.
o Substantial list of system generated and Communication Assistant-initiated macros (pre-programmed commonly used phrases).
o Ability to handle any type of traditional Relay call from any Communication Assistant position including: TTY, Voice, VCO, HCO, Speech-to-Speech, Spanish language and combinations of these call types.
o Recording feature that captures and replays messages at a slower speed, allowing the Communication Assistant (in most cases) to type recordings on the first attempt without multiple redials.

♦ **Operational Practices:** Operational practices are in place to ensure that both high quality and efficiency is maintained including, monthly individualized surveys addressing, among many other aspects of quality Relay performance:

o Appropriate Grammar
o Spelling
o Voice Clarity and Articulation
o Typing Speed and Accuracy
o TTY-ASL Interpretation,
o Etiquette
o Language
o Cultural Understanding
o 60 wpm Typing Tests

LIMITING INAPPROPRIATE USE

We also limit inappropriate use so the State doesn't get overcharged. We take decisive action against those using Relay services inappropriately or fraudulently.

♦ **Correctional Facility Collect Calls:** We were the first Relay Provider to create a nationwide solution to prevent prisoner inmates using Relay inappropriately. This solution was first implemented on March 19, 2005. We identified that some prison inmates around the nation were attempting to inappropriately accessing Relay services to avoid paying for local voice phone calls. We created a solution that utilized the telecommunication industry standards for identifying incoming calls from all correctional facilities. By identify originating calls as correctional facility calls, TRS call centers can process the inbound call as a collect call. This solution eliminated the incentive to misuse TRS for free local calling, and complied with the Americans with Disabilities Act.

♦ **Pay-Per-Use Calling:** We implemented a pay-per-call process that accurately detects restrictive blocks placed on the calling party's telephone line by the Local Exchange Carrier (LEC). Other Relay provider's "work-around" solution requires that the Relay user contact the Relay service to register a Relay-only 900 block. Our system eliminates the need for this work-around therefore, resulting in greater efficiency for both the provider and the end-user. In addition, this increases the functional equivalence of Pay-Per-Call Services.

♦ **Voice to Voice Calling:** We do not support voice-to-voice calling when relay is not needed.

PROOF OF EFFICIENCY

We appreciate the State's request for the most cost-effective, efficient, and highest quality relay service possible. Our TRS and CTS products have been designed around these core values as well. Our team's unyielding commitment to consumers, equal access, and functional equivalency has resulted in clear, quantitative proof from independent evaluators, and public sources that demonstrate our superiority in many areas including the following:

♦ Fast and accurate CA typing and/or speech-to-text transcription (CTS)
♦ Quick and efficient processing of calls
♦ Consistent call processing in other key quality areas

Many providers claim to offer the highest quality services while offering anecdotal references, citing vague sources, or comparing apples to oranges by comparing two states with different service requirements. We avoid these misleading practices by citing real-life, current examples in states where we and the competition have recently provided service so that the evaluators can see the actual performance of the providers. We also invite the evaluators to place test calls themselves to evaluate the quality offered by both providers.

Example One: West Virginia Relay

Within the State's last three contract cycles, the remaining two TRS providers have provided TRS in the state. The figure below highlights the efficiency offered through our service.

State	Them	Us
Speed of Answer		
Source of Information	2008 Annual Report[18]	2010 Annual Report
Average Speed of Answer	1.4 seconds	0.7 seconds
Average Percentage of Calls Answered within 10 seconds	94%	97%
Efficiency		
Source of Information	02/01/07- 10/31/08[19]	03/01/10 - 02/28/11
Average Number of Intrastate Minutes	25,183	11,914
Average Number of Answered Calls	8,185	4,388
Average Intrastate minutes per answered call	3.08	2.72
Customer Satisfaction		
Source of Information Mandatory FCC filings of Customer Complaints	12 months (6/1/08-5/31/09)	12 months (6/1/10-5/31/11)
Average Number of Intrastate Minutes	Seven (7) (TRS & CTS)	Two (2) TRS and CTS

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[18] Provided as Exhibit 3 in State's RFP proceeding.
[19] Obtained from competitor proposal response dated 01/12/10.

Example Two: Wyoming Relay

Within the State's last three contract cycles, the remaining two TRS providers have provided TRS in the state. The figure below highlights the efficiency offered through our service.

State	Them	Us
Speed of Answer		
Source of Information	FCC Recertification Application filled 10/1/07 (2006 data)	Internal Reports for First Calendar Year of Service (2012)
Average Speed of Answer	1.0 seconds	0.72 seconds
Average Percentage of Calls Answered within 10 seconds	97%	97%
Efficiency		
Source of Information	Public Reports (August - December 2004) [20]	Public Data Included in State's RFP (RFP Full Calendar Year 2003)
Average Number of Session Minutes	84,853.6	174,704
Average Number of Inbound Calls	18,761	40,516
Average Intrastate minutes per answered call	4.5	4.3
Customer Satisfaction		
Source of Information Mandatory FCC filings of Customer Complaints	12 months (6/1/10-5/31/11)	12 months (6/1/12-5/31/13)
Average Number of Intrastate Minutes	Eleven (11) (TRS & CTS)	Two (2) TRS and CTS

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[20] Obtained from competitor's proposal response dated 01/12/10.

4.1.4 Multiple/Additional Services (Value Added)

This RFP specifies minimum requirements for the State's TRS. Nothing in this section or other sections of the RFP is intended to prohibit an Offeror from offering additional telecommunications services to users and the State at no additional cost. Offerors should specify any additional services that will be provided at no additional cost. Additional consideration may be awarded by the Evaluation Team for those Offerors offering additional services at no cost. The Offeror should also describe other services they could provide at a small additional cost.

Bidder response:

We have read and fully meet this requirement.

Please see the Section labeled "Tab: Value Added Services" for details on the multiple additional services offered, including:

- ♦ Captioning for conference calls (including 10,000 minutes at no additional charge per year)
- ♦ Video-Assisted Speech-to-Speech (VA-STS)
- ♦ **Speech-to-Speech Call Set-Up via E-Mail**

4.1.5 Additional Requirements for FCC Certification

Offerors shall identify other FCC requirements for certification related to TRS vendor operational, technical or functional performances not otherwise listed in this section of the RFP and specify how those requirements will be met.

Bidder response:

We have read and fully meet this requirement.

Please see Appendix 2 for details on how we meet and, in many cases, exceed the FCC's requirements related to TRS and CTS services.

4.1.6 Location and CApabilities of Relay Center(s)

The Offeror must demonstrate its ability to put in place a fully functioning relay center (or centers) meeting the operational, technical and functional standards described previously and elsewhere in this section of the RFP. If the Offeror proposes either building a new relay center or expanding the capability of existing relay centers, it must provide documentation demonstrating that they will be able to secure the needed building space, telecommunications and other necessary equipment and trained personnel to provide the proposed services. Areas to be addressed in an Offeror's proposal should include:

Bidder response:

We have read and fully meet this requirement.

We have in place a fully-redundant network of relay call centers across the United States that will meet the needs of Relay Colorado users and exceed the State's requirements. Our experience in fully-satisfying the operational, technical, and functional standards required in this RFP are described fully below. We have existing capacity in our TRS and CTS call centers to handle Relay Colorado calls. In the event that we near our threshold in any area, we will supplement our systems with the

specific items (e.g., hardware, personnel, telecommunications, etc.) needed. Please see more in-depth responses to the requirements in the following sections.

4.1.6.1 Building Requirements. Offerors shall document ability to provide building space for a relay center to handle the State's calls, perform all necessary site preparation work, provide all office furniture and office supplies and furnish all recurring and non-recurring physical plant needs. There also shall be individual workstations for operators of each terminal. Building and office space shall demonstrate expansion capability to handle any increased call volume. An Offeror already operating one or more relay centers should provide details of their existing facilities and document how they would accomplish needed building expansion to handle the State's relay calls and their ability to further expand to respond to increased call volumes system-wide.

Bidder response:

We have read and fully meet this requirement.

Our network solution provides the most advantageous Relay Colorado service for the State and for TRS and CTS users. Some of those advantages are listed below:

- ♦ Our TRS and CTS call centers are fully staffed with a highly trained, dedicated and mature workforce.
- ♦ Each TRS and CTS call center is equipped with all necessary equipment, furnishings, and necessary switches and connections to provide uninterrupted Relay services.
- ♦ Individual Relay Operator positions are in service and additional Relay Operator positions are available as needed for any expansion requirements, as detailed below.

EXPANSION PLANS

Our Expansion Plan is designed to maintain all standards listed in this RFP as well as offer the most cost-effective use of available resources. Our supporting systems and platforms are sized to support well in excess of the current Relay Operator and TRS/CTS call volume capacity.

Procedures in place to monitor and respond to network staffing needs include:

- ♦ Equipment Capacity: Equipment expansion is reviewed bi-monthly in conjunction with circuit capacity and reviews session. Whenever necessary to meeting increases in trunk augmentation, we make sure there is sufficient equipment to support the augmentation.

- ♦ Trunking Capacity: Our Network Engineers meet bi-monthly to review trunk utilization and forecasts to insure that sufficient capacity exists to handle all TRS traffic. Trunk capacity is groomed as needed to augment shift capacity as dictated by call volumes and business needs. In most cases, trunks can be augmented within 60 days if necessary.

- ♦ Relay Operator Workstations: We have installed work stations in each of the Relay Call Centers, which exceeds call volume and headcount requirements. If required, these workstations can be immediately activated during emergencies. During times of forecasted call volume increases, these workstations will be used to support additional hiring of new Relay Operators.

- ♦ Personnel Staffing: In emergency situations, resulting in short term call volume increases, we approve overtime to meet staffing requirements. Long term forecasted call volume increases will be supported by call center hiring. The time period from the initial request to completion of Relay Operator training is 30 days.

CALL CENTER EXPANSION TIMETABLE

Once capacity thresholds are breached and the determination is made that additional capacity is needed in the relay network, approximately sixteen (16) weeks is needed to provide additional capacity in all areas. The figure below is an example of a service expansion schedule. An actual schedule will depend on the expansion components required.

4.1.6.2 Telecommunications Service Priority (TSP). The Offeror shall meet Federal TSP requirements pertaining to TSP in terms of providing redundant services.

Bidder response:

We have read and fully meet this requirement.

Our TRS and CTS Centers are enrolled in the FCC's Telecommunications Service Priority (TSP) program. In 1988, the FCC established the TSP Program to prioritize the restoration of telephone service to critical facilities and agencies at times when Telecommunications repair companies are typically overburdened with service requests. The program presently restores telephone services most critical to national and homeland security on a priority basis in the event of a national crisis. The FCC partnered with the Department of Homeland Security to increase TSP participation, including TRS.

Our participation in the TSP Program strengthens our already robust reliability. If a national or regional emergency causes service to be disrupted and we cannot receive or place calls, our participation in the TSP program means that LECs will be required to restore service as rapidly as possible, consistent with the priority status assigned to TRS call centers.

4.1.6.3 Location. *The building housing the operators may be located in the State of Colorado; however, it must be located within the United States of America. Offerors may propose various combinations of in-state and out-of-state facilities to handle the Colorado relay operation at different times of the day or days of the week. Offerors proposing that any portion of TRS be provided at an in-state center can route calls to an existing relay center outside the State for as long as they wish prior to establishing an in-state center.*

Bidder response:

We have read and fully meet this requirement.

Relay Colorado TRS and CTS calls will be handled using a network solution of call centers located throughout the United States. We offer the largest network of relay call centers with redundancy for all call types, including the following centers:

Number	Location	Operator Skills
1	Austin, TX	TRS and VCO
2	Dayton, OH	TRS, STS and VCO
3	Honolulu, HI	TRS and VCO
4	Madison, WI	CTS
5	Lubbock, TX	TRS, Spanish TRS, and CTS
6	Milwaukee, WI	CTS
7	Moorhead, MN	TRS, STS, VCO, Customer Service, Spanish TRS
8	Orlando, FL	CTS
9	Overland Park, KS	Customer Service
10	Syracuse, NY	TRS, Spanish TRS, VCO, and CTS

As wireline relay call volumes continue to decline, our network routing strategy means a more efficient approach to the service which saves Relay Colorado users' time and the State money. It also offers more efficient utilization of CAs, faster speeds of answer as calls are answered by the first available CA across the network, proven independent verification of quality, and greater long-term savings.

4.1.6.4 Equipment. Offeror shall furnish all necessary telecommunications equipment and provide and arrange for all telephone service into and out of the relay center. The Transmission circuits shall meet or exceed interexchange performance standards for circuit loss and noise. The center must have telecommunications equipment capable of receiving and transmitting in both Baudot and ASCII codes. Relay systems must be capable of automatically identifying incoming TTY signals as either Baudot or ASCII.

Bidder response:

We have read and fully meet this requirement.

We will furnish all of the necessary facilities, equipment, software, circuits, staff, training setup, testing, reporting and other program elements necessary for a turn-key TRS and CTS service. All call center facilities and equipment conform to our demand for leading-edge technology and operational effectiveness, and comply with all standards that affect the provision of Relay services including applicable FCC interexchange performance standards for circuit loss and noise.

The TRS platform is capable of receiving and transmitting in Voice, Baudot, ASCII and Turbo Code using industry standards. Our modems are auto-detectable and auto-switchable. The TRS platform automatically detects a connection mode, without CA intervention. In addition, the TRS platform contains a self-learning database which allows us to answer a call using the last known communication mode to reduce call set-up times. In addition, customers may also register a permanent communication mode as a part of the Customer Profile which overrides the temporary self-learning database.

4.1.6.5 Back-up. Offeror shall demonstrate an adequate back-up system, or show how relay calls could be rerouted to another relay center with sufficient capacity to handle the additional load in the event of a power outage, fire, cut trunk line or other disaster making a relay center inoperable for a period of time.

If the Offeror has experienced relay centers going off line in the past, they should provide information on how that contingency was handled, and the extent of the disruption in service that was experienced by relay users. If the Offeror does not own a back-up relay center, then proof of a contractual agreement with a proposed back-up center must be provided.

Bidder response:

We have read and fully meet this requirement.

We have the ability to route traffic to any of our domestic relay centers immediately when a disaster or event occurs anywhere in the country. Over the past 24 years, we have experienced power outages, cut trunk lines, and other disasters which have shown our ability to act and react immediately to such events. We are pro-active in informing our State customers of all predicted impacts and provide updated status throughout the incident, as well as an "all-clear" notification.

The Offeror shall also demonstrate how it will maintain an auxiliary source of power which is functionally equivalent to normal central office auxiliary sources of power so that the TRS will continue to function during power outages.

Bidder response:

We have read and fully meet this requirement.

Our TRS and CTS switching system includes redundant Central Processor Units (CPUs) on 'hot stand-by.' This includes a full maintenance and administrative terminal with keyboard, screen and printer capabilities, on-line system monitoring, and real-time programming capabilities. The maintenance and administrative terminal has the ability to perform preventative maintenance without taking the system off-line. In addition, on-line and off-line diagnostic routines identify system faults or failures at the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Our network is designed to contend with weather-related challenges, power outages, and disasters. If one core switching system must shut down, the other core switching system in the network remains operational and available to process calls, guaranteeing that communication is accessible at times when it is most needed.

We provide a cost effective solution with an Uninterruptible Power System (UPS) using a combination of standard battery backup and an auxiliary generator. This provides uninterrupted power for an unlimited duration of time for all key components including:

♦ The switch and its peripherals
♦ Switch room environment, including:
♦ Air conditioning, if required to maintain service
♦ Fire suppression systems
♦ Emergency lights and system alarms
♦ Relay Operator consoles/ terminals
♦ Relay Operator work site emergency lights
♦ Call Detail Recording (CDR)

We ensure that the UPS system capacity is sufficient to operate each relay center at busy season and during busy hour load. We have installed power-generating equipment capable of operating the call center for extended periods of time. In the event of a power outage, the UPS and back-up power generator ensure seamless power transition until normal power is restored. The UPS is used only long enough for the backup power generators to come on line – a matter of minutes. Backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. Generators can stay in service for longer periods of time as long as fuel is supplied.

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental controls until commercial power is restored.

4.1.7 Account Representative

The Offeror shall assign an account representative for the State's TRS. The account representative shall possess good communication skills in both American Sign Language (ASL) and written English.

Bidder response:

We have read and will fully meet this requirement.

We put our State customers and relay users first using a seamless customer support experience. To implement the strategy, we adhere to fundamental policies and practices that make this strategy real. Putting the customer first includes, but is not limited to the following activities:

♦ The Account Manager will take *ownership* of all issues or requests. Once the Account Manager identifies an issue, the Account Manager owns the issue or request until full resolution. The customer does not need to make multiple calls to various departments for status and/or resolution. This policy has practices surrounding it to ensure that we record, track, and communicate the status and results of the inquiry.

♦ The Account Manager will *communicate* with the State or relay user using the method preferred by the customer. For example, if a customer requests us to communicate via videophone or email, we honor the request.

Beyond response methodologies, we recognize effective communications between us, in both written and in person, is an essential factor in creating a collaborative partnership among all individuals. We practice and encourage open, fluid communications that focus on the priorities of our customers. This communication approach includes:

♦ Empowering key personnel within all organizations
♦ Providing a timely and comprehensive status and resolution process
♦ Using predefined, proven escalation paths to support the State and relay users
♦ Executing project documentation process consistently.

Ethical business practices are the cornerstone to our customer support activities. We benefit from this principled approach, and in turn, this benefits our customers. Our Code of Conduct ensures that our good intentions consistently take the form of appropriate actions in all activities. We conduct quality reviews that provide the facts about our performance against the established objectives. By regularly assessing performance, we identify opportunities to continually improve and resolve performance issues before impact on the customer.

In addition, we has well-defined escalation paths that aid in quick resolution of issues and requests. The Account Manager has a thorough understanding of these escalation processes and how to initiate them without requiring a customer request.

ACCOUNT MANAGER FOR RELAY COLORADO

We will provide an experienced and passionate Account Manager to support the Relay Colorado TRS and CTS contract. Our Account Management team is comprised of highly skilled and passionate staff. Almost half of our Account Management team possess an advanced degree (i.e., Master's Degree) and most have over 10 years of experience with the company.

We will assign Kris Smith-Shipley, who is Deaf, is fluent in American Sign Language (ASL) and is highly proficient communicating in written English. Our Account Manager has worked in the relay industry for over 24 years in various capacities and for 17 years with our company. The Account Manager will be fully responsible for the Relay Colorado contract and will serve as the point of contact between the Colorado Public Utilities Commission, the State Relay Administrator, the State Relay Advisory Committee, and our company. This greatly benefits the State, as the Account Manager is highly knowledgeable of all relay products, FCC updates, and the rules and regulations regarding their State contracts.

The account representative may also be the representative for other states served by the Offeror. Offerors shall describe the full duties and qualifications of the account representative including a job description, what other states besides Colorado will be assigned to the representative, where the individual will maintain his/her primary office, what portion of the time the representative will actually be in Colorado, the community and business group meetings that will be attended, and the respective roles of the account representative and other support staff who will be handling consumer complaints, billing, reporting, contract management, communications, concerns and ideas.

Bidder response:

We have read and will fully meet this requirement.

We understand that the State is not requiring a dedicated in-state Account Manager solely focused on Relay Colorado. It is our intent to have our Account Manager have a primary office in Denver, Colorado. The Account Manager will spend approximately 75% of their time physically in the State. In addition to serving Relay Colorado, the Account Manager currently serves one other State account (Alaska) and supports national marketing.

We also have a Customer Care team who acts as a support staff to the Account Manager. This team assists in special reporting, presentation preparations, and preparation of FCC filings.

ACCOUNT MANAGER RESPONSIBILITIES

♦ Ensure contract compliance
♦ Act as a liaison between our company and the State Relay Administrator
♦ Handle FCC reporting
♦ Plan, develop and execute Marketing and Outreach strategies for Relay Colorado and CTS services, working closely with the Colorado Public Utilities Commission for approval before executing the marketing plan
♦ Interface with people who are deaf, hard of hearing, deaf-blind, or have a speech disability
♦ Conduct Outreach activities for the community and businesses
♦ Identify and implement marketing strategy for the publications and media
♦ Handle complaint resolution and maintenance of the customer complaint log

- Provide invoice monitoring
- Supply annual trending projections
- Offer evaluations of various reports
- Maintain monthly statistic and outreach/marketing reports
- Deliver reports

ACCOUNT MANAGER QUALIFICATIONS

- Strong customer relations skills
- Excellent presentation skills
- Computer literacy
- Excellent oral and written communication skills
- Strong knowledge of American Sign Language
- Deaf Culture awareness/sensitivity
- Bachelor's degree or equivalent experience totaling 5 years post-high school

COMMUNITY AND BUSINESS MEETINGS

The Account Manager and/or Outreach Specialists will participate and interact in Colorado statewide local community events and meetings. Below is a sample list of organizations:

- American Legion
- Aspen Camp School for the Deaf
- Center for Hearing Speech and Language
- Chamber of Commerce
- Colorado Associations for the Deaf, Inc.
- Cochlear Implant Kids and Family Camp
- Colorado Commission for the Deaf and Hard of Hearing
- Colorado Families for Hands & Voices
- Colorado Hearing Foundation
- Colorado Hearing Impaired Program (CHIP)
- Colorado Neurological Institute's Center for Hearing, Inc.
- Colorado Registry of Interpreters for the Deaf
- Colorado School for the Deaf and the Blind
- Colorado School for the Deaf and the Blind Alumni Association
- Colorado Services to the Deaf and Hard of Hearing
- Colorado Mental Health Association for the Deaf and Hard of Hearing
- Deaf Youth Camp
- Denver Commission for People with Disabilities
- Denver Deaf Senior Citizens
- Denver Ear Institute
- Denver Office of Disability Rights
- Denver Postal Service – Deaf and Hard of Hearing Employees
- Department of Vocational Rehabilitation
- Disabled American Veterans

- Disability Center for Independent Living
- DOVE: Advocacy Services for the Abused Deaf Women and Children
- Friends and Families of the Veterans
- Front Range Community College Interpreter Program
- Goodwill Industries of Denver – Deaf Services of Program
- Hearing Loss America Association (HLAA) Chapters
- Latino/Hispanic Non-Profit Organizations
- Legal Center for People with Disabilities
- Listen Foundation
- Marion Down Hearing Center
- Mental Health Center of Denver: Deaf and Hard of Hearing Services
- Northern Colorado Center on Deafness and Disabilities
- Pikes Peak Center on Deafness
- Pikes Peak Deaf Senior Citizens
- Pueblo Deaf Gathering
- Rocky Mountain Deaf School
- Rocky Mountain Deaf School Parents and Teachers Association
- Rotary Clubs
- Silent Athletic Club of Denver (SAC)
- Silent Coors
- Veditz Center
- Veterans Chapters
- United Cerebral Palsy Local Chapters
- United Way

The individual assigned as account representative is subject to approval by the State Relay Administrator.

Bidder response:

We have read and will fully meet this requirement.

We are confident that the State will be delighted with the Account Manager who is both highly skilled and passionate about providing the best service possible.

We understand that the State Relay Administrator must approve the selection of the Account Manager. We will work closely with the State Relay Administrator on any staffing concerns.

Additional consideration shall not be given to Offeror's who assign an account representative who resides in state as opposed to being located out of the state.

Bidder response:

We have read and understand.

4.1.8 Outreach, Education and Related Expenses

The State shall provide limited funds for pre-approved outreach efforts. The selected vendor is the primary beneficiary of increased TRS usage resulting from marketing and outreach efforts. As such, the selected vendor shall primarily fund such efforts.

Bidder response:

We have read and will fully meet this requirement.

We understand that the State has set aside limited funds to reimburse pre-approved outreach efforts. As the selected provider, we will be primarily responsible for funding pre-approved marketing and outreach efforts. While increased usage may result from an effective outreach program, our company's motivation is simple: we believe spreading the word about relay services is simply the right thing to do. We are passionate about it.

Our Relay Colorado Outreach and Education programs combine two simple high-level approaches: 1) Promote awareness of the service to the general public and 2) Provide personalized outreach and education within the community. While many relay providers do one or the other extremely well, our strength is combining an effective mass marketing strategy with a more personal outreach model.

> "In our 50-plus years as members of the disability communities in several states, we have met and worked with many service providers from public, business and corporate areas. Many of them enjoyed their work; a few more really liked their work; and a very special few loved their work. Sprint falls into the latter classification, a pre-requisite for ultimate consumer satisfaction in today's competitive and increasingly impersonal world of communications."
>
> Letter from key leader in the Deaf Community

PUBLIC AWARENESS

Creating public awareness of the Relay Colorado program benefits many people. Seniors with hearing loss can learn about assistive devices so they can use the telephone again. Companies will discover that accepting relay calls can be good for business.

PERSONAL TOUCH OUTREACH

We know that personal outreach and education is critical. We routinely engage members of the community who use relay services to conduct outreach and education activities. We don't expect one person to do it all, our staff reflects diverse relay user segments.

Because the resultant contractual services are being provided as Colorado Relay services, the selected vendor must consult with and obtain approval from the State Relay Administrator for the appropriateness of all outreach associated with Colorado Relay.

Bidder response:

We have read and will fully meet this requirement.

Our Account Manager will work closely with the State Relay Administrator and State Relay Advisory Committee to ensure that all outreach and marketing services are pre-approved and deemed appropriate for the community. All of the activities that we plan to conduct for Relay Colorado will be specifically tailored for the local community.

*The selected vendor shall design and prepare an annual Relay Colorado Outreach Plan.*

This outreach plan, and accompanying budget, must be annually submitted to the SRA by March 1 of each year of the contract. The Offeror must provide a high-level summary of the Relay Colorado Outreach Plan in the bid that will indicate the amount of the budget and staffing to be dedicated to the various outreach and educational efforts in the plan.
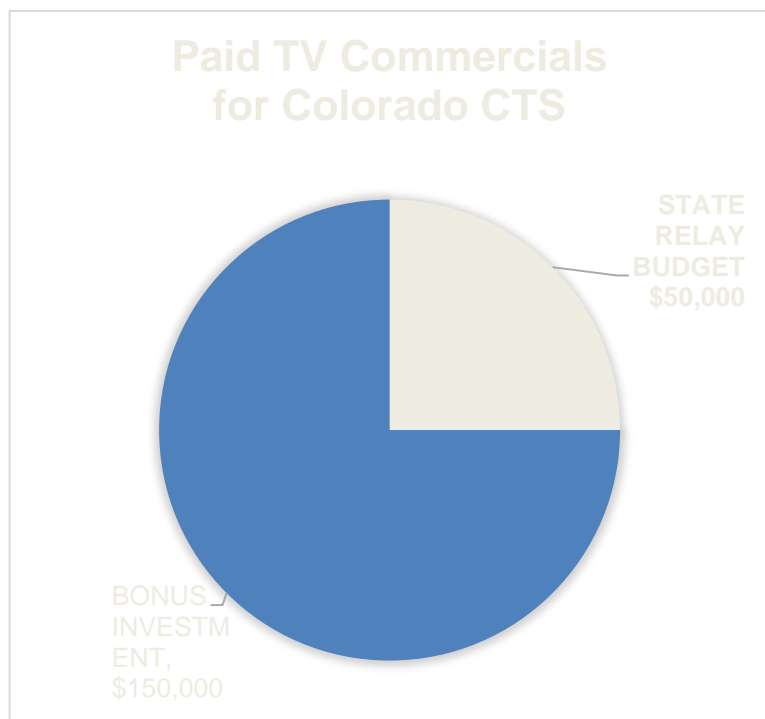
Bidder response:

We have read and will fully meet this requirement.

By March 1 of each year of the contract, we will develop a high-level summary Outreach Plan for Relay Colorado that includes goals, strategies, budget, and staffing efforts. As a part of our commitment to the State and to the community, we will commit to providing an annual Outreach and Marketing budget of $100,000 PLUS BUDGET-STRETCHING BONUS FEATURES, such as:

✓ **Paid TV Commercials:** Paid TV commercials are the fastest way to spread a consistent message. With an annual investment of $50,000 towards CTS commercials, we will provide an additional annual investment of $150,000 – as a BONUS - at no charge. This equals to $450,000 in value during the 3 year contract. This investment in paid television commercials means we can reach more people in our target market, including the Latino/Hispanic market.

Paid TV Commercials for Colorado CTS

STATE RELAY BUDGET $50,000

BONUS / INVESTMENT, $150,000

- ✓ **CTS** Outreach Expert: As a part of our contract with our CTS subcontractors, we will make a local, full-time outreach expert available in the State – at no additional charge. This CTS outreach expert will perform up to 3 outreach events or presentations per month supporting CTS users in the State. This bonus equates to an extra 108 outreach events over the life the contract. In addition, the CTS outreach expert will support approximately 25 CTS installations per month in the region.

- ✓ Special Veteran Captioned Telephone Offer: To recognize the service of our veterans, we offer presentations and captioned telephones to qualified veterans, at no additional cost. We have paid TV commercials which feature veterans. In addition to our Account Manager and Outreach Specialists, we also have a manager who is dedicated to providing support to federal employees, including veterans. She will provide presentations, training, and one-on-one support for veterans and those who support them.

"Client basically severed all ties to his long-distance family members due to his hearing loss. He was unable to communicate with them by phone and rarely had a chance to see them. He relied completely on his wife to communicate and handle his affairs and this was beginning to wear on her and their relationship.

The CTS Consultant [Outreach Specialist] was instrumental in assisting us get this phone for the vet… Husband and wife were ecstatic to receive the phone and we were able to witness his phone call to his sister which was amazing!"

Director of Veteran Affairs in North Carolina

- ✓ Subsidized CTS Devices: We strongly believe that every person with a hearing loss who could benefit from a CTS phone should have access. Money should never be a barrier. Therefore, we offer highly-subsidized CTS devices. With the new FCC rulings, we are happy to announce that if the Colorado Commission for the Deaf and Hard of Hearing (i.e., the Equipment Distribution Program provider) supplies a 3rd party certification for an IP CTS phone, we will provide a IP CTS phone at no cost to the user.

We expect our CTS outreach and marketing to be highly effective. Our paid TV commercials and special offers will direct interested users to call our centralized equipment customer service for equipment inquiries, request for information, and installation support for telephone equipment. This approach will act as a funnel to ensure that the State and Equipment Distribution Program is not overrun with potential customer inquiries. We will also work cooperatively with the Equipment Distribution Program to coordinate outreach events to reduce duplication of efforts and share their material at our outreach events and presentations.

HIGH-LEVEL SUMMARY OF OUTREACH PLAN

Below is a high-level summary of our annual Relay Colorado Outreach Plan. These details of the plan will be refined after consulting with the State Relay Administrator and the State Relay Advisory Committee.

Relay Colorado High Level Summary of Annual Outreach Plan
Funding

Relay Colorado High Level Summary of Annual Outreach Plan	
Our Annual Marketing and Outreach Investment	$100,000 plus Bonus offers (at no additional cost) • $150,000 paid TV commercials for CTS • CTS outreach expert performing 3 outreach events plus approximately 25 installations per month in the region • Veteran CTS program • IP CTS phones to Coloradans certified through the State's Equipment Distribution Program
State investment in outreach	Up to $100,000
Goals	
Outreach and Marketing	To increase general awareness and provide outreach/education about the services offered under the Relay Colorado and CTS programs throughout the State.
Targeted Market Segments	• General Public • Deaf Community • Hard of Hearing Community • Senior Citizens • Speech Disability Community • Disabilities Community • Latino/Hispanic Community/Organizations • Native American Community/Organizations • Businesses • Government Agencies • Professional and Health Care Service Providers (e.g., audiologists, speech-language pathologists, occupational therapists, etc.) • Veterans/Military • Advocacy Organizations • Non-Profit Organizations • School-age children and their parents • Colleges, Community Colleges and Universities • Professional Organizations • Emergency Service Providers
Strategies	
Outreach Tactics	• TV Public Service Announcements (English and/or Latino/Hispanic) • Dedicated Outreach Specialists (Latino/Hispanic, Native American, Senior Citizens, Hard of Hearing, Deaf, Deaf-Blind) • Presentations or training sessions • Exhibit/Booth at conferences or community events • Print Media (brochures, newspaper ads, etc.) • Latino/Hispanic Collaterals (translated) • Videos (including captions or ASL, as appropriate) • Websites (English and Latino/Hispanic) • Online marketing • Sponsorships or third-party advertisings • Social Media (Facebook, Twitter, LinkedIn, Google ADwords or viral marketing campaign) • Outreach Materials (booths, signs, giveaways, etc.)
Measuring Effectiveness	
Outreach Success Measurements	• People and communities reached • One-on-one training sessions • TRS and CTS minutes in targeted locations • Captioned telephone equipment requests

Relay Colorado High Level Summary of Annual Outreach Plan	
	• Information calls to Customer Service • Hits to website and social networking sites • Satisfaction levels (i.e., positive feedback from individuals and organizations)

MONTHLY OUTREACH PLAN WITH TARGETED OUTREACH

Please see the following pages for a monthly breakdown of target user segments. This plan is subject to change based on feedback from the State and State Relay Advisory Committee and approval of the budget.

Jul.
- Health Care Providers (CTS)
- Businesses/Chamber of Commerce (Relay/CTS)
- Non-Profit Organizations (Relay/CTS)
- Deaf/Hard of Hearing Communities (Relay/CTS)

Aug.
- Latino/Hispanic Organiztions (Spanish Relay)
- Speech Disability Providers (STS)
- Senior Citizens Organizations/Hard of Hearing (CTS)
- Emergency Service Providers (Relay/CTS)

Sep.
- Native American Organizations (Relay/CTS)
- Health Care Providers/Care Givers (Relay/CTS)
- School/College/Universities (Relay/CTS)
- Deaf/Hard of Hearing Communities (Relay/CTS)

Oct.
- Paid TV Commercials (CTS)
- Disabilities Organizations (Relay/STS)
- Government Agencies (Relay/CTS)
- Veterans Organizations (CTS)
- Deaf/Hard of Hearing Communities (Relay/CTS)

Nov.
- Paid TV Commercials (CTS)
- Disablity Organizations (Relay/STS/CTS)
- Latino/Hispanic Organiztions (Spanish Relay)
- Speech Disability Providers and Customers (STS)
- Deaf/Hard of Hearing Communities (Relay/CTS)

Dec.
- Paid TV Commercials (CTS)
- Health Care Providers/Care Givers (CTS)
- Latino/Hispanic Organizations (Spanish Relay)
- Non-Profit Organiztions (Relay/CTS)
- Deaf/Hard of Hearing Communities (Relay/CTS)

Jan.
- Paid TV Commercials (Latino CTS)
- School/College/Universities (Relay/CTS)
- Native American Organizations (Relay/CTS)
- Veterans Organizations (CST)
- Deaf/Hard of Hearing Communities (Relay/CTS)

Feb.
- Professional Organizations (Relay/CTS)
- Health Care Privders/Care Givers (CTS)
- Native American Organizations (Relay/CTS)
- Government Agencies (Relay/CTS)

Mar.
- Latino/Hispanic Organiztions (Spanish Relay)
- Speech Disability Providers (STS)
- Senior Citizens Organizations/Hard of Hearing (CTS)
- Emergency Service Providers (Relay/CTS)

Apr.
- Health Care Providers (CTS)
- Businesses/Chamber of Commerce (Relay/CTS)
- Non-Profit Organizations (Relay/CTS)
- Deaf/Hard of Hearing Communities (Relay/CTS)

May
- Disablity Organizations (Relay/STS/CTS)
- Latino/Hispanic Organizations (Spanish Relay)
- Speech Disability Providers and Customers (STS)
- Deaf/Hard of Hearing Communities (Relay/CTS

Jun.
- Native American Organizations (Relay/CTS)
- Veterans Organizations (CST)
- Deaf/Hard of Hearing Communities (Relay/CTS)
- Speech Disability Providers and Customers (STS)

The Relay Colorado Outreach Plan will be funded by the State and the Offeror. The State anticipates providing an annual amount of $100,000 or less for Outreach. Regarding the dollar amount budgeted for the Offeror's portion of the outreach plan, the State's position is that the Offeror is the primary beneficiary of marketing and outreach, and therefore, the State does not want to set a specific dollar maximum on the Offeror's portion of the plan. The State does require, at minimum, that the Offeror match the State's portion for the year's Relay Colorado Outreach Plan, and should the Offeror decide to apportion additional funding for the Offeror's portion of the plan, the State will leave the dollar determination to the judgment of the Offeror.

Bidder response:

We have read and will fully meet this requirement.

As described above, we are passionate in our marketing and outreach efforts and will provide an annual budget for the Colorado Relay program of $100,000 plus a BONUS offer of $150,000 for paid TV commercials (as described in the sections above). We understand that the State will also provide funds of up to $100,000 annually that will be used to support the Relay Colorado Outreach Plan. Combined, these innovative programs could result in an annual outreach budget for Relay Colorado of up to $350,000.

Up to $350,000 Annual
Relay Colorado Outreach Budget
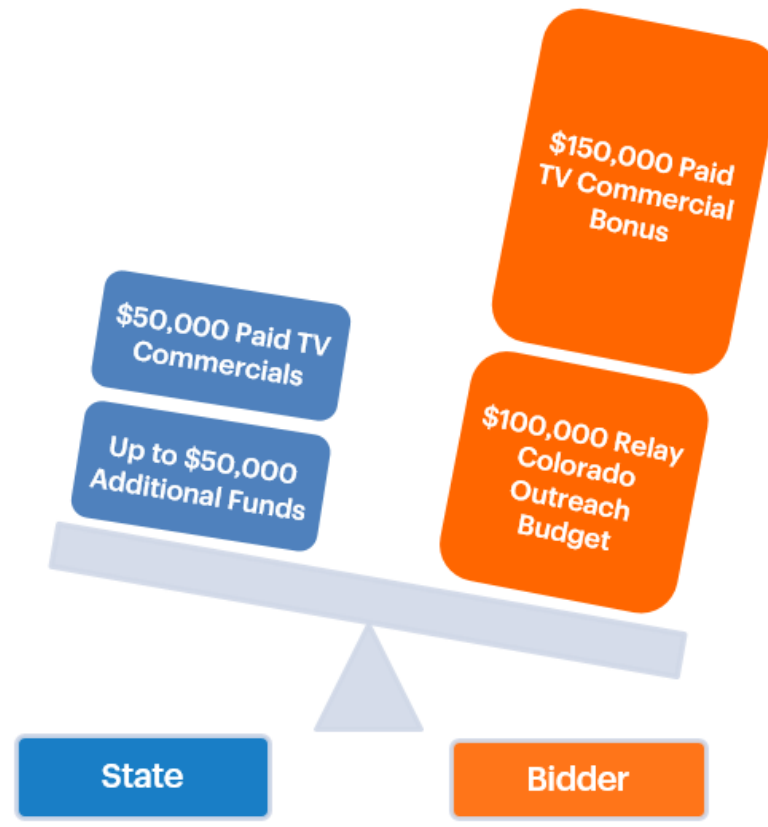
$150,000 Paid TV Commercial Bonus

$50,000 Paid TV Commercials

Up to $50,000 Additional Funds

$100,000 Relay Colorado Outreach Budget

State

Bidder

The State's portion of outreach will be reimbursed to the vendor through the monthly invoicing process based on actual pre-approved reimbursable expenses. The State's portion of outreach is not a fixed monthly charge nor should it be calculated into the price per minute.

Bidder response:

We have read and will fully meet this requirement.

We understand that the State's portion of the pre-approved Marketing and Outreach expenses will be reimbursed as a part of the monthly invoicing process. Costs for the State's outreach portion has not been included in the price per minute, nor will it be a fixed monthly charge. We understand that the amount reimbursed will fluctuate based on the amount of pre-approved State Marketing and Outreach conducted.

As a part of our service, we will work closely with the State Relay Administrator to develop a tracking spreadsheet for all Outreach and Marketing expenses as a tool to review all previously approved items and costs.

Offerors must indicate their response to this section in their annual budget for the Relay Colorado Outreach Plan.

Bidder response:

We have read and will fully meet this requirement.

As noted in the sections above, at least $100,000 will be spent by us annually to support the Relay Colorado Outreach Plan. We will also provide budget-stretching bonus features including the following items:

♦ $150,000 paid TV commercial Bonus
♦ CTS outreach expert
♦ Veteran CTS program
♦ IP CTS phones at no cost to Coloradans that are certified through the State's Equipment Distribution Program – otherwise a subsidized phone will be offered

With these bonus features and the State's contribution of up to $100,000 annually, the Relay Outreach annual budget will be combined to be $350,000 annually.

4.1.8.1 Advertising and Demonstration Equipment. *The Offeror shall have primary responsibility for advertising in Colorado. The State may fund limited advertising that has been pre-approved by the SRA for such things as sponsorships, promotional items, production and airing of Public Announcements and/or other advertising that shall be reimbursed by the State through the following month's billing. The Offeror shall provide demonstration equipment, such as the latest and most up-to-date wireless handsets, tablets, captioned telephone units, text telephone units and/or any other equipment as designated by the SRA. Reimbursement for demonstration equipment shall be obtained from the State through the following month's billing.*

Bidder response:

We have read and will fully meet this requirement.

We understand that, as the relay provider, we will have primary responsibility for advertising in Colorado. We also understand that the State may fund limited advertising which has been pre-approved by the State Relay Administrator on the following month's invoice.

PAID TV COMMERCIALS

Mainstream marketing methods have proven the most effective in reaching people with a hearing loss. Paid TV commercials are directly responsible for most of our captioned telephones distributed in the United States. We have found that the number of requests for information about captioned telephone services in States that run paid television ads are as much as 400% higher than in those states where no ads are run.

To make sure we are reaching more people in Colorado, we are offering a bonus incentive of $150,000 annually with a $50,000 investment by the State. This approach allows us to provide a significant marketing investment of $200,000 ensuring that we reach more Coloradans.
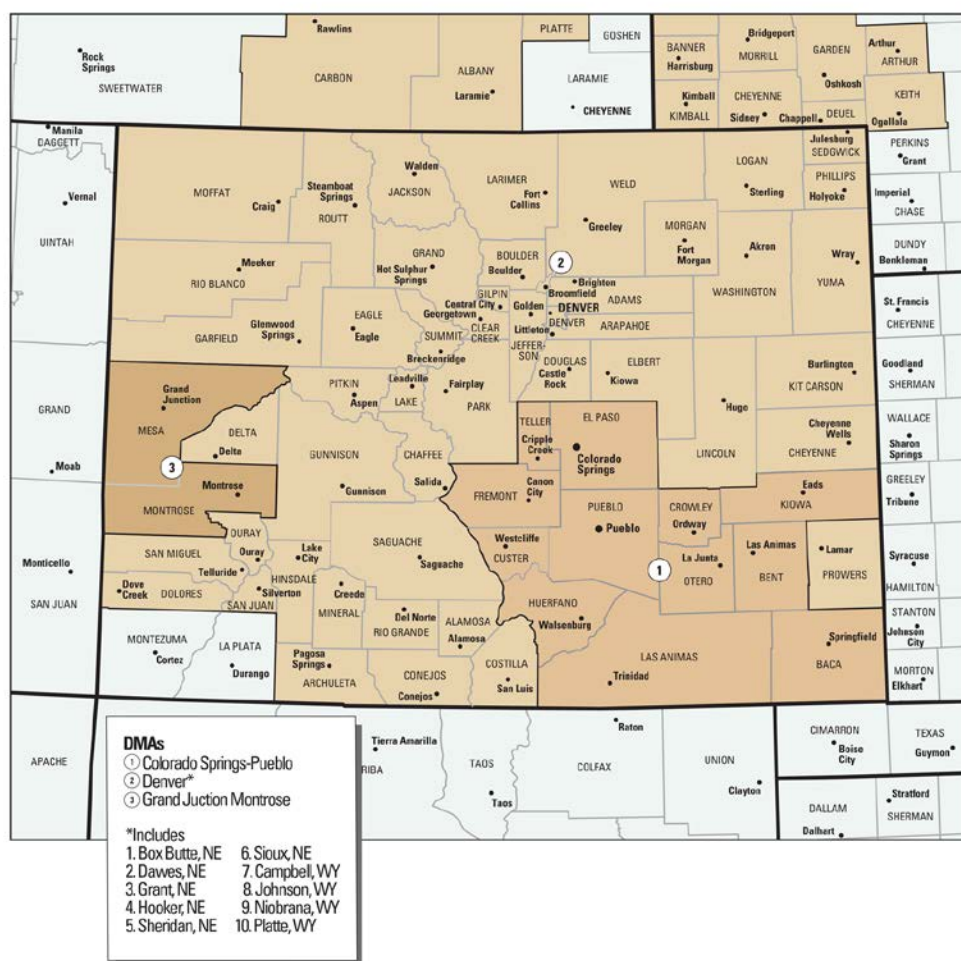
Target Audience
Females age 35 to 64 are the primary caregivers and information-gatherers for senior citizens. This group typically is the one who contacts us to find out more about Captioned Telephone Services. Our media schedule will focus on commercials that reach over 75% of our target audience (Females 35-64, and secondary market of Adults 35+). The average person in our target market will be exposed to our message at least 3 times during the TV campaign. Overall, about 90% of the state's population in this target market will see our PSA at least once during the campaign period

Approach
As a part of our television campaign, we recommend a program to run from October – January of each year in all three major television markets in Colorado including:

- ♦ Colorado Springs
- ♦ Pueblo, Denver, and
- ♦ Grand Junction – Montrose, Colorado areas.

As demonstrated on the map (on the following page), the State of Colorado is virtually blanketed by these three broadcast markets.

Hispanic/Latino Community

As noted in the RFP Section 4.2.2.6, the State has a significant Hispanic/Latino community. In the first of its kind within the State of Colorado, we propose to purchase TV airtime to show our 30-second commercials directed to the Hispanic/Latino population in the state. We have commercials that can be customized to promote Relay Colorado CTS and TTY to reach our target markets. We plan to advertise on Telemundo Denver, which reaches Denver's Latino community and offers Spanish language content related to local news, network programming, weather, updates, video content and much more. Likewise, we will explore adding commercials on Univision and Unimas networks, which are targeted to the same population.

PERSONAL TOUCH OUTREACH

In addition to the mass Relay Colorado marketing efforts, we are passionate about being active and visible throughout the State. We know that not everyone communicates the same or has the same experiences, so we routinely recruit outreach specialists who are just as passionate as we are about educating the community. For example, we may hire someone on a part-time basis who speaks Spanish or has a speech disability to focus on serving those relay users. This concentrated Personal Touch outreach effort provides more interaction between us and the community and allows us to engage the customer, get their feedback, and provide them with the support they need.

"The Company, the advertising and the consultants [Outreach Specialists] are all working together for the common good of the hearing impaired, and believe me, it is working.

From the minute I called regarding the advertisement in the magazine to the moment the consultant left my home, there was never any doubt that these people knew their business and meted it out graciously and with the utmost confidence and knowledge."

Letter of Support from "A most satisfied customer"

The costs for this Personal Touch outreach will be billed as a part of the Relay Colorado outreach budget. Also, as mentioned above, we are offering a BONUS CTS OUTREACH EXPERT, who will perform at least 3 outreach events a month plus support CTS users with equipment installations and training in the State at no charge to the State or to our annual Outreach budget.

The Account Manager and outreach specialists (including CTS Outreach Expert) will perform all types of personal touch outreach activities, including, but are not limited to:

- ♦ Presentations
- ♦ Community events
- ♦ On-site training
- ♦ One-on-one training
- ♦ Hands-on demonstrations
- ♦ Captioned Telephone installations and training
- ♦ Small group sessions
- ♦ Workshops
- ♦ Exhibits at state conferences, trade shows, and conventions
- ♦ Attendance at local or state wide community events
- ♦ Hosted community events

SPONSORSHIPS

Sponsorships can be a wonderful win-win situation for relay outreach. It allows us to invest in our local community and gives those organizations the opportunity to earn money by helping us spread the word about the relay services that are available. We will work closely with organizations in the Colorado community (including non-profits and underserved user groups) to help expand our reach to those users.

Each sponsorship opportunity will be evaluated to find ways to maximize the benefits to both the Relay Colorado program, as well as the organization, and may include items such as:

♦ Advertisement placement on website and other social media channels
♦ Advertisement placement in event brochures, flyers, giveaways, and/or event signage
♦ Acknowledgement of sponsors at the event.
♦ Stage time (presentation, brief announcement, etc.)
♦ Exhibit booth

"In addition to providing excellent service, Sprint has offered support over the years, including our 25th, and our recently, 30th anniversary celebrations.

Because of their support, we were able to improve the quality of our children's, youth and adult programs. Without their support, Camp Mark 7 would not have been as successful with our programs and services to the Deaf community. "

Letter of Support from Lisa Brinks, Foundation Director.

HANDS-ON DEMONSTRATION ON EQUIPMENT

We understand that hands-on demonstration of the service is simple and effective. We often provide demos using the latest and most up-to-date wireless handsets, tablets, captioned telephone units, TTYs, and other devices. In fact, each of our Account Managers now carry a tablet device in order to easily show demonstration videos of the types of services that are available.

If future equipment is requested by the State Relay Administrator, we would be happy to purchase such equipment and seek reimbursement for the demonstration equipment from the State through the following month's billing.

__4.1.8.2 Relay Colorado Website.__ The Offeror shall maintain and update the Relay Colorado website (www.relaycolorado.com) using the Content Management System (CMS) tools that the State has purchased from the website designer and server host. The Offeror shall ensure the website content reflects current relay services and shall consult with the SRA on content. The Offeror will provide additional website functionality at the request of the State and pre-approved by the SRA. Annual website hosting expenses and any additional functionality will be reimbursed by the State through the following month's billing.

Bidder response:

We have read and will fully meet this requirement.

We will maintain and update the existing Relay Colorado website. We understand that the Relay Colorado website uses a Content Management System (CMS) tool which allows both the relay provider and the State to make changes quickly and seamlessly. We understand that important updates can be added or changed in a matter of minutes and the CMS tool allows information to be disseminated quickly, with options to upload new information and documents directly from a personal computer. The CMS tool also makes it possible for the Account Manager and the State Relay Administrator to manage feedback reports.

WEBSITE IMPROVEMENTS

We understand that the Relay Colorado website is owned by the State and will be maintained by the selected relay provider. We have experience supporting and designing websites for relay users and can offer the following enhancements as a part of the annual Outreach Plan, if desired. Our Account Manager will consult regularly with the State Relay Administrator to get approval for all content prior to posting new information.

Relay Colorado Website Enhancements	
Calendar of State Outreach Activities	Our goal is to make it easy for the community to find us. By posting a calendar with activities, we encourage more personal outreach.
Captioned Videos to Illustrate Services	Our goal is to make information available in a variety of formats so that customers find one that can most easily meet their needs. We often provide written web pages that are supported by video explanations which are instantly understandable.
Download Collaterals	Customers will have access to download Relay Colorado and CTS collaterals including step by step instructions.
Links to Social Media Activity	To keep the website information up-to-date, we can provide information on how to link social media posts with the Relay Colorado Website.
Low Vision Support	To ensure users with low vision can view the website, a text only version can be created.
Online Assistance	Customers will have the ability to fill out inquiries online to get the support they need from the Customer Service or Account Manager.
Optimization for wireless devices and tablets	As more relay users are going mobile, we can provide guidance on how to make the Relay Colorado website easier to view using wireless devices or tablets.
Spanish-Language Option	We can serve Latino and Hispanic users more effectively by offering a Spanish-language website option (rather than a single page).

**4.1.8.3 Additional Community Outreach.** Offerors should provide examples of community outreach activities that would be part of its community outreach efforts.

Bidder response:

We have read and will fully meet this requirement.

We will support community outreach events throughout the State with a personal touch. Our goal is to attend existing events, as well as create opportunities to interact with the community. The examples provided below highlight some of our most popular and innovative outreach events. We would be happy to work with the State to tailor our community outreach approach based on the desires of the State and community.

SENIOR LEARNING COURSES

We recently implemented an innovative approach to reaching seniors by partnering with a Senior Learning Program company affiliated with hundreds of Colleges and Universities nationwide, including Colorado State University. As a part of this program, we would offer a one-day class that includes information on captioned telephones. For example, a recent course called "Hear! Hear!" covered a variety of topics related to seniors with hearing loss. The class describes newer resources available so that seniors can lead independent lives and enjoy life more by reducing the stress associated with hearing loss. Topics covered include:

♦ Types of hearing loss,
♦ Features of hearing aids and cochlear implants, telecommunications equipment,
♦ Smartphone applications,
♦ Public accommodations, including television and movie captions.

This new approach has proven highly effective in reaching seniors with a desire to learn more about captioned telephones and other technologies that support independent living. The costs for this type of event is typically around $2,000. However, we would be glad to host this informational workshop at no charge to the State.

SPORTS CAMP

We know that engaging the next generation is critical when it comes to Outreach. As a part of this strategy, we often host and support Sports day camps for deaf and hard of hearing student athletes. During the camps, we spend time discussing the advantages of using the service and the independence it can bring. The camps feature skills training with an emphasis on fundamentals and teamwork. The coaching staff is made up of former college and professional athletes who understand the importance of communication. At the conclusion of these very popular camps, each coach spoke about the keys to winning and how these traits can play an important role in their everyday lives outside of sports.

COLORADO EQUIPMENT DISTRIBUTION PROGRAM

We will work closely with the Colorado Commission for the Deaf and Hard of Hearing (CCDHH) and the State's Equipment Distribution Program provider to make sure we provide consistent information between the two programs. Colorado residents who receive specialized telecommunications equipment through the State's Equipment Distribution Program can receive support from our Outreach team.

We have experienced great success in providing outreach and marketing services that complement the State's Equipment Distribution Program. As part of our outreach activities, we will be available to assist Relay Colorado and CTS users to select the type of equipment that meets their needs before purchasing or receiving their equipment. We will also provide installation support and training on the proper setup and use of their CTS, VCO, HCO, or TTY equipment.

We offer one-on-one support to people who need assistance in filling out the State's application form and understanding the difference between the State-based CTS and IP CTS solutions. This type of personal attention ensures that each person can find the service and/or equipment to satisfy their need for communicating freely on the telephone.

As mentioned above, part of our program includes offering subsidized CTS phones and IP CTS phones to at no additional costs to Coloradans certified through the State's Equipment Distribution Program. We have significant experience working with equipment distribution programs and look forward to working with CCDHH.

COMMUNITY EVENTS

We will host, sponsor, or attend community events for all targeted user segments. The boxes below highlight the types of events that will be targeted. We would be happy to modify based on the State Relay Administrator or State Relay Advisory Committee preferences.

Deaf and Hard of Hearing Events

- Sponsor and/or attend organizational events (e.g., Colorado Association of the Deaf, Hands-n-Voices, Hearing Loss of American Association, etc.)
- Host or attend Deaf Awareness Days or other community events
- Present at national or local tradeshows (e.g., Amazing Age Expo)

Latino/Hispanic Community Events

- Collaborate or sponsor organizational events
- Attend Latino/Hispanic Chamber of Commerce events
- Present at Latino Community Foundation of Colorado
- Attend Colorado Latino Leadership Advocacy Organizational events

Native American Events

- Collaborate with Native American Events in Colorado
- Partipcate in Tribal events such as Pow-Wows
- Collaborate with and present to resource agencies (e.g., Colorado Springs Indian Center, Denver Family Indian Resource Center)
- Attend Native Education Forum at Colorado State University

Speech-Disabled Community Events

- Attend the Disabilities & Assistive Technologies Expo (University of Colorado)
- Attend assistive Technology Program events
- Conduct outreach with local organizations(e.g., Colorado Speech-Language-Hearing Association, The DRM Regional Reources - Colorado)

Deaf-Blind Community Events

- Sponsor and attend Colorado School for the Deaf and the Blind events
- Host training and information to the Programs and Services group of the Colorado School for the Deaf and The Blind
- Contribute on Colorado Services for Children and Youth with Combined Vision and Hearing Loss Projects

Children/Young Adults Events

- Present career fair, presentations, and/or sports camps at local schools including the Rocky Mountain Deaf School (new), Colorado School for the Deaf and Blind, and the Colorado Hearing Impaired Program

The PUC has in place a State Relay Advisory Committee (SRAC) of six-to-eight members from different groups of relay users, including members of the Deaf, hard of hearing and speech disabled communities. The Offeror will arrange and provide interpreting services as well as other services

required for these meetings that are typically held annually. These associated expenses will be reimbursed by the State through the following month's billing.

Bidder response:

We have read and will fully meet this requirement.

Our Account Manager will support the State Relay Advisory Committee meetings by making arrangements for Interpreting services and any other communication accommodations necessary, in conjunction with the State Relay Administrator.

There may be community outreach activities that go beyond those normally performed by the Offeror that, when pre-approved by the SRA, will be reimbursed by the State through the following month's billing.

Bidder response:

We have read and will fully meet this requirement.

The Account Manager will manage all expenses and claims for State reimbursement including any pre-approved unique Outreach activities. While it's impossible to list all types of outreach that can be used, the table below highlights several options which may be used, in addition to the items discussed previously:

Additional Types of Outreach	
Audiologists and Hearing Aid Dealers	We have partnered with a hearing health network which includes several audiologists and hearing aid dealers including several Colorado locations such as Castle Rock and Parker. This program encourages Audiologists to share information about captioned telephones with their consumers and has become a significant resource to identify new users.
Business Campaign	We will educate businesses on both their responsibility and the value that can be gained by accepting relay calls. We can also make it easy for relay users to report "hang ups" by including a reporting mechanism on the website so that we can follow up with businesses who need training.
Customer Service (Training Lines)	We will offer one-on-one personal assistance for all relay users including Customer Service/Training Lines including specialized lines for CTS users, Spanish Relay users, VCO users, and Speech-to-Speech users.
Digital Signage	We can also place digital animation advertising on a Kiosk display at shopping centers or many other public places.
Educational Brochures and Flyers	We will create professional-grade educational brochures and flyers which can be added to the website for direct downloads or distributed via electronic mail to state agencies, audiology/speech associations, and non-profit organizations. Customer Service and Account Manager will also distribute, upon request.
Emergency Service Providers	We routinely work with emergency service providers to educate them on the needs of relay users.
Goodwill Investments	We routinely invest in the communities in which we serve. We may elect to donate to schools, create scholarships, or recognize key members of the community.
Instructional Videos	We currently have instructional videos demonstrating how many services work, including the following: • TTY (English and Spanish available) • CTS (English and Spanish available)

Additional Types of Outreach	
	• VCO • HCO • Speech-to-Speech • Captioning for conference calls
Local Exchange Carrier Billing Inserts and Directory Information	We will provide information to LECs to make sure that accurate information is available via LEC billing inserts and in telephone directories.
Pharmacy Bag Campaign	Mass advertising using pharmacy bags is successful in reaching individuals who may not be aware of relay services, particularly those who may have an illness, disability, or other factor that results in the individual being housebound.
Print Media	Relay Colorado will be featured in print marketing for targeted areas and user segments, including the following (including Latino/Hispanic community): • Local newspapers • State Newspapers • Newspaper advertisements • Program Booklets • Press Releases
Promotional Items	Promotional items can advertise the Relay Colorado brand, the 7-1-1 access number, and websites. Part of the Relay Colorado budget can be dedicated to providing promotional items.
Social Media	A growing number of individuals are using Facebook and other social media channels to stay connected. If desired by the State, the Account Manager will create and monitor a Relay Colorado page.
Town Hall Meetings	Our goal will be to host town hall meetings in each major city in the State throughout the contract including Denver, Colorado Springs, Fort Collins, Grand Junction, and Pueblo.
Transit Advertising	We may work with local transit providers to advertise Relay Colorado in bus kiosks, billboards, interior signs, and/or tailgate signs on buses.

4.1.8.4 Travel reimbursement. The Offeror will pay for travel reimbursement for SRAC members to attend the annual meetings and for the SRA and/or other PUC technical or management staff to attend the National Association of State Relay Administration yearly meeting, possible yearly meetings of SRAs from states served by the same vendor, site visits to TRS call centers, and/or other travel directly related to effective administration of the relay program. The Offeror will be reimbursed by the State through the following month's billing.

Bidder response:

We have read and will fully meet this requirement.

We will pay for SRAC members to attend annual meetings and for the State Relay Administrator (and/or PUC staff) to travel related to the administration of the relay program, including items such as:

- ◆ Annual National Association of State Relay Administration meetings
- ◆ Site visits to TRS and/or CTS call centers
- ◆ Travel related to effective administration of the Relay program

SRA MEETINGS

Many of the State Relay Administrators (SRAs) that we provide services for share our passion for excellence. We annually host a meeting for these SRAs to meet other SRAs to share experiences, consult with each other, offer ideas, and to learn more about industry trends. In addition to our own management team who attend, experts from the industry (including key leaders in the community and representatives from the FCC) often offer workshops or presentations.

TRAVEL REIMBURSEMENT

We understand that once travel on behalf of Relay Colorado has been completed, that the State will reimburse the relay provider through the following month's bill.

4.1.9 Reports

The Offeror shall provide monthly a billing statement, performance reports and complaint reports that will enable the SRA to monitor whether the TRS is meeting each of the FCC and State performance standards.

Bidder response:

We have read and fully meet this requirement.

Monthly billing statements, performance reports, and a customer contact report will be provided to the State Relay Administrator each month. These reports will allow the State Relay Administrator to determine whether the service is meeting all of the State and Federal performance standards.

We have a lot of experience delivering invoices and reports, and will work with the State Relay Administrator to make sure you are delighted. As a part of contract implementation process, our Account Manager and Billing Analyst will meet with the State Relay Administrator to review the reports and answer any questions. After we submit the first invoice and reports, our team will be available again to meet with State Relay Administrator and answer any additional questions and to walk-through the invoice and reports.

The billing statement, performance reports, and complaint reports will be provided by the 15th of each month for the previous month's activity.

FCC REQUIRED FILINGS

In addition to the reports listed below, we are happy to support the State Relay Administrator with all required FCC filings such as the annual complaint logs, annual State cost data, and the State's FCC recertification package. We understand that the required FCC filings can require a lot of time and effort. As the State's relay provider, we make the process as painless as possible by preparing information based on our in-depth understanding of Federal reporting guidelines.

Please see the quote on the right from a new State customer during the recent FCC recertification period.

"One of the first tasks that we asked Sprint for assistance with was the mandatory recertification application for the Federal Communications Commission. We were on a tight schedule and found that the Sprint's team was responsive whenever we had questions. They really went the extra mile to assist us in meeting the FCC's deadlines."

Mickey Breton, TRS Administrator U.S. Virgin Islands

4.1.9.1 Invoice (Billing Statement). This information must be reconcilable data taken from a switch report or other similar audible mechanized source. The Colorado Public Utilities Commission would prefer to receive billing summaries in electronic format via email with the ability to access the full billing statements upon request. Please be advised that these invoice requirements are subject to modification at the request of the SRA:

- ***Total costs for TTY and captioned telephone service.***
- ***Total Monthly Intrastate/IntraLATA Minutes of Service***
- ***Total Monthly Reimbursable Outreach Expenses***

Bidder response:

We have read and fully meet this requirement.

We will provide a monthly invoice (i.e., billing statement) by no later than the 15th working day of the following month of service. Our reports are reconcilable to source data (e.g., platform switches and network reports).

To provide the State Relay Administrator and the Colorado Public Utilities Commission with the maximum flexibility possible, we propose to provide a monthly excel file via email. The monthly billing statement will include a summary invoice page which highlights applicable charges including the total costs for TRS and CTS, the total monthly intrastate/intraLATA minutes of service, and the total monthly reimbursable outreach expenses. This excel report is fully customizable based on the preferences of the State (assuming the underlying data is available in the full billing statements).

In addition, the full billing statements will be provided in PDF format and will be available to the Colorado Public Utilities Commission and/or the State Relay Administrator on a monthly basis.

ACCURATE REPORTING

Our in-house developed CA software records data from the TRS platform switches and from data captured by the system while handling the call. At the end of the call, that data is sent to an application server for insertion into a database. The co-located application servers communicate and insert the call detail record (CDR) information into an Oracle database. That Oracle database feeds another backup database with real time data serviced by the Oracle streams application.

A nightly process running on the database server extracts CDRs and matches the information to the switch records. All CDR records for a particular day are placed into a file that is picked up by a billing process.

Once the IT billing team receives the CDR files, the data is parsed and loaded into segregated database tables for reporting purposes. The XML call detail record format passes the data from one system to another and is used for all State services – TTY, Speech to Speech and CTS. This reporting system allows us to provide the reports requested by the State in this section.

Data from relay centers is maintained in a highly-secured data center. The data is organized, calculated, and securely stored for each billing cycle. Afterwards, all data is protected in an off-site location. However, this data is still retrievable, if needed.

BILLABLE MINUTES

Our monthly reports and invoice to the State will include the total monthly state-billable TRS and CTS Minutes of Service. This will include all intrastate minutes including local, intrastate/intraLATA, intrastate/inter-LATA, intrastate directory assistance, and the intrastate portion of toll-free and pay-per-calls.

Individual calls are recorded in seconds and not rounded at the call level. This is a significant advantage over the competitor who could overbill the State for up to five seconds per call. Instead we convert from the summarized seconds to minutes at the end of the month for each service-type (i.e., toll-free, local, interstate, international, etc...). Our conversion process round the exact summarized seconds and presents the numbers on the invoice as minutes with two decimals (to the nearest 100th of a minute). Only we provide this level of detail.

This process ensures that the State receives fair and accurate billing.

4.1.9.2 Performance Reports. This information should ideally be available electronically, preferably through a web interface that would allow the SRA the ability to run these reports as needed.

- Total number of relayed calls handled by the TRS for any given time period.
- Traditional TRS and captioned telephone statistical information as requested by the State Relay Administrator.
- Call volume reports showing percentages of each of the following types of calls: local, toll free, intrastate intraLATA, intrastate interLATA and interstate, separated by originating area code.
- Average holding time per call and supporting documentation.
- Average answer time and supporting documentation.
- Number of calls originated by TTYs.
- Average daily and monthly blockage rate.
- **Summary report of the above for any given time period.**

Bidder response:

We have read and fully meet this requirement.

To provide the State Relay Administrator and the Colorado Public Utilities Commission with the maximum flexibility possible, we propose to provide a monthly year-to-date excel file that contains performance reports via email. The monthly performance reports will include information providing how we met or exceeded all performance expectations. As the report will contain previous month's data, trends will be easily visible and graphically available. This excel report will be fully customizable based on the preferences of the State (assuming the underlying data is available in the full billing statements).

In addition, the standard performance reports will be provided in PDF format and will be available to the Colorado Public Utilities Commission and/or the State Relay Administrator on a monthly basis and will include the following information:

- Total number of relayed calls handled by TRS, STS, and CTS by day and month
- Call volume reports showing percentages of each of the following types of calls: local, toll free, intrastate intraLATA, intrastate interLATA and interstate, separated by originating area code.
- Average holding time per call and supporting documentation

- Average answer time and supporting documentation.
- Number of calls originated by TTYs.
- Average daily and monthly blockage rate.
- Summary reports of the above for any given time period as requested by the State.

TRAINING AND ANALYSIS

As a part of contract implementation and again after we submit the first invoice and reports, we would be happy to set up a meeting with the State Relay Administrator to walk-through the invoice and reports. On an ongoing basis, we will provide continued professional interpretation, analysis, and explanations. We will work as a partner of the State when reporting needs arise. If the State Relay Administrator requests information, we will work to find the options to meet that request. We have a wide variety of standard PDF reports available including the following.

TRS Reports	
Report Name	**Description**
Invoice	Invoice Summary page shows amount owed; Account Summary page shows TRS, Speech to Speech and CTS information
Traffic Statistics Report_REG	High level - Traditional TRS. Report shows: ASA; Service Level; Minutes and Calls and % Completed to Total by Jurisdiction; Average Length of Call; Call Setup/Wrap-up; Minutes and Calls based on Call Type (Modality); Average calls for Weekend/Weekday; Number of Subscribers (unique originating numbers)
Traffic Statistics Report_STS	High level - Speech to Speech. Report shows: Total minutes and Calls; Breakdown by Jurisdiction.
Average Speed of Answer (ASA)	Average Speed of Answer (ASA) report.
Service Level (SVL)	Service Level (SVL) report.
Blockage	Statistics based on Toll Free Number/Product. Shows daily activity based on Attempts, Completed, Blocked, Abandoned, and Other calls.
Number of Communication Assistants	CAs on duty by Hour of Day for all call centers
Relay Operations ACD Summary	Number of Calls Handled; Average Talk Time; SVL and ASA broken down in 6-hour increments by day with monthly totals. Separate report for each Call Center as well as a report for Speech to Speech and one for Customer Service.
Daily TRS Call Summary	High level. Monthly totals by Jurisdiction for Inbound and Total Calls; Conversation Minutes and Session Minutes.
Intrastate/Interstate	High level. Monthly totals by Jurisdiction for Inbound, Outbound and Completed Calls; Busy Ring No Answer Calls and Minutes; Conversation Minutes and Session Minutes.
Speed of Answer (Modality)	High level. Monthly totals by Modality for Inbound and Outbound Calls; Conversation Minutes and Average Length of Conversation Minutes per call
Daily Call Setup/Wrap-up Averages	Daily breakdown of Average Setup; Average Conversation Minutes; Average Wrap-up Time.

TRS Reports	
Report Name	**Description**
Call By Jurisdiction	Breakdown by Jurisdiction and Call Type (Modality). Calls - Inbound, Outbound, Completed; Minutes - Conversation Minutes and Session Minutes. Three reports - All languages; Spanish; Speech to Speech
Breakdown by Minutes	Number of calls broken down by incremental minute categories
HCO/VCO Breakout	Number of calls; Conversation Minutes; Session Minutes; Average Length of Conversation Minutes per call
Inbound Calls by Call Center	Breakdown by Call Center. Inbound Calls; Session Minutes; Call % handled by each Call Center; Minutes % handled by each Call Center.
Complete Calls and Minutes by Device	Breakdown by Modality of Completed Calls and Minutes; Breakdown by Jurisdiction of Completed Calls and Minutes
Daily Inbound Call Profile By Hour	Inbound Calls by Hour for each day
Inbound Calls	Breakdown by Call Center. Number of Calls Handled and Average Talk Time.
Average Length of Call by Hour	Daily breakdown by Hour of Average Length of Call.
Average Conversation Minutes by Hour	Average conversation minutes by Hour for each day
Completed Daily Activity	High level. Weekday and Weekend breakdown Completed Calls and Inbound Calls
Total Calls Inbound	Time call was in queue; Calls grouped into time increments
Total Calls Answered	Time call was answered; Calls grouped into time increments
Total Calls Abandoned	Time call was abandoned; Calls grouped into time increments

In addition, the following CTS reports are available.

CTS Reports	
Report Name	**Description**
CTS Summary	CTS detail invoice and Intrastate/Interstate report
Daily Traffic Statistics	Daily breakdown of: Calls, ASA with and without Abandoned calls included; Average Queue Seconds; Conversation Minutes and Session Minutes.
Daily-Weekly	Answered Calls; Minutes and Session Minutes by day and week.
Traffic By Jurisdiction	Breakdown by Jurisdiction of: Conversation minutes and Session Minutes; Average Length of call; Answered Call. Three reports - All Languages; English; Spanish.
Daily Average Call Handling Time	Daily breakdown of: Call Setup; Talk Time; Call Wrap-up
Traffic Pattern Statistics	Breakdown by Jurisdiction of: Conversation minutes, Session Minutes and Calls; % of Total for Minutes and Calls; Voice and Data call count; Weekend and Weekday Conversation Minutes; Highest User; ESN count.
Originating City	Breakdown by city of: Unique Users, Answered Calls; Conversation Minutes and Session Minutes.
Blockage-CA Statistics	Daily and monthly blockage rate[21] CTS CA Statistics

We will review all requests for new reports or formatting changes to the standard PDF performance reports on an individual basis. Once the request is received, we will investigate if the information is available and the level of effort required. We will meet with the State Relay Administrator to share our findings and/or alternate solutions. Depending on complexity, we will negotiate delivery time frame and cost (if applicable). Some reports may not be possible (e.g., if the information not available with CTS platform – which would be the same for all providers). As such, we do need to evaluate each request for data on an individual basis. However, our goal is to delight the State with the level of detail and information available.

Please see Appendix 4 for a sample year to date report.

4.1.9.3 Complaint Reports. A log of customer complaints to include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

Bidder response:

We have read and fully meet this requirement. We offer customer contact reports which far exceed the minimum requirements. Our customer contact records include all of the minimum fields required for State and Federal compliance, including the following:

♦ Name of complainant

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[21] We provide a blockage report which includes the daily and monthly blockage rates for CTS. It is important to note that the CTS toll-free numbers are national, rather than state-specific. Like all wireline CTS providers, our compliance with the P.01 daily and monthly blockage performance reports represents the average of all incoming and blocked calls to the national numbers.

- Address of the complainant
- Date and time complaint received
- CA identification number
- Nature of the complaint
- Results of any investigation
- Disposition of the complaint
- Date of such disposition
- Tracking number
- Call Center receiving complaint
- Call Center handling the call
- Communication mode of caller
- Person taking the information
- Calling number
- Called Number
- Follow-up
- Complaint category/ subcategory
- Person being assigned to resolve

We believe in transparent access to customer feedback. Our customer contact tracking system supports ongoing quality assurance efforts for both individual States as well as our performance from a network, CA, and call center level for both TRS and CTS. The resources will ensure that the State can closely monitor all complaints.

- **State Relay Service Report** includes monthly tracking number, date of complaint, CA identification number, type of complaint, nature of complaint, date of resolution and explanation of resolution, status *(available upon request)*

- **State Relay Service Tally Report** includes total commendations and total complaints by classification and category number *(available upon request)*

- **Total Tally Report:** This internal report is used as a part of our quality assurance program. It contains consolidated compliment and complaint information by category number for all products.

- **Global Call Center Report:** This internal report is used as a part of our quality assurance program. It contains compliments and complaints (by category) for each call center.

- **Account Report:** This internal report provides a snapshot of the State's total customer contact files, open and closed files for each month *(available upon request)*

- **Annual FCC Tally Report:** This report is shared with the State for annual FCC reporting.

4.1.9.4 Proprietary Reports. *After receiving authorization from the Colorado Public Utilities Commission, the selected Offeror may request designation of certain written reports as proprietary, consistent with the Colorado Open Records Law. If so designated by the Colorado Public Utilities Commission, these reports will be available only to the Colorado Public Utilities Commission and their staff, who are bound to keep such information from being publicly disclosed. (Information related to pricing or statistical components that reflect what is being paid for, generally, will not be considered proprietary information).*

Bidder response:

We have read and fully meet this requirement.

We understand that the Colorado Open Records is intended to offer the public transparent access to most reports. In many States that we serve, we offer full reporting with information freely available to the public. While we do not suspect that any of our reports will be classified as proprietary, if the State does request information that needs to be kept confidential, we will work cooperatively with the Colorado Public Utilities Commission. If the Commission agrees to the proprietary designation, we understand that the information will made available only to the Commission and staff.

We do understand and agree that information relative to pricing or statistical components that reflect what is being paid will not be considered proprietary information.

4.2 TRADITIONAL TTY REQUIREMENTS

The following provides the requirements for Offerors seeking to provide traditional TRS services.

4.2.1 FCC Operational Standards

4.2.1.1 Communication assistants (CA). TRS Offerors are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

Bidder response:

We have read and fully meet this requirement.

Relay Colorado users deserve consistent high-quality services delivered by competent, courteous, and efficient employees who are able to quickly and accurately relay messages. We deliver a highly-professional TRS and CTS serviced that makes this possible.

TRS COMMUNICATION ASSISTANTS (CAS)

Our goal is to attract and retain the best and the brightest talent. We use a level-based system to recognize and reward quality service based on the core responsibilities of the TRS CA position. This level-based approach recognizes and rewards CAs based on the quality of service provided on the job, based on the following categories:

- ♦ Quality Audits
- ♦ Typing Speed
- ♦ Typing Accuracy
- ♦ Adherence to Scheduled hours

Attendance

Performance Management Overview
We ensure that all of our CAs meet all performance specifications using a complex Quality Assurance Program that has been developed based on **direct input from our customers**. The Quality Assurance program encompasses all stages of employee development including hiring, training, ongoing performance evaluations, and individual development planning.

Performance Management with us is an ongoing series of open and honest conversations that drive high performance. Frequent dialogue between employees and managers is expected. Our Performance-Management expectations focus on four key areas:

- ♦ Ensuring clear expectations have been set
- ♦ Defining priorities tying them to business goals
- ♦ Giving coaching and feedback about work performance
- ♦ **Providing attention to skill development and career aspirations**

We provide an array of resources and tools to help employees develop

along with frequent informal and formal coaching and feedback about work performance that helps employees do their jobs better.

Employees and managers use a simple online performance plan to monitor and track their performance and development against mutually agreed upon objectives. Managers meet regularly with employees to ensure understanding of the value they bring to the team, what they are doing well, and what they could do better. These conversations are then summarized by both employee and manager into a formal year-end review within the performance plan.

Our expectation is for **100% participation** for all CAs processing Relay Colorado calls in the quality assurance program.

Our training has been developed using effective Adult Learning theories. After initial or ongoing training is delivered, CAs are tested on their understanding of the information. All CA trainees must successfully pass five written tests prior to graduating training and must complete all ongoing training through a "Check for Understanding" program. The mandatory ongoing monthly refresher training and testing has been designed to reinforce correct processes and encourage CAs to increase their knowledge and proficiency. A sample excerpt of the "Check for Understanding" proficiency test is provided below.

Sample Check for Understanding Written Test

Remote Monitoring of Live Calls

CA's performance is remotely monitored and evaluated through individualized surveys at least twice a month. Supervisors use a CA Performance Survey while observing CAs process actual relay calls. The Performance Survey is a comprehensive assessment tool designed to evaluate CA performance on over 40 aspects of TRS call processing. The Performance Survey addresses, among many aspects of quality relay performance, appropriate grammar, spelling, voice clarity and articulation, typing speed and accuracy, TTY-ASL interpretation, etiquette, language and cultural understanding.

Correct Number Dialed[+]	Service Explanation[*]	Flow / Complete Message[+]
1. Y N Was the correct number dialed within 5 seconds or appropriate message and seconds used when dialing number?	15. Y N Was explanation used appropriate to call type? 16. Y N Was explanation adjusted after standard explanation?	30. Y N Was the complete message read? 31. Y N Was a conversational flow maintained?
Billing procedures[*]		**Conversational English Translation[+]**
2. Y N Were billing instructions followed? 3. Y N Was branding information provided?	**Progress of Call / Customer informed[*]** 17. Y N Were the call steps relayed at time of occurrence?	32. Y N Was ASL translated to grammatically correct English? 33. Y N Was the message read verbatim if necessary?
Greeting / Announcement[*]	18. Y N Were call changes relayed at time of occurrence? 19. Y N Were all appropriate macros used throughout the call?	**Spirit / Expression – Clarity / Enunciation**
4. Y N Was the voice greeting typed verbatim? 5. Y N Was a prompt state-specific announcement/greeting used and was the agent's ID provided? 6. Y N Was familiarity of service determined?		34. Y N Was natural voice inflection used reading TTY message? 35. Y N Was the voice clear and with accurate pronunciation?
	Technical / Information / Referral 20. Y N Were complex system messages explained effectively?	
Call Processing Procedures[+]	21. Y N Were complex directions followed?	**Caller Control[+]**
7. Y N Was the call processed according to procedures? 8. Y N Were call procedures changed as directed by customer?	22. Y N Were appropriate referral / contact number offered?	36. Y N Was transparency maintained? 37. Y N Was an appropriate attempt made to redirect?
9. Y N Was gender identification used when appropriate? 10. Y N Was the call closed according to procedures?	**Accuracy / Spelling[*]** 23. Y N Was the message typed verbatim? 24. Y N Were words spelled correctly?	**Define Agent Role / Pacing** 38. Y N Were appropriate phrases used to redirect? 39. Y N Were appropriate phrases used to educate caller?
Person Request / Identification[+]	25. Y N Were standard abbreviations used? 26. Y N Was the recorded message typed verbatim?	40. Y N Were appropriate phrases used to pace the customer?
11. Y N Was the customer prompted for a live person when reaching a recording. 12. Y N Were TTY requests confirmed in parenthesis? 13. Y N Was the Caller's name used in the announcement? 14. Y N Was the Called-to name used in the announcement?	**Descriptive / Spirit / Background[*]** 27. Y N Were impacting and/or enhancing sounds and background info typed? 28. Y N Were descriptive words used? 29. Y N Was the typing style adapted to convey emotion (TTY)?	41. Y N Were the caller's last thoughts conveyed as necessary? **Operator Mode Composure/Etiquette** 42. Y N Was patience and flexibility demonstrated? 43. Y N Was politeness, professionalism and friendly natural approach demonstrated? 44. Y N Was responsiveness and focus maintained?

CA Performance Survey used for Remote Monitoring

The CA Performance Survey provides a detailed perspective on individual performance, and is used as a basis for feedback to the employee; to identify strengths and weaknesses, and for employment and compensation decisions. CAs are required to meet expectations in all areas of the Performance Survey. If a CA does not meet a specific expectation, additional training and an opportunity for improvement are offered. In order to meet expectations on the Performance Survey, CAs must score at least 90%.

Specialty CAs (e.g., Speech-to-Speech and foreign language CAs) are also monitored twice monthly with at least one survey targeted at observing them in their specialty skill.

Performing well on the CA Performance Surveys is one of the key components of the CA level program and being eligible to process Relay Colorado Service calls.

Monthly Internal Test Call Program

The Internal Test Call Program is conducted by center representatives across the nation. Specific scripts and survey forms are used to focus on the topic being tested. Trainers compile the information and supporting data. The information is sent to our Operations team where it is analyzed and feedback is given to the CA. The trainers will decide if additional action is required such as re-training. We are happy to accept input from the State Relay Administrator and State Relay Advisory Committee on monthly test call topics. The figure below highlights recent topics.

Month	Internal Test Call Topics
Jul 2013	Operator mode: Voice tone/ Professional/Friendly
Aug 2013	Voice to VCO call set-up procedure
Sep 2013	Transfer to CTS
Oct 2013	Correct Number Dialed – out dial time
Nov 2013	Follows Customer Note instructions – call set up
Dec 2013	Greeting and Close
Jan 2014	Correct Number Dialed – out dial time
Feb 2014	Follows Customer Note instructions – call set up
Mar 2014	Relaying Verbatim
Apr 2014	Conversational Voicing
May 2014	CTS Transfers
Jun 2014	ASL to Conversational English Translation

Test Call Topics

Quarterly Independent Testing

We also currently engage a neutral third-party company each quarter to evaluate each TRS call center's performance through a scripted test call program. The auditors dial into relay centers using TTY devices or ASCII simulators using pre-approved scripts. Our CAs do not have inside knowledge of either the script or when test calls will be placed. CAs are evaluated on several areas of performance, including the following:

- ♦ Typing Speed
- ♦ Announcing the Call
- ♦ Providing CA ID number
- ♦ Typing Verbatim
- ♦ Voice Inflection
- ♦ Closing Call Appropriately
- ♦ Voicing Verbatim
- ♦ Spelling

Elimination of Typos

Industry Audit

For almost 10 years, we have also commissioned and/or participated in third-party, industry audits to compare services to those offered by other relay providers. During the past four years, this study has been made available to all relay providers and states. The following are highlights of our performance as a top provider in the industry.

TYPING SPEED
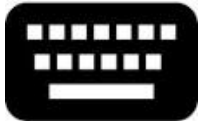
Sprint's TRS CAs exceed minimum typing speeds with average speeds that far surpass industry standards. Sprint CAs were ranked first or tied each testing period.[1]

TYPING   **ACCURACY**

Sprint CAs   type verbatim. Sprint's TRS CAs were ranked first or were tied for
first place   in typing accuracy during each testing period.[22]

SPOKEN ACCURACY

Sprint CAs read the typed message verbatim. Sprint's TRS CAs were ranked first or tied for first place in spoken accuracy during each testing period.[1]

OVERALL SPEED

Sprint processes calls quickly so callers get helped faster and the State gets billed fewer minutes. Sprint was recognized as a top provider for processing calls more quickly in 3 out of 4 testing periods for TRS.[1]

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[22] In some areas, multiple providers are recognized as top providers when factoring in the margin of error.

CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Bidder response:

We have read and fully meet this requirement.

All of our TRS CAs have been screened and tested to ensure that they meet all minimum qualifications including skills in typing, grammar, spelling, and clear, articulate voice communications. CAs also must demonstrate the ability to interpret typewritten ASL and familiarity with hearing and speech disability cultures, language, and etiquette.

TYPING

Relay Colorado users can be assured that each TRS CA types at least 60 wpm. We meet that objective. Please see the figure below for current typing programs and the current and previous performance results.

Internal Typing Test
• Quarterly
• Auditory (listen and type) Test
• 60 wpm with 95% accuracy
• Live environment inbound call

79.4 WPM

Secret Shopper Calls
• Quarterly
• Live, scripted calls
• 60 wpm with 95% accurately
• Independent, third party

76.1 WPM

Industry Audit
• Annual
• Live, scripted test calls
• Top provider for TRS average typing speed and accuracy for 4 consecutive years [1]

TOP PROVIDER

[1] In some areas, multiple providers are recognized as top providers when factoring in the margin of error.

OUR CALCULATION FOR SCORING TYPING TESTS

The typing test is administered orally using a wide range of prepared scripts. The test administrator calculates the typing speed by:

1. Identifying the number of characters typed
2. Dividing by the time (in seconds) between the time the agent begins and stops typing
3. Multiplying by 60 (the seconds in 1 minute) to get characters per minute

4. Dividing by 5 (the number of keystrokes considered to be the standard in 1 word) to get words per minute

TYPING SPEED FORMULA

_____ characters / _____ seconds = _____ x 60 seconds = _____ / 5 = _____ WPM

Example

    1,216 characters typed
÷ 173 seconds between typing start and stop
    7.02
×   60 seconds in 1 minute
   421 characters per minute
÷   5 keystrokes
   84 WPM

The test administrator calculates agent accuracy percentage by:
1. Identifying the number of errors typed
2. Dividing the characters typed by 5 (the number of keystrokes considered to be the standard in 1 word) to get the total words typed
3. Dividing the number of errors by the total number of words typed to get the error rate
4. Subtracting the error rate from 1 to calculate the accuracy rate
5. Multiplying the accuracy rate by 100 to get the accuracy percentage

TYPING ACCURACY FORMULA

_____ characters / 5 = _____ words typed   _____ errors / _____ words typed = _____ error rate

1 − _____ accuracy rate = _____ x 100 = _____ % **ACCURACY**

Example

1,216 characters typed   10 errors   1.00
÷   5 keystrokes   ÷ 243 words typed   −   .04
   243 words typed   .04 error rate   .96
                                      ×   100

or English comprehension, grammar, and
n, and speech clarity through in-person and
ry communication skills are not considered for

proof of grammar proficiency, we go a step further
evel college English comprehension and grammar

We know that many grammatical errors may occur within written ASL that need to be corrected when translated to conversational English. In these situations, it is important the CA has proficient grammar proficiency.

Performance Based Testing
Our CAs are evaluated and tested throughout training and employment on their English Grammar skills through monthly CA Performance Surveys.

SPELLING

New Hire Written Test(s)
All prospective CAs must pass a written spelling test with at least 90% accuracy prior to graduating training. No technical aids assist the CA during this test.

CA Performance Surveys
Spelling is one of the categories that CAs are evaluated on twice each month as a part of the CA Performance Survey. During these evaluations, CAs are able to take advantage of our sophisticated CA software that includes error correction and single word edit feature.

Secret Shopper Test Calls
As a part of the quarterly third-party test calls conducted, CAs are evaluated on their ability to spell quickly and accurately. In recent testing, CAs spelled correctly 98.0% percent of the time.

INTERPRETATION OF TYPEWRITTEN AMERICAN SIGN LANGUAGE (ASL)

We are committed to providing quality services to all customers including those who type in ASL. Our TRS CAs and call center staff are trained to serve as ASL translators/interpreters to process relay calls. Our **98.0%** approach of training all CAs to perform ASL-to-conversational English translation ensures that ASL translation/interpretation is available to callers at all times.
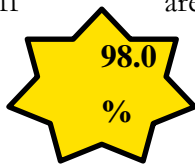
Training and Written Test
CAs are provided initial and ongoing training on accurately interpreting written ASL, also referred to as ASL Gloss, for relay users whose primary language is ASL. CAs are tested on ASL Gloss interpretation/translation skills prior to completing training. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases.

After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA review the workbook and the CA's ability to translate ASL to conversational English together. The CA keeps this manual for future reference. Throughout employment, CAs continue to expand their skills and improve their knowledge of ASL Gloss and Deaf culture.

CA Performance Surveys
Translation of ASL Gloss is one of the categories that CAs are evaluated on twice each month as a part of the CA Performance Survey. On a monthly basis, each CA is observed remotely processing live calls. This skill is continually monitored for quality assurance and any areas of deficiency are immediately addressed.

FAMILIARITY WITH THE HEARING AND SPEECH DISABILITY COMMUNITY'S CULTURE, LANGUAGE, AND ETIQUETTE

Hiring preference for CAs, managerial and administrative support positions is given to applicants with experience serving individuals who are deaf, hard of hearing, or with a speech disability. Hiring preference is also given to individuals with knowledge of these communities and knowledge of ASL. All TRS center employees, including management, participate in User Culture training during the

initial training period. Representatives from the local organizations or internal staff with experience deliver this portion of training. We use videos, role-play, group activities, and discussion groups to educate employees on the needs of our customers.

CLEAR AND ARTICULATE VOICE COMMUNICATIONS

We understand the importance of accurately portraying a written communication verbally with appropriate spirit and intention in order to achieve functional equivalence. We stress the basic components of voice quality including articulation, inflection and pacing. During all evaluations (initial hiring, training, monitoring) CAs are evaluated on voice communication skills including having a neutral accent.

Screening Interviews   Ongoing Monitorin and Testing

Training and Evaluation of Professional Phone Image

Our Relay Operators are trained to always use clear articulation and enunciation. Equally important, Relay Operators are taught to be expressive and vary their tone of voice and rate of speaking by creating a verbal picture with their voice. For many customers it may be their first experience using a relay service. Hearing customers using relay rely on the tone of voice and inflection to better understand the message. How information is relayed may have a greater impression than what is said.

CUSTOMER COMPLIMENTS

"This CA deserves to be recognized for great voice inflection and providing excellent assistance." (Feb 2014)

"Excellent CA. Great voice tone in making my calls." (Apr 2014)

"Caller reported that the CA was very good with [voicing] transitions. I barely knew relay was on the line." (Jun 2014)

CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Offerors must give oral-to-type tests of CA speed.

Bidder response:

We have read and fully meet this requirement.

As described above, all of our CAs have been screened and tested to ensure that they meet all minimum qualifications including the ability to listen and type 60 wpm with error rate of less than 5%. During initial and ongoing internal testing (every 3 months), each CA must pass an oral-to-type test. During this test, macros and function keys are counted by the number of key strokes required

to invoke rather than the number of characters transmitted. This ensures that each CA actually TYPES 60 wpm.

"In our experience, Sprint's typing speeds and efficiency lead the industry" said Jeff Rudolph, President/CEO.

CAs answering and placing a TTY-based TRS call must stay with the call for a minimum of ten minutes. CAs answering and placing a STS call must stay with the call for a minimum of fifteen minutes.

Bidder response:

We have read and fully meet this requirement.

We meet or exceed all FCC minimum requirements regarding changing Relay Operators (i.e.., Communication Assistant or CA) during a call.   We ensure that each CA remains on the call for at least 10 minutes (or 20 minutes for Speech-to-Speech calls). We understand that changing CAs can disrupt a relay call. As a matter of practice, calls are not taken-over, unless it is absolutely necessary to do so.

With our average call length for a session-minute measurement at approximately 3 minutes, the vast majority of calls last less than the minimum standard. A study in one of our TRS call centers demonstrated that less than 1% of calls results with in-call replacement of CAs.

In compliance with the recent FCC Order modifying the length of time that a STS CA must remain on a call prior to transferring to another CA, our STS CAs stay on the call 20 minutes. The timeframe begins when the CA reaches the called party and ends when one party terminates the call or when 20 minutes have elapsed.

The situations in which a CA would transition during a call prior to the FCC minimum standard include:

♦ The customer requests a CA of the opposite gender
♦ End user verbal abuse of a CA or obscenity towards the CA
♦ Call requires a specialist (STS, Spanish, etc…)
♦ CA Illness
♦ At the request of the customer for any reason
♦ CA becomes aware of a conflict of interest such as the CA identifying callers as friends, family, or customer

In addition, there are situations which may require a CA to transition the call to a different CA which is only approved after the CA has remained on the call longer than the FCC minimum standard. These include:

♦ CA Shift change
♦ CA restroom break
♦ CA fatigue normally as a result of 60 minutes or more processing an average call

If transition of CAs is unavoidable, the change occurs with minimal disruption to either relay participant. We attempt to honor any requests for a specific gender or call handling preferences during call transitions.

TRS AND STS PROCEDURES

When a call takeover is unavoidable, the CA signals for a call takeover and makes themselves unavailable for incoming calls. A second CA connects their headset and observes the flow of the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile (generally 2 to 5 minutes).

At that time, the two CAs will mutually agree to the call takeover nonverbally. For TTY and Voice calls, the CA will wait until the TTY user begins typing for the second CA to log in and begin processing the call. The second CA will notify the voice user, type the voice party's message, and send a macro to inform the text user. For all call types, the CA is trained to transition with the **least impact** to the relay users' conversation.

TRS Offerors must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

Bidder response:

We have read and fully meet this requirement.

We make every effort to satisfy a TRS user's request for a preferred CA gender when the call is initiated or during transfers, if necessary. We also make it easy for a relay user to request a preference of CA gender; preferences can be made through registration using the Customer Profile Database, E-Turbo, or at any time by asking the CA.

TRS shall transmit conversations between TTY and voice callers in real time.

Bidder response:

We have read and fully meet this requirement.

All conversations are relayed in real time between the TTY user and voice caller.

These standards also apply to Captioned Telephone CAs, whenever applicable. However, Captioned Telephone waivers, per the FCC's declaratory ruling of July 25, 2003 (CC Docket No.98-67), regarding captioned telephone service, are described elsewhere in this RFP.

Bidder response:

We have read and fully meet this requirement.

We meet all of the minimum standard requirements mandated by the FCC. Please see Appendix 2 for additional information.

Although all minimum standards must be met, the FCC has granted Captioned Telephone waivers which acknowledge that some standards do not apply. Requirements that received waivers are listed below:

- STS Requirements
- HCO Requirements
- Minimum requirements for Relay Operators

- ♦ Interpretation of typewritten ASL
- ♦ Oral-to-type tests (replace with oral-to-text tests)
- ♦ Not refusing single or sequential calls
- ♦ Gender preferences
- ♦ Interrupt Functionality
- ♦ Call Release
- ♦ **ASCII and Baudot**

4.2.1.2 Confidentiality and conversation content. Except as authorized by section 705 of the Communications Act, 47 U.S.C. § 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with State or local law.

Bidder response:

We have read and fully meet this requirement.

We believe that measures to ensure confidentiality are crucial to the success of relay operations and have implemented procedural and environmental measures to safeguard customer and call information.

STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Bidder response:

We have read and fully meet this requirement.

Our STS Relay Operators may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call, unless the STS user requests to add information to his or her Customer Profile to aid processing of future calls.

CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, State or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call.

Bidder response:

We have read and fully meet this requirement.

Our Relay Operators convey the full content, context and intent of the TRS communication that they relay. The Relay Operators type to the TTY user or verbalize to the non-TTY user exactly what is said, in real-time, and verbatim when the call is first answered and at all times during the conversation, unless either user specifically requests summarization or interpretation of an ASL call.

Relay Operators are evaluated monthly on their abilities to accurately translate typed text of relay users who have limited written English language skills. As part of on-going monthly evaluations, Relay Operators are evaluated on their ability to translate ASL 'Gloss.'

An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object.

Bidder response:

We have read and fully meet this requirement.

STS Relay Operators are allowed to interact with the user when it is apparent the user is new to the product and is in need of guidance. STS Relay Operators may correct a telephone number that the user receives from one caller and is repeated to the Relay Operator for the purpose of placing another call. STS Relay Operators however do understand they are not to take away the users' independence or direct the call in any way. The STS Relay Operator will facilitate when necessary only for the purpose of assisting in the processing of the call. However, STS Relay Operators will not facilitate if there is a risk of removing the users' independence in placing a call.

4.2.1.3 Types of calls. Consistent with the obligations of common carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing TRS.

Bidder response:

We have read and fully meet this requirement.

Restrictions are never placed on the number of calls, frequency of calls, multiple sequential calls or the duration of calls placed through TRS, regardless of peak calling periods. CAs make immediate, unlimited, subsequent outgoing calls as requested by the caller, without exception.

When the relay user provides the number to dial, CAs are expected to dial the requested number within **5 seconds**. If the customer provides special instructions in the Customer Profile or as a one-time request, it may take CAs a little longer (up to 10 seconds) to review and dial the requested number. With us, Relay Colorado users will remain in full control of their calls and may make as many outgoing calls as they desire. We supply adequate staff to accommodate relay users' calling needs.

TRS shall be capable of handling any type of call normally provided by common carriers and the burden of proving the infeasibility of handling any type of call will be placed on the carriers.

Bidder response:

We have read and fully meet this requirement.

We process all calls normally provided by common carriers and allowable by the FCC rules and orders.   Certain calls, such as pay phones, are a challenge for TRS providers.   Coin-operated public payphones present a challenge to relay providers who cannot monitor coins being placed in the payphone. When this challenge arose, we worked with the FCC, to determine an alternate solution. As a result, the FCC eliminated the requirement of "coin sent paid" for payphones through TRS and adopted the 'Alternative Plan' which allows TRS users to place local TRS calls from payphones without incurring a charge. Toll calls can be billed Collect, Third-Party, Person-to-Person, to LEC calling cards, non-proprietary IXC calling cards (if the Carrier is a participant of the COC program) and debit (pre-paid) cards.
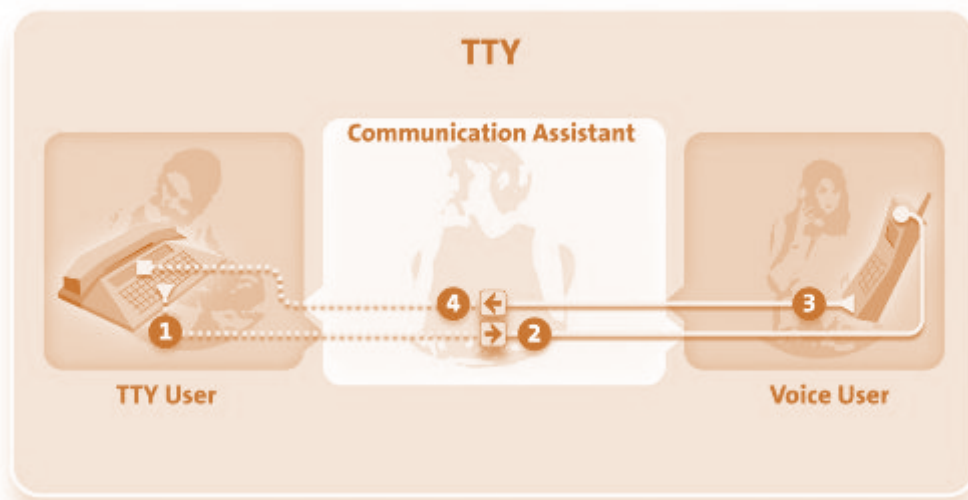
The TRS Offeror is required to provide the following types of TRS calls: Text-to-voice and voice-to-text, captioned telephone (Captioned Telephone), VCO, VCO with Privacy, 2LVCO, VCO/TTY, VCO/HCO, HCO, HCO/TTY, HCO/HCO, HCO/VCO, Non-English TRS, STS, and three-way calling.

Bidder response:

We provide the most comprehensive list of call types (i.e., communication modes) available in the industry, including the following call types.

TEXT-TO-VOICE AND VOICE-TO-TEXT

CAs will process calls from text callers (e.g., TTY users, ASCII) and complete outbound calls to standard (voice) telephone callers. The CA acts as a communications link to relay calls between the text-equipped caller and the voice called party. The figure below highlights the basic process of a TTY to Voice call.

TTY-to- Voice

1. TTY user types his conversation to the CA.

2. The CA then voices TTY user's typed message to Voice Caller.

3. After TTY User types "GA", it is the Voice Caller's turn to talk to CA.

4. The CA relays Voice Caller's spoken words by typing them back to TTY User.

Calls are also accepted standard telephone users, and complete outbound calls to text callers. The CA acts as a communications link to relay calls between the voice capable caller and the text user.

CAPTIONED TELEPHONE

We will also process calls to and from Captioned Telephone users. Please see Section 4.3 for details on the Captioned Telephone Service. The graphic below illustrates a typical CTS to voice call.

Captioned Telephone
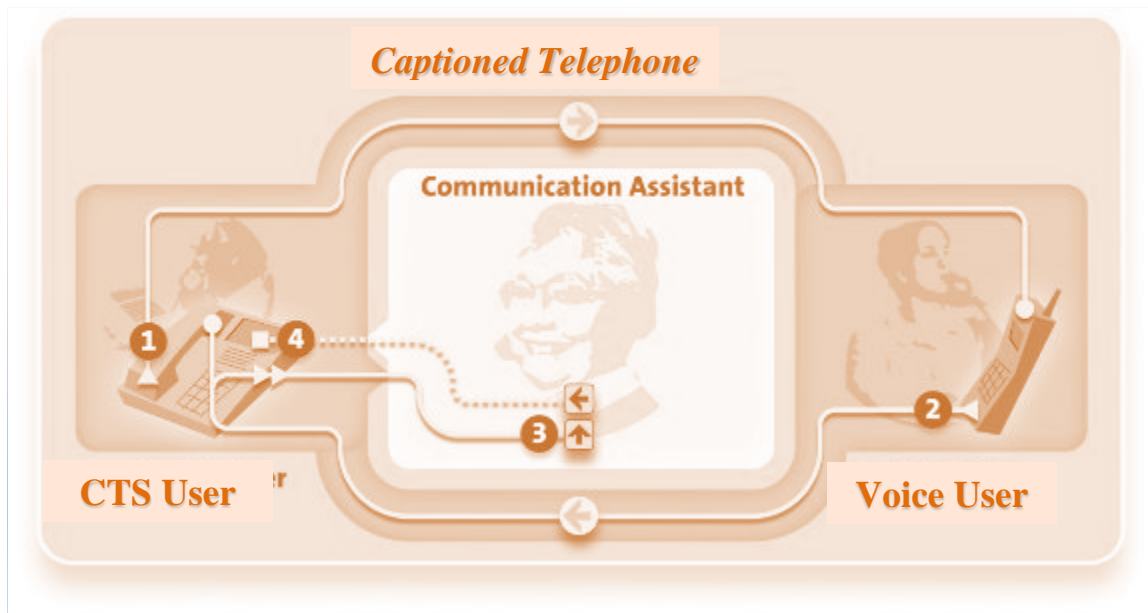
VOICE CARRY-OVER (VCO)

We offer Voice Carry-Over (VCO) and make it easy for users to access the service by registering a Customer Profile, requesting to use this service on a call-by-call basis, or by dialing the dedicated toll-free number.   VCO allows a user to speak directly to the person they are calling and receive responses by text through the CA as demonstrated in the graphic and basic relay steps shown below.

VCO
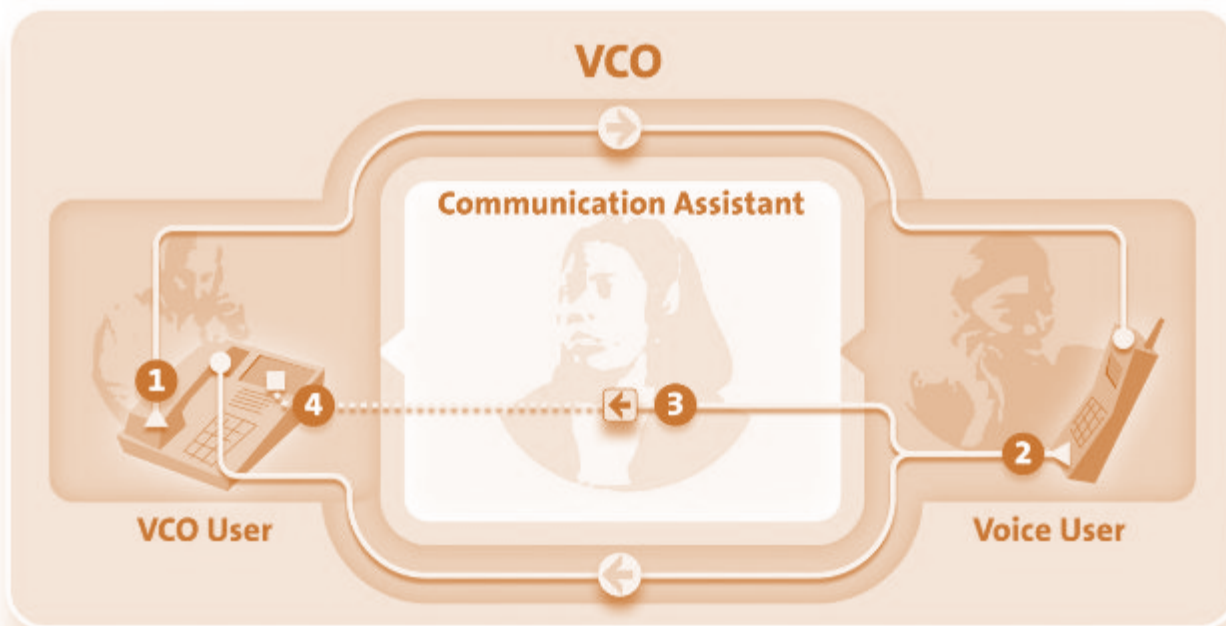
The steps for a standard VCO to Voice call are detailed below.

- ♦ VCO user talks to voice caller directly.
- ♦ Voice caller talks to CA.
- ♦ CA types voice caller's message.
- ♦ VCO user reads message on the TTY screen.

In addition to basic VCO service, we provide the following VCO features and enhancements:

- ♦ **Connect Options** – We provide access through direct connect mode or acoustic mode. VCO users are able to set up calls using their voice as opposed to having to set up calls via TTY transmission.

- ♦ **VCO Skill-Based Routing** – We provides VCO Skill-Based Routing via the designated toll-free number. CAs who demonstrate a high proficiency in handling VCO calls receive specialized VCO training and are designated targets for VCO calls. VCO dedicated toll-free access numbers also assists VCO users that may be calling from PBX lines and/or dual household members.

- ♦ **Voice-Carry-Over with Privacy** – VCO users have the ability to request 'VCO with Privacy'. This popular feature provides the VCO caller with added privacy on their call because the CA does not hear the VCO user's voiced messages and the VCO user does not need to say "GA." The voice user is heard by the CA and gives the "GA" each time to alert the CA that he/she is finished speaking.

- ♦ **VCO Branding** – VCO users may choose to have their telephone numbers permanently branded as VCO calls. When a telephone number is branded as VCO, each call into 711 or Customer Service receives a unique greeting which allows the user to voice his/her call set-up instructions to the CA directly.

VCO User Experience
- ♦ VCO user dials the dedicated VCO access number, registers a VCO preference in the Customer Profile, or simply requests VCO during direct communication with a CA.
- ♦ The CA requests the number the user would like to dial. This number can be typed and/or spoken by the VCO user. In addition, the VCO user may elect to provide additional call handling preferences, which the CA will follow.
- ♦ After the CA connects to the called party, CAs are trained to use a brief announcement to explain VCO to the end user. For example:

"HELLO. A PERSON IS CALLING YOU THROUGH RELAY COLORADO SERVICE. THIS IS CA XXXX. HAVE YOU RECEIVED A VOICE CARRY OVER CALL BEFORE?"

If the hearing party has received a VCO call before, the call begins. If not, the CA is trained to provide a brief VCO explanation if the hearing party has not received a VCO call before. For example:

"THE PERSON WHO IS CALLING WILL BE SPEAKING DIRECTLY TO YOU. WHEN HE/SHE SAYS THE PHRASE, "GO AHEAD OR GA," THAT INDICATES THEY ARE DONE SPEAKING AND ARE READY FOR YOU TO RESPOND.

WHEN YOU TALK, THE OPR WILL BE TYPING EVERYTHING HEARD BACK TO THE CALLER. ONE MOMENT FOR YOUR CALL TO BEGIN."

We also recognize that VCO users may prefer to announce and explain their calls themselves. The CA honors the VCO caller's preference regarding announcing or explaining each call. The CA always processes calls according to the VCO user's preferences, FCC guidelines, and State requirements.

TWO-LINE VCO (2LVCO)

We also provide 2-Line VCO as a standard service. 2-line VCO (2LVCO) allows a deaf or hard of hearing person with two telephone lines to use one line for speaking directly to a hearing person while the second line is used to receive the hearing person's typed responses. This feature provides a more natural flow of conversation without the pauses of single-line calls.

The basic steps for users with multiple phones wishing to use 2LVCO are listed below.

1. Dial the VCO phone number. Relay will answer with the CA's number, the CA's gender, and "VOICE (OR TYPE) NOW GA". The VCO user types the area code and telephone number associated with the second line and then types "TWO LINE VCO GA". (This information can also be stored in a 2LVCO user's profile). When the second line rings, the 2LVCO user answers it using voice and asks the CA to hold.

2. The 2LVCO user presses the conference button and then dials out the third party's number.

3. The 2LVCO user then presses the conference button again to "bridge" all three parties.

2 Line VCO

Conference calling or 3-way calling capability must be purchased from local telephone company or built into PBX service

Once the 2LVCO user is connected to the voice caller, the 2LVCO call progresses. The 2LVCO user and voice user can speak directly to each other simultaneously. The CA types the voice caller's message to 2LVCO user. The 2LVCO user reads text message on the TTY.

It is important to note that the customer's line must have conference/three-way calling capability. We advise relay users to contact their phone company for adding the three-way calling service. In order to speed up the call-set up process, we aid customers in establishing Customer Profile notes which contain the user's 2LVCO personal preferences and instructions.

Reverse Two-Line VCO

Voice users can also call the R2LVCO user. The R2LVCO user receives the call and connects to the CA via a standard telephone with three-way calling. The CA dials the second (TTY) telephone at the R2LVCO user's location. The R2LVCO user speaks directly to the hearing person on one (Voice) line and uses the second (TTY) telephone to receive the CA's typed responses voiced by the hearing person. Like 2LVCO, there is no need to give the "GA" or wait a turn, allowing for a smoother and more natural flow of conversation.
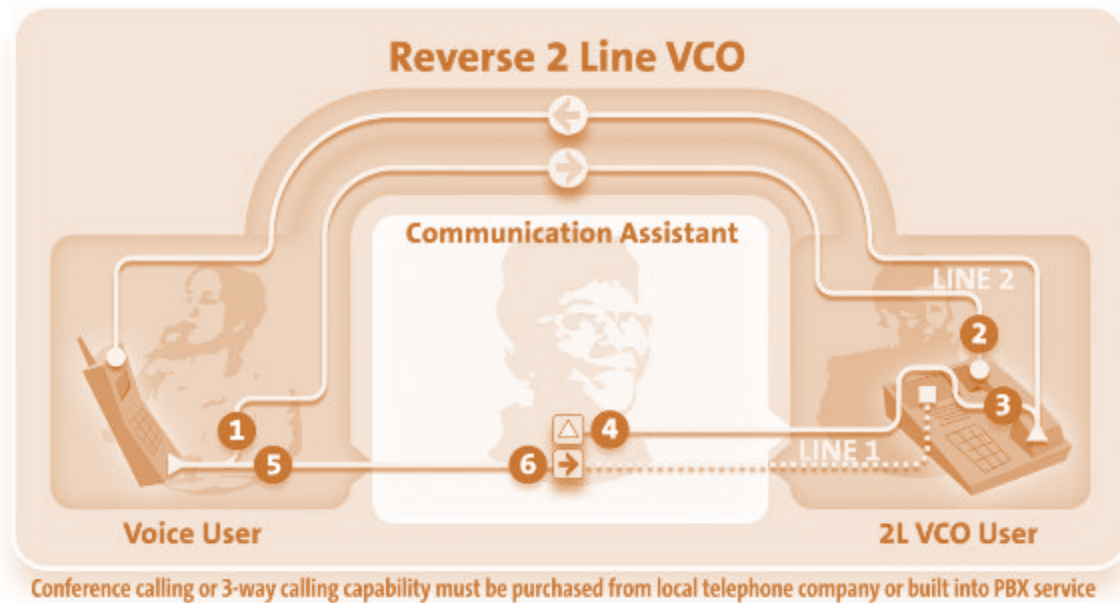
VCO TO HCO AND HCO TO VCO

We support VCO to HCO calls and HCO to VCO calls. In these calls, the VCO user speaks directly to the HCO user. The HCO user types back the response directly to the VCO user. The CA is online to set up the call and assist, as needed.

VCO TO TTY AND TTY TO VCO

We make it possible for a VCO user to communicate with TTY users through the relay service. The CA listens to the VCO user's spoken messages and types it to the TTY user. The TTY user's message is transmitted directly back to the VCO user, as demonstrated below.

VCO to TTY
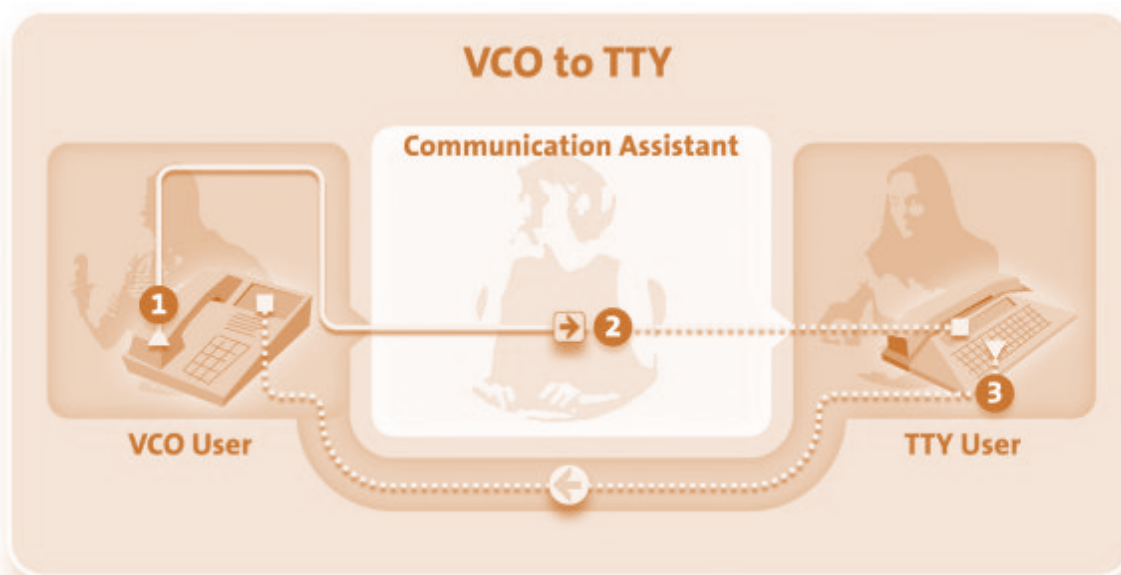
HEARING CARRY-OVER (HCO)

HCO allows a person to listen directly to the person they are calling and provide their responses by text through the CA (and vice-versa). As a part of our service, we offer voice progression technology. This advancement eliminates the HCO user's need for reading macros and allows him or her to hear the call set-up, ringing and the called-party answering the telephone.

HCO
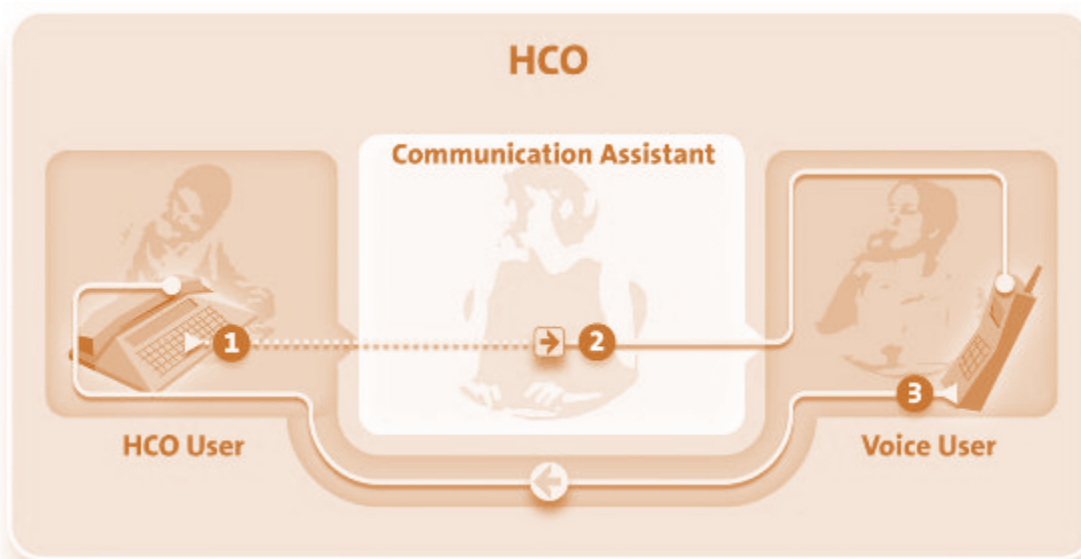
The steps for a standard HCO to Voice call are detailed below.

- ♦ HCO user types his or her conversation to the CA.
- ♦ The CA then voices the typed message to voice caller.

♦ The voice caller talks directly to HCO user.

In addition to basic HCO service, we provide the following HCO features and enhancements:

♦ **HCO with Privacy** – HCO users have the ability to request 'HCO with Privacy'. This enhancement provides the HCO caller added privacy on their call because the CA does not hear the hearing users' voiced messages. The CA is engaged only to voice the HCO user's typed message.
♦ **HCO Branding** – HCO users may choose to have their telephone numbers permanently branded as HCO. When a telephone number is branded as HCO, each call into relay receives a unique greeting allowing the HCO user to listen directly to the CA rather than initiating contact through the TTY.

HCO User Experience

♦ HCO user dials 711 or a toll-free access number, registers a HCO preference in the Customer Profile, or simply requests HCO during direct communication with a CA.
♦ The CA will request the number the user would like to dial using voice (if the user has requested HCO). In addition, the HCO user may elect to provide additional call handling preferences, which the CA will follow.
♦ The CA will dial the call. The HCO user can hear the phone ringing, busy signal and how the phone is answered.

The CA provides a concise HCO announcement to end users, for example:

"HELLO. A PERSON IS CALLING YOU THROUGH THE SOUTH DAKOTA RELAY SERVICE. THIS IS CA XXXX. HAVE YOU RECEIVED A HEARING THRU CALL BEFORE?"

If the hearing party has received an HCO call before, the call commences immediately. The HCO user can begin typing their conversation, which will be read by the CA.

If the hearing party is not familiar with HCO, the CA will provide an HCO explanation, as seen below:

"THE PERSON WHO IS CALLING YOU CAN HEAR BUT DOES NOT SPEAK. YOU WILL BE ABLE TO SPEAK DIRECTLY TO YOUR CALLER AND THEY WILL BE ABLE TO HEAR YOUR MESSAGE. WHEN YOU ARE FINISHED SPEAKING, PLEASE SAY THE WORDS "GO AHEAD" AND THAT WILL INFORM THE CALLER THAT IT IS THEIR TURN TO RESPOND. THEY WILL TYPE THEIR RESPONSE, WHICH WILL BE READ TO YOU. ONE MOMENT FOR YOUR CALL TO BEGIN".

HCO users can also announce and explain their calls themselves, if desired. The CA honors the HCO caller's preference regarding announcing or explaining each call. The CA processes the call according to the HCO user's preferences, FCC guidelines, and State requirements.

HCO TO TTY

We ensure that HCO and TTY users can communicate with each other through relay. The HCO user types directly to the TTY user. The CA voices the TTY user's typed messages to the HCO user.
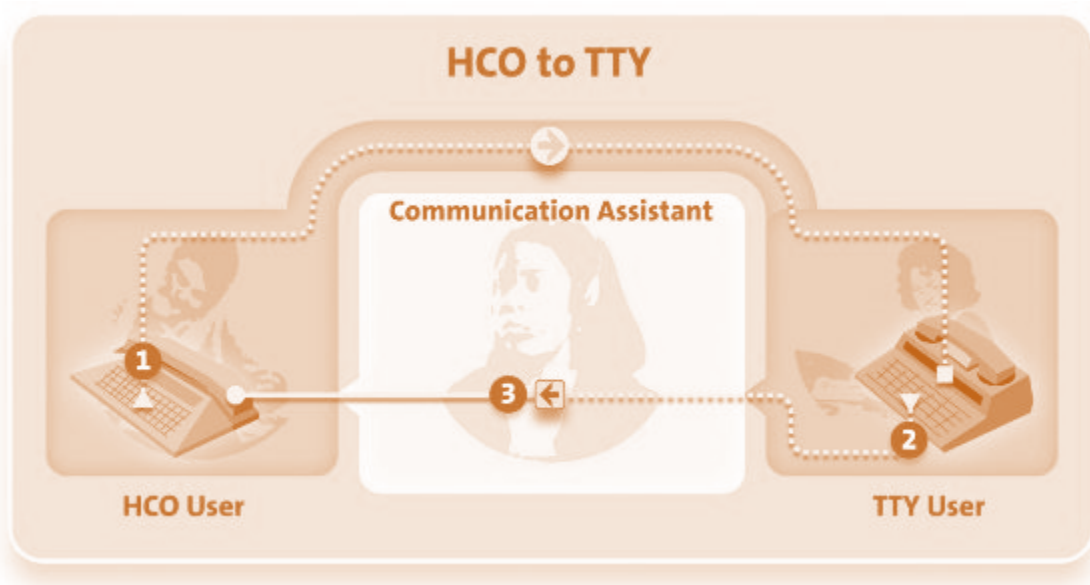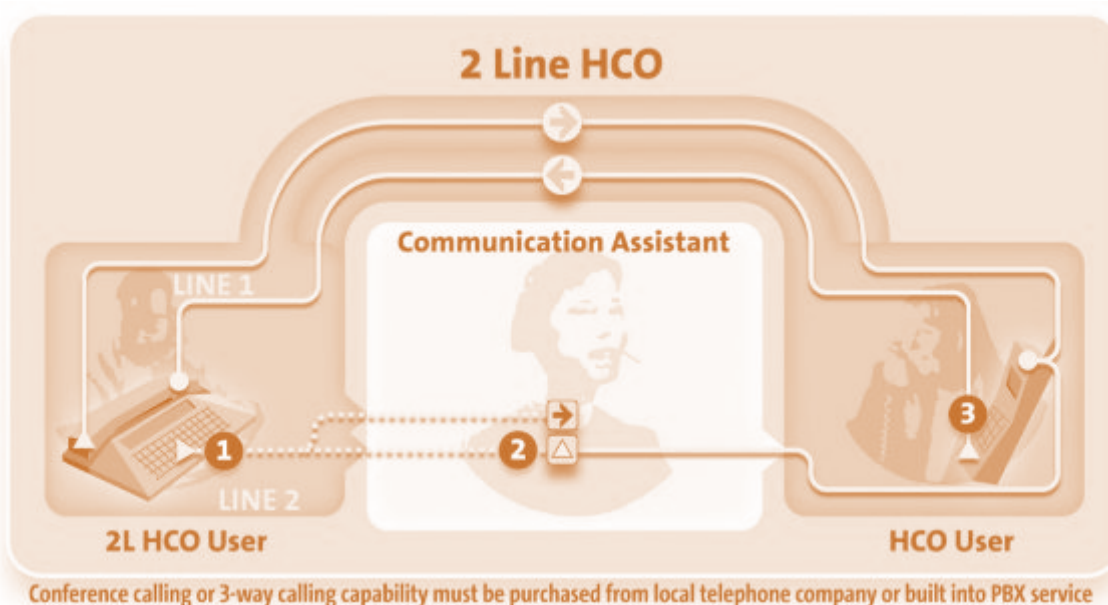

HCO TO HCO

HCO users can communicate with other HCO users through our relay service. The CA voices the typed message from the HCO user and voices to the other HCO user who listens and then types his or her response back in the same manner, and vice versa.

HCO to HCO
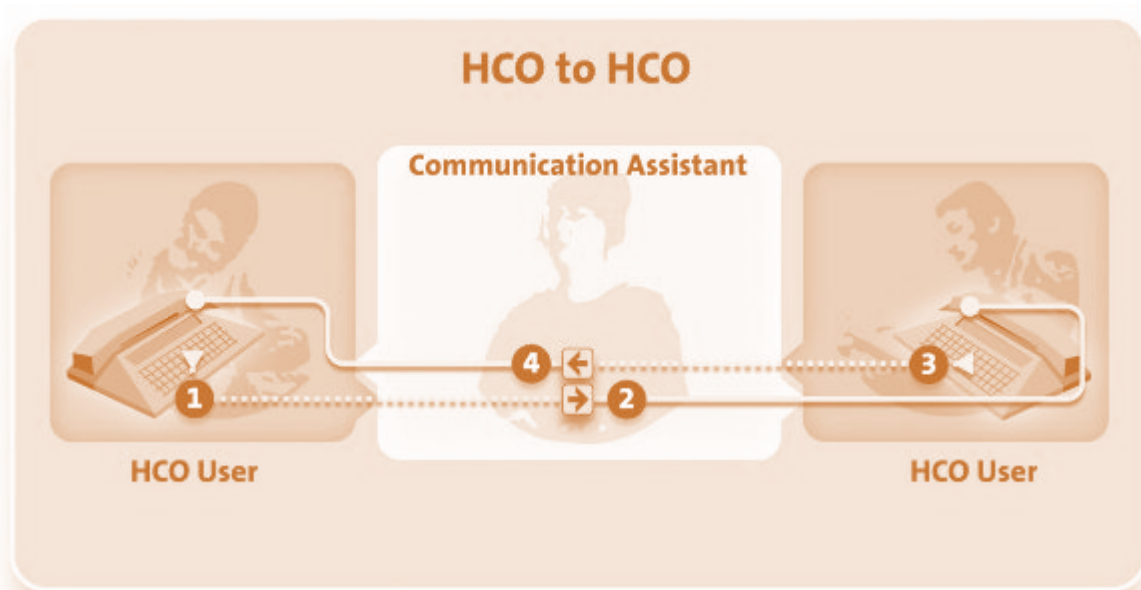
2-LINE HCO

We provide 2-Line HCO as a part of our standard offering. 2-line HCO (2LHCO) provides close to real-time conversations between an HCO user and a voice caller. Two telephone lines and three-way calling is needed for this type of Relay. The 2LHCO user listens to the hearing person on one (Voice) line and uses the second (TTY) telephone line to type their responses to the CA who then voices to the voice caller. There is no need to give the "GA" or wait a turn, allowing for a smoother and more natural flow of conversation.

2 Line HCO

Conference calling or 3-way calling capability must be purchased from local telephone company or built into PBX service
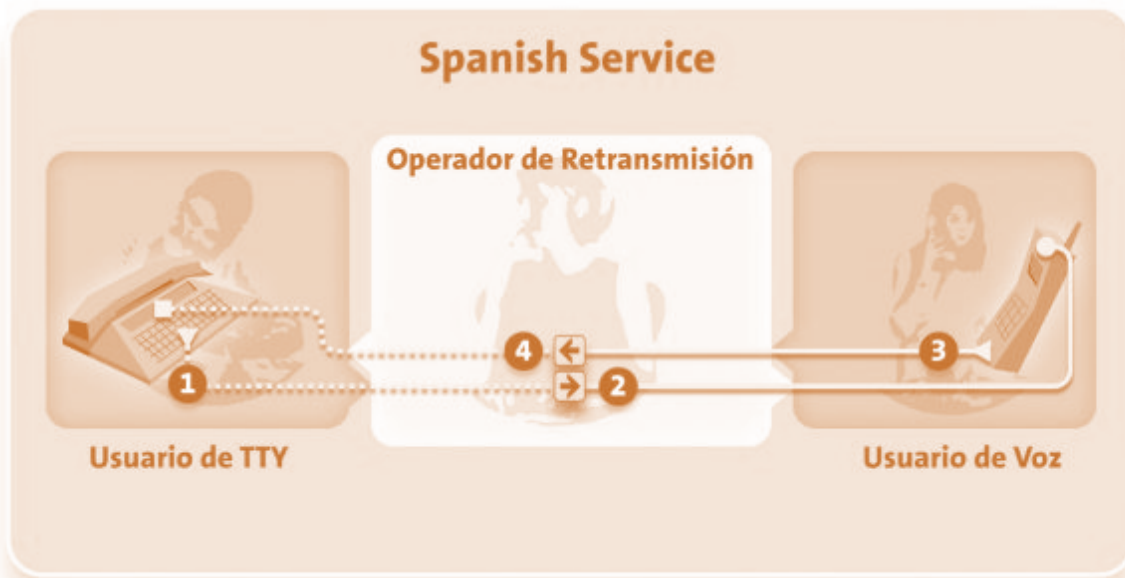
REVERSE TWO-LINE HCO (R2LHCO)

A voice caller can initiate a call to the R2LHCO user. The R2LHCO user receives the call and connects to the CA via the standard phone with three-way calling. The CA dials the second (TTY) telephone at the R2LHCO user's location. The R2LHCO user listens to the voice caller on one (Voice) line and uses the second (TTY) telephone to type their responses to the CA who then voices to the hearing person. There is no need to give the "GA" or wait a turn, allowing for a smoother and more natural flow of conversation.

NON-ENGLISH TRS (SPANISH RELAY)

We will offer Spanish-to-Spanish and Spanish-to-English relay services for TRS users and Spanish-language transcription for Captioned Telephone Service. Please see the graphic on the following page for an example of a typical Spanish Relay call.

Spanish Service

Operador de Retransmisión

Usuario de TTY

Usuario de Voz

SPEECH-TO-SPEECH (STS)

We understands the frustration of a person who wants to express himself, yet due to a speech disability has trouble being understood. This relay enhancement enables a speech disabled person to use his/her voice or voice synthesizer, rather than a TTY, to communicate on the telephone. Please see an illustration of STS call-processing in the following figure:

Speech to Speech

Communication Assistant

STS User

Voice User

We offer many enhancements and features which allow STS users to customize their relay calls, many of which are not available through other relay providers.

THREE-WAY CALLING

We support three-way calling for both TRS and CTS users who have purchased the service from their telephone provider (i.e., LEC). Our TRS platform also features the ability for our CAs to establish a three-way call for TRS users which provides greater flexibility.

TRS providers shall provide, as TRS features, answering machine and voice mail retrieval including interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Bidder response:

We have read and fully meet this requirement.

We fully support answering machines, voice mail retrieval, and interactive menus, using a sophisticated CA software that includes hot keys, recording technology, touch tone capability, and the ability to override toll charges when additional calls are necessary. Please see our in-depth response, including standard procedures for processing these calls, in Section 4.2.3.6.

Providers of TRS are permitted to decline to complete a call because credit authorization is denied.

Bidder response:

We have read and fully meet this requirement.

If credit authorization is declined, we will notify the TRS user and follow the user's instructions.

TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Bidder response:

We have read and fully meet this requirement.

We provide the call release, speed dialing, and three-way calling functionality that greatly exceeds the competition and offers Relay Colorado users more flexibility and options.

CALL RELEASE FUNCTIONALITY

We will offer Call Release Functionality that complies with all State and Federal requirements. This feature has been offered by us for over 10 years and our approach is driven by technology, tested-and-proven processes, customer-centric options, and customer confidentiality.

Call Release Functionality for TTY Users
We support Call Release Functionality for TTY users when requested as part of the call set-up or "on the fly" as needed.

Our Call Release for TTY users (also known as TTY-to-TTY Call Set-Up) is often requested as a part of call set-up when the TTY user knows that the called party can only be reached through a switchboard or an automated voice response unit.

In these instances, the CA relays the call as normal until both TTY users are on the line. At that point, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct their conversation directly.

When the call is signed off or 'released' by the CA, the call ceases to be a relay call and is no longer subject to the per-minute reimbursement.

We also support Call Release functionality "on the fly" when the calling party has not specifically requested TTY-to-TTY Call Set Up. In these instances, the inbound TTY user has complete control over the call and requests Call Release or can request a voice user and have the CA relay the call.

Please see the following detailed descriptions of the processes to support Call Release Functionality.

Standard Call Release Process
When a TTY user informs the CA that they would like to place a call to another TTY user, the CA uses standard processes to quickly and easily honor the request.

Call Release for TTY Users	
The TTY user asks the CA to dial a telephone number that they know will be answered by a TTY, e.g., **PLEASE DIAL 123-456-7890 FOR TTY TO TTY CALL SET UP GA**	
The CA confirms their understanding of the request and places the call, keeping the user informed of the status, e.g., **(CA WILL CONNECT YOU) (ONE MOMENT PLS)** **DIALING LOCAL 123-456-7890**	
TTY Answers	**Voice Answers**
CA immediately connects the callers and informs the user, e.g., **"CA NO LONGER ON LINE GA"**	If the call is answered using voice, the CA will announce the call and request the TTY user, e.g., **"HELLO. THIS IS RELAY COLORADO WITH A CALL FOR A TTY USER (NAME IF GIVEN). ARE THEY AVAILABLE?"**
	The CA keeps the TTY user informed, e.g., **(M) ABC STORE THIS IS JOE** **(ASKING FOR TTY USER)**
	Once the TTY user is on line, the CA bridges the callers and notifies the parties. **"CA NO LONGER ON LINE GA"**
After the call is 'released' by the CA, the call is no longer subject to the per-minute reimbursement.	

"On the Fly" Call Release for TTY Users

The CA does not assume that all TTY users wish to be directly connected to another TTY user. There are situations where a TTY user places a call through relay and the call is unexpectedly connected to another TTY user. In these instances, the CA informs the inbound caller and allows them to decide how to proceed.

For example, a TTY user may place a call to a business that has both voice and TTY access. If a switchboard operator answers the call and immediately transfers the CA to the TTY line, the CA will inform the inbound TTY user and let him or her decide if they'd like to connect directly or use Relay Colorado to communicate.

<table>
<tr>
<td colspan="4" align="center">**"On the Fly" Call Release for TTY Users**</td>
</tr>
<tr>
<td colspan="4">When the CA hears TTY tones, the CA informs the calling party and asks how to proceed:
(TTY TONES WOULD U LIKE TO CONNECT TTY TO TTY Q) GA</td>
</tr>
<tr>
<td align="center">**If "Yes"**</td>
<td colspan="3" align="center">**If "No"**</td>
</tr>
<tr>
<td rowspan="5">The CA immediately redials and connects the callers and informs the user, e.g.,
"CA NO LONGER ON LINE GA"</td>
<td colspan="3">The CA redials to ask for the voice user, e.g.,
(REDIALING TO ASK FOR VOICE PERSON PLS HD)</td>
</tr>
<tr>
<td colspan="3">The CA redials and announces the call to the outbound TTY user, e.g.,
RELAY COLORADO CA 1234F WITH A CALL (FOR A VOICE PERSON ARE THEY AVAILABLE</td>
</tr>
<tr>
<td align="center">**If "Yes"**</td>
<td colspan="2" align="center">**If "No"**</td>
</tr>
<tr>
<td>If the voice user is available, the call is processed as normal.</td>
<td colspan="2">The CA places the outbound TTY user on hold by typing:
(ONE MOMENT PLS)</td>
</tr>
<tr>
<td></td>
<td colspan="2">The CA notifies the inbound TTY user.
(PHONE ANSWERED BY TTY VOICE PERSON NOT AVAILABLE)</td>
</tr>
<tr>
<td></td>
<td></td>
<td colspan="2">The inbound TTY user can choose to be connected to the outbound caller or can leave a brief message.</td>
</tr>
</table>

The chart above shows how our processes and technology allow the TTY user more flexibility in determining how he or she wishes to communicate. We understand that there are situations where TTY-to-TTY Call Set-Up is not desired by the inbound TTY user. Call Release is an option for TTY users; but, each TTY user has complete control over how his or her call is processed.

Call Release Functionality for Voice Users
The TRS platform includes system blocks to prevent Call Release Functionality for voice users to prevent fraud. TRS users often receive significant long distance discounts to make up for the longer time needed to communicate.

Some voice users may attempt to try to take advantage of these discounts by pretending to place a relay call that is then answered by another voice user. By denying the request, we discourage abuse and this prevents the State from incurring additional session minutes to process calls which may be fraudulent in nature. Likewise, voice-to-voice calling through Captioned Telephone is limited to prevent fraud.

Some relay providers offer this service for voice users and bill the State for the minutes conversing with the voice callers to establish a voice connection. We don't.

While the TRS platform is fully capable of processing Voice-to-Voice calls (e.g., Speech-to-Speech calls), we are steadfast in our commitment to maintaining the integrity of the service. Our sole focus is providing functional-equivalent access to the telecommunications network for people with a hearing loss or speech disability.

SPEED DIALING FUNCTIONALITY

We offer both Basic and Enhanced Stored Number functionality which is designed to make the Relay Colorado user's experience more functionally equivalent to a traditional phone user. All of our Basic and Enhanced Stored Number features are included as a part of our standard service and offered at no cost to the user.

We will offer the ability for TRS users to store up to 100 speed dial entries. Speed dialing functionality allows TRS users to simply provide the CA with the "short-hand" name or code associated with that number instead of the entire 10-digit number.

For example, a caller can simply request, "Please call Mom," and the CA will dial the associated ten-digit telephone number without delay or additional questioning. This efficient system provides faster service for the TRS user and fewer billable minutes to the State.

In addition to basic speed dialing functionality, we have enhanced the TRS operations to maximize the service for TRS users' convenience. We offer several other options for relay users to store telephone numbers, as explained below.

Emergency Numbers
We always advise relay users to dial 9-1-1 in an emergency. But, we know from listening to our customers, that in some situations it is critical to reach contacts other than 911 very quickly.

TRS users who have many contacts in their speed dial list may be reluctant to add emergency contacts into the general speed dial list as it takes precious seconds to find one contact in long lists – even though system tools allow the CA to sort the order of entries.

What our TRS users have told us is that a small list of Emergency Speed Dial numbers is preferred over searching other Speed Dial lists.

Contacts such as primary caregivers, home health nurses, doctor's office, local or state poison control centers, and the local hospital are often used for this purpose.

We are the only provider to offer TRS users the option to store 30 emergency phone numbers in their Customer Profile.

Remote Access
Our sophisticated Customer Profile solution will allow Relay Colorado users to access their basic or enhanced speed dialing services anywhere, anytime. In order to access Speed Dial numbers, including the enhanced options, TRS users can simply provide their usernames and passwords to the CA. The CA will pull up the customer's preferences, including all Speed Dial options.

This solution is also very helpful to multiple TRS users within the same household. Our "household" profile option is available to all callers from the registered telephone number, as well as individual "customer" profiles which are available by providing the username and password. This will provide a combination of accessibility, personalization, and security for all Relay Colorado users.

THREE-WAY CALLING

We provide support for basic 3-way calling, CA-initiated 3-way calling, and enhanced multiple party calls. Regardless of the number of participants on a basic or CA-initiated 3-way call, we will bill the State based only on the CA's work time, rather than the number of relay call participants.

Basic 3-way Calling
TRS users who have purchased 3-way or conference calling capability from his or her Local Exchange Carrier can use these features when placing a call through Relay Colorado. The TRS user places the call to the relay and then conferences in the voice-called party.

An example would be if the TTY user places a call to Relay Colorado and then conferences in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one voice user. This process also would apply if there were two voice customers and one TTY user on the line.

CA-initiated 3-way Calling
We are excited to announce that we can provide CA-initiated 3-way calling for TTY and voice users. CA-initiated 3-way calling helps TRS users to fully enjoy the ability of speaking to two parties simultaneously without having to worry about navigating telephone systems designed for those who can hear audible prompts.

In order to process CA-Initiated 3-way calling, we upgraded our TRS platform with:

- ♦ Additional telephone line at each CA position in the network
- ♦ Modifications to the platform infrastructure

♦ Upgrades to the CA software
♦ Modifications to Billing systems
♦ Additional training for CAs

Customer Experience

A TRS caller will be able to request a 3-way call either during the initial call setup or as an add-on to an existing conversation. When this happens, the CA will establish the 3-way conference call. To minimize confusion, the CA will instruct both outbound callers that the call being made is a 3-way call.

Our CA software allows the CA to block the callers to be able to **communicate with each party separately** while setting up the call. The following sample announcements are used for the callers' benefit.

CA Initiated 3-Way Phrases	
TTY Greeting	RELAY COLORADO CA XXXX WITH A CALL (WITH A 3 WAY CALL)
Voice and STS announcement	"Hello. A person is calling you through Relay Colorado. This is CA XXXX. Have you received a 3-way call before?"
Explanation	The person on the line is using the relay service to communicate with you and another party. Once both parties are added, the caller will type/voice their conversation (and it will be read). When you type/hear the words "Go Ahead" please type/say your name before speaking and type/speak one at a time. I will type everything heard. Please type/speak directly to the caller and say "Go Ahead" when you are ready for a response.

Once all parties are connected, the CA relays all conversation between the parties. The relay user is charged in the same manner as traditional phone users for all calls. The State is billed based on the CA's work time and is only charged for one call.

4.2.1.4 Emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner. Providers must indicate in their response that their handling of emergency calls through relay will meet all Federal Communications Commission rules and regulations for these emergency calls.

Responders shall describe, in detail, their policies, procedures, training, and access for handling emergency calls through relay. Further the CA must provide the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

9-1-1 Database Provider. Responders shall indicate if they subcontract with a third-party 9-1-1 (PSAP) database provider to route relay calls to the appropriate PSAP. If so, responders shall include the name of the 9-1-1 database provider and detail the provider's process for routing calls to the appropriate PSAP. The relay contract provider shall notify the State Relay Administrator prior to changing 9-1-1 (PSAP) database providers.

Bidder response:

We have read and fully meet this requirement.

We will accept incoming emergency calls and automatically and immediately transfer a call to an appropriate Public Safety Answering Point (PSAP). We route the call based on the best known information provided at the time of the call (i.e., the user's phone number).

As the Relay Colorado provider, TRS users will be able reach a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

All CAs and relay call center staff have been trained on emergency call handling procedures. The CA will pass along the TRS user's telephone number to the PSAP in the event that a caller disconnects before being connected to emergency services.

EMERGENCY SOLUTION

Bandwidth (formerly known as Dash) is our 9-1-1 database service provider. Each telephone number entered into the Bandwidth 9-1-1 database is geocoded and assigned an emergency service number (ESN) that designates the PSAP that the call is to be routed to when 9-1-1 is dialed. When 9-1-1 is called from a telephone number in the 9-1-1 service provider's database, the database is queried to determine the geo coordinates associated with the address of the caller and the ESN associated with the PSAP. The ESN is used to route the call to the appropriate PSAP.

During the life of this contract, we anticipate that technology for emergency calls will continue to evolve and offer benefits to Relay Colorado consumers. Services such as wireless text-to-911 and video access to 911 are already being explored in many areas. We will monitor these services and keep the State abreast of changes and options for TRS users to access 911 services.

We provide our TRS customers with efficient and accurate access to emergency services. Our 9-1-1 services provider, offers 9-1-1 services to more TRS and VRS companies than anyone in the industry. The 9-1-1 services provider also supports:

- ♦ The largest footprint of coverage across the U.S. to connect a TRS 9-1-1 call
- ♦ A web interface with complete application programming interface (API)
- ♦ Address geo-coding with a 99% address acceptance rate on the first submission, translating to a lot less manual work for TRS and internet calls.

Our solution goes above and beyond minimum standards to route calls to an appropriate PSAP and delivers the call over **native 911 trunks**.

Receiving a Call

- We receive a Relay Colorado emergency call.
- CA presses 911 hot key.

Routing the Call

- Database looks up the rate center of the NPA-NXX.
- Rate Center boundary is compared to the corresponding boundary of the PSAP.

Delivering the Call

- Call is routed over native 911 trunks to the first PSAP listing.
- If problems occur, the call is routed to secondary listing automatically.

If Problems Occur

- If information is not available from database, the call is routed to the 9-1-1 service provider's contact center for assistance.
- If no numbers available, the CA calls Directory Assistance.

CALL PROCESSING PROCEDURES

The CA will use the proven techniques described below to ensure that each and every Relay Colorado user who needs emergency services receives our undivided and personal assistance.

	Emergency Call Procedures
1.	The CA always acts on the word "emergency." Calls placed to fire, police, ambulance, and rescue squad are also considered emergency calls.
2.	The CA hits a software function key (i.e., "hot key") which designates the call as an "emergency." This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 Center.
3.	Simultaneously, the CA alerts a supervisor. The supervisor will assist the CA in processing the call, if needed. The supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (i.e., telephone number) is passed to the E-911 center as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: **"THIS IS AN EMERGENCY. I AM CALLING FOR A DEAF (OR HARD OF HEARING OR SPEECH DISABLED) PERSON THROUGH THE RELAY COLORADO SERVICE. THEY ARE CALLING FROM (CALLER'S TELEPHONE NUMBER). THIS IS CA # 1234, ONE MOMENT PLEASE."**
6.	The CA advises the inbound caller that emergency services is on the line. For example, **(POLICE ON LINE NOW)** and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E-911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.

PRIVACY

Emergency Incident Form information may be made available only to emergency call handlers, and emergency response or law enforcement personnel and is to be solely for the purpose of ascertaining a customer's location in an emergency situation or for other emergency or law enforcement purposes.

BACK UP PROCEDURES

Our enhanced PSAP solution has proven extremely accurate. In many instances, two numbers are provided for each rate center. If one of the numbers fails, a second contact center is automatically connected with no CA intervention.

In the rare cases that a valid number is not available, the CA will contact Directory Assistance for support. Our TRS operations and training department have partnered with our Directory Assistance call center team to establish processes and procedures that will allow us to obtain a 10-digit police emergency number in the most expedient manner possible. The CA will request the number based on the caller's telephone number and/or address, as available. Once this number has been received, the CA immediately places the call and documents the issue with a trouble ticket so that the PSAP system can be updated.

TRAINING AND SUPPORT MATERIALS

Our Quality Assurance team ensures that each and every CA and supervisor receives in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where relay call center staff must demonstrate knowledge and proficiency of emergency processes and procedures.

Supervisors or operations administrators are available 24/7/365 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The Quality Assurance team has established processes for many of these variations, as outlined below.

CALLER DISCONNECTS BEFORE CONNECTING TO 911 CENTER

If the inbound caller disconnects prior to being connected to 911, the CA software will continue dialing to the PSAP/emergency call center. The CA or supervisor will notify the PSAP call center of the premature disconnect and provide the user's information to assist the PSAP center with the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an emergency call. Since the customer does not give an emergency service name, the CA always connects the caller to 911. The CA will notify the supervisor who, in turn, calls the PSAP and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The PSAP will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

SENSITIVE TOPICS

We have established procedures for calls where the CA hears or reads things that may be designated as suspected emergency calls, including the following:

♦ **Suicide Declaration to the CA:** If the caller dials relay and tells the CA they are going to commit suicide, the call is treated as an emergency call. The CA will dial the PSAP and allow 911 personnel to determine the best course of action.

♦ **Crisis/Hotline Calls:** Calls to crisis/hotline numbers are processed in the same manner as all other relay calls. If the caller requests a number for a hotline, the CA will dial Directory Assistance and provide the number, which can be called directly (if TTY number available) or through relay.

♦ **Privileged Communication:** If the CA overhears abuse (e.g., child, elderly, or spousal abuse), suicidal statements, or potentially illegal activity, the CA remains neutral and processes the call without paraphrasing, editing, or showing any personal bias.

EMERGENCY NUMBERS

We always advise relay users to dial 9-1-1 in an emergency. But, we know from listening to our customers that in some situations TRS users prefer to contact people other than emergency services.

TRS users can designate up to 30 contacts in their Customer Profile as their emergency numbers. This can be anyone who they feel may aid them in an emergency situation including primary caregivers, home health nurses, doctor's office, a poison control center, or the local hospital.

EMERGING TEXT-TO-911 TECHNOLOGY

Text-to-911 is the ability to type and send a Short Message Service ("SMS") text message to a public safety answering point ("PSAP") via a wireless phone to request emergency assistance. While the interim SMS text-to-911 solution may provide the most overall benefit to the deaf, hard of hearing, and speech-disabled communities, it is expected to be increasingly used by the general public. Due to the inherent limitations in text messaging, individuals should always attempt to call 9-1-1, whenever possible. Text-to-911 may also be an option in circumstances when voice calling is unavailable or unsafe, such as during incidents of domestic violence where a voice 9-1-1 call could endanger a victim further.

As a company dedicated to the importance of communications, we are enthusiastic about helping expand the public's ability to get critical assistance when they need it through additional services such as text-to-911. Towards that end, we actively participate in standards bodies and industry working groups, along with cooperative efforts with PSAPs across the country.

EDUCATION AND OUTREACH

We will work with the State Relay Administrator and State Relay Advisory Committee to include procedures for accessing E-911 through Relay Colorado in outreach materials. Relay users are encouraged to dial 911 as their primary means of contacting emergency services.

However, as demonstrated above, if a user makes an emergency call through relay, the CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the emergency service provider the caller's telephone number, even if the caller is no longer on the line.

We work closely with 911 call centers as a part of our Outreach program. If desired by the State, we will work closely with PSAPs in Colorado to make sure they have the tools and information necessary on how to process 911 calls originating from the Relay Colorado Service.

Misdialed Emergency Calls. Responders shall describe how misdialed calls by hearing individuals who intended to dial 9-1-1 but dial 7-1-1 in error will be handled.

Bidder response:

We have read and fully meet this requirement.

If a voice customer misdials 711 when actually they require assistance through 911, the CAs will connect the caller to emergency services. The CA will inform the caller:

> **"YOU HAVE CONNECTED TO A TELEPHONE RELAY SERVICE FOR THE DEAF AND HARD OF HEARING. IF POSSIBLE, YOU SHOULD HANG UP AND DIAL 911. IF NOT, WE CAN ATTEMPT TO CONNECT YOU TO A 911 CENTER NEAR YOUR ASSIGNED TELEPHONE NUMBER, BUT THERE COULD BE SIGNIFICANT DELAY IN GETTING ASSISTANCE."**

We never refuse a 911 call – even those by hearing callers - and will process the emergency call if the hearing caller does not disconnect.

Report Calls Placed to Public Safety Answering Points. The State would like to receive a report indicating the number of outbound Relay Colorado calls placed to 9-1-1 during the month. The report should indicate, by day of the month and by type of relay call (i.e. TTY, STS, CTS, Voice, etc.), the number of emergency calls relayed by the CA and the number directly transferred to the PSAP. The responder must indicate in their response to this RFP if responder is willing to report this information, on a monthly basis, to the State Relay Administrator.

Bidder response:

We have read and fully meet this requirement.

We will provide a report of outbound Relay Colorado calls placed to 911 during the month including the day of the month, the type of relay (e.g., TTY, STS, Voice, and CTS), the number of calls relayed by the CA, and the number of calls transferred directly to the PSAP.

This detailed 911 PSAP reporting will be made available to the State Relay Administrator on a monthly basis. This reporting will demonstrate the number of 911 calls, by call type for each day of the month along with the associated conversation minutes and session minutes. A sample of the report has been provided on the following page.

4.2.1.5 In-call replacement of CAs. CAs answering and placing a TTY-based TRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

Bidder response:

We have read and fully meet this requirement.

We meet or exceed all FCC minimum requirements regarding changing Relay Operators during a call. We ensure that each CA remains on the call for at least 10 minutes (or 20 minutes for Speech-to-Speech calls). We understand that changing CAs can disrupt a relay call. As a matter of practice, **calls are not taken-over, unless it is absolutely necessary to do so**.

With our average call length for a session-minute measurement at approximately 3 minutes, the vast majority of calls last less than the minimum standard. A study in one of our TRS call centers demonstrated that **less than 1%** of calls results with in-call replacement of CAs.

In compliance with the recent FCC Order modifying the length of time that a STS CA must remain on a call prior to transferring to another CA, our STS CAs stay on the call 20 minutes. The timeframe begins when the CA reaches the called party and ends when one party terminates the call or when 20 minutes have elapsed.

The situations in which a CA would transition during a call prior to the FCC minimum standard include:

- The customer requests a CA of the opposite gender
- End user verbal abuse of a CA or obscenity towards the CA
- Call requires a specialist (STS, Spanish, etc…)
- CA Illness
- At the request of the customer for any reason

- ♦ CA becomes aware of a conflict of interest such as the CA identifying callers as friends, family, or customer

In addition, there are situations which may require a CA to transition the call to a different CA which is only approved after the CA has remained on the call longer than the FCC minimum standard. These include:

- ♦ CA Shift change
- ♦ CA restroom break
- ♦ CA fatigue normally as a result of 60 minutes or more processing an average call

If transition of CAs is unavoidable, the change occurs with minimal disruption to either relay participant. We attempt to honor any requests for a specific gender or call handling preferences during call transitions.

TRS AND STS PROCEDURES

When a call takeover is unavoidable, the CA signals for a call takeover and makes themselves unavailable for incoming calls. A second CA connects their headset and observes the flow of the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile (generally 2 to 5 minutes).

At that time, the two CAs will mutually agree to the call takeover nonverbally. For TTY and Voice calls, the CA will wait until the TTY user begins typing for the second CA to log in and begin processing the call. The second CA will notify the voice user, type the voice party's message, and send a macro to inform the text user. For all call types, the CA is trained to transition with the **least impact** to the relay users' conversation.

MONITORING COMPLIANCE

CA Performance Surveys at least twice each month confirm compliance with changing CAs, including the following:

- ♦ Was the call processed according to procedures?
- ♦ Was patience and flexibility demonstrated?
- ♦ Was the state specific greeting used and the CA identification number provided?

4.2.1.6 CA gender preferences. TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

Bidder response:

We have read and fully meet this requirement.

We make every effort to satisfy this request and to maintain the same gender during transfers, if necessary. We also make it easy for a relay user to request a preference of CA gender; preferences can be made through registration using the Customer Profile Database, E-Turbo, or at any time by asking the CA.

4.2.1.7 STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers, which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Bidder response:

We have read and fully meet this requirement.

As the largest provider of STS in the world, our STS serves a broad range of users with speech, cognitive, or mobility disabilities with patience and respect. A group of hand-picked operators processes all of our STS calls. Our STS relay is designed to be simple and easy-to-use with the ability to store up to 100 speed dial entries. STS operators confirm the number to dial prior to dialing. This information will be transferred to new STS providers.

Our customer-focused STS Service complies with all State and Federal STS requirements including the FCC's 2013 increased standards. We also offer many enhancements including items such as STS Customer Profile, Call Set-Up via E-mail, 711 Automated Call Routing. These enhancements also speed up call processing providing a better call experience and fewer billable minutes.

Please see Appendix 6 for information on our additional enhancements, including STS.

4.2.2 Additional Colorado Operational Standards

4.2.2.1 Standard Relay Product Features. Offerors must demonstrate that they can provide all of these services and the prices per call session minutes in their proposal should be for TRS that include all these services. To facilitate a comparison of proposals, Offerors should review the list of features and indicate which services they provide in an identical fashion, which they provide, but in a different fashion and what those differences are, and which they do not provide. Offerors should also list additional services they would provide as standard features that are not included on the list.

Bidder response:

We have read and fully meet this requirement.

Please see Appendix 6 for a list of Standard Relay product features that will be made available to Relay Colorado users as a part of the standard price per call session minutes.

4.2.2.2 Placing Calls. Offers will adhere to the FCC rule requiring 85% of all calls to be answered in ten seconds by any method which results in the TRS caller's call immediately being placed, not put in a queue or on hold.

Bidder response:

We have read and fully meet this requirement.

We will ensure that the FCC rules for answering calls quickly (i.e., 85% of calls answered within 10 seconds) is met or exceeded. We routinely exceed the minimum standards. Over the past three years, our speed of answer was 95% of calls answered within 10 seconds. Please see Section 4.2.3.2 for additional information on how we calculate speed-of-answer and our current speed-of-answer performance.

Calls to the relay which are placed on hold shall not be on hold longer than one minute.

Bidder response:

We have read and fully meet this requirement.

We will answer all TRS calls with a live Relay Operator who is ready to process the call. Relay Operators are trained and monitored to ensure they dial the number requested within five seconds, unless detailed call instructions have been provided by the user or are provided as a part of the Customer Profile. In those instances, the Relay Operator is instructed to dial within 10 seconds.

Calls identified as emergency calls shall receive immediate priority over other calls and must be referred to the nearest 9-1-1 Public Safety Answering Point (PSAP).

Bidder response:

We have read and fully meet this requirement.

When a call is identified as an emergency, that call receives immediate priority over other calls. For TRS calls, the call is identified once it has been answered by the Relay Operator. A Supervisor will be available to provide assistance to the Relay Operator.

For specific call types that are identified as emergency (prior to being answered), they are given priority access in the call-answering queue according to federal standards.

Relay Operators immediately process the call to an appropriate PSAP serving the customer, as detailed in Section 4.2.1.4.

4.2.2.3 Relaying the full content of communication. CAs must convey the full content, context and intent of the communication they translate. CAs shall, to the best of their abilities, let the deaf or hearing-impaired user know the tone of voice the hearing caller is using. For example, they can type in parenthesis that a person is being rude, is yelling, is being humorous, is laughing, is impatient, or other characterizations of behavior. CAs shall also keep the user informed on the status of the call, such as dialing, ringing, busy, disconnected, on hold, or explaining the relay to a hearing caller. When speaking for the TTY user, the CA shall adopt a conversational tone of voice appropriate to the type of call being made. CAs shall indicate to the TTY user if another person (hearing) comes on the line. CAs shall also announce to both parties to the call when there is a change of operators during a call.

Bidder response:

We have read and fully meet this requirement.

Our CAs are trained to convey the full content, context and intent of the conversation. Nothing is edited or omitted from the content of the conversation or the spirit of the speaker. We provide a professional, transparent service that enables relay users to maintain full control of their call. We follow all call-handling preferences provided to the CA or registered as part of the Customer Profile.

TONE OF VOICE

CAs are taught to assess a TTY user's mood, emotion, and intent using specific cues. Our CAs relay the conversational manner using these cues to aid in conveying the spirit and meaning of the message.   We relay calls so that the full context of the TTY user's message is clear. When appropriate, the CAs will speak in a voice that conveys emotions such as excitement, happiness, anger, sadness, or surprise. Our CAs are dedicated to providing the best calling experience and will even sing Happy Birthday, if requested. This area is trained as a part of initial and ongoing training.

IDENTIFIABLE EMOTIONS

We are a pioneer in providing more information to the TTY user about the identifiable emotions of the other caller. CAs let the TTY user know any identifiable emotions observed.   We have worked closely with the TRS user community to develop an appropriate list of words that convey the tone of the non-TTY user. CAs can easily select from these **almost 100 pre-approved phrases**. Our CA software makes it easy and fast for CAs to select and automatically send to TTY users (with no manual typing). Tone of Voice descriptions are also available in Spanish.

Sample Tone of Voice Descriptions		
(SOUNDS ANGRY)	(SOUNDS CONFUSED)	(SOUNDS MAD)
(SOUNDS BORED)	(SOUNDS EXCITED)	(SOUNDS NERVOUS)
(SOUNDS BUSY)	(SOUNDS FRUSTRATED)	(SOUNDS SICK)
(SOUNDS CARING)	(SOUNDS HAPPY)	(SOUNDS SLEEPY)

If it is clear that the tone of voice is more emotional than the descriptive words can provide, the CA will further clarify. For example, "(SOUNDS ANGRY)" may be conveyed as "(VOICE GETTING LOUDER)."

EXPRESSIVE TYPING

CAs are also taught how to convey the voice user's emotion using different typing styles and punctuation. Expressive typing can create a more complete picture of the conversation. For example, if a voice user has a sarcastic tone of voice, the CA attempts to describe the sarcastic tone using expressive typing.

Expressive Typing Examples	
Normal tone of voice	WHAT Q THAT'S JUST BRILLIANT MAYBE WE ALL SHOULD HAVE DONE THAT GA
Rude or sarcastic tone of voice	WHAAAT QQ (SIGH) THAT'S JUST BRILLIANT MAYBE WE ALL SHOULD HAVE DONE THAT (SOUNDS SARCASTIC) GA

The CA exaggerates the words that are said with a rude or sarcastic tone of voice. Spaces can also be used to emphasize the words that the voice person stresses. Together, it is much clearer to see the intended message of the voice caller with the expressive typing.

Background Noises

We also provide background noise descriptions so that TTY users receive a truly functionally-equivalent service. As the CA hears and identifies sounds, the CA relays those to the TTY user. CAs can quickly notify TTY users of background noises by selecting one of **262 pre-approved background noises** that is provided in the CA software. These background noises are automatically transmitted to the user after being selected. These phrases are available in all languages including Spanish.

Sample Background Noises		
(BABY CRYING)	(DOOR SLAMMING)	(SNEEZE)
(COUGHING)	(EATING SOUNDS)	(TYPING)
(CRYING)	(KNOCKING ON DOOR)	(WATER RUNNING)
(DOG BARKING)	(LOUD TV)	(YAWN)

STATUS UPDATES

We provide real-time status updates to keep relay users informed on the status of the call at all times. When the relay user provides the number to dial, CAs are expected to dial the requested number within **5 seconds**. If the customer provides special instructions in the Customer Profile or as a one-time request, it may take CAs a little longer (up to 10 seconds) to review and dial the requested number.

As the number is dialed and throughout the call, text relay users are informed of call status using real-time status updates. The table below provides a small sample of call status updates that we offer.

Status	Action
Busy	If a busy signal is reached, the CA will press a hot key that notifies the text user, such as: **(LINE IS BUSY) GA**
Caller Disconnects	When the other party disconnects, the CA will inform the caller: **(PERSON HUNG UP) CRS OPR 1234M GA OR SK** If someone hangs up while the TTY user is typing, the CA also provides additional information to keep the user informed: **PERSON HUNG UP <HOW LONG AGO> SECONDS** **AGO AND THE LAST FIVE WORDS RELAYED WERE** **<LAST RELAYED> CRS 1234M GA OR SK**
Change of CAs	If a change of CAs becomes necessary, the CA will inform both parties, e.g., **(THIS IS CA 1234F CONTINUING UR CALL)**
Dialing Confirmation	When the CA dials the call, an automated message is sent to the text user that confirms the number to be dialed and the type of call (e.g., local, long distance, toll-free). **DIALING LOCAL 123-456-7890**
Holding	If the text relay user is placed on hold, the CA software has a timed macro to keep the user informed. The CA initiates the macro and the system continues to send dots to maintain contact with the TRS user. **(HOLDING ...,...,...,STILL HOLDING)**
Ringing	If the line rings, the CA presses a hot key which notifies the relay user. This timed macro continues to send additional rings until the next status update is entered. If the call is not answered after 10 rings, the relay user is prompted for additional instructions. **RINGING 1 ... 2 ... 3 ... 4 ... 5 ... 6 ... 7 ... 8 ... 9 ... 10 ...** **STILL RINGING GA**

CALL STATUS FOR VOICE USERS

Our sophisticated CA software includes Voice Progression technology that allows hearing-capable callers (including voice, STS, and HCO users) to listen to the call as it is being dialed and answered.

IDENTIFICATION OF VOICES

At the beginning of each call, the CA will type the gender of the speaking person to the TTY relay user. The CA informs the TTY user of the gender of the person speaking in parenthesis (M) or (F). If another person comes on the line, the CA will inform the caller by again typing the gender of the person speaking.

4.2.2.4 Prohibited communications. CAs shall not counsel, advise or interject personal opinions or additional information into any relay call. This also means the CAs shall not make any value judgments on the obscenity of any messages. Furthermore, the operators shall not hold personal conversations with anyone calling the Colorado TRS. The State will not reimburse for any call session minutes that violate this standard.

Bidder response:

We have read and fully meet this requirement.

Our Relay Operators do not counsel, advise, or interject personal opinions or additional information during a call, even if the Relay communication breaks down. Nor do Relay Operators make value judgments on the content of any Relay communication and will not hold personal conversations with anyone calling Relay Colorado. When prompted, the Relay Operator may extend a polite or concise response such as "thank you" if a Relay user comments on a job well done.

4.2.2.5 Preserving confidentiality. Proposals shall specify the policies the Offeror will use to preserve confidentiality. Such policies may include mechanisms employees are encouraged to use to prevent unintentional disclosure of relayed conversations, denying employment as CAs to those who have deaf family members or acquaintances, and other methods. Proposals shall specify the policy for handling violations of confidentiality.

Bidder response:

We have read and fully meet this requirement.

Our Code of Conduct describes the ethical and legal responsibilities of employees and anyone we authorize to act on our behalf. All TRS employees are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Code of Conduct that all employees and others are obligated to report violations or suspected violations. Additionally, we have an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an

investigation may be subject to corrective action up to and including termination. This information is also contained within our compliance program that all employees are required to complete annually.

There is a **TRS whistleblower protection notification** posted at TRS call centers in accordance with FCC rules. We also obtain a signed acknowledgement of the receipt of the Whistleblower Policy from all employees upon hire, and annually thereafter.

SUSPECTED VIOLATIONS

Our policy for investigating violations of confidentiality is designed to immediately address any suspected breaches of confidentiality. Any CA or relay call center staff who, after an investigation, has been found to violate the confidentiality rules and regulations are subject to immediate discipline, up to and including termination of employment.

If we are made aware through a customer complaint, user inquiry, or any other method, we will:

- ♦ Conduct an investigation
- ♦ Document all facts in a written report ☐
- ♦ Communicate resolution to relay user and/or State
- ♦ Take appropriate employee actions (reprimand, suspend, or terminate employee)
- ♦ Prosecute employee (depending on severity of breech)

Please note that any employee found to have breached the confidentiality policy a second time will automatically be terminated.

4.2.2.6 Spanish-to-Spanish calls. In view of Colorado's significant Hispanic population, English-to-English and Spanish-to-Spanish as well as English-to-Spanish and Spanish-to-English translation are considered standard features within Colorado TRS and should be included in the Offeror's proposal.

Bidder response:

We have read and fully meet this requirement.

We will provide Spanish-to-Spanish, English-to-Spanish, and Spanish-to-English TRS services. Our Spanish language Relay Service is handled by proficient Spanish speaking Relay Operators. We offer Spanish TRS services 24 hours-a-day, 7 days-a-week. Relay Operator workstations have been modified to provide macros and other functions to the caller in Spanish. In addition, we offer live access to Customer Service 24/7 for our Hispanic and Latino customers who speak Spanish.

Relay Operators who are hired to provide Spanish services are required to pass an evaluation of their ability to read, write, speak and understand Spanish. We also use an independent vendor testing (specialized in the assessment of foreign language skills) to conduct this evaluation.

Spanish language Relay Operators are evaluated monthly on their abilities to accurately translate typed text of Relay users who have limited written Spanish language skills. As part of ongoing monthly evaluations, Spanish-language Relay Operators are evaluated on their ability to translate

Spanish Gloss. Fully trained Relay Operators will automatically translate limited typed Spanish to conversational Spanish.

Our bilingual Relay Operators are trained to meet the specific needs of Spanish-speaking Relay users and are able to adapt to various dialects used by the Spanish-speaking community. Our Spanish Relay Operators are trained and experienced to handle regional variations of the Spanish language. We handle dialects from all parts of Latin America and the Caribbean including:

- Mexico
- Nicaragua
- El Salvador
- Colombia
- Ecuador
- Argentina
- Cuba
- Dominican Republic

- Guatemala
- Honduras
- Panama
- Peru
- Venezuela
- Chile
- Puerto Rico
- Standard Castilian Spanish

Relay Operator workstations provide State specific notifications, greetings, macros, and call-screen information, including caller origination and destination information. This information makes Relay Operators aware that the call originates or terminates in Colorado and enables the Relay Operator to provide translation that will meet the needs of a Colorado Spanish-speaking user. This also enables Relay Operators to draw upon terminology, mimic accents, and use appropriate idioms and other language characteristics, for their speech to be fully understandable by Spanish-speaking user groups in Colorado.

Callers who register a Customer Profile preference for Spanish are immediately connected to a Spanish-speaking Relay Operator when dialing 711. Our offer also includes establishing toll-free access numbers for Spanish TRS and Spanish TRS with Translation.

4.2.2.7 CA community contacts. Offerors shall propose a method for a relay user to uniquely identify a relay agent in the event a complaint is filed or a user wants to praise the work of the CA. Offerors proposing an in-state center shall describe how they will handle the confidentiality concerns related to possible social contact or the provision of other services by relay agents for members of the deaf and hearing impaired community that use the relay.

Bidder response:

We have read and fully meet this requirement.

Each Relay Operator is assigned a unique four-digit number with gender identification. For TTY calls, the system automatically sends the ID number and the gender at the beginning of the call and the end of each call. On voice-generated calls, the Relay Operator verbally states his or her Relay Operator ID number. Such identification allows the Relay user to be able to identify the Relay Operator's gender. Whenever possible, the user's preference to utilize the same Relay Operator during the entire conversation will be honored. Upon a request from an inbound caller for a specific gender, every attempt is made to honor the request.

Although we are not proposing an in-state center, we have procedures and environmental measures to safeguard customer and call information with all employees. We strictly enforce Confidentiality with all employees. All Relay Operators and other Relay Center personnel are required to sign and

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abide by our confidentiality policy. Employees receive training on confidentiality and ethics. Issues of confidentiality and the confidentiality agreement are reviewed with Relay Operators at least annually. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect Relay user's privacy, how to prevent the unintentional disclosure of Relay communications and the consequences of not following all confidentiality requirements. Employees are expected to abide by the pledge of confidentiality during and after their period of employment. These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

4.2.3 FCC Technical Standards

4.2.3.1 ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Bidder response:

We have read and fully meet this requirement.

All Relay telecommunications equipment to support Colorado, including station terminals, are capable of receiving and transmitting in voice, Baudot and ASCII codes, with Baudot (TTY) as the primary setting. Access via all commonly used TTY protocols, including 2400 Baud ASCII rates are available at each Relay Operator position. Upon a call being received at the Relay Colorado Operator position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the Baud rate is detected. ASCII rates up to and including 19,000 bps is supported by the TRS platform. The domestic TTY Baud rate of 45.5 and the international rate of 50 Baud are also supported.

The TRS platform is capable of receiving and transmitting in Voice, Baudot, ASCII and Turbo Code using industry standards. Our modems are auto-detectable and auto-switchable. The TRS platform automatically detects a connection mode, without CA intervention. In addition, the TRS platform contains a self-learning database which allows us to answer a call using the last known communication mode to reduce call set-up times. In addition, customers may also register a permanent communication mode as a part of the Customer Profile which overrides the temporary self-learning database.

The TRS platform features modems which support Turbo Code. In 1998, we were one of the first TRS Providers to add Turbo Code functionality to our platform as an alternate protocol for sending and receiving relay conversations.

The Turbo Code technology saves time and money on every call - automatically. Unlike traditional baudot communication that slows down transmissions, Turbo Code displays TTY characters in real time– as fast as typing occurs. Turbo Code allows users to interrupt one another, giving a more natural, back and forth feeling to the conversation.

Our modems have an auto-detect feature to automatically connect in Turbo Code.

TURBO CODE BENEFITS

Faster Typing
One of the most popular benefits of the Turbo Code protocol is the ability to receive typing as quickly as the other party types. For some Turbo Code TTY users, the enhanced speed can be too fast. CAs have the ability to slow down typing for Turbo Code users, if desired. Turbo Code TTY users can also scroll back using the device to view previous text.

Interrupt Functionality
TTY conversations have historically required the two parties to take turns talking, with each party giving the "Go Ahead" to the other party when they are done typing.

The Turbo Code protocol allows users to interrupt each other. CAs receive interrupt requests directly from Turbo Code TTY users. It is important to note that CAs can also initiate "interrupt" requests on behalf of the other relay user. (Please note that Turbo Code users do have the ability to disable these notifications if they prefer not to be interrupted).

Please see below for an example of how interruptions can be initiated by the CA.

Interrupting a Turbo Code TTY User
If the Turbo Code TTY user is typing and the voice user begins speaking and would like to interrupt, the CA can say: **ONE MOMENT THE OPERATOR WILL INTERRUPT**
The CA will press a "hot key" that will initiate the interrupt request.
A light will flash on the user's Turbo Code TTY and "INTERRUPT" will be displayed on the screen to signal the interrupt request.
If the TTY user stops typing the CA will begin typing the voice user's message.
If the TTY user continues typing, the CA will inform the voice user: **ONE MOMENT YOUR CALLER HAS CONTINUED TYPING**

Disabling Turbo Code

CAs can also disable Turbo Code, if needed. For example, a caller can dial Relay Colorado and establish a Turbo Code connection. If garbled messages occur (e.g., poor line quality), the CA can disable Turbo Code and down-shift to a Baudot connection. This often eliminates the noise-interference issues and allows the user to receive communication without issue.

E-TURBO

In 2002, we were the first provider to update its platform to be compatible with Ultratec's Enhanced Turbo Code (E-Turbo).

E-Turbo builds on the functionality of Turbo Code and was designed to streamline relay access and personalization.

> **We have 12 years' experience providing E-Turbo which is at least 10 years longer than any other provider.**

While any provider who offers Turbo Code can connect with E-Turbo TTYs, we worked closely with Ultratec to make sure we offer our relay users the full benefits of E-Turbo. All of the following advanced E-Turbo features can be stored in the E-Turbo TTY and automatically transmitted to the CA as the call arrives, as outlined on the following page.

Feature	Options
Connection Mode	E-Turbo users can designate themselves as Braille, HCO, 2-Line HCO, VCO, or 2-Line VCO. The TRS platform recognizes this preference and automatically greets users in the preferred mode.
Immediate Dial	The CA immediately dials the number provided without delay (unless the E-Turbo user specifically asks us to not dial through).
Gender Preference	E-Turbo users can designate their preferred CA gender and we will do our best to honor all gender requests.
COC Preference	Our Customer Service staff will assist E-Turbo users who wish to store their preferred COC in their TTY. We have established short abbreviated names for each carrier to be entered in E-Turbo TTYs. When an E-Turbo user has entered a preferred LD carrier, we process the call without delay or questioning the caller.
Typing Speed	E-Turbo users can decrease the speed of the CA's typing on the call at any time without CA interaction.
Language	E-Turbo users can request to use English or Spanish. CAs will receive this request and immediately transfer the caller to a CA who has the skills necessary for the call.
Other Preferences	The E-Turbo user can also tell the CA if they prefer to not have relay announced, relay explained, or to not have recordings typed. The CA honors these requests without questioning the caller.

ASCII

Our TRS modems also support faster transmissions using ASCII protocols for TTY devices (300 baud) and computers (2,400 baud and up). We make it easy for relay users to take advantage of ASCII features that are built-in to their TTY devices. To use ASCII, callers simply use the ASCII TTY default settings or configure the following settings for computers: 8 bits, no parity, 1 stop bit, and full duplex.

We were the first relay provider to develop the automated ASCII detection and connection features which allows ASCII users to be detected without manual CA interaction. This results in time and cost savings for relay users and the State.

DETECTING FASTER PROTOCOLS

Our intelligent modems automatically detect faster transmission protocols (Turbo Code, E-Turbo, and ASCII). The modems also allow switching between voice and TTY protocols.

To reduce set-up time, the TRS platform features a **self-learning database** that answers calls using the last known communication mode. TRS users will also be able to register a permanent communication mode as a part of the Customer Profile that overrides the temporary self-learning database.

4.2.3.2 Speed of answer. *TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.*

Bidder response:

We have read and fully meet this requirement.

We will answer at least 85% of all inbound TRS calls within 10 seconds on a daily basis except during network failure. This includes all call types including Spanish, STS, and VCO.

All calls are answered by a live CA who is ready to immediately process the call. Our service is designed around the concept that relay users deserve the same calling experience as traditional phone users. When relay users dial 711 (or other access number), the access should be almost instantaneous in the same way traditional phone users pick up the phone and hear a dial tone.

Over the past 3 years, our average speed of answer rate for customers was 95% of calls answered within 10 seconds[23]. In fact, each month was above 90%. Even more important is our ability to consistently meet speed-of-answer requirements for State and Federal customers. In 2013, we met 99.4% of our 15,600 contractual speed-of-answer requirement including during force majeure events such as hurricanes, tornadoes, and severe winter storms.

We are able to achieve these industry-leading speed-of-answer results through the use of superior technology and people. All TRS call centers are connected by a central call routing system, workforce scheduling system, and a workforce management team. This means that callers benefit from the highly-efficient relay service through faster and more consistent service.

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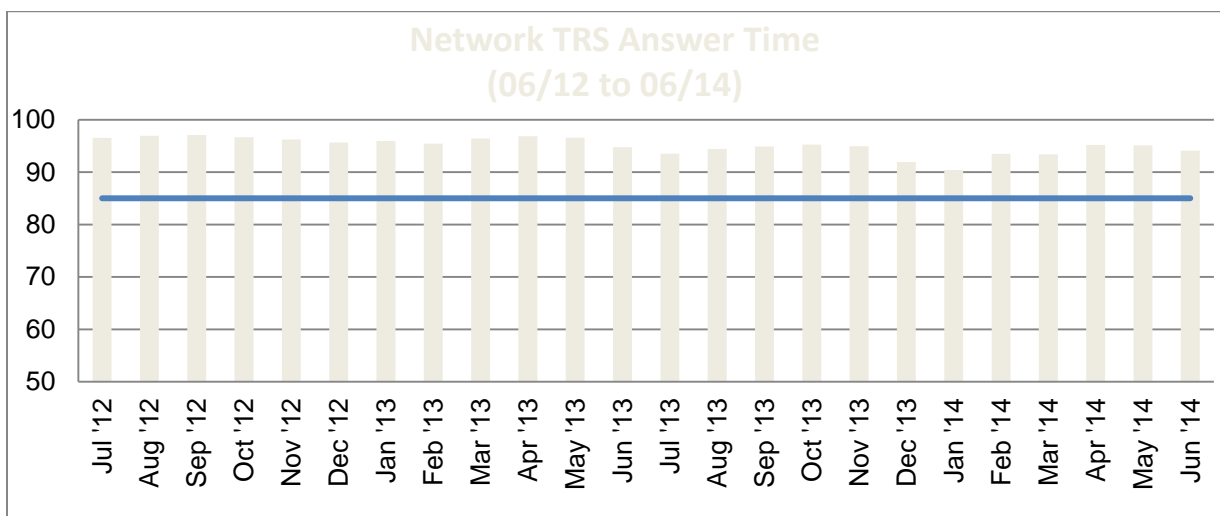
[23] July 1, 2011 through June 30, 2014

Our quick answer time incorporates the latest call center technology, experienced traffic analysts, and a large CA workforce to deliver industry-leading results, even during times of planned or unplanned outages. Please see the chart below for examples.

TRS Issue	TMCC Actions
Call Center Fire Alarm **(Call center closed for 20 minutes)**	While the TRS staff was offline, the traffic management group secured additional staffing at all other call centers.
Call Center Network DS3/Fiber Cut	When a network issue briefly interrupted service at one call center, the traffic management group arranged additional staffing at all other call centers including Spanish-language support from multiple other centers.
Mandatory Tornado Drill **(Call center closed for 30 minutes)**	When the main Customer Service office had to close to conduct a tornado drill (required by the State), the traffic management group arranged for Customer Service staff at the back-up call center.

LEADING TECHNOLOGY

Our centralized workforce scheduling software allows us to handle the daily number of relay calls and the CA amount of work more efficiently. The software gives us real-time insight which gives us options on how to handle the daily activity. We forecast Relay call volumes every 15 minutes – four times more detailed than another relay provider. To develop the 15-minute forecast, our staff considers historical information, current trends, and special events (e.g., weather, scheduled political events, etc…).

Our consolidated scheduling software also directly benefits the CAs. Giving CAs more information and allowing them to manage their own time at work can make a big difference in morale, helping to reduce CA turnover, and attendance problems that can add up to considerable costs. This workforce scheduling software means that we are able to offer CAs greater flexibility. The scheduling software also provides information about how well our CAs adhere to their schedule. Following a CA schedule means Relay Colorado users won't experience unnecessary wait time when making calls. This also saves the State as we don't need to hire more staff and our price reflects that efficiency.

REAL-TIME DISPLAY

Every 30 seconds, relay call centers and the traffic management group receive the latest information on how we are doing. The real-time display makes it easy for us to instantly take action, if needed (e.g., increase staffing or conduct training sessions). The real-time display provides:

- Daily speed of answer (% of calls answered within 10 seconds)
- # of current calls
- # of calls on hold
- # of CAs logged in to the system
- # of CAs ready and available to take calls
- # of daily calls (with abandons)
- # of daily calls (without abandons)

CALL ROUTER

While it sounds simple to receive a relay call and route it to the next available CA, it is actually a science. With the cost of CA work time being the single most expensive part of providing relay service, there are many factors that play into doing it more efficiently.

We have invested heavily in our call routers to ensure we are doing it faster and better. Our extremely robust call router can route calls across the network seamlessly and transparently to users.

When a caller dials into TRS, our call router uses "routing scripts" to determine which call center and CA should handle the call. With the information available to our call router, we can base that information on many key elements.

Platform Health
Before sending a call to a call center, we check to see which call centers are open. We also verify that there are no technical or other issues affecting the center (e.g., fire drill). This all happens automatically.

Service Needed
We also look at what type of relay service is being requested. If the user dialed a dedicated number or has a Customer Profile for STS or Spanish, we connect the caller to the correct CA the first time – without forcing them to redial or be transferred.

Multiple Available CAs

When more than one CA is available, we can choose which CA will receive each call. We can monitor a CA's workload. This gives us the option to route relay calls to a CA who has not been as busy, giving the busier CA a break.

Anticipated Hold Time

We minimize hold times, whenever possible. There are times when no CAs are readily available. We use a network solution when faced with this dilemma. Similar to choosing a checkout line at a grocery store, we analyze many factors before making the decision what call center will be assigned the call. Choosing the shortest line is not always the quickest.

Relay Colorado Scripts

We will create special routing scripts for Relay Colorado. These scripts will be based on the RFP requirements but may be customized based on the time-of-day, day-of-the-week, or day-of-the-year.

Back-Up Call Router

Our primary router is reliable and rarely experiences any type of outage. In the unlikely event that the primary call router has an outage, we do have a back-up solution that delivers calls to the relay centers.

The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Bidder response:

We have read and fully meet this requirement.

We will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is delivered to the TRS platform and we will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Bidder response:

We have read and fully meet this requirement with the clarification that our TRS platform has eliminated an unnecessary connection between our network provider (IXC) and a terminating LEC to reduce potential points of failure and speed up call processing.

We begin measuring speed-of-answer at the time the call hits our TRS platform (i.e., relay switch). Elapsed time continues to accrue until the call is answered by a live CA ready to process the call.

Our equation for answer time (i.e., Service Level) has the numerator representing the total number of calls that are answered in 10 seconds or less. The denominator is the total number of calls reaching the switch.

Answer Time =   the total number of calls answered in 10 seconds or less

total number of calls

ADDITIONAL TIME SAVINGS FOR END USERS

While the State defines speed of answer as the time the call is delivered to the TRS provider's switch until the call is answered by a live CA, relay users total wait time is higher.

From a customer's perspective, however, the customer's wait time involves far more. A customer's wait time starts when a relay user dials 7-1-1 (or a toll free number) and lasts the time that user is connected to the CA in the correct communication mode, including the following:

♦ Originating LEC routing time,
♦ Toll-free network routing time,
♦ Terminating LEC routing time (if applicable),

- ◆ TRS platform and database set up time at the call center,
- ◆ Time holding for an available CA, and
- ◆ Time for CA to engage the caller in the correct mode (if not done automatically by the system).

Although not required by the FCC, we have taken numerous steps to reduce "Customer Wait Time" – even in areas not defined by the FCC's definition of Speed of Answer. **These enhancements also save the State money.** Our updates include:

- ◆ Automated 711 Call Routing: TRS users who have registered a Customer Profile with Spanish or STS preferences will automatically be routed to a CA with those skills.

- ◆ Dedicated Toll-Free Numbers: TRS users can dial dedicated toll-free numbers to quickly reach a CA with the skills needed to handle the call (e.g., Spanish, VCO, STS).

- ◆ Elimination of Terminating LEC connection: Our TRS platform connects directly to the IXC network. Although not a part of the FCC's definition for Speed of Answer as this happens prior to being delivered to the TRS switch, we have eliminated this potential point-of-failure.

- ◆ Automated acceptance of calls by the CA software: Our intelligent CA software automatically accepts calls by inbound users. Rather than the CA physically pressing a key to accept calls, the software immediately answers and presents the call to an available CA who is ready to assist the caller.

Our technology enables us to maximize efficiency. These savings provide significant benefit and greater price stabilization in the rapidly-declining wireline service.

Abandoned calls shall be included in the speed-of-answer calculation.

Bidder response:

We have read and fully meet this requirement.

We include abandoned calls in the speed-of-answer calculation.

A TRS provider's compliance with this rule shall be measured on a daily basis.

Bidder response:

We have read and fully meet this requirement.

We will ensure that compliance to speed-of-answer requirements are measured on a daily basis, and reported in the State's monthly reports and invoices.

The system shall be designed to a P.01 standard.

Bidder response:

We have read and fully meet this requirement.

We will ensure that at least 99 percent of all Relay Colorado calls that reach the relay center switch are answered by a CA ready to process the call or receive a ringing signal in compliance with federal

and state regulations. In the unlikely event that a call is blocked by the TRS platform, the caller will receive a network blockage signal of 120 interruptions per minute.

Our internal objective for call completion for wireline voice network availability is **99.995% - well above the State and Federal minimum requirements.** We strive to meet this same benchmark for our relay users.

In compliance with the federal requirements, we provide adequate network facilities so that even with projected calling volume the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

We do not have issues in complying with the P.01 requirements as incoming network capacity is well in excess of any peak load requirements. We have a proven track record in the industry of going the extra mile to avoid blockage for our relay users by engaging the many tools and resources available, including, but not limited to:

♦ Industry-leading TRS switch technology with automatic alarming when we even get close to capacity
♦ Routine platform and circuit capacity analysis

INDUSTRY-LEADING SWITCH TECHNOLOGY

Our TRS platform is designed to prevent blockage and to exceed industry standards which means that no more than one call in 100 will receive a busy signal when calling the relay service at the busiest hour. Once the calls reach the TRS platform, they will be handled by one of three Automatic Call Distributors (ACDs).

Our three TRS switches are connected directly to the 800 network by redundant inbound connections. If both connections to a switch go down, calls are automatically re-routed to the unaffected switches. Each switch is also segmented to support portions of CA positions at multiple relay call centers. If a portion of the switch is affected, the rest of the switch will continue to process calls. We can reduce impact by having CAs log into unaffected CA workstations.

Our TRS switches also feature automatic alarming that alerts technicians if capacity thresholds are reached. Our highly redundant TRS architecture and excess circuit capacity virtually eliminates blocked calls. The redundant system provides quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems, including reaching pre-determined capacity levels, and moves to the secondary systems, immediately if necessary.

With system availability in excess of 99.995%, our digital advanced-technology switches provide unparalleled reliability and fault recovery.

> **Our TRS platform switches and software were upgraded in 2012.**

Over one million businesses worldwide, including us, rely on our platform switch technology provider for solutions and services that enhance value, improve productivity, and gain competitive

advantage. Our TRS switch provider is a world leader in secure and reliable IP telephony systems, communications software applications, and full life-cycle services. This state-of-the-art switching technology is very different from the switching systems used by the competition.

CAPACITY MANAGEMENT ANALYSIS

The key to providing a consistent quality experience is to ensure routine, periodic analysis of all components of the Relay Service. Usage studies of TRS system components ensure that optimum capacity requirements are met while ensuring maintenance to all service standards detailed in the RFP.

- ♦ Trunking capacity reports, including busy-hour information, are captured and reviewed daily and weekly to ensure that capacity levels remain within thresholds.
- ♦ Automatic alarms within the TRS platform switches alert our IT teams if pre-determined threshold capacity levels (more stringent than the State requirements) are exceeded.
- ♦ Our switches have built-in algorithms that predict the number of circuits needed based on historical volumes that assist in both short- and long-term planning.
- ♦ We review historic call volume to determine short-term and long-term personnel staffing needs on a periodic reoccurring basis.
- ♦ Equipment utilization, including the number of CA positions, is monitored weekly and quarterly.

Blockage is measured as a percentage of each group's calls received by the IXC network for delivery to the appropriate platform that are either not delivered due to congested circuits on the platform, or are presented but not accepted by the platform.

WIRELINE CAPACITY PLANNING

Capacity planning of the voice (IXC) network is achieved by reviewing Dynamic Controlled Routing (DCR) node stats daily for traffic increases, decreases, and overflows. DCR is an automated processor that monitors all InterMachine Trunks every 10 seconds and allocates traffic among switch pairs in a manner to meet the changing traffic loads of congested routes. DCR will automatically recommend off-peak trunk pairs to complete traffic from congested routes.

Using these off-peak routes greatly reduces the chances of a call being blocked by a congested route. Any switch exceeding a Grade of Service (GOS) of 4 calls blocked per 1000 callers in an hour will be analyzed for port augmentation.

Augments are issued at half of the IMTs' historical undersized delta using Average Busy Hour (ABH) Erlang B in modular groups of 24. These IMT augments will allow calls to be completed via the direct route or DCR. Port augmentations are issued on overflowing IMT routes to avoid exceeding the maximum call blocking level of 5 calls per 1000 callers.

We also collect Call Detail Records (CDRs) and Operational Measurements (OMs) for reporting purposes, and then create reports to enable internal and external customers to monitor their traffic. If problems are identified, we use both CDR and OM data to help identify the issues in either the network or on a customer trunk. The data helps pinpoint problem locations so appropriate groups can be brought together to correct the problem.

A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to SRAs and TRS providers upon request.

Bidder response:

We have read and fully meet this requirement with the clarification that we have eliminated the incoming LEC as a point of failure. As explained above, our TRS platform connects directly to the IXC network. Call attempt rates from the toll-free network to the TRS facility are available and will be provided, upon request.

4.2.3.3 Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Bidder response:

We have read and fully meet this requirement.

We will offers Relay Colorado users the option of having their intrastate, interstate, and international calls carried by any IXC who has agreed to participate in the State's COC program. When a Colorado user indicates their COC preference, the Relay Operator verifies that the requested Carrier is a COC participant. If so, the call is routed accordingly. Relay Colorado users will be able to use any billing method made available by the requested Carrier; including Collect, Third-Party Calling, and Pre-paid cards.

Relay Colorado users may also designate their preferred COC in their Customer Profile in order to default to that specified Carrier. This feature is included in our standard features. As described in Section 4.1.1.2, we provide equal access to interexchange carriers in full compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006). This approach ensures that we are providing the same access that is available to voice users.

BILLING OPTIONS

We will process operator-assisted calls such as: Collect, Third Party, Person-to-Person, non-proprietary LEC (local) or IXC (long distance) calling or credit cards (as offered by the user's preferred provider if the Carrier is a participant of the Carrier-of-Choice program). We will also process calls to or from hotel rooms and pay telephones.

Sent Paid
Our TRS platform supports billing to the calling line on an unrestricted line and will offer alternative billing methods either when requested on an unrestricted line or required due to a restricted line. The TRS platform receives the ANI and ANI II digits of the calling line, recognizes the routing needs of the calling party, and will map the line II digits to the appropriate TRS II digits. When routing the call to the customer's preferred carrier of choice, we will provide all necessary additional information to that carrier. We shall also provide access to Local Exchange Carrier (LEC) operator when necessary.

Collect Calls

Relay Colorado users will be able to bill long distance calls to the person they are calling. In these cases Relay Operators or the long distance operator obtain call acceptance from the called party prior to allowing the user to begin his/her conversation. This information will be embedded in the call detail record and used to bill collect calls to the end user.

Person-to-Person

TRS users can place person-to-person collect calls. The calling party must specifically request a "person-to-person" call to avoid accidentally incurring higher charges. Only the person requested for the person-to-person can accept charges for these calls. System flags are recorded so that these calls can be rated and billed appropriately.

Third Party

TRS users can bill long distance calls to a third-party number (i.e., a different number than the calling or called number). All Relay calls are billed from the city where the caller is located to the city where the called party is located.

Credit Cards and Prepaid Calling Cards

Colorado Relay users will be able to place long distance calls and bill the call to a calling card, credit card, or prepaid card if supported by the participating COC.

4.2.3.4 TRS facilities. TRS shall operate every day, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. TRS shall transmit conversations between TTY and voice callers in real time. Adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. TRS that are not mandated by the FCC are not required to be provided every day, 24 hours a day. This definition is more detailed than the FCC requirement.

Bidder response:

We have read and fully meet this requirement.

We will provide TRS 24 hours a day, 365 days a year. Our TRS platform features functionally-equivalent equipment to that of normal central offices, including uninterruptible power supplies (UPS) for emergency use. These protections ensure that loop trunk congestion is not a problem for our TRS users.

The TRS platform is supported by three redundant switches connected by two redundant inbound connections. Each TRS platform switch is located in a telecom bunker that offers additional security and reliability.

If a switch goes down, calls are automatically routed to the unaffected switches and call centers. Each switch is also segmented to support pods of CA work stations at the relay center. If a single portion of the switch is affected, we can continue to process calls by having CAs log into unaffected CA workstations.

The TRS platform also supports outbound calling redundancy with five different types of circuits and connections. If the primary connection is not available, the call can be placed using alternate outbound connections, including the following:

♦ ISDN connections to the Local Exchange Company (LEC) support local calls and is the back-up solution for toll-free calls

♦ SS7 circuits to the Access Tandem support toll calls and toll-free calls

♦ ISDN connections to the DMS 250 support local calls (back-up) and transferred calls

♦ Ultra watts circuits are maintained as a back-up solution for all calls types (with the exception of toll-free calls)

♦ Virtual Private Network (VPN) connections to the DMS 250 support regional toll-free calls and Marine long distance calls

NON-MANDATED SERVICES

We understand that non-mandated services are not required to be offered 24/7. With the exception of our captioning for conference calls service, which is available during standard business hours, all of our services are available 24/7.

4.2.3.5 Technology and Caller ID. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities.

Bidder response:

We have read and fully meet this requirement.

We are committed to leading the market in investing in new technology and in fulfilling government commitments. During the past 10 years, we have invested over $15 million dollars in our relay platforms and products to ensure that we are providing the most desired products and features available in the industry. In 2014 alone, we invested approximately $1.35 million dollars. Recent Relay platform and products upgrades include the following:

♦ TRS platform switches (including software)
♦ TRS platform databases
♦ Relay Operator desktops
♦ TRS Braille displays for our low vision, blind Relay Operators
♦ Carrier of Choice routers
♦ Application Servers
♦ Peripheral Gateway Servers

TRS facilities are permitted to use Signal System 7 (SS7) technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq. Regarding Caller ID, when a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Bidder response:

We have read and fully meet this requirement.

Our Caller ID service passes the calling party's 10-digit number to the called party. This ability increases efficient call set-up to relay users, even those who do not subscribe to the service.

To use Caller ID service, relay users simply need a telephone or other equipment with a caller-ID display device and to subscribe to the service through their phone company. When placing calls, our relay platforms will be able to tell automatically if the customer prefers to send their Caller ID or block it. If blocked, the Caller ID is not passed to the called party.

If not blocked, the calling party's 10-digit number is displayed (rather than the TRS facility).

HISTORY AND BENEFITS OF SS7 TECHNOLOGY

SS7 is a network standard that was developed from the Common Channel Signaling (CCS) international standards recommendations set by the ITU Telecommunication Standardization Sector (formerly CCITT), the international telephony standards organization. In the U.S., we conform to the American National Standards Institute (ANSI) standards, Issue 1.

CCS is based on the concept of "out-of-band" signaling where signaling is a data communications function and has its own channels on the network separate from the call transmission facilities. SS7 is strategically important for the following reasons:

♦ SS7 takes full advantage of fiber-optic transmission technology and meets the requirements of recent ITU Telecommunication Standardization Sector and North American standards activity

♦ SS7 is a high-speed, reliable data network designed to support the call set-up and intelligent network needs of the IXC network

♦ SS7 is a basic block required for ISDN, and allows the addition of an abundance of features and services that depend on SS7 technology; the variety of different services available with digital networks could not be offered with transparent interconnection without the use of common channel signaling

Prior to the deployment of SS7, all call set-up information was relayed switch-to-switch on the same trunk circuit as the call itself. This information included supervisory signals (e.g. dial tone, ring back, busy tone), billing information (who called whom), and network management signals, such as maintenance test signals. This type of signaling (per trunk or associated channel) has some inherent disadvantages compared to SS7 (slower, inefficient use of available circuits, susceptible to fraud).

CALLER ID SUPPORT THROUGH THE CA

Our TRS platform has been designed to offer full functionally-equivalent access to telecom services. Caller ID including blocking services can be initiated directly without the CA's involvement. Our sophisticated TRS platform also gives TRS users the additional flexibility of asking the CA to block or unblock their line on a per-call basis.

Caller ID Blocking
CAs have the ability to add a Caller ID block to a TRS user's line for use on that relay call.

When a TRS user dials into Relay Colorado (without a Caller ID block registered from the LEC) and asks the CA to block Caller ID, the CA can hit a toggle button on the TRS CA software to add a temporary block.

This is especially helpful for callers who have difficulty navigating the traditional *67 per-line Caller ID blocking feature.

This feature is also extremely helpful when multiple calls are being made. For example, a TTY user may place a call to family and wishes Caller ID to be displayed. On the next call, to respond to a classified advertisement, the TTY user may wish to block his Caller ID. In this instance, the TTY user could simply ask the CA directly to block Caller ID.

This approach saves the TTY user time as he/she would not need to hang up and redial into Relay Colorado to make the second call with the Caller ID block.

Per Call Un-Blocking
Likewise, the CA can un-block a line that has registered a per-line or per-call Caller ID block with the LEC. Many phone users do not accept calls from unknown users and will ignore the call or block it completely using the "Anonymous Call Rejection" LEC feature.

If this happens through TRS, the TRS user can ask the CA to unblock the Caller ID and immediately place the call. The TRS user will not have to hang up from Relay Colorado and call back in.

Return to Default
All requests for Caller ID and Caller ID blocks that are handled by the CA are available on a per-call basis. The TRS user can select Caller ID settings on a per-outbound call basis. This information is not saved for future calls.

OTHER LEC FEATURES

The LEC features listed below are a sample of what may be available through Relay Colorado as a result of our provision of SS7 technology. The user's LEC services determine which features are available.

Anonymous Call Rejection
Anonymous Call Rejection prevents calls from callers who have blocked their Caller ID information and is typically offered by landline carriers as a standard part of the Caller ID package. Users who have access to Anonymous Call Rejection from their carrier will continue to have this service available through TRS as this feature is activated by the LEC when Caller ID information is provided.

Customers who have enacted this feature will not receive calls from Relay Colorado users with their Caller ID blocked. When a TRS user (with blocked Caller ID) places a call to someone with the Anonymous Call Rejection feature, the CA will relay the LEC recording (e.g., "We're sorry the party you have reached is not accepting private calls, if you want to allow your number to be displayed

hang up dial *82 and redial the number.") to the inbound caller. If the inbound TRS caller wants to redial and send Caller ID, the caller will need to hang up, unblock his or her Caller ID, and redial the Relay Colorado service and provide the CA with the telephone number or ask the CA for last number redial (LNR).

Call Forwarding
Call forwarding (*72) is provisioned on the Relay Colorado user's line by the LEC. Incoming phone calls to the caller are automatically forwarded to a new telephone number. This process will be completely transparent to the CA.

Call Rejection
Selective Call Rejection is provisioned by the LEC and allows a user to create a list of phone numbers so that they will receive only calls from numbers on that list. All other callers will be directed to an announcement (e.g., "The number you have dialed is not accepting calls at this time.") If this recording is reached by the Relay Colorado CA, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it may supersede all other enhanced features.

Last Call Return
Relay Colorado users cannot use Last Call Return by dialing *69 – which is a feature that allows customers to automatically return the last incoming call.

However, because we provide true Caller ID service through SS7 signaling where the actual information of the calling party (rather than 711 or relay center number) appears on the Caller ID box, the Relay Colorado customer is able to view the telephone number of their last incoming call and to provide the TRS CA that number or to dial it directly from a CTS phone.

Preferred Call Forwarding
Preferred call forwarding is provisioned on the user's line by the LEC. Incoming phone calls to the caller on a pre-subscribed list are automatically forwarded to a new telephone number. All other calls do not forward to the new number and may be redirected to a recording, busy signal, or voicemail as provisioned by the LEC. The CA will keep the inbound caller informed and process these calls as normal.

Priority Call
The priority call feature is provisioned on the user's line by the LEC. Because we provide true Caller ID through SS7 signaling where the actual information of the calling party (rather than 711 or relay center number) appears for Caller ID, if the called party has enabled the priority call feature through the LEC, the telephone numbers will ring distinctively based on the calling party's information.

Call Trace
Call Trace is a fee subscription service offered by telephone company providers which works by allowing a phone call recipient to mark or flag the preceding phone call connection as malicious (i.e. harassing, threatening, obscene, etc.) The phone system will then automatically trace the call by flagging station to station billing and routing data including start and end times. The call trace is not dependent upon call duration and will record all meta-data regardless of source conditions - even if the call was made from a silent number, payphone or a number with caller identification disabled. To protect privacy, the resulting trace data is only made available to law enforcement.

This feature is not automatically available via relay services as most malicious callers block Caller ID. Relay Colorado encourages users in this situation to contact the appropriate law enforcement agency. Our Corporate Security works closely with law enforcement agencies and provides limited call detail information, upon subpoena.

4.2.3.6 Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls that must be made by the relay user in order to complete calls involving recorded or interactive messages.

Bidder response:

We have read and fully meet this requirement.

We have processed calls to Interactive Menus and Voice Mails for many years and leads the industry in paving the way for better customer experiences on these calls. We were the first relay provider to introduce recording technology for CA software in 1994. Our recording technology continues to lead the industry by being more flexible and efficient.

RELAY USER CONTROL

Relay users are in complete control of how recordings or interactive menus are processed. Many relay users have expressed a desire to immediately have the option to tell the CA how to proceed when they reach a recording. In many instances, callers prefer to speak to a live representative rather than the automated recordings. To answer this request, we revised our procedures several years ago to be more flexible and customer focused.

When reaching a recording, the CA types the name of the business reached, informs the caller that a recording has been reached by pressing a hot key, and asks the caller if they would like to hold for a live person.

ABC COMPANY (RECORDING) (WOULD YOU LIKE TO HOLD FOR A LIVE PERSON Q) GA.

We understand that relay users are looking for an efficient call that meets their needs for information and access to a live representative. Our approach permits the relay user to retain full control of their call at all times. TRS users can also request to have the entire recording typed to them verbatim. CAs follow customer instructions at all times (either holding for a specific department or live rep or typing the options).

RECORDING TECHNOLOGY

In 1994, we were the first provider to develop a TRS recording technology. Our recording technology allows a CA to record audio information and simultaneously replay the recording at a slower rate so that the CA can type without multiple redials. This recording technology was implemented well before the FCC required this technology in 2000 and was available before other providers began offering the feature.

Today, we believe our advanced recording technology continues to lead the industry by providing a more real-time experience. When reaching a recording, the CA immediately notifies the customer and, if requested by the user, the CA can immediately begin typing the message at the same time the recording is being recorded. Unlike some providers, we do not require callers to hold while a recording is being recorded and then relayed.

Our ability to relay recordings immediately offers a distinct advantage for Relay Colorado users. Less waiting also means lower cost for the State as fewer minutes per call are billed to the State.

Our superior recording technology allows CAs to:

- Capture recorded audio
- Pause the recording in order to type the full message
- Rewind the recording by five (5) seconds to retrieve anything missed
- Go to real-time, live call to check and see if a live person has answered the call
- **Return to the last typed phrase to continue relaying the recording**

KEEPING THE RELAY USER INFORMED

CAs keep the relay user informed of call status at all times. As the CA makes selections based on the relay user's instructions, the CA will confirm those choices by typing the menu prompts in parenthesis, such as:

(PRESSING 1 FOR ENGLISH) or (PRESSING 0 FOR OPERATOR)

This ensures that the caller is always in control of the call and can select additional prompts if they would like.

CONFIDENTIALITY

We protect customer information and all recorded messages are deleted after the completion of each relay call. Our CA software removes all call information from the CA position and no records of the call are kept other than the basic call detail records that are stored and transmitted electronically immediately following the completion of the relay call.

We do not impose any charges for additional calls needed in order to complete calls involving recorded or interactive messages. Relay callers are only billed for the first initial call. This provides a functionally-equivalent billing scenario comparable to that of a direct-dialed call.

LEAVING ANSWERING MACHINE MESSAGES

CAs have the ability to leave all types of answering machine messages, be it a voice mail system or TTY answering machine. The CA is an advocate in supporting relay users' decision on how calls should be handled. We encourage our relay users to let us know exactly how to make their calls more productive.

The tables on the following pages highlight our standard procedures for each type of communication mode. These procedures can be customized on a per-call or per-line (Customer Profile) basis. All relay users' instructions override our standard processes.

We look forward to providing all of these options to Relay Colorado users. By having superior recording technology and so many options available, we can ensure that each relay user is able to access all types of voice mail and recordings without frustration.

TTY to Voice Answering Machines

Our standard process for relaying answering machine calls ensures that the caller is kept informed during each stage of the process and does not experience unwanted delays.

Process for Leaving an Answering Machine Message for Text Relay Users
The text relay user instructs the CA to dial a number.
The CA dials the requested number and reaches an answering machine, keeping the user informed of the call progress. **DIALING LOCAL CALL XXX-XXX-XXXX RINGING 1… 2…3…4…**
If the voice recording on the answering machine is too fast, the CA will use the recording feature to pause or slow down the recording in order to accurately type it verbatim (unless the customer has requested otherwise).
The complete message is relayed including the beep and gender of the person on the recording, such as: **WE CAN'T COME TO THE PHONE NOW PLEASE LEAVE A MESSAGE** **(BEEP) (F) (ANS MACH HUNG UP) GA**
The text relay user types his or her message to the CA. If no instructions are provided, the CA will ask the relay user if they would like to leave a message.
If the caller wants to leave a message, the CA redials the call (without additional end user charges) and voices the message to be left. **(REDIALING TO LEAVE MSG) RINGING 1...2…3…4… (ANS MACH)** **(LEAVING MSG)**
Once the message has been successfully left, the CA will inform the relay user through the use of hot key macros, such as; **(UR MSG LEFT) RELAY COLORADO OPR XXXXM GA**

If the TTY user gives the CA instructions on how they want the call handled, the CA will follow the TTY user's instructions. The TTY user's instructions always override our standard procedures.

Voice to TTY Answering Machines

We have standard procedures for relaying answering machine messages for hearing relay users who reach a TTY answering machine. The CA ensures that hearing relay users are kept informed during the process while being able to listen to the call as it happens.

Process for Leaving an Answering Machine Message for Hearing Relay Users
The hearing relay user instructs the CA to dial a number. The CA enters the number and dials: **THANK YOU, DIALING NOW.**
As the call is dialed, the hearing relay user can hear the phone ringing.
When the TTY answering machine is reached, the CA will inform the hearing relay user and read the text recording aloud. For example: **YOU HAVE REACHED A TTY ANSWERING MACHINE, THE MESSAGE IS** **…** **HELLO THIS IS JOE. LEAVE A MESSAGE (BEEP) GA**
The CA will ask the hearing relay user if they would like to leave a message, e.g., **WOULD YOU LIKE TO LEAVE A MESSAGE?**
If the hearing relay user wishes to leave a message, the CA will press a hot key (macro) for the TTY recording to announce relay, e.g., **RELAY COLORADO OPR 1234M WITH A MSG**
The CA will type the gender of the hearing relay user and his or her message, such as: **(F) THIS IS SUE GIVE ME A CALL TONIGHT SKSK**
Once the message has been successfully left, the CA will inform the voice relay user and wait for further instructions: **YOUR MESSAGE HAS BEEN LEFT.**

STS Users

We also support STS users when leaving answering machine messages with an emphasis on user control and patience. Our standard procedures are provided below.

Process for Leaving an Answering Machine Message for STS Users
The STS relay user speaks the number to dial, e.g., **THIS IS MARY. PLEASE CALL DR AT 123-456-7890**
If the STS user does not have a profile with call handling preferences, the STS CA will ask the user how the call should be handled by asking questions such as: **ARE THERE ANY SPECIAL INSTRUCTIONS YOU HAVE FOR ME?** or **WOULD YOU LIKE ME TO VOICE EVERYTHING?** If no … **WOULD YOU LIKE ME TO VOICE ONLY WHAT THE OUTBOUND DOES NOT UNDERSTAND?**
As the call is dialed, the STS relay user can hear the phone ringing.
When the answering machine answers, both the CA and STS user can hear the recording.
The STS CA will ask the STS user if they would like to leave a message.
Depending on the STS user's preferences, the STS CA may obtain a message in full and then redial to leave it on the machine in the CA's voice.
Once the message has been successfully left, the CA will inform the STS user and wait for further instructions: **YOUR MESSAGE HAS BEEN LEFT. WOULD YOU LIKE TO MAKE ANOTHER CALL?**

Please note that if the line is busy and/or the STS CA is unable to leave the STS user's message, the STS user has the ability to request that the CA retain the message for up to 24 hours as a part of our STS Message Retention feature, described in the STS section.

During those 24 hours, the STS user may call back and ask the STS CA to retry to leave the message as many times as they would like. At the end of the 24 hour period, the message is automatically deleted from the system.

VCO Users

The standard procedures in the figure below highlight our flexibility in allowing VCO users the option to voice or type answering machine messages.

For VCO users who prefer to always leave a message when reaching an answering machine or know ahead of time that they will be reaching an answering machine, the CA makes it possible for them to leave a message on the first call. When instructed ahead of time, the CA will simply confirm that an answering machine was reached, e.g., (ANS MACH PLAYING) and if time allows the CA may type (BEEP) if heard, followed directly by the GA. Once the message is left, the CA will confirm with the user.

Process for Leaving an Answering Machine Message for VCO Users
The VCO user voices or types a number for the CA to dial.
The CA dials the requested number and reaches an answering machine, keeping the VCO user informed of the call progress.   **DIALING LOCAL CALL XXX-XXX-XXXX RINGING 1… 2….3…4…**
If the voice recording on the answering machine is too fast, the CA will use the recording feature to pause or slow down the recording in order to accurately type it verbatim (unless the customer has requested otherwise).
The complete message is relayed including the beep and gender of the person on the recording, such as: **WE CAN'T COME TO THE PHONE NOW PLEASE LEAVE A MESSAGE**   **(BEEP) (F)**   **(ANS MACH HUNG UP) GA**
The VCO user speaks or types instructions to the CA, (e.g., "I'd like to leave a message Go Ahead"). If no instructions are provided, the CA will ask the VCO user if they would like to leave a message.
If the VCO user wishes to voice their message themselves, the CA will redial the call (without additional end user charges) and advise the VCO user when to begin speaking   **(PLS VOICE UR MSG WHEN U SEE "GA" REDIALING)**   **(RINGING 1...2...3) (ANS MACH PLAYING) GA**
Once the message has been successfully left, the CA will inform the relay user through the use of hot key macros, such as;   **(UR MSG LEFT) RELAY COLORADO OPR XXXXM GA**

HCO Users

Our answering machine functionality and processes have been tailored to support our HCO users, as well. HCO users can listen to the call as it happens and make real-time decisions. Of course, HCO users are also encouraged to personalize this process, if desired.

Process for Leaving an Answering Machine Message for HCO Users
The HCO relay user types a number to dial. The CA enters the number and says: **THANK YOU, NOW DIALING**
As the call is dialed, the HCO relay user can hear the phone ringing.
When the answering machine answers, both the CA and HCO user can hear the recording.
The HCO user types his or her message.
Once the CA receives the GA, the CA says verbally: **REDIALING TO LEAVE YOUR MESSAGE, PLEASE HOLD.**
The CA will redial, announce the call as a relay call and voice the HCO user's message, such as: **THIS IS RELAY COLORADO OPERATOR 12344 WITH A MESSAGE...** **JOHN, THIS IS SUE. PLEASE CALL ME BACK.**
Once the message has been successfully left, the CA will inform the HCO relay user and wait for further instructions: **YOUR MESSAGE HAS BEEN LEFT.**

VOICE RESPONSE UNITS

Please see our standard process for calls involving voice response units (VRUs) or interactive recordings. These standard processes can be modified by relay users on either a per-call or per-line (Customer Profile) basis.

Voice Response Units
The relay user requests a telephone number that is answered by an automated menu.
The CA will use the recording feature to begin recording the menu.
The CA types the name of the business reached, informs the caller that a recording has been reached, and asks the caller if they would like to hold for a live person. **ABC COMPANY (RECORDING) (WOULD YOU LIKE TO HOLD FOR A LIVE PERSON Q) GA.**
The CA follows the relay user's instructions and keeps the user informed of call status.
CA uses the CA software scratch pad to temporarily store menu options selected by the caller. Depending on the type of recording reached, CAs will use touch tones (i.e., DTMF) or speak the party's selections.
CA redials (as needed) to enter preferences until caller reaches the appropriate message or representative. (Please note that the relay user is only charged for the initial call regardless of the number of redials required to complete the call).
Once the call is complete, the information stored in the scratch pad and on the CA's screen is deleted from the system.

Touch Tone Capabilities
To make navigating menus quick and easy, CAs can easily use the CA software to enter touch tones. In addition, our customer-centric service provides the ability for STS callers to enter touch tones directly. This provides hearing users greater control and confidentiality.

Confidentiality of Voice Response Units
We do not maintain any types of written or electronic records or notes beyond the duration of the call, except as provided elsewhere in the RFP for billing purposes. All customer sensitive information including scratchpad information is automatically deleted when the caller hangs up.

We are a highly committed to protecting our users' privacy and information. Corporate guidelines for business ethics and behavior, called the Code of Conduct, along with the Relay Center Confidentiality forms specifically cite protection of user information and privacy as a paramount responsibility of every relay center staff employee. We re-train and re-commit every employee every year regarding the confidentiality of our relay users' information; all our employees serving relay callers make this commitment.

Retrieving Voice Mail
The following is a brief outline of our standard process used for retrieving voice mails. These standard processes are modified based on individual relay user requests on either a per-call or per-line (Customer Profile) basis.

Retrieving Voice Mail Procedures
When a relay user asks to retrieve voicemail, the CA will ask the caller for the appropriate information, if not provided, e.g., **(MAY I HAVE UR VOICE MAIL NBR AND PASS CODE PLS Q) GA**
The CA dials the requested number and reaches an answering machine, keeping the relay user informed of the call progress. **DIALING LOCAL CALL XXX-XXX-XXXX RINGING 1… 2….3…4…**
Once the voicemail system answers, the CA enters the passcode using a touchtone keypad.
If there are no new messages, the CA will relay this information and wait for additional customers instructions. **(NO NEW MESSAGES) GA**
If there are new messages, the CA will retrieve all voicemail messages while keeping the relay user informed and prompting them for actions, as appropriate. **(ONE MOMENT PLS)** **(SAVE Q DELETE Q REPLAY Q) GA** **(REDIALING TO GET MSGS)**
Once all voicemail messages have been successfully retrieved, the CA will inform the relay user and following the user's instructions.

Confidentiality

Relay callers must have confidence in knowing that their personal information such as voicemail access codes remains confidential and private. We do not maintain written or electronic scripts of any conversation. All call communication, electronic scratchpad information, and recordings are automatically cleared once the caller disconnects.

Many relay users choose to store their voicemail instructions within the Notes section of their Customer Profile for their convenience and to speed up call processing. The CA only records this information upon a relay user's direct request. Customer Profile information is considered highly sensitive and is highly protected.

SINGLE-LINE ANSWERING MACHINE RETRIEVAL (AMR)

We also support the ability for Relay Colorado users to retrieve messages from an answering machine at the same location as the relay user using a single telephone line. This is known as Answering Machine Retrieval (AMR).

The standard procedures used to process AMR calls have been provided on the following page.

Answering Machine Retrieval (AMR) Procedures
When a relay user asks for Answering Machine Retrieval, the CA will instruct the relay user to place the phone near the answering machine to play the messages, e.g., **(PLS PLACE UR HANDSET NEXT TO ANS MACH AND TURN ON) GA**
The CA will use the recording feature to record all messages.
Once the messages have been recorded, the CA will wait for the relay user to place the handset back on the TTY.
The CA will replay the messages using the recording feature at a speed that allows the CA to relay all messages verbatim to the Relay Colorado user.
When all messages have been typed, the CA will inform the Relay Colorado user and await further instructions. **(END OF MESSAGES) GA**

Confidentiality of AMR Recordings
As with all other recordings captured as a part of call processing, AMR recorded messages are automatically deleted from the CA's terminal once the relay call is completed.

4.2.3.7 Pay-per-call calls. TRS shall be capable of handling pay-per-call calls.

Bidder response:

We have read and fully meet this requirement.

We will provide access to pay per call services for Relay Colorado users. We use the power of our resources as a telecom provider to deliver the most functionally-equivalent pay-per-call service for relay users.

We will provide a new dedicated toll-free number for pay-per-call services for relay users. If the owner of the phone has registered a block with the LEC, the call will be blocked to avoid unauthorized charges. In addition, we also provide four additional levels of protection, as described on the following pages.

Like voice users, Relay Colorado users will be directly billed by the pay-per-call service provider for both interstate and intrastate calls. Our platform supports the necessary Telecommunication interconnections to make this possible.

We will be proactive in ensuring that all Relay Colorado users understand they will be charged for pay-per-calls and will help Relay Colorado users resolve complaints of high bills.

OVERVIEW OF OUR APPROACH

In 1996, we began offering dedicated toll-free numbers for 900 services to ensure that relay users were protected. This revolutionary approach increased the true functional-equivalence available to
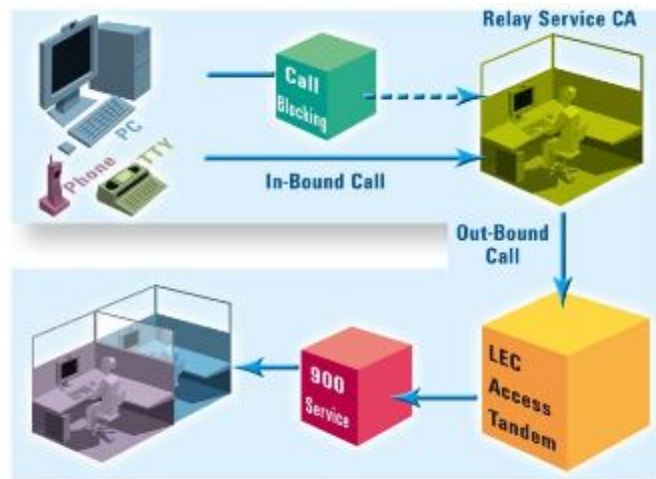
relay users. Rather than mimic inherent system protections, relay users began having the same exact protections available to traditional phone users.

FIRST LEVEL OF PROTECTION – 900 ACCESS NUMBER

To dial pay-per-calls through Relay Colorado, TRS callers will dial a dedicated toll-free 900 number. This first level of protection ensures that callers, who have registered blocks with their local exchange carrier, are protected against unauthorized calls to 900 numbers through the relay service.

In order to reach the relay service, the telephone line must be free from all LEC-enabled 900 blocks, as displayed in the figure to the right.

This first level of protection is very important for business owners or households that want to prevent any unauthorized pay-per-calls from being charged. The risk of high bills being accumulated on a phone line when a LEC block is in place is eliminated with our service.

SECOND LEVEL OF PROTECTION – CUSTOMER PROFILE RESTRICTIONS

We also provide a second level of protection against 900 calls for relay users who may want to place pay-per-calls directly on their phone, but not allow calls through the relay service.

For example, a parent may want to place 900 calls directly and prevent their child (who uses relay) from accessing those services. In this instance, the parent can register a 900 block directly with the relay service as a part of the Customer Profile "Outdial Restrictions" setting. The parent would still be able to place calls directly, but calls through Relay Colorado would be blocked.

THIRD LEVEL OF PROTECTION – GENERAL 900 CHARGE ADVISORY

When the 900 call first arrives at the CA position, the relay user is greeted by a pay-per-call specific greeting, such as:

RELAY COLORADO OPR 1234F (900 CHARGES MAY APPLY) NBR CALLING PLS Q GA

This third level of protection ensures that the CA advises each TTY caller that there will be a charge for the call.

FOURTH LEVEL OF PROTECTION – SPECIFIC 900 CALL ADVISORY

The FCC requires that each pay-per-call provider include an introductory message at the start of the call that includes the name of the company, a brief description of the information or service to be provided, and the price terms of the transaction prior to beginning the charge for the call.

CAs use the recording to capture this message and then immediately disconnect the call. The recording will then be relayed to the Relay Colorado user. This fourth level of protection ensures that callers can disconnect without being charged.

If the Relay Colorado user chooses to accept the charges, the 900 services provider will rate and bill the user as if the call was dialed directly from the originating user's telephone. (Please note that discounts are not offered for relay users placing 900 calls).

FIFTH LEVEL OF PROTECTION – PAY-PER-CALL BILLING SEPARATION

As we support billing directly by the service provider, relay users will have the same protections as non-relay users with billing. All end user billing for pay-per-call services through TRS, including interstate and intrastate pay per calls are rated and billed as if they were dialed directly from the originating user's telephone by the 900 service provider and 900-number Carrier.

Charges for pay-per-call services are displayed in a section of the user's telephone bill that is separated from local and long distance telephone charges.

For each call made to a pay-per-call service, information regarding the type of service, the amount of the charge, the date and time of day, and length of the call must be indicated. Information service providers must notify their customers at least one billing cycle prior to making any changes in their charges or terms of service.

ADDRESSING COMPLAINTS OR CONCERNS

Our Customer Service team is always available to discuss issues with customers, including pay-per-call services. The Customer Service Representatives will help relay users understand their rights as consumers as well assist TRS users in contacting their LEC with high bill questions or file an FCC complaint, if desired.

FCC'S ROLE

When 900 numbers were first introduced, there were widespread reports of abuse as telephone (non-relay) users were charged per-call or per-minute fees. Due to the sheer volume of complaints involving calls to 900 numbers, or "pay-per-call" services, the FCC first adopted rules to govern these services in 1991.

USER'S RIGHTS AND RESPONSIBILITIES

Today, the FCC's rules for 900 calls include several protections for callers and provisions for pay-per-call providers, including the fact that a user's telephone company cannot disconnect the user's local or long distance service for nonpayment of disputed 900 number charges. However, the telephone company can, however, block the customer from making calls to 900 numbers if the customer does not pay legitimate 900 number charges.

Our TRS platform never blocks 900 calls itself. If relay users question why they are unable to place 900 calls or what will happen if they do not pay a legitimate bill, our staff will encourage the relay user to contact his or her carrier directly. If they are unable to resolve the issue, we will provide FCC complaint information.

4.3 CAPTIONED TELEPHONE REQUIREMENTS

The following provides the requirements for Offerors seeking to provide Captioned Telephone services.

4.3.1 Captioned Telephone TRS

Captioned Telephone TRS was inaugurated in Colorado in March 2004 to provide services to Colorado's significant hard-of-hearing population. CapTel® units, a product of Ultratec, Inc., were utilized to provide this service. Captioned telephone TRS is now considered by Colorado to be a basic service and is required in the Offeror's proposal.

Bidder response:

We have read and fully meet this requirement.

Captioned Telephone Service (CTS) allows people with a hearing loss who can speak to voice their conversation directly to a voice user. A specially-trained CA transcribes the conversation using speech-to-text technology to provide captions to the CTS user. A special CTS-enabled telephone is needed to use the State's CTS service.
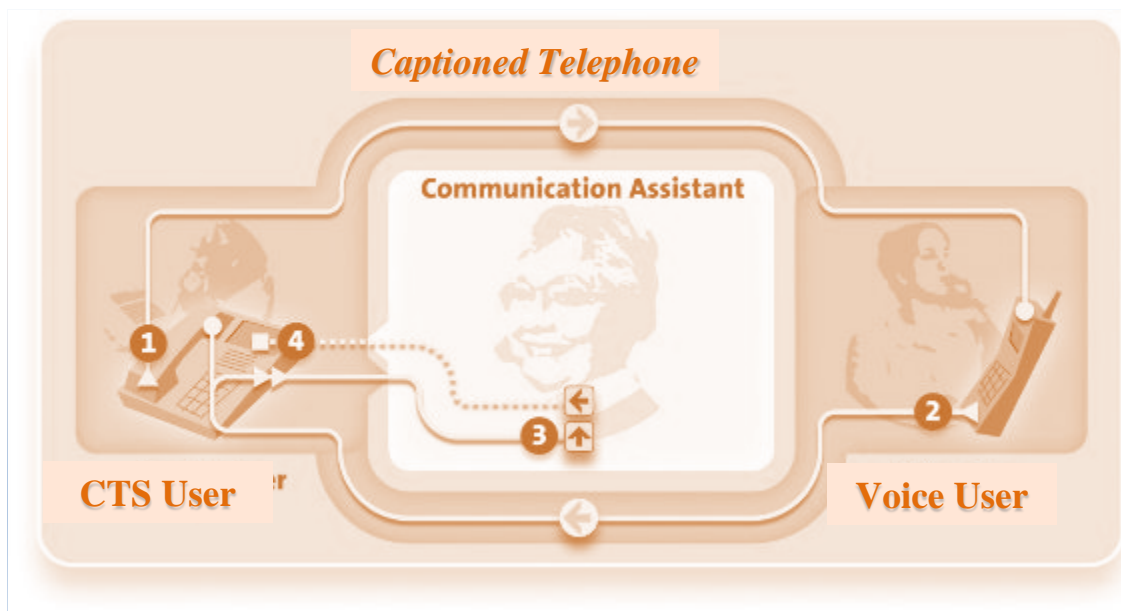
WHO USES CTS?

CTS was designed to assist people with a hearing loss who could benefit from real-time captioning of telephone calls, including the following:

Seniors with a hearing loss
The majority of CTS users are people who are over the age of 65 with hearing loss brought on by age who now have difficulty hearing on the phone.

Deaf and hard of hearing
CTS can also benefit deaf or hard of hearing people who prefer speaking over the phone.

Veterans
Veterans with hearing loss are a growing segment of CTS users.

CTS SERVICE SPECIFICATIONS

The following specifications will be provided as a part of our Captioned Telephone Service:

♦ Accessible: CTS will be accessible 24/7/365. Spanish CTS will also be available from 6 am to 10 pm MST, every day of the year.

♦ Appropriate: We will bill the State for CTS calls based on ANI – similar to TRS – which ensures that the State is only charged for its customers' use.

♦ State Specific: Colorado State-specific CTS reporting will be provided, including the following items:

o state-specific ASA
o state-specific Service Level with and without abandons and
o state-specific abandon call information

♦ Helpful: Specialized CTS Customer Service is staffed 24 hours a day including weekends. Specialized CTS Customer Service is not open on the following holidays: New Year's Day, Easter, Memorial Day, Labor Day, Thanksgiving, and Christmas. On those days, CTS users have the option to leave a message or to contact our Relay Customer Service general access number which is always available.

♦ Compliant: Our CTS is compliant with all State and Federal requirements. The following items are currently waived for CTS:

o Speech to Speech (STS) and Hearing Carryover (HCO)
o Communication Assistants waivers:
  o TRS mandatory minimum standard requiring CAs to be competent in interpretation of typewritten ASL as applied to captioned telephone CAs
  o CA oral-to-type test requirement and permit the use of an oral-to-text test instead for CTS CAs
  o CAs refusing sequential calls not applicable to CTS as the CTS user initiates each call
  o Gender preference
  o 60 wpm mandatory typing speed for CAs
o Interrupt Functionality
o Call Release
o ASCII and Baudot Format

STATE CTS ENHANCEMENTS

We offer the following enhancements to the standard Captioned Telephone platform and services.

711

We provide 711 access for voice callers calling a 1-Line CTS user. Voice users can request a transfer with the CA or add this information to their TRS Customer Profile for immediate transfer.

We pro... ...CTS users including ... ...mmunity services ... ...cy), 411 (directory), 511 (traffic), and 811 (utility information).

In addition to the standard disability training, we provide supplemental User Culture training for CTS CAs during orientation at TRS call centers.

As noted in the Outreach section, we will offer subsidized rates including IP CTS phones at no charge for users who are certified by the Equipment Distribution Program.

Standard Call Features

The following call features are available for all wireline CTS providers.

Call Feature	Explanation
Answering Machines	CTS users can place calls to or retrieve messages from answering machines and voicemail systems. CTS users can also retrieve captions for answer machine messages from their same physical location. CTS users with 840 model phones have a built-in answering machine that can currently store up to 60 messages at a maximum of 2 minutes per message. When a caller leaves a message on the CTS phone, the captions are recorded once. The user can play back the captions and audio as many times as they would like without incurring additional answering machine retrieval charges to the State.
Call Waiting	When a 2-line CTS user hears (or reads a "beep" in the captions to inform the user that a call is waiting), the CTS user simply presses the "flash" button to switch to speak to the 2nd caller with captions. When finished, the CTS user can switch back to the first caller by pressing the "flash" button again.
Caller ID	Caller ID is available through CTS for both CTS and voice users who subscribe to the Caller ID feature from their LEC. The 10-digit number of the person calling is provided (rather than relay number). Callers are also able to use other LEC features that rely on SS7 caller ID technology such as call blocking.
Default Amplification Settings	The State can determine the default amplification settings for its CTS devices. With this new change, the 40 decibel minimum can be turned on or off based on the State's preferences.
Recordings	We provide full access to all types of recordings. CTS CAs have the ability to pause or slow down the conversation in order to fully capture a recording or conversation and provide accurate captions to the CTS user. CTS users can make selections directly by pressing buttons on the phone (i.e., touch-tone capability).
Speed Dialing	CTS users can store up to 3 speed dial numbers in the CTS phone. To place a call using a speed dial number, the CTS user simply ensures that captioning is turned on and then presses the number of the Speed Dial entry. Additional numbers can be stored as contacts.
3-way Calling	We provide 3-way calling for CTS users that is in full compliance with FCC requirements. 2-line CTS users are able to host, join, or be added to any 3-way call in the same manner as traditional telephone users. 1-line CTS users are able to join any three-way call in progress. In order to be added on, the host of the 3-way call would simply dial the national CTS number and enter the CTS user's telephone number.

TYPES OF CALLS SUPPORTED

We provide access to all types of calls, except those waived by the FCC. The following chart highlights types of calls to be provided:

Call Feature	Explanation
Directory Assistance (DA)	CTS users will have access to DA via their carrier of choice who bills for interlata and intralata DA calls at its tariffed rate.
Emergency Calling (2-Line CTS)	2-Line CTS users can place a 911 call where one line is routed directly to the appropriate 911 center and the second line is routed to the captioning center. This allows the user to receive captions on one line and hear the conversation on the other line.
Emergency Calling (Standard 1-Line CTS)	When calling 911 in emergency situations, the standard (1-line) CTS user's call is automatically routed to the appropriate 911 center directly and does not go through the captioning service. The CTS phone functions as a VCO phone which ensures there are no delays reaching emergency personnel who also have access to the caller's phone number and location information.
Interstate and International	CTS users will have access to interstate and international calling. Voice access from international locations is also available. All minutes associated with these calls are billed to the Interstate TRS fund.
Local	CTS users have unlimited access to local calling.
Long Distance	CTS users have the same access to the long distance calls as all other relay users including our expansive list of carriers. (Please note that LD calls for 2-Line CTS users are billed and rated directly on the voice line as the captioning line is separate). We encourage 1-Line CTS users and voice callers to register a preferred COC directly with Customer Service or through a card that is distributed with the CTS phone. Voice callers are also notified on the CTS recording that LD charges may apply. CTS users are able to use any billing method or operator service made available by the requested carrier; including collect, third-party calling and pre-paid cards.
Pay-per-Calls	CTS users can place 900 calls after removing the Customer Profile block. The CTS center does not receive 900 block information from the LEC.
Regional numbers	CTS users will place regionally-directed or regionally-restricted toll-free calls. We also support regional N11 numbers (e.g., 211)
Toll-free	CTS users can place calls to all toll-free numbers.

SPANISH CTS SERVICE

We offer the following support for Spanish-speaking CTS users. Please note translation is not available through any provider.

Spanish CTS is available every day of the week from 6 am to 10 pm MST. While closed, Spanish CTS users can use the phone as a VCO phone.

CTS users can enable Spanish and change the menu into Spanish, by selecting Spanish in the menu.

Spanish Customer Service support is available by dialing a dedicated number or by pressing the Customer Service key.

SPECIALIZED CTS CUSTOMER SERVICE

CTS Customer service is available 24/7 every day of the week (excluding select holidays). On holidays, CTS users can choose to leave a message for the specialized Customer Service team or to contact Relay Customer Service which is available every day of the year.

CTS users can quickly connect to CTS Customer Service by simply pressing the "CUST SERV" button on the CTS phone.

Other Customer Service Options include

- ♦ Phone
- ♦ Fax
- ♦ Mail
- ♦ Email
- ♦ Online forms
- ♦ Online Chat

CTS CUSTOMER PROFILE

We provide our CTS users with the ability to register preferences using a Customer Profile. Colorado CTS customers will not be required to enter preferences in all categories. Minimum mandatory fields to have a customer profile are phone number and the name of their long distance carrier or cell phone provider.

However, since many CTS users are not traditional relay users, we provide helpful literature with all CTS phones that encourages users to register preferences for toll and pay-per-calls.

The CTS Customer Profile includes the following fields:

♦ User's primary telephone number and area code
♦ Address
♦ Email Address
♦ Serial Number of CTS phone
♦ Type of phone using the submitted phone number
♦ User's first and last name
♦ Preferred long distance carrier
♦ Call blocking of outbound pay-per-use calls
♦ Call blocking of toll-free calls
♦ Call blocking of up to 5 specific blocked numbers per type

Entering or Modifying Information

We believe that CTS users should have immediate access to their preferences and make it easy for the customer to view, update, or verify their Customer Profile Data. Colorado CTS users will be able to view, update, or verify their profile using the following:

♦ Customer Service
♦ Online using Customer Service chat

These updates are processed immediately. In addition, customers can email, fax, or mail completed customer database forms to the CTS Customer Service department. These forms will be processed as quickly as possible, most within 24 business hours. A customer can also request a copy of all information entered in the profile either verbally or written through a Customer Service Representative at any time.

The State will consider the utilization of other captioned telephone equipment in this proposal, including Caption Call®, distributed by Sorenson Communications. Offerors must indicate in their response to this proposal that they clearly understand that, should the FCC's position change on captioned telephone waivers and/or standards that they will adhere to FCC captioned telephone policy."

Bidder response:

We have read and fully meet this requirement.

The Captioned Telephone Service (CTS) industry faces significant challenges with increased federal oversight and legacy technology. We are the best partner to assist the State and to ensure CTS users receive the best service.

FEDERAL REGULATIONS

The State Relay Administrator can trust us to do the right thing. When new requirements are introduced, we comply. We clearly understand that, should the FCC's position change on captioned telephone waivers or standards, we will adhere to that policy. Our top priorities are providing a compliant service while serving relay users.
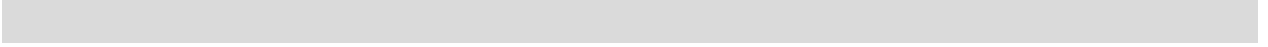
♦ In 2013, we complied with all temporary requirements that prohibited offering financial incentives for referrals and registrations of new IP CTS users, certification (or $75 purchase of phone), and the default setting for captions off for IP CTS phones. Please note that since that time several of these restrictions have since been lifted.
♦ In 2014, we affixed warning labels to all IP CTS phones and ensured that CTS service is used by appropriate and authorized users.

TRANSITION TO DIGITAL NETWORK

As traditional wireline users transition from analog connections to digital services, more CTS users are looking for guidance on how to continue to use the service. We will work proactively with the State Relay Administrator, State Relay Advisory Committee, and CTS users to educate them on the transition and possible solutions**,** including the following:

✓ When a CTS user decides to get home phone service from a VOIP and/or digital provider, this decision may impact their ability to use some wireline CTS phones
✓ If the back-office carrier for your phone upgrades to digital switching, the CTS could also be impacted
✓ There are other CTS options available that support digital connections including IP CTS phones, IP CTS (on the web) and wireless options
✓ The digital transition impacts other services such as fax machines and alarm systems.
✓ There is information available to consumers regarding tests being run by the FCC and telephony providers to assess the impacts
✓ It is not currently possible to offer an analog-to-digital adapter as each provider of digital phone services has its own unique internet protocols

We will work with the State to monitor the impact to the State's service and budget and will also share information with CTS callers.

4.3.2 Captioned Telephone TRS Facilities

Captioned telephone TRS shall operate every day, 24 hours a day. Captioned telephone TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Captioned telephone TRS shall transmit conversations between captioned telephone users and voice callers in real time. Adequate network facilities shall be used in conjunction with captioned telephone TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Bidder response:

We have read and fully meet this requirement.

We will provide CTS that will be accessible and operational twenty-four (24) hours a day, seven (7) days a week, and three hundred and sixty-five (365) days a year. We were the first to offer and provide a statewide CTS service that was available 24 hours a day and 7 days a week and met all FCC requirements. We set the benchmark that other relay providers followed.

CTS PLATFORM ARCHITECTURE

Our CTS technology provider offers the following platform technology for all wireline CTS providers. CTS depends on the interaction between a specialized CTS phone, the CTS platform, and a voice-to-text application that supports real-time transcription.

Data Centers
Calls arrive from the Public Switched Telephone Network (PSTN) at one of two CTS data centers containing SS7 equipment, a call router, and databases (e.g., reporting, billing, jurisdictional). Redundant equipment is available to serve customers without interruption if equipment fails or needs routine maintenance. Data centers offer:

- Multiple connections to network providers,
- Access tandems to support carrier of choice selections, and
- Monitoring equipment to issue alarms and report problems.

Network Operations Center
The CTS Network Operations Center (NOC) monitors the health of the equipment, facilities, and service level performance using specialized software applications to issue alerts, alarms, and informational messages to the CTS operations staff.

The NOC also controls the routing of CTS calls between the data centers and call centers which are used to respond to network failures, equipment issues, local emergencies, or for maintenance events.

Call Centers
The CTS technology provider routes CTS calls from the data centers to a call center where captioning is provided. Call centers include the CA workstations, CA recruiting and training facilities, quality monitoring personnel, and management offices. Each call center is connected to both data centers. If a call center loses connection to a data center, the back-up data center offers service.

Call Detail Records
The CTS technology provider captures Call Detail Records (CDRs) for each call and then sends the CDRs to us for billing and reporting. We use the CDR information to bill the appropriate entity, (i.e. the State or the FCC's Interstate TRS Fund).

Intercept Messages
Our CTS platform technology instantly recognizes a problem anywhere in the relay system and routes the calls to another operating CTS call center and/or supporting data center within seconds. This process is automated and does not require manual intervention. This should eliminate the need for intercept messages. However, the following is a description of all times where any type of intercept message is delivered:

♦ If a network failure occurs prior to being delivered to the CTS platform, the caller may receive a fast busy signal, alarm tone, or a standard error message (i.e., "Sorry all trunks are busy, please try again later.") Since a CA is not yet present on the call, these messages are delivered only in voice. As the caller has not connected to the service, minutes of use are not included in billable minutes.

♦ If a system failure occurs after reaching the CTS platform but prior to reaching a CA, the system is not programmed to send an error message. In these instances, the CTS user would receive only a caption such as, "Waiting for Captions. Captioning Service Line is Ringing." In these instances, there is not a voice recording. As the CA is not on the call, minutes of use are not included in the billable minutes.

♦ If a network failure occurs after connecting with the CA, the CTS user is able to hear any telephone company recordings (e.g., "Sorry all trunks are busy, please try your call again later") or indicators (e.g., fast busy signal or alarm signal). These signals are also captioned for the CTS user. Likewise, voice users who encounter a network failure after connecting with a CA will hear telephone company recordings. Minutes of use attributed to these calls are included in billable minutes.

♦ If an emergency occurs at the center or if a switch failure occurs preventing the processing of calls while still allowing the CA to communicate with the CTS user, the CA will provide appropriate text messages (e.g., "Due to an emergency, CAs need to leave the center. Please hang up and try your call again.") If the CTS user is in the middle of a conversation, the State would be charged for the associated minutes. If this occurs prior to connecting the user with the called party, the State would only be charged if it selects to be billed based on session minutes.

While outages are extremely rare, we understand that informing CTS users of outages is a great concern to many customers. One of our priorities for CTS includes working proactively with our subcontractors to continue to increase the system reliability, improve redundancy, and improve communication with CTS users during outages. We will keep the State fully apprised as we make progress in these critical areas.

PERFORMANCE

We work closely with the CTS technology provider to ensure that adequate network resources and staffing are available to provide access that is functionally-equivalent to what voice callers experience on the public telephone network.

P.01 Standard

The CTS platform has been designed to avoid blockage. We will ensure that CTS call centers are fully staffed and are provided with sufficient network facilities to provide a Grade of Service (GOS) of P.01 or better. This means that no more than one call per 100 will receive a busy signal when calling the CTS center during the busiest hour. Blockage is calculated by the CTS technology provider by sampling the number of calls blocked at a minimum of every 60 minutes. Daily results are reported monthly.

Below are the recent CTS P.01 results from another large state served by us.

Blockage Sample Report	
Month	**P.01 Standard**
July 2013	0.00
August 2013	0.00
September 2013	0.00
October 2013	0.00
November 2013	0.00
December 2013	0.00
January 2014	0.00
February 2014	0.00
March 2014	0.00
April 2014	0.00
May 2014	0.00
June 2014	0.00

Speed of Answer

Our CTS speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within ten seconds. We work with our partners to ensure that adequate facilities exist to handle projected calling volumes so that the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Below are the recent CTS speed-of- answer results from another state served by us.

Speed of Answer Sample Report	
Month	**Speed of Answer**
July 2013	99.84%
August 2013	99.83%
September 2013	99.79%
October 2013	99.81%
November 2013	99.82%
December 2013	99.30%
January 2014	99.44%
February 2014	99.84%
March 2014	99.82%
April 2014	99.89%
May 2014	99.94%
June 2014	99.86%

CTS DISASTER RECOVERY PLAN

We offer an extremely reliable Captioned Telephone Service. We have a written Business Continuity and Disaster Recovery Plan that includes all types of natural and man-made events that may isolate a CTS center or prevent calls from reaching the center or cause the center to be unable to operate. The plan details the steps which will be taken to resolve the issue and fully restore service.

We will inform the State Relay Administrator of any major interruptions to the CTS center extending beyond 30 minutes or to any portion of the State. To provide the State Relay Administrator with the most complete and timely information on problems affecting the CTS, the trouble reporting procedure will include three levels of response:

- ♦ An immediate report (within one-hour)
- ♦ A 24-hour status report
- ♦ A comprehensive final report within 5 business days

In addition, all of the call centers that process our CTS calls offer the following carrier-grade features:

- ♦ **Redundant Facilities:** CTS calls can be routed to any of our five CTS-enabled call centers.

- ♦ **Uninterruptible Power:** CTS centers provide seamless power transition while the emergency generator is brought on line. Adequate and immediate auxiliary power is available for call center operations during a commercial power failure.

- ♦ **Telecommunications Network:** We will ensure adequate telecommunications that support network signaling to support Carrier of Choice selection,

- ♦ **Redundant Systems:** CTS service centers have redundant power systems, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear.

- ♦ **Adequate Facilities:** We offer adequate hardware, software, and facilities to ensure compliance with P.01 (blockage) and answer speed requirements.

- ♦ **TSP Program:** All CTS circuits have been enrolled in the FCC's Telecommunications Service Priority (TSP) program.

- ♦ **Winter Programs:** We have developed winter programs to ensure calls are handled adequately.

Features that are not mandated by the FCC are not required to be provided every day, 24 hours a day. This definition is more detailed than the FCC requirement.

Bidder response:

We have read and fully meet this requirement. As noted in the sections above, Spanish CTS (which is not mandated by the FCC) does currently have limited hours. Our CTS has been designed to meet both the requirements of the State, as well as requirements of the FCC.

4.3.3 Captioned Telephone Compatibility

The Offeror shall provide captioned telephone services which must be compatible with the State's current form of captioned telephone, currently CapTel®. Offerors may utilize captioned telephones from Caption Call®. However captioned telephone TRS must work with existing equipment currently being used by Colorado consumers.

Bidder response:

We have read and fully meet this requirement.

Our CTS service is fully compatible with the existing CapTel® phones currently distributed in the State. Our CTS permits wireline CTS-device owners to take full advantage of the phone's built-in features. We support all current and previous wireline models of CapTel phones including the 200, 800, and 840 models.

The following picture demonstrates the key features of the current model of the wireline CTS phone being distributed.
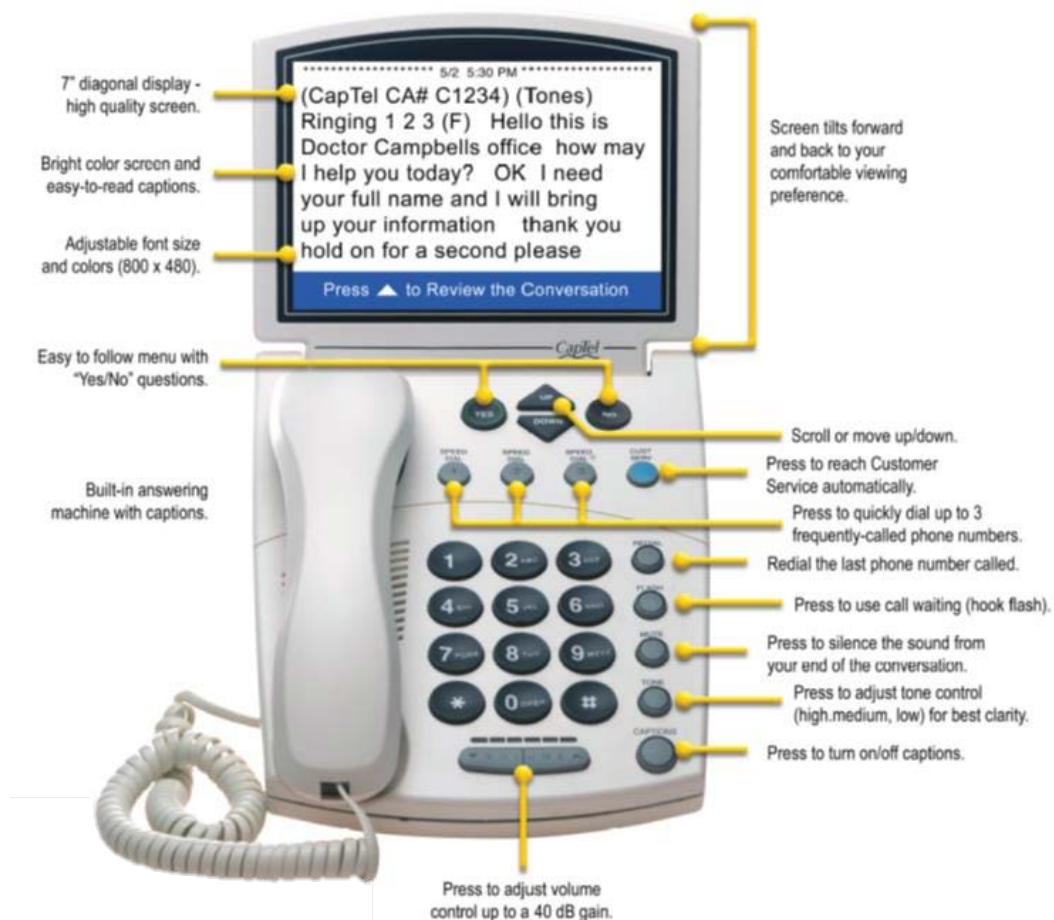
It is important to note that we will work closely with the State and CTS users to determine which new features are desired. We will also work with the CTS technology provider on the development of new phone features and incorporating those features into the Captioned Telephone Service.

NEW CTS TECHNOLOGY

New IP CTS Phone Model
As demonstrated at the recent National Association of State Relay Administration (NASRA) conference, a new IP CTS phone model has been launched and is currently being sold to individual users. Our CTS service will support all models of Ultratec's IP CTS phones, including this new IP CTS model which includes:

- ♦ Large tablet-style display allows for variety of font sizes and colors for easy readability
- ♦ Touch-screen functionality allows for easy navigation through menu options
- ♦ Traditional dialing keypad for comfortable, familiar dialing on number pad instead of onscreen
- ♦ Contemporary design for users who prefer a high-tech appearance
- ♦ Powerful amplification and frequency/tone control for optimal sound quality targeted to individual's hearing needs
- ♦ Memory dialing allows for easy one-touch dialing of frequent phone numbers
- ♦ Built in answering machine records voice messages and shows captions of the messages
- ♦ Ergonomic hearing aid compatibility handset for maximum hearing comfort
- ♦ WiFi or Ethernet compatible for maximum flexibility in user's home or office setting

Braille CTS Service
We are also working with our CTS provider to make CTS more accessible to blind or low vision users. The new Braille CTS device looks and acts just like any other telephone, with one important difference: it provides text captions of everything a caller says with captions appearing on a built-in display and on a dynamic braille display.

- ♦ Braille users who have difficulty hearing over the phone can read word-for-word captions
- ♦ Captions are provided on a dynamic braille display
- ♦ Users can read captions at their own speed
- ♦ Scroll through captions using the buttons on the braille device
- ♦ Works with headset, neck look or T-coil for hands free use

The Braille CTS product launch date is not yet scheduled. We are currently looking for beta testers and input from the community and would be happy to work with the State Relay Administrator, State Relay Advisory Committee, and CTS users if they are interested in providing input or beta testers.

Wireless IP CTS
We also offer wireless IP CTS options that provide the same real-time word-for-word captions on select smart phones and tablets including Android and iOS operating systems. Our Wireless IP CTS offers many benefits to both the State and CTS users including the following:

- ♦ **No cost to the State** as these minutes are billed to the Interstate TRS fund as Internet Captioned Telephone calls

- ♦ **Easy to use for customers** and designed to work just like the basic phone features, only with captioning.

- ♦ **Available on more networks** as our solution uses a data connection for both the voice and captioning so simultaneous voice and data is not required.

- ♦ **Faster Transcription** as this product uses the same voice-to-text technology employed using wireline CTS

- ♦ **Functional Equivalent** as Captioned Telephone customers will continue to be in complete control with the CTS CA remaining transparent during the call.

The application has been designed to be carrier-neutral, user-friendly, and easy to navigate. Captioned Telephone users simply pick up the phone and dial a phone number using the application, just like a traditional wireless call.

Web-based IP CTS
Our web-based IP CTS is a free, web-based service that allows a person who can speak, but has difficulty hearing over the telephone, to read word-for-word captions on a computer monitor.

The web-based IP CTS allows individuals of all ages who prefer to use their own voice the opportunity to supplement their hearing ability with text captions. Text captions can be read word-for-word on their laptop or PC. These users do not pay long distance charges to access the service. However, they may be charged for long-distance calls to the recipient through their service provider. Cell phone users may be charged for the actual use of minutes by their cell phone provider.

A web-based IP CTS caller can make or receive calls while logged into the dedicated website. The caller can use their residual hearing and listen to the other person speaking through the telephone, not through the internet or web browser. Users can make calls using any telephone, whether it is a landline, wireless phone, or cell phone. This solution enables individuals to place and receive calls in remote locations, as long as they have access to a telephone and the Internet.

In addition to being able to read captions of the conversation; the caller also has the ability to save the conversation and customize the screen to their preference i.e. background, font size and color. When a call is completed, the caller can save the captioned conversation for later review, allowing the caller to concentrate on the conversation.

Prior to making a call, the user will need to register, log onto the website, and provide both the 'calling to' number as well as the number to call the user back. While the service is free, users must register to use the service. To sign up, a user can simply go to the designated registration page and enter all of the required information; the caller can select their username and password. There are security measures in place to prevent unauthorized users from signing up.

Users will be e-mailed a link to verify that their email is valid and to activate their account, after which they will be able to make and receive calls using the web-based IP CTS.

4.3.4 Pay-per-call calls

Captioned telephone TRS shall be capable of handling pay-per-call calls.

Bidder response:

We have read and fully meet this requirement.

Our CTS service fully supports access to pay-per-calls for our CTS users. Traditional CTS users may place 900 pay-per-calls by registering the preference to allow these calls and then dialing the number directly on the phone. This can be done by simply pressing the "Customer Service" designated key on the telephone or filling out a simple form. An excerpt of the preference form is provided below.

CTS Customer Profile Form

Two-line CTS users are directly connected to the 900 pay per call provider with the captioning service added via the second line.

4.3.5 2-Line Captioned Telephone Service

The Offeror shall ensure captioned telephone services support 2-line functionality.

Bidder response:

We have read and fully meet this requirement.

We provide 2-Line Captioned Telephone Service (CTS) as an optional way to use the CTS phone that is more convenient and transparent for CTS users and their callers. By using two telephone lines instead of just one, the CTS phone displays captions on every call, at any point in the call. We offer 2-Line CTS for the same rate as standard CTS.

The chart below highlights the major differences between single-line and 2-Line CTS.

Standard CTS (1-Line)	2-Line CTS
Captions and voice are provided across one telephone line.	Conversation is carried on one line, captions are provided on the second.
Captions must be initiated at the start of a call.	Captions can be turned on or off on demand, at any point in a conversation.
Voice callers must first dial a toll-free CTS number, then the CTS user's number.	Incoming calls are automatically captioned. Voice callers simply dial the CTS user's phone number directly.
Call-waiting tones may interrupt captioning support. Call-waiting cannot be used during a captioned call.	Call-waiting can be used with 2-Line CTS calls.
Automatic call-back (*69) option cannot be used.	Automatic call-back (*69) option is supported.
Calls to 9-1-1 and 7-1-1 are treated as VCO calls and routed to 9-1-1 and relay directly. The 9-1-1 or CA's typed messages appear on the CTS display, but no sound is provided while receiving captions.	Calls to 9-1-1 and 7-1-1 are captioned through CTS on the second line. The voice conversation is conducted on the first line. Both sounds and captions are provided on the call.
Calls are automatically routed through the Captioning Service on outgoing calls only.	Calls are direct between parties with captions on all calls.
Requires one standard (analog) telephone line.	Requires two standard (analog) telephone lines.

TAB 3: MANAGEMENT REQUIREMENTS

4.4.1 Prime Contractor Responsibilities

The selected contractor will be required to assume responsibility for all services offered in the proposal whether or not the contractor produces them or utilizes a subcontractor to perform the work. Further, the Department of Regulatory Agencies will consider the selected contractor to be the sole point of contact with regard to contractual matters. If any part of the work is to be subcontracted, the prime contractor must provide a complete description of work subcontracted and descriptive information about the subcontractor's organization and capabilities. The contractor will be held totally responsible for subcontractor's performance and adherence to all contract provisions.

Bidder response:

We have read, understand, and will comply.

We have identified all subcontractors below who will perform services in the direct provision of the proposed Relay Colorado Service, along with the scope of each subcontractor's role.[24] As an interexchange carrier (IXC), we perform many of the core responsibilities of a relay provider and of this RFP, including the following:

♦ Provisioning of inbound toll-free numbers and management of 800 network
♦ Long distance calling
♦ Directory Assistance and Operator Services

We subcontract some services to specialized subcontractors who have become long-term partners in delivering the nation's leading relay solution.

Subcontractor	Key Responsibilities	Partner Since
Communication Services for the Deaf, Inc.	TRS and CTS operations	1993
CapTel, Inc.	CTS technology and operations	2002[25]
Caption Colorado	Captioning for Conference Calls (technology and operations)	2003

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[24] We have not included General Supply & Support Agreements that were entered into for the purpose of providing Products and Services to our customers generally (as opposed to specifically for this State).
[25] We have worked with the CTS technology parent company since we began offering relay services.

OUR ROLE AS PRIME CONTRACTOR FOR TRS

We are fully responsible for the quality of our subcontractors and have stringent quality controls in place and maintain active control over TRS operations and engineering including the following:

♦ All TRS traffic is processed using our TRS platform.
♦ All TRS call center operations utilize our CA software.
♦ All TRS CAs rely on our centralized traffic management group for call routing, operations reporting, and workforce management (scheduling).
♦ Our Quality Assurance staff oversees all TRS operational and training issues, including Colorado-specific training. We hosts weekly TRS training calls with all trainers, including subcontractors.
♦ We currently conduct monthly TRS test calls and quarterly independent testing.
♦ All TRS centers use our specially-developed initial CA training.
♦ All TRS centers follow our procedures and tools (e.g., customer contact database) for handling customer complaints or compliments
♦ **All TRS centers maintain quality records following our standards.**

OUR ROLE AS PRIME CONTRACTOR FOR CTS

We assume full responsibility for the quality of all CTS subcontractors. The CTS technology provider is the driving force for all wireline CTS providers (who contract with States) to ensure strict quality standards and active control over operations and technology. However, we take an active role in the provision of services.

♦ All CTS traffic is all processed using the CTS technology provider's platform and technology.
♦ The CTS technology provider routes CTS calls between CTS-enabled call centers.
♦ The CTS technology provider operates the specialized CTS Customer Service and addresses customer contacts and uses our customer contact database to log entries.
♦ All CTS-enabled call centers (including CTS and TRS centers) follow the CTS technology provider's hiring, training, and quality assurance testing standards.
♦ Our Quality Assurance staff reviews customer feedback weekly, works with vendors on quality assurance, and manages our internal CTS testing programs.
♦ Our CTS Product Manager works closely with the CTS technology provider to ensure that our CTS service complies with FCC requirements and develops service enhancements and products.
♦ Our IT team works closely with the CTS technology provider to support CTS in TRS centers.
♦ Our billing team produces reports based on call detail records (CDRs).
♦ Our expansive list of COCs is used by the CTS technology provider for routing CTS calls to other carriers.

COMMUNICATION SERVICES FOR THE DEAF, INC. (CSD)

This subcontractor is a non-profit organization with the mission of serving the deaf and hard of hearing. Everything they do supports communication access—a critical component in ensuring an improved quality of life. This subcontractor does this in a variety of ways: through sign language interpreting services, Telecommunications Relay Services, global equipment distribution programs and human and advocacy services. The subcontractor has received $18,298,070 in grants since 2011 to serve the deaf and hard of hearing community in a variety of ways.

Since 1975, the subcontractor has been redefining access for deaf and hard of hearing people nationwide. The subcontractor is dedicated to providing the full array of tools needed by state, federal, and private entities to ensure effective communication with their deaf and hard of hearing employees and consumers.

We have enjoyed a 20 plus year partnership – providing Relay services on a global scale. That 20 plus year partnership has brought about great change and advancement for relay users. With all the collective technology support we have plus their operational support, we have been able to introduce and utilize a wide variety of emerging FCC compliant technologies over the years while maintaining our customer knowledge and presence that is very much a part of who we both are.

As a nonprofit, 501(c)(3) organization dedicated to and run by deaf and hard of hearing people, their service standards are held up to the highest expectations of our members—who are also our consumers. In a world that is rapidly evolving through technological innovation, globalization and greater tolerance for diversity, it is this subcontractor's vision that the deaf and hard of hearing community will continue to evolve and achieve higher levels of success. The subcontractor is dedicated to continuing to help drive positive change and innovation for our community. With them, more is possible.

Together, through our combined partnership, we a one of the nation's largest most robust, advanced, and successful providers in the entire TRS industry. We are proud of that fact and we look forward to continue providing this experience and expertise to the consumers and to the State of Colorado.

It is important to note that this company received the 2004 Global Call Center of the Year award for its outstanding service quality as a Telecommunications Relay Service provider, confirming that they are one of the best in the world.

Subcontractor's Key Personnel

Christopher Soukup, CEO
He received a Bachelor of Science degree in Business Administration from Gallaudet University in Washington, D.C. For more than a decade, he has served in a variety of capacities including community outreach, public relations, marketing, large-client sales, business development, information technology and contact center operations. Serving as a company spokesperson, he has appeared at numerous engagements across North America representing the company at international conferences, community forums, professional panels and workshops, and company marketing events.

Nancy Soyring, Director of US Operations including TRS and CTS]
She is fluent in ASL and joined the company in November of 1996 as receptionist, during the start-up of the TRS centers. She became HR manager in March 1998, Center Manager in April 2001, Regional Manager in September 2007, Regional Director of TRS operations in October 2009, and VP of the relay division in June 2010 and recently the Director of US Operations. She received her Call Center Industry Advisory Council Certification (CIAC) for Call Center Operations Management in 2006 and was recertified in 2009. She has past work experience in banking and the medical field.

CAPTIONED TELEPHONE, INC. (CTI)

This subcontractor provides the CTS technology and call center work for the Captioned Telephone Service. The subcontractor has a long history of supporting CTS beginning with consumer testing on CTS throughout the United States in 2002. In coordination with the CTS technology provider, we were one of the first providers of CTS trials. In 2003, Captioned Telephone Service technology was approved by the FCC enabling individual states to offer Captioned Telephone as part of their relay services.

In January 2004, fully FCC compliant Captioned Telephone Service was launched. Our subcontractor is currently the only wireline provider of Captioned Telephone Service in the United States.

For more than 34 years, the CTS subcontractor and its parent company have set the standard for new technology, inventing new ways for people to communicate with one another. As a pioneer in the industry, the CTS technology provider has many areas of technical expertise, including the following:

- ◆ Voice-to-Text Captioned Telephone technology
- ◆ Management of multiple Captioned Telephone call centers
- ◆ Training and Quality Assurance for the Captioned Telephone service
- ◆ Telephony and network engineering

Our relationship with the CTS technology provider and equipment manufacturer is integral to the service quality. We have on staff a full-time CTS Product Manager (i.e., Business Development Manager) whose sole responsibility is to develop, manage, and implement enhancements to the Captioned Telephone Service. We also host routine conference calls with our counterparts to maintain a focus on quality and address any service issues which may arise, as applicable.

Subcontractor's Key Personnel

Pam Frazier, Call Center Director
She joined the subcontractor's parent company in 1991 as a Customer Service Representative. She was promoted in 1994 to Marketing Specialist and continued to work in the Marketing department as a Supervisor in 1996 and then promoted to Marketing Manager in 1998. Starting in 1999, she worked in a dual role as Marketing Manager and assisted with development and testing of Fastran and CTS technologies. This included setting up and coordinating pre-CTS trials, CTS trials, CTS call center operations, and training of all call center positions. In 2002, she was promoted to Director of the CTS Call Center. She received her Bachelor of Science degree in Marketing from

Ball State University in December 1990. She is a hearing child of deaf parents, has a sibling who is deaf, is fluent in American Sign Language and experienced in Deaf culture.

Pamela Holmes, Director of Consumer & Regulatory Affairs and Customer Service
She works closely with government regulatory bodies, performs public speaking, and operates CTS's Customer Service Department. Recently, she was appointed by President Obama and confirmed by the Senate to serve as a Member of the National Council on Disability (NDC). She brings considerable experience with communication access matters and an expertise in the Americans with Disabilities Act (ADA) to this new role as Board member. She earned her Bachelor's Degree in English at Gallaudet University, Washington D.C., where she was on the Dean's List. She earned her Master's Degree in Deaf Education, and was presented with the Graduate Fellowship Award.

CAPTION COLORADO

We offer captioning for conference calls through a partnership with this subcontractor whose headquarters are in the State of Colorado. Founded in 1991, they produce closed-captioning for live television, news, sports, and weather. In 2003, we began working together to offer an on-line solution to support relay users. Together, we currently provide this service for several government and corporate customers. The subcontractor provides the technology and operations of the service. We support the marketing, customer feedback, and billing of the captioning for conference call service.

Did you know?
While other relay providers may offer similar services, we are the only company with experience providing this service as a part of a State Relay program.

Subcontractor's Key Personnel

Tad Polumbus, CEO and President
He has a Business degree and formerly practiced law and has experience in oil and gas and financial investment. In 1999, he (along with investors) acquired the company.   The subcontractor has grown two management employees and 25 captioners, to approximately 60 management employees, over 160 real-time captioners and 60 editors; has developed its own proprietary IP based captioning software; has broadened its service base to include Offline Captioning and a broad array of Internet based real-time transcription services; and has become the one of the largest real-time captioning and transcription companies in America.

Victor Perez, Chief Operating Officer
He recently joined the company as a 27-year cable television industry veteran with a unique blend of Executive Management, Information Technology & Engineering (OTT, Internet TV, satellite, fiber transmission, network origination, production) always providing leadership development and relationship building along the way. Before joining the company, he served as Vice President of Operations and Engineering for a major television company.

Kurt Suppes, Chief Financial Officer
He joined the company in April 2002. He is a CPA with over 25 years' experience in public accounting and private industry, including 12 years with Ernst & Young and PricewaterhouseCoopers. At Pricewaterhouse Coopers, he was a senior manager in the firm's

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national Financial Services Industry Practice providing accounting and business consulting services to publicly-traded and private companies. He earned a Bachelor of Arts degree in Economics at the University of Colorado.

James Barker, Chief Information Officer
He joined the company's Senior IT management team as Vice President of Campus Solutions in May 2010. He has a distinguished digital career with outstanding experience in developing and implementing eLearning platforms, educational web applications, data and metadata management, online publishing infrastructure and multimedia systems. He is a go-to specialist for accessibility solutions, search tools, and automated web-based retrieval. His role includes the development of a standards-based data, meta-data indexing system that is changing the captioning game and expanding valuable SEO offerings to our clients and online audiences.

John Irwin, Senior Vice President of Marketing and Sales
He joined the company in 2003 with over 30 years of experience in the television and radio industry. In 1985, he was recognized in the National Association of Broadcasters Publication; In Search of Excellence-Lessons from Americas Best Run Radio Stations.

4.1.2 Contract Period and Performance Review

The initial contract term shall be for a term of three years, with two one-year renewals, not to exceed a total contract term of five years.

The Department of Regulatory Agencies may review contractor's performance during the course of the contract and may also require an independent performance analysis. Such review will encompass service quality, including marketing, responsiveness to clients and the Department of Regulatory Agencies personnel, timeliness of required reporting, and any other specifics as required under terms of the contract. Review results, along with recommendations for change, will be distributed to the contractor. Performance reviews will be conducted at the Department of Regulatory Agencies direction and at the contractor's expense.

Unsatisfactory results of a review may result in cancellation of the contract.

Should the contractor desire, a meeting will be arranged between all concerned parties within ten (10) calendar days of the date the contractor received, or could reasonably have been expected to receive, the review results. This meeting will provide the contractor with an opportunity to appeal the review recommendation to the Executive Director of the Department of Regulatory Agencies.

Clarification during Q&A: The Option to Renew outlined in Section 5, C, would only be used if an extension would be at the same rate and term of the original contract. If the awarded Offeror chose to increase the cost after the initial three-year period, we would need to do a formal contract amendment to reflect the new cost.

Bidder response:

We have read, understand, and will comply with the clarification that, per the response to the State's Q&A, our pricing will be valid for the first three years. A formal contract amendment will be sought for the optional extension years.

As stated above, we understand that the initial contract term will be for a period of three years. If the State and relay users are delighted with our service, we understand that the State may elect to renew the contract for two single-year extensions. Many of our current customers have similar

contractual agreements with us to provide relay services. Very often, those States decide to extend our service rather than go through another procurement process.

We also understand that the Department of Regulatory Agencies may wish to review our performance during the contract period. We look forward to meeting or exceeding all expectations. If there are any areas of concern, they will be addressed promptly within 10 calendar days of the receipt of such information. We will meet with the State. If applicable, we understand that appeals should be placed with the Executive Director of the Department of Regulatory Agencies.

4.4.3 Compliance with Applicable Laws

The selected contractor will be required to administer the program pursuant to all statutory and rule requirements as well as terms and conditions outlined in this RFP, the contract, and any other applicable laws including the Health Insurance Portability and Accountability Act. Nothing in this section shall be construed to supersede any Federal privacy or confidentiality requirement, including the regulations promulgated under section 264(c) of the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191; 110 Stat. 2033) and section 290dd-2 of this title.

Bidder response:

We have read, understand, and will comply.

Our TRS and CTS services are designed to comply with all applicable laws.

4.4.4 Audit/Inspection of Records, Monitoring and Reporting Requirements

The awarded contractor must permit State, Federal Government, or any other duly authorized agent of a governmental agency to audit, inspect, examine, excerpt, copy and/or transcribe contractor's records during the term of the contract and for a period of three (3) years following the termination of contract or final payment, whichever is later, to assure compliance with the contract terms, or to evaluate the contractor's performance. The contractor shall also permit these same described entities to monitor all activities conducted by the contractor pursuant to the terms of the contract. As the monitoring agency may in its sole discretion deem necessary or appropriate, such monitoring may consist of internal evaluation procedures, examination of program data, special analyses, on-site check, or any other reasonable procedure.

The successful Offeror may also have a performance review conducted of its program at the Department of Regulatory Agencies' determination. This performance review and any financial audit will be at the Offeror's expense.

The Department of Regulatory Agencies reserves the right to require the awarded contractor to have a financial audit conducted during the term of the contract. If this is required, the audit must be carried out by one of the major accounting firms, preferably one that does not currently conduct the contractor's fiscal audits. A complete copy of the audit including the management letter must be provided to the Department of Regulatory Agencies within five working days of its completion. The Department of Regulatory Agencies will negotiate directly with the contractor regarding any exceptions or findings from the audit. The awarded contractor shall be responsible for payment of this audit.

The awarded contractor shall maintain all call records and other related data necessary to support all invoices for Services to the Department of Regulatory Agencies. The Department of Regulatory Agencies or its authorized agent shall, upon reasonable notice, have the option to request copies of such supporting data for the purpose of reviewing and auditing the call records and other related data which supports the invoices for Services.

Bidder response:

We have read, understand, and will comply.

4.4.5 Contract Acceptance

Offeror shall list any exception that it has to the provisions, terms and conditions in the State of Colorado Model Contract, which is attached as Appendix C. Please refer back to Section 1.19 for additional information on this section.

Bidder response:

We have read, understand, and will comply.

4.4.6 Sub-Contractors

Planned use of sub-contractors shall be clearly explained in the proposal, including terms of any subcontract. However, the Offeror shall be responsible for contract performance whether or not sub-contractors are used. Current employees of the State of Colorado may not participate as sub-contractors of the award. The only contact with the State will be the Offeror.

Bidder response:

We have read, understand, and will comply with the exception that copies of subcontracting agreements are proprietary and may not be disclosed to third parties.

Please see Section 4.4.1 for a list of planned subcontractors and roles that each will fulfill. We understand that we are solely responsible for performance under the resulting contract and the State's sole contact will be with us.

4.4.7 Compliance

All Offerors will submit positive statements with respect to their willingness to comply with all work requirements described in this RFP and with the general contract requirements and the terms and conditions specified this section of the RFP. The TRS must meet all requirements necessary for certification by the FCC; therefore, if any of the following requirements conflict with current FCC certification requirements, the FCC requirements shall prevail. All Offerors will clearly describe and explain any proposed deviations from or changes to the RFP or contract requirements for consideration by the State in the appropriate section of the proposal and in the transmittal letter. The State reserves the right to reject any proposal including such deviations or changes.

Bidder response:

We have read, understand, and complied. We comply fully with the FCC requirements relative to the services being offered. To the extent we have clarified or taken exception to an RFP requirement, comments have been included only after careful consideration of the RFP requirements, company policies, and applicable law. We have made a good faith effort to respond to all RFP terms and requirements to the best of our ability and knowledge. The absence of a response in relations to a particular provision indicates our acceptance of that provision as it appears in the RFP.

Per RFP Section 5.1.3.2, we have submitted deviations to the general contract requirements separately.

If awarded the contract, we will negotiate in good faith to execute a definitive agreement for the products and services that will incorporate elements of the RFP, the Model Contract, RFP responses, and any additional commercially reasonable terms and conditions negotiated by the parties.

4.4.8 Ownership

All reports, documentation, and material developed or acquired by the contractor, as a direct requirement specified in the contract, shall become the property of the State of Colorado. The contractor shall agree and understand that all discussions with the contractor and all information gained by the contractor as a result of the contractor's performance under the contract shall be confidential and that no reports, documentation, or material prepared as required by the contract shall be released to the public without the prior written consent of the State. Upon expiration, termination, or cancellation of the contract, all documents, data, reports, supplies, equipment, and accomplishments prepared, furnished or completed by the contractor pursuant to the terms of the contract shall become the property of the State.

Clarified during Q&A: "The State agrees that a list of mutually-agreed upon list of intellectual property items may be attached as an exhibit to the resulting Contract."

Bidder response:

We have read, understand, and will comply.

As allowed by the State, we have attached an initial list of intellectual property items to be discussed during contract negotiations. Per RFP Section 5.1.3.2, this information has been segmented from our proposal.

4.4.9 Employment of State Personnel

The Offeror shall not knowingly engage on a full time, part time or other basis during the period of the contract, any individual involved in preparation of this RFP, or the selection and/or award of the resulting contract.

Bidder response:

We have read, understand, and will comply.

4.4.10   Transition Requirements

4.4.10.1   Upon award of the contract, the Offeror shall work with the Colorado Public Utilities Commission and any other organizations designated by the Colorado Public Utilities Commission to insure an orderly transition of services and responsibilities under the contract and to ensure the continuity of those services required by the Colorado Public Utilities Commission.

Bidder response:

We have read, understand, and will comply.

4.4.10.2   Upon expiration, termination, or cancellation of the contract, the Offeror shall assist the Colorado Public Utilities Commission to ensure an orderly transfer of responsibility and/or the continuity of those services required under the terms of the contract to an organization designated by the Colorado Public Utilities Commission, if requested in writing.

Bidder response:

We have read, understand, and will comply.

4.4.10.3   The Offeror shall deliver, FOB destination, all records, documentation, reports, data, recommendations, or printing elements, etc., which were required to be produced under the terms of the contract to the Colorado Public Utilities Commission and/or to the Colorado Public Utilities Commission's designee within seven (7) days after receipt of the written request in a format and condition that are acceptable to the Colorado Public Utilities Commission.

Bidder response:

We have read, understand, and will comply.

4.4.10.4   The Offeror shall agree to continue providing any part or all of the services in accordance with the terms and conditions, requirements and specifications of the contract for a period not to exceed 150 calendar days after the expiration, termination or cancellation date of the contract for a price not to exceed those prices set forth in the contract.

Bidder response:

We have read, understand, and will comply.

4.4.10.5   The Offeror shall discontinue providing service or accepting new assignments under the terms of the contract, on the date specified by the Colorado Public Utilities Commission, in order to ensure the completion of such service prior to the expiration of the contract.

Bidder response:

We have read, understand, and will comply.

4.4.10.6   The Offeror shall make arrangements to transfer all toll-free telephone numbers used to provide intrastate relay services within Colorado to any subsequent contractor providing TRS as directed by the Colorado Public Utilities Commission.

Bidder response:

We have read, understand, and will comply.

4.4.11   Payment

After the close of each month, the Offeror shall submit an invoice to the State Relay Administrator (SRA) for the previous month's work. Such invoice shall be delivered to the SRA by the 15th of the month. The SRA and/or the CO PUC Staff will review the monthly invoice and if it is determined that the invoice is erroneous, shall notify the Offeror of the error and request a correct copy. The State cannot process payment on an erroneous invoice. The Offeror must submit a true and correct copy of the monthly invoice before payment can be authorized. The State will make payment within forty-five (45) days of receipt of said invoice. Total reimbursement shall not exceed the total fixed bid per minute price submitted to and accepted by the State along with any other reimbursable charges.

Bidder response:

We have read, understand, and will comply.

4.4.12 Records Maintenance

The Offeror shall maintain its records of TRS operations so as to permit review and determination of such operations. Such records shall be made available during normal business hours for inspection by the Colorado Public Utilities Commission or its designee. The Offeror shall maintain a complete file of all records, documents, communications and other materials which pertain to the operation of the service or the delivery of services under this agreement.

Bidder response:

We have read, understand, and will comply.

4.4.13 Audit Requirements

The State is using a competitive bid process through issuance of this RFP as the primary mechanism to ensure it pays a fair price and receives excellent TRS. The State has not conducted a formal audit of its relay vendor since the inception of its relay program and does not envision a specific need to do so in the future. If reason exists for concern, a State audit would likely focus upon performance issues, including service quality, billing accuracies and/or financial stability of the vendor. The Offeror shall make all requested financial information available to the State for audit on request, including: salaries and benefits associated with both operators and managerial employees, local exchange access charges, operating expenses, building rent and utilities, equipment depreciation, corporate overhead allocations, outside consultants and temporary help and account management. The Offeror shall also make all telecommunications hardware, software and procedures available for audit by an engineer sent by the State to check that calls and their duration are being accounted properly in billings and sent to the State. As noted in section 4.1.1.6, the Colorado Public Utilities Commission reserves the right to contract with an independent entity to conduct a random proficiency audit.

Bidder response:

We have read, understand, and respectfully takes an exception. Regarding inspections of CTS' facilities, authorized representatives of the State may, upon adequate advance notice (which shall not be less than 10 working days) and solely at their own expense, visit CTS call centers and during such visit may, in accordance with the subcontractor's policies and accompanied by subcontractor's management personnel, inspect, monitor or otherwise evaluate the CTS being supplied only to Colorado users. All inspections and evaluations shall be at reasonable times and conducted in a manner that will not unreasonably delay or interfere with CTS operations.

The following Confidential Information are the only records that may be reviewed or copied by authorized representatives or personnel of the State. (Disclosure to unauthorized third parties is prohibited).

♦ CTS subcontractor's customer service records for CTS users for the State
♦ CTS subcontractor's Call Detail Records (CDRs) supplied to Bidder for State
♦ Consolidated reports on the average monthly speed and accuracy CTS CA scores
♦ Other records as mutually agreed in writing

The records that may be reviewed and copied do not include any information that is, in whole or in part, the property of any other CTS customer, or any of the subcontractor's or its Affiliates' financial, operational, internal or other information, or any other documents, methods, procedures,

technical, confidential, proprietary, or trade secret information, or information of any kind unless specifically agreed to in writing.

4.4.14 Identification of Possible Onerous Provisions of this RFP

In issuing this RFP, the State does not anticipate that it has added any requirements beyond those already required for FCC certification or part of a State's basic relay service that should add significantly to the cost per minute charged by a relay vendor. If an Offeror agrees that there are no such requirements, it should so state. Alternatively, Offerors should identify any such requirement and an estimate of the cost per minute that would have to be charged to meet it.

Bidder response:

We have read, understand, and will comply.

In our opinion, the RFP has not added any requirements that are onerous. All RFP requirements are in line with the FCC minimum standards requirements for TRS and CTS.

4.4.15 Financial & Organizational Strength

4.4.15.1   Successful Offeror, together with any subcontractors, must demonstrate that they have the financial resources to perform all requirements of this RFP. Provide information on the financial strength of your organization, and include a copy of your audited (as applicable to your company's organizational structure) financial statements from the last three (3) years, or, if the Offeror has not been in business for three (3) years, since the business began.

Financial statements do not need to be blinded and should be segregated from the main proposal for review by a financial analyst who is not part of the evaluation committee.

Bidder response:

We have read, understand, and will comply.

Both our company and those of our subcontractors have the financial resources to comply with the requirements of the RFP. Please see the separately segregated financial information (including three years' of audited financial statements) which attests to our financial strength.

Please note that the CTS technology subcontractor is a privately held company whose financial information is classified as proprietary and confidential.

4.4.15.2   Please explain how your company's business plan financially supports the awarded outsource examination contract in light of your organization's growth in the coming years.

Bidder response:

We have read, understand, and will comply.

As demonstrated in Section 4.4.15.1 (and related attachments), we have the financial strength to serve in this capacity for the State of Colorado. We will use our proven relay infrastructure and subcontracting arrangements in the provision of TRS and CTS.

4.4.15.3   Provide evidence of general liability insurance coverage and specific insurance you carry that covers professional losses, e.g. professional liability or errors and omissions insurance (see Sample Contract, Appendix C for requirements of State). Insurance certificates or other proof of insurance coverage should be segregated from the main proposal if Offerors identifying information cannot be blinded.

Bidder response:

We have read, understand, and will comply.

Please see the separately segregated insurance certificate which proves our compliance with these requirements. As our company identifying information cannot be blinded, we have provided this separately.

5.2.3 Management and Experience Component

A.   Restate each requirement and describe how you will address the deliverables set forth in Section 4.4. Identify the Section number of each requirement. Indicate in detail the scope of services included in your proposal and identify any items requested by the State that are not included in your proposal.

Bidder response:

We have read, understand, and will comply.

Please see the sections above with information on how we comply.

B.   Indicate key personnel who will be assigned to the project and describe their experience. Explain how you will ensure that equally qualified persons are assigned to the project if these individuals leave the project. The State expects that the awarded Offeror will continue to make the key project personnel available through the life of the contract as long as they remain in Offeror's employ. The State reserves the right to approve any replacement personnel.

Bidder response:

We have read, understand, and will comply.

Relay Colorado users will be fully supported by our passionate and experienced relay team, including the following management and key personnel, who are among the most experienced in the relay industry. We will continue to make these personnel available throughout the life of the contract (as long as they remain in our employ). We believe that the State will be delighted with these individuals. If it becomes necessary to replace any of the key personnel, we will seek approval from the State.

National Director — Mike Ellis, National Director

Branch Managers — Mark Seeger, Customer Relationship | Maggie Schoolar, Sales | Mark Tauscher, Product & Program Mgmt

Relay Colorado Key Personnel — Kris Smith-Shipley, Account Manager | Chris Smith, Sr. Acct. Exec. | Liz D'Anna, Sr. Impl. Mgr.

Outreach Specialists — Outreach Staff
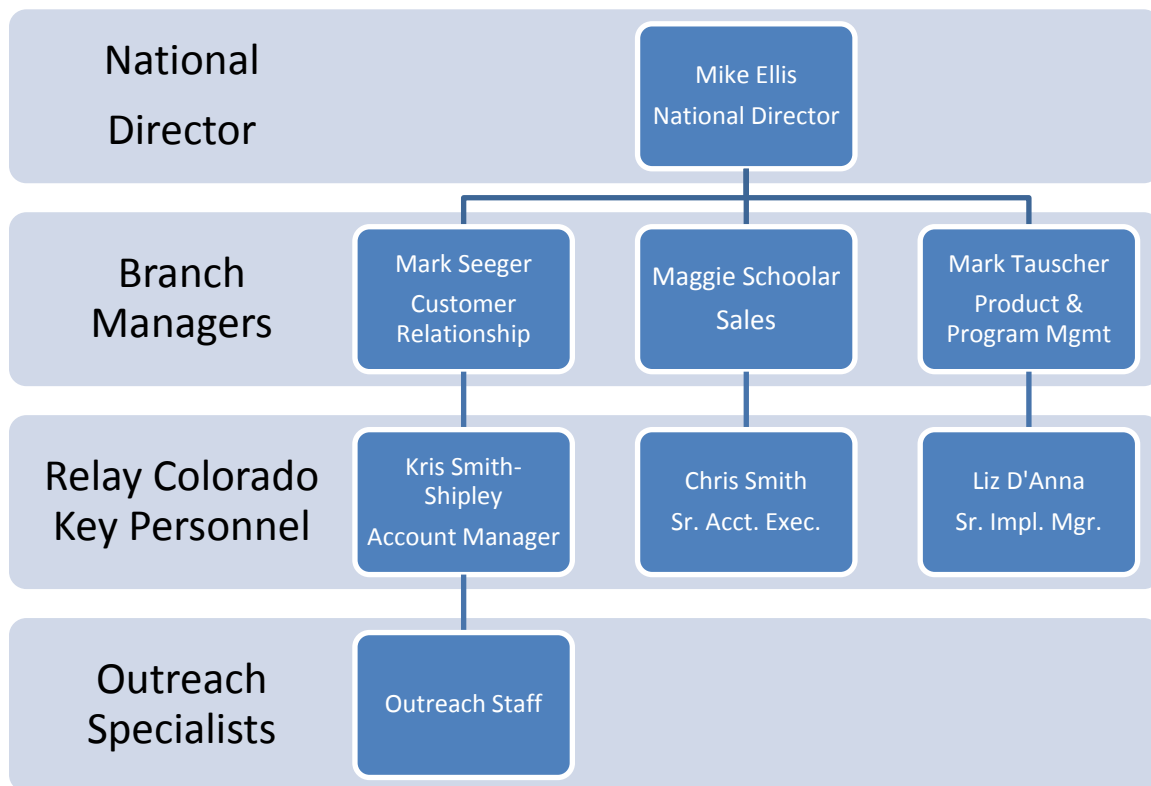
Director of Relay Services

Mike Ellis, Relay National Director
As the National Director, he oversees our relay team, which is focused on developing and maintaining relationships with relay customers, sales/marketing, and increasing accessibility through innovative products and services. As a late-deafened adult, he uses CTS and Video Relay Service with Voice Carry-Over (VCO). He is also fluent in American Sign Language (ASL) and has first-hand knowledge of the needs of Relay users and uses relay services every day. In addition to leading the relay team, he has become an advocate for people with disabilities. He has testified before the U.S. Senate Health, Education, Labor and Pension (HELP) Committee and members of the Gallaudet University community on the importance of using higher education opportunities as a way to foster future career prospects for individuals who are deaf or hard of hearing.

Hired by our company in 1992, he has been recognized as a top performer several times, including the company's Legends Award for corporate and civic leadership. He has a Bachelor of Arts degree from Baker University and a Master of Arts degree from Gallaudet University.

Branch Managers

Mark Seeger, Customer Relations Branch Manager
One of two Customer Relations Branch Managers, he leads a team of management-level Customer Relationship Managers (i.e., Account Managers). He has been serving the deaf and hard of hearing community for almost thirty (30) years. After seven (7) years of experience at a State Commission

for the Deaf as a Direct Services Program Specialist, he joined our team in 1990 as the National Customer Relations Manager. In 2002, he transitioned to one of our subcontractors as their National Director of Business Development. Recently, he has returned to our company as the Branch Manager of Customer Relations and Marketing.

He is active in the deaf community including such distinctions as a lifetime member of the Registry of Interpreters for the Deaf, Board Member of the State's School for the Deaf Foundation, and was recognized by the National Association of the Deaf with the "Golden Hand Award". He has a Bachelor of Science Degree in Math Education from the University of Texas and a Master of Administration in Human Services.

Maggie Schoolar, Sales Branch Manager
As the National Branch Manager for our sales team, she is responsible for strategic planning and execution of our objectives as well as ensuring contract compliance and end user satisfaction. She is one of the most experienced sales managers in the industry with over 25 years of experience in the relay industry and was one of the original members of our first Advisory Board that established our first State Relay service back in 1990. She has worked for our company for over 24 years. She is one of the top sales performers in the company and has received our company's Diamond Award.

Mark Tauscher, Program/Project Management Branch Manager
As the Branch Manager over Program and Project Management group, he has over 18 years of experience in the relay industry. He began his relay career with our subcontractor in 1996 as a Customer Relations Manager. In 1998, he was promoted to Group Manager of a relay call center. In 1999, he came to work at our company as an Account Manager and was promoted to Business Development/Product Manager for Internet-based products. He now serves as the Branch Manager overseeing the development and implementation of relay products and services for our wireline, internet, and wireless solutions. He also serves as a member of the RL Interstate TRS Fund Advisory Council. He has a Bachelor of Science degree and a Master of Business Administration degree from the Rochester Institute of Technology.

Kris Smith-Shipley, Account Manager
The Account Manager for Colorado joined our relay team in 1998 and was promoted to Customer Service Manager III in August 2012. With a total of 22 years of experience managing relay accounts and supporting outreach and marketing to the deaf and hard of hearing community, the Account Manager has a Bachelor of Fine Arts degree from the Rochester Institute of Technology. Active in the local community, serves as the Community at Large of the Rocky Mountain Deaf School (RMDS) Board of Directors.

Chris Smith, Senior Account Executive
As one of three Senior Account Executives, he is responsible for TRS and CTS sales to State and federal customers. He has enjoyed a very successful career in sales and management including the management of one of our first TRS centers. Additionally, he built strong relationships within the community including a position with Gallaudet University. He has a Bachelor of Arts degree and a Master of Business Administration.

Liz D'Anna, Program Manager – Implementation
As one of two Implementation Program Managers, she has over 20 years of experience managing complex projects. She is Project Management Certified which includes integration, scope, time, cost, quality, human resources, communications, risk, and procurement management. She has a vast knowledge of TRS implementation experience including the launch of new services and trial services including the recent launch of Video Relay Service, Video Relay Interpreting, CTS, and Video Speech-to-Speech Services domestically.

Outreach Specialists

We understands that no one single person can meet the communication or outreach needs of all relay users. As a result, we have developed a network of Outreach Specialists throughout the State. These Outreach Specialists to target specific geographic locations and/or user segments to ensure that information is shared consistently across the population. This approach also ensures that we are delivering a highly cost-effective solution for the State.

Lifecycle Team

In addition to the key personnel above, the State will also be supported by a full lifecycle team which includes supporting personnel working behind the scenes to ensure all requests or issues are addressed quickly and accurately. The figure below outlines the full team of experts which are engaged as a part of our lifecycle team.

Position	Areas of Responsibility	Experience
Dennis Selznick Business Development (CTS Product Manager)	Develops new innovations for CTS service including wireline CTS, wireless CTS applications, and IP CTS.	✓ 10 years of experience with the company ✓ 7 years of experience as the CTS Product Manager ✓ Bachelor of Science degree
Maryann Dry Customer Service Location Manager	Manages 24/7 Customer Service for Relay users and Video Customer Service for customers who prefer to communicate using ASL. Accepts commendations/complaints regarding service and technical issues for end users. Provides information about the Relay Service and TTY equipment.	✓ 24 years of experience with the company including 21 years' experience in call center management ✓ Bachelor's degree in Psychology and a Master's degree in Business and Human Resources from
Ron Peay Vendor and Subcontractor Operations	Oversees the Relay Center daily traffic routing and staffing requirements to meet the 85/10 monthly requirement. Responsible for sub-contractor relations.	✓ 24 years of experience with the company ✓ 12 years of experience supporting TRS traffic management and vendor operations ✓ Bachelor of Science degree

Position	Areas of Responsibility	Experience
Kris Owara Billing Analyst	Prepares and submits billable minutes and total service compensation monthly. Prepares and provides invoices and reports.	✓ 12 years of experience with the company ✓ 6 years of experience supporting TRS Billing ✓ Bachelor of Arts degree in Business
Sharon Behringer Training and Quality Assurance Manager	Develops initial and ongoing TRS training materials. Internal and external quality assurance testing. Addresses customer compliments and complaints.	✓ 24 years of experience with the company ✓ 12 of experience as a Quality Assurance Program Manager
Shawn Daniels TRS Information Technology (IT)	Designs and develops new enhancements and technologies for the TRS platform. Tests and implements new product developments and platform configurations. Oversees systems network and traffic management. Maintains systems maintenance.	✓ 13 years of IT experience with company's call centers ✓ 10 years of experience supporting TRS ✓ Bachelor of Science degree in Computer Science
Michaela Clairmonte Contracts	Administers Telecommunications Relay Service contracts between the State and Sprint.	✓ 14 years with the company ✓ 7 years of experience in Contracts management ✓ Bachelor of Business Administration
Mike Black Subcontracts	Oversees subcontract agreements between Sprint and Vendors which are utilized in the provision of services for Relay Colorado.	✓ 8 years of experience with the company ✓ 8 years of experience supporting the TRS group ✓ Certified Purchasing Manager

C. *The Offeror's proposal shall include evidence that it has the knowledge, skills, abilities and experience in the areas identified by the requirements in Section 4, Statement of Work.*

Bidder response:

We have read, understand, and will comply.

Over the last 24 years, our company has placed a premium on a simple concept: doing the right thing. As a part of this concept, we are able to offer the State of Colorado and its relay users the following benefits:

♦ Simplicity and Value: With today's economy, it is more important than ever to receive more value for each dollar spent. As relay users ourselves, we are highly focused on providing a combination of the best quality, efficiency, and technology. Our simplified approval to overall value means that relay users will have access to all of our premium products and features without the State being "nickeled and dimed." Please see Tab 5 for additional information.

♦ Healthy and Diverse Workplace: Our greatest strength is our employees. From our Relay Operators to our management teams, we work hard to recruit and retain the best employees. Our staff is passionate and dedicated; many of our employees have decades of experience and have made serving relay users their lives' work. Several of our employees have been with us since day one.

♦ Commitment to the Community: While all providers say they invest in the community, we prove it. The decision makers in our relay group are actual users of our services. Our largest TRS subcontractor is a non-profit organization that is dedicated to serving the needs of the community – meaning each dollar spent with us goes back into the helping the community. We also engage the local community and relay users in our outreach and marketing programs.

♦ Innovative Technology: Providing the best service to our users requires a commitment to providing the best technology. From the hundreds of enhancements that relay users enjoy to the "behind-the-scenes" platform hardware and software that power the service, we spend millions of dollars to provide the most reliable, efficient service possible.

♦ Regulatory Compliance: We have developed and implemented rigorous quality controls and regulatory compliance mechanisms that have enabled us to avoid the fraud, waste, and abuse that have plagued the industry. We are a contributor to the TRS fund and a relay provider; therefore, our operational and technical procedures are among the strictest in the industry. This enables us to assure our customers that the minutes we process are legitimate and compliant with all applicable State and Federal regulations. We also offer a robust regulatory team with contributions from key decision makers within our relay division to ensure that we continue to put the needs of the community first.

EXPERIENCE

We have the necessary experience, skills, and resources available to fulfill all commitments made in our Technical Proposal. We are proven, professional service provider of relay services with resources that are unmatched in the industry. We provide all of the products and services included in this bid to multiple State customers around the country.

♦ 115 years as a Telecommunications Provider
♦ 28+ years as a Long Distance Provider
♦ 24+ years as a TRS Provider with over 2 billion calls processed
♦ 23+ years as a Spanish Relay (TRS) provider
♦ 20+ years providing Operator Services for the Deaf
♦ 17+ years as a provider of Speech-to-Speech Relay
♦ 12+ years as a CTS Provider
♦ 11+ years as a provider of Captioning for Conference Calls

In compliance with RFP Section 1.11 requiring all bidders to list jurisdictions in which they provide relay services, please see Appendix 5. Please note that we redacted all identifying information in the blind copies.

D.   Please return Appendix D, the "Company Experience and Demonstrated Capability (CEDC)" form (attached at the end of this RFP) with your proposal.

The following Offeror qualifications are required to ensure effective TRS services:

•   Demonstrated success of at least three years within the past five year time period in providing similar services required in this solicitation on a statewide or national basis

The State reserves the right to contact jurisdictions where Offeror's have had or currently has contracts with providing the same or similar services.

Bidder response:

We have read, understand, and will comply.

Please see the following pages for Appendix D.

TAB 4: PRICE PROPOSAL

Please see the separately attached price proposal.

Page intentionally left blank

TAB 5: VALUE ADDED SERVICES

This RFP specifies minimum requirements for the State's TRS. Nothing in this section or other sections of the RFP is intended to prohibit an Offeror from offering additional telecommunications services to users and the State at no additional cost. Offerors should specify any additional services that will be provided at no additional cost. Additional consideration may be awarded by the Evaluation Team for those Offerors offering additional services at no cost. The Offeror should also describe other services they could provide at a small additional cost.

Bidder response:

We have read and fully meet these requirements.

Captioning for conference calls

Our proposal includes 10,000 annual minutes of captioning for conference calls for relay users in the State of Colorado, at no additional cost. With this service, individuals with a hearing loss or speech disability can fully participate in multi-party conference calls via the Internet. More and more employees rely on teleconferencing as a normal course of business. Whether the call is personal, business or financial, deaf and hard of hearing individuals can now fully participate in multi-party conference calls.

We know that technology can greatly enhances lives. With our captioning for conference calls, users can receive live, real-time text captioning of multi-party conference calls using the same high-quality captioners that produce closed-captioning for live television. Our service offers:

- ♦ Increased understanding of meeting discussions
- ♦ Immediate delivery of live captioning
- ♦ The ability to join in conference calls anywhere there is an Internet-connected computer and a toll-free conference bridge, including but not limited to: Dial-up Internet, Mobile Broadband (MBB) Card, Wi-Fi Hotspot, or Ethernet-based connection. High speed internet access is required.
- ♦ Text transcript upon request
- ♦ Shorter calls than traditional Relay service
- ♦ No special software requirements

Our captioners can keep up with dialogue up to 225 words per minute and maintain an average of 98% accuracy or better. We work constantly to enhance the skills of our team and you can help in the accuracy by providing as much advance information about the event including proper names, agenda, speaker notes, a PowerPoint, or other pertinent information.

RELIABILITY OF SERVICE

Our staff for this service includes over 160 real-time captioners. Each captioner works remotely and independently. When one real-time captioner is unable to perform an assignment, we immediately reassigns the job to another captioner. In addition to the scheduled conference calls on any given day, we maintain a list of available real-time Captioners to handle unforeseen emergencies in sufficient number to handle the day's volume.

CALL CONFIDENTIALITY

Our captioners adhere to FCC regulations and our internal procedures regarding confidentiality. All real-time Captioners assigned to this service are required to sign and adhere to a Relay confidentiality agreement. Unless compelled under lawful order, we will not reveal any customer information or data obtained in the provision of this service.

CALL TRANSCRIPTS

As an optional add-on to service, we can provide a full conference call transcript for predetermined captioned calls. This option allows anyone with an event ID to view and/or save a transcript of the call to their individual computers. Due to confidentiality issues, these services must be requested prior to the start of an event otherwise this service is disabled, by default, and no record of the event/call will be retained.

TYPES OF CALLS

Our staff will support conference calls using an Internet 'Text Streaming' platform. Our team of real-time capable, CART-skilled, and real-time Captioners will provide highly accurate real-time captioned text for conference calls with audio or toll-free audio bridge availability. Participant(s) can be in the same room where the conference is taking place or they can be thousands of miles away provided they have a computer with internet access and a toll-free phone number for the conference call.

CALL LENGTH & QUANTITY

There are no limits on the number or length of individual calls, up to the 10,000 total annual minutes included in the contract. We will support any length of call that occurs during the specified hours of operation 8:00 AM to 6:00 PM Monday through Friday in all time zones.

SCHEDULING A CALL

With the launch of this service, we will provide a password protected website which contains service description, event ordering, demos, and tech support. We can support staffing needs with 48-hour advance notice and have a process to submit conferencing requests via a monthly on-line calendar guaranteeing coverage. Every effort will be made to accommodate last minute requests; however no guarantee of availability can be made for these calls. Scheduling confirmations will be sent to the requester via e-mail.

All calls are scheduled using an online ordering system. Within one day of the request, an email will be sent to the requester with confirmation information.

Step 1 – Arrange for a conference call or conference bridge with your phone company or telecom services provider. We provide captioning and voice relay for the conference call.

Step 2 – Complete the ordering form with all relevant information including:

- ♦ Name
- ♦ Phone number
- ♦ Email address
- ♦ Alternative contact information
- ♦ Conference call (and access code)or toll-free telephone number for the Captioner to dial
- ♦ Title or subject matter of the conference
- ♦ Optional notes on the topic
- ♦ Date of event
- ♦ Time and duration of the call
- ♦ Transcript options (as described below)
- ♦ Option to add SSL encryption for security purposes
- ♦ Option for user to be contacted for quality assurance purposes.

ORDERING CALL TRANSCRIPTS

Real-time call transcripts are available during the call and for up to 48-hours after the call. During the scheduling process, the user requesting the service can select the following options regarding transcripts:

- ♦ Transcript Options
  - o Retain a copy on the server that can be accessed for up to 48-hours after the call is completed.
  - o Destroy the transcript immediately after the event to protect the confidentiality.
- ♦ Participant Options
  - o Allow all participants to view transcript.
  - o Allow all participants to view and print transcripts.
  - o Restrict the ability for participants to view and print transcripts.

Unless specifically disabled, you may click the "View Transcript" button to view and save a copy of the transcript in HTML or RTF format at any time during the event. This feature can be disabled by the scheduler of the event to protect confidentiality.

CANCELING A SCHEDULED CALL

We ask all participants to notify us of any call cancellations so that the captioner can be assigned to assist other callers. The Relay Colorado account will be charged for the time requested unless provided with a *24-hour notice of cancellation*. Should the event be changed or canceled, users can notify us by email of any changes.

PARTICIPATING ON AN CALL

When an event is scheduled, a confirmation is sent via email that contains a Personal Identification Password (PIN) assigned to access the appropriate website at the scheduled time. The user can access the website and enter the PIN or click on a link contained in the email to reach the caption

site. At the appointed time of the conference call, the caller connects to the website via their computer and internet connection and logs in.

Once logged in, the text is delivered to the user's computer via a real-time captioner who is connected by audio to the conference. When the conference begins, the user views the streaming text which denotes the speakers and their gender.

The real-time text streaming can be viewed simultaneously by up to 50 participants. One captioner can re-voice for up to three relay users. If more than one person is responding, each user will need to identify who is speaking in order for the captioner to accurately caption the user's name. The transcript will display the name of the user that logged into the event.

During the call, relay users can customize the display of captions by altering the font, text color, background color, and refresh rate. The relay user can also voice for themselves by dialing into the conference directly.

TERMS OF USE

Our proposal includes 10,000 annual minutes of the captioning for conference calls service for the three-year contract term with the following conditions:

- ♦ The number of minutes, hours, or partial hours for any event shall equal the "actual" minutes, hours, or partial hours of the event.
- ♦ Minimum Incremental Billing Unit: 15 minutes for Real-time Reporting/Streaming Services with an initial minimum of 1/2 hour.
- ♦ Minimum Fee for any Event: One half (1/2) of the Hourly Rate for the Event
- ♦ All events will be billed in full for the amount of time requested and in 15-minute increments thereafter unless cancelled with a 24-hour notice of cancellation.

Based on other State's usage, we anticipate this number of free minutes for the service will be adequate to cover the anticipated demand. If usage is greater than anticipated, the service can be continued for a small additional cost over the standard relay rates.

Video-Assisted Speech-to-Speech

Video-Assisted Speech-to-Speech (VA-STS) is an enhancement to the traditional STS service. With a VA-STS call, in addition to a basic phone call to the relay service, the STS caller is also using a webcam with video conferencing software to connect with the Communications Assistant (CA) at the relay call center. During the call, the VA-STS user and CA will establish a one-way video connection that allows the CA to see the STS user as they are speaking.

The purpose of VA-STS is to provide the STS CA with visual communication cues including lip reading, spelling in the air, facial expressions and other physical movements that may facilitate comprehension of what the person with a speech disability is saying. VA-STS calls are initiated through a telephone connection with the video connection added.

USER REQUIREMENTS

In order to access VA-STS the user will need to have the following, a computer with a web cam (or comparable equipment) and access via the internet.   We also recommend the following:

♦ A telephone located near the device for voice connections to the STS CA (Please note that a device with a speakerphone is preferable)
♦ Access to high-speed internet with an estimated 500-700 Kbps (around 4-6 MB) for the video conference connection. If the VA-STS user is located behind a corporate firewall we recommend the service have at least 6 Mbps of upstream and downstream bandwidth. (Higher internet bandwidth is preferred.)
♦ The ability to operate the equipment independently or with assistance
♦ Users are strongly encouraged to set up a customer profile that identifies the user's needs and call preferences, including a preference for STS with VA-STS. Established preferences will help the agent to set up the call more quickly and facilitate the call more smoothly.

TERMS OF USE

We will provide the VA-STS service at the same contracted standard relay rate per billable minute (e.g., no additional charge).   Our VA-STS service is available in English and is available 24/7. VA-STS is available to STS users regardless of whether they are the originating (inbound) calling party or the outbound (called) party.

STS Call Set-Up via E-mail

In order to speed up the set-up of the call, we offer STS Set-up via E-Mail, at no additional charge to the State. STS users can email call instructions or information two (2) to 24 hours prior to the call. This can include information such as:

♦ Number to be dialed
♦ Name of the person being called
♦ Special instructions and the subject of the call
♦ Anything that makes it easier for the STS user to complete the call.

Please note that this feature cannot be used to request a specific relay operator, schedule an STS call, or be used in lieu of placing a live call.

Prior to using this service, the STS user must set up a Customer Profile. Once complete, the STS user simply sends an email to STS and/or fills out a short online form. This form can be added to the Relay Colorado website for easy access.

Speech-to-Speech Email Call Set Up

Your Name
(A)

Your phone number OR username & password: *REQUIRED*
(B)

Your email address:
(C)

Number you are calling: *REQUIRED*
(D)

State you are calling from: *REQUIRED*
(E)

Name of person or business:
(F)

Preferred announcement:
(G)

Instructions STS Operator:
(H)

After you click the Submit button, please wait for a few seconds.
Do not click repeatedly. Thank you.

Submit (I)

APPENDICES

APPENDIX 1:   SAMPLE CUSTOMER LETTER

NAME
ADDRESS
ADDRESS

Dear NAME:

Thank you for taking the time to express your concerns regarding <nature of complaint> during your relay call on <date of complaint>. Feedback concerning individual relay calls lets us know what we are doing well and what areas could be improved upon.

To address your concern, appropriate action has been taken including <description of action taken>.

Providing quality customer service is top priority at Relay Colorado. Your active participation in sharing concerns and commendations about the service provides essential input for responding to customer needs. We value your feedback and patience as we strive to improve service to the customer through our quality assurance program.

If you are not satisfied with this resolution, please contact us at the following:

Relay Colorado   Colorado Department of
Account Manager: Name   Regulatory Agencies
Voice: 1-XXX-XXX-XXXX   Public Utilities Commission
TTY: 1-XXX-XXX-XXXX   1560 Broadway, Suite 250
VP: Denver, CO 80202
E-mail: www.dora.state.co.us
Website

 You may also file a complaint directly with the FCC at:

    The Federal Communications Commission's Consumer Center:
    Voice: 1-888-CALL-FCC (1-888-225-5322)
    TTY: 1-888-TELL-FCC (1-888-835-5322)
    Fax: 1-866-418-0232
    Online: www.fcc.gov/complaints

ASL Consumer Support Line: Call 844-4-FCC-ASL (844-432-2275) or 202-810-0444
The FCC has launched a video consumer support service, the ASL Consumer Support Line, specifically designed to enable consumers who are deaf and hard of hearing to engage in a direct video call with a consumer specialist at the FCC.

The ASL Consumer Specialist is able to assist consumers with filing informal complaints. In addition, the Specialist can help consumers obtain information in response to inquiries on a wide range of disability-related matters, such as telecommunications relay service (TRS), closed captioning and access to emergency information on television, and general telecommunication matters, such as slamming, Do-Not-Call telemarketing violations and broadband services.

Thank you again for taking the time to bring this matter to our attention.

Best Regards,

NAME
TITLE

APPENDIX 2:   FCC COMPLIANCE MATRIX

Our provision of TRS will meet or exceed federal requirements for both intrastate and interstate relay including the Americans with Disabilities Act and the FCC minimum requirements. We understand that if there is any discrepancy between requirements, the stricter of the requirements will apply. Please see the figure below for information on how we meet and/or exceed the FCC standards.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS	Exceeds	We offer a comprehensive training program designed to offer the best quality to all relay users including those who are deaf, hard of hearing or have a speech disability. Our 2-3 week program includes training on User Culture, compliance with regulatory requirements, and the operation of our systems. In 2013, our User Culture training was expanded to feature interviews with key community leaders who are Deaf or hard of hearing.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS (Partially waived for CTS and IP CTS)	Exceeds	We ensure that all CAs are skilled in typing, grammar, spelling, and interpretation of typewritten ASL (as applicable), familiar with hearing and speech disability culture, language and etiquette; and have clear and articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS (Waived or Partially waived for CTS and IP CTS)	Exceeds	Our CAs type and/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS	Exceeds	As a general rule, we allow CA takeovers only when necessary. Our CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS (Waived for CTS and IP CTS)	Meets	We make its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation and/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS	Meets	Our sophisticated software enables real-time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, CTS, IP CTS)	Meets	We offer STS users the option to mute their voice so that the other party to the call will hear only the CA and will not hear the STS user's voice.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	TRS, STS, CTS, IP CTS	Meets	We have systematic and operational processes intended to prevent disclosure of call content and/or Customer Proprietary Network Information (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS	Meets	We ban CAs from intentionally altering the conversations they relay, except to the extent necessary to (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide information to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS (Waived for CTS and IP CTS)	Meets	Our CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, CTS, IP CTS	Meets	We never limit the length of a Relay call.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	TRS, STS, CTS, IP CTS	Meets	Except to the extent the requirements are waived, not permitted, or as the FCC determines that it is not technologically feasible to do so, our services are capable of handling any type of call normally provided by telecommunications carriers.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
Credit Authorization 47 C.F.R. § 64.604(a)(3)(iii)	TRS, STS, CTS (Waived for IP CTS)	Meets	We understands that we are permitted to decline a call if the user cannot pay or because a credit authorization for toll calls is denied.
Pay Per Calls 47 C.F.R. § 64.604(a)(3)(iv)	TRS, STS, CTS (Waived for IP CTS)	Exceeds	We process TRS calls to 900 numbers via a dedicated toll-free number which observes LEC restrictions. We also provides pay per calling for CTS users, and requires users to complete a Customer Profile prior to placing 900 calls.
Call Combinations 47 C.F.R. § 64.604(a)(3)(v)	TRS (Partially waived for CTS, IP CTS)	Meets	Our services support all mandatory FCC call types.
Call Release 47 C.F.R. § 64.604(a)(3)(vi)(1)	TRS (Waived for CTS, IP CTS)	Meets	We provide TTY-to-TTY call set-up which allows the CA to set-up the call and drop off the line, if not needed to facilitate conversation.
Speed Dial 47 C.F.R. § 64.604(a)(3)(vi)(2)	TRS, STS, CTS	Meets	Our TRS and CTS Speed Dial functionality is available by filling in a Customer Profile. CTS users are able to select three (3) speed dial buttons as well as a phone book for contacts.
Three-Way Calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	TRS, STS, CTS (Waived for IP CTS)	Meets	We support LEC-based three-way calling for our customers. TRS users also have access to CA-initiated 3-way calling.
Interactive Menus and Voicemail 47 C.F.R. § 64.604(a)(3)(vii)/(viii)	TRS, STS, CTS, IP CTS	Exceeds	We electronically capture recordings and makes interactive recordings and voice mail/answering machines available to Relay customers.
Emergency Calls for TTY-based providers 47 C.F.R. § 64.604(a)(4)	TRS, STS (N/A for CTS, IP CTS)	Meets	We automatically and immediately connect emergency calls to an appropriate Public Safety Answering Point (PSAP) which is capable of dispatching emergency services.
STS Called Numbers 47 C.F.R. § 64.604(a)(5)	STS (N/A for TRS, CTS, IP CTS)	Exceeds	We allows STS users to register a Customer Profile which includes Speed Dial and other enhancements. In 2012, we upgraded our STS program to include a full suite of additional STS enhancements.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
Privacy Screens 47 C.F.R. § 64.604(a) (6)	VRS	N/A	This requirement is not applicable to the services being offered.
International Calls Non-reimbursable 47 C.F.R. § 64.604(a)(7)	VRS, IP Relay (N/A for TRS, STS CTS, or IP CTS)	N/A	This requirement is not applicable to the services being offered.
ASCII and Baudot 47 C.F.R. § 64.604(b)(1)	TRS, STS (Waived for CTS and IP CTS)	Exceeds	Our TRS (TTY) platform supports all communication modes generally in use including Baudot (domestic and international), ASCII, Turbo Code, and Enhanced Turbo Code (E-Turbo).
Speed of Answer and Blockage 47 C.F.R. § 64.604(b)(2)	TRS, STS, CTS, IP CTS	Exceeds	We answer at least 85% of all calls on a daily basis within 10 seconds, including abandons. Our systems exceed the P.01 standard.
Equal Access to IXCs 47 C.F.R. § 64.604(b)(3)	TRS, STS, CTS (Waived for IP CTS)	Exceeds	Our TRS and CTS platforms support the billing and rating of toll calls through other carriers.
TRS Facilities 47 C.F.R. § 64.604(b)(4)	TRS, STS, CTS, and IP CTS	Meets	We provide mandated services 24/7 using redundant facilities that are functionally-equivalent to normal central offices.
Technology 47 C.F.R. § 64.604(b)(5)	TRS, STS, CTS, and IP CTS	Exceeds	We exceed the minimum mandatory services and routinely upgrades our products to increase functional equivalency.
Caller ID 47 C.F.R. § 64.604(b)(6)	TRS, STS, CTS, and IP CTS	Meets	We provide SS7 Caller ID. If not blocked by the customer, the number of the calling party is transmitted.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
STS 711 Calls 47 C.F.R. § 64.604(b)(7)	TRS, STS (N/A to CTS, IP CTS)	Exceeds	We offer States multiple solutions to meet this requirement including: Automatic 711 Routing for STS users connects callers with a Customer Profile directly to STS CAs. CAs answering 711 for callers without a profile will immediately transfer the caller to a STS CA. We also offer an IVR systems allow the STS user to connect directly to an STS CA using the same level of prompts as the IVR system uses for other forms of TRS.
Consumer Complaint Logs and Procedures 47 C.F.R. § 64.604(c)(1)	TRS, STS, CTS, and IP CTS	Meets	We maintain 24/7 Customer Service and logs all complaints received. We provide the State a summary that meets FCC standards.
Contact Persons 47 C.F.R. § 64.604(c)(2)	TRS, STS, CTS, and IP CTS	Meets	Our point of contact for complaints is our Relay Customer Service department.
Public Access to Information 47 C.F.R. § 64.604(c)(3)	TRS, STS, CTS	Exceeds	We provide innovative Outreach services through its state programs.
Rates 47 C.F.R. § 64.604(c)(4)	TRS, STS, CTS, and IP CTS	Meets	We ensure that TRS and CTS users, who rely on our platforms to establish billing for toll calls, are charged no more than traditional phone users.
Cost Information and Data Submission 47 C.F.R. § 64.604(c)(5)	TRS, STS, CTS, and IP CTS	Meets	We contribute to the Interstate TRS Fund and submits the required cost data to the FCC and to the Fund administrator to receive reimbursement for services provided.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(M)	TRS, STS, CTS, and IP CTS	Meets	We have provided copies of the whistleblower protections to all of our employees including instructions for reporting noncompliance to the FCC's whistleblower hotline.
Complaint Resolution 47 C.F.R. § 64.604(c)(6)	TRS, STS, CTS, and IP CTS	Meets	We support timely and effective complaint resolution.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, and IP CTS	Meets	We does not use Customer Profile data for any purpose other than to process calls and will not sell, distribute, share, or reveal the profile data unless compelled by law to do so. During State Relay transitions, we provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, or CTS)	Meets	We does not offer incentives to IP CTS users directly or indirectly. We prohibit incentives to hearing health professionals and does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration and Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, or CTS)	Meets	We comply with the final FCC rule requiring the collection of each new customer's name, address, and telephone number, date of birth, and the last four social security digits. We also collects a separate, self-certification for all new IP CTS users. We maintain registration and certification records for at least 5 years after service ceases, and do not disclose registration and certification information, except as required by law or regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, or CTS)	Meets	Our default setting for the IP CTS phone is to have captions on.
IP CTS Equipment Fee and Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, or CTS)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling and no longer applies. We fully comply with the remainders of the order to provide a warning label on all IP CTS equipment and software.
TRS calls requiring the use of multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS	Meets	We comply for VCO to VCO calls between multiple captioned telephone relay service users, IP CTS users, or CTS users and IP CTS users; CTS or IP CTS users and TTY users; CTS or IP CTS users and VRS users.
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	N/A	This requirement is not applicable to the services being offered.

FCC Minimum Standard	Applies to:	Compliant	Our Approach
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	N/A	This requirement is not applicable to the services being offered.

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APPENDIX 3:   JOB DESCRIPTIONS

TRS Communication Assistant (Relay Operator)
DESCRIPTION

Communication Assistants provide communication access for deaf, hard of hearing, and speech impaired consumers through the telephone network by relaying telephone calls using voice and text.

•Accept and place local and long distance relay calls for consumers.

•Follow desired method of billing instructions and enter billing information into the system.

•Translate electronic messages to voice messages and voice messages to electronic messages.

•Translate sentence structures and language patterns from American Sign Language (ASL) to English and English to ASL to ensure the correct message is relayed.

•Convey the callers' actual feelings and emotions.

•Relay contents of the call as accurately as possible without intervening in the conversation.

•Maintain strict consumer confidentiality and professionalism.

REQUIREMENTS

•A minimum of a High School Diploma or equivalent.

•At least 18 years of age or older.

•Typing skill of at least 60 WPM using a personal computer.

•Ability to work various schedules including weekdays, evening and weekends.

•Ability to learn ASL syntax.

BENEFITS

We offer a competitive benefits package for full-time employees.

We are an Equal Opportunity Affirmative Action Employer and drug free and tobacco free workplace. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, or national origin, including individuals with a disability and protected veterans.

Captioning Assistant (CTS Operator)
DESCRIPTION

Captioning Assistants provide quick and accurate captions for telephone conversations of Captioned Telephone clients using voice recognition applications.

•Ensure the highest level of quality service is delivered to all consumers with a calm demeanor.

•Multi-task while focusing on a high amount of attention to detail, (hear audio, voice quickly with clear enunciation what was heard, proof-read developing captions,- all simultaneously).

•Utilize keyboard by typing corrections and other words as necessary.

•Maintain the CTS Call Centers quality standards for accuracy and speed.

•Monitor technical issues on calls and report to appropriate staff.

•Attend job appropriate meetings and training sessions.

•Sign and abide by the CTS Oath of Confidentiality, even after employment is terminated.

•Other duties as assigned by supervisor or Center manager

REQUIREMENTS

•A minimum of a High School Diploma or equivalent.

•At least 18 years of age or older.

•Typing skills of at least 35 words per minute with a low error rate.

•Ability to work various schedules including weekdays and evenings.

•Excellent reading, vocabulary and spelling skills.

•Strong memory-recall ability.

BENEFITS

We offer a competitive benefits package for full-time employees.

We are an Equal Opportunity Affirmative Action Employer and drug free and tobacco free workplace. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, or national origin, including individuals with a disability and protected veterans.

APPENDIX 4:   SAMPLE   PERFORMANCE REPORTS

Please see the following page for a sample monthly performance reports.

APPENDIX 5:   LIST OF TRS CUSTOMERS

Per RFP Section 1.11 that requires bidders provide a list of jurisdictions where they provide services, we currently hold State contracts for TRS and/or CTS services in the following States.

State
ALABAMA
ALASKA
ARKANSAS
CONNECTICUT
DELAWARE
HAWAII
ILLINOIS
INDIANA
KENTUCKY
MINNESOTA
MISSISSIPPI
MISSOURI
NEBRASKA
NEW HAMPSHIRE
NEW JERSEY
NEW YORK
NORTH CAROLINA
NORTH DAKOTA
OHIO
OKLAHOMA
OREGON
PUERTO RICO
SOUTH CAROLINA
SOUTH DAKOTA
TEXAS
U.S. VIRGIN ISLANDS
VERMONT
WASHINGTON
WEST VIRGINIA
WISCONSIN
WYOMING

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APPENDIX 6: TRS STANDARD FEATURES

	Standard Relay Product Feature	Identical Fashion	Different Fashion
1	Abbreviation Expansion – *Relay users unfamiliar with standard TTY abbreviations can have the CA software automatically expand words.*		X
2	Alpha-Numeric Dialing	X	
3	Answering Machine Retrieval (Single Line)	X	
4	ASCII Split Screen	X	
5	ASL Translation (Upon Request)	X	
6	Automated Call Routing	X	
7	Automatic Error Correction – *Our CA software offers both spell check and a single word edit capability which means greater accuracy for relay users.*		X
8	Automated Number Identification (ANI)	X	
9	Automatic Connection Mode	X	
10	Average Speed of Answer	X	
11	Background Noises – *Our CA software features 262 background noise descriptions to enhance the calling experience.*		X
12	Carrier of Choice – *Over 260 carriers are available nationwide mean more choices of long distance carriers for relay users.*	X	
13	Cellular/Wireless/PCS Phone Access	X	
14	CA Gender ID	X	
15	CA Gender Preferences – *Relay users can add gender preferences to the Customer Profile and we will attempt to meet.*		X
16	CA In-call Replacement	X	
17	CA Typing Speed – *More technological aids mean faster typing speeds for relay users.*		X
18	CTS and 2-Line CTS	(see below)	
19	• ANI Billing	X	
20	• State-specific Reporting	X	
21	• N11 dialing	X	
22	• Subsidized equipment programs	X	
23	• Default Amplification Settings	X	
24	• IP options available (web, wireless, equipment)	X	
25	Courtesy Message	X	
26	Credit for Wrong Numbers	X	
27	Customer Database		(see below)
28	• Personal Information – *More fields including the option to register the user's LEC to assist in troubleshooting.*		X
29	• Speed Dial Numbers – *Up to 100 speed dial entries and 30 emergency numbers mean greater flexibility for relay users.*		X
30	• Preferences – *More options mean that each caller can customize their calling experience.*		X

	Standard Relay Product Feature	Identical Fashion	Different Fashion
31	• Caller of Choice – *Relay users can select a preferred LD carrier for each type of long distance call for more flexibility.*		X
32	• Outdial Restrictions	X	
33	• Remote Access	X	
34	Customized 800 Access	X	
35	Customer Service	X	
36	Deaf-Blind Pacing (Slow Type Buffer)	X	
37	Dialed Number Verification	X	
38	Directory Assistance	X	
39	Emergency Assistance	X	
40	Emergency Call Handling (E911)	X	
41	Emergency Numbers – *Users can establish a separate speed dial list of emergency numbers for faster access in times of emergency.*		X
42	Enhanced Modems	X	
43	Error Correction	X	
44	Enhanced Turbo Code with Dial Through (E-Turbo)	X	
45	Expressive Typing –*CAs use expressive typing to create a more complete picture of the conversation.*		X
46	Friendly Greetings/Closings – *Our CAs offer friendly greetings (e.g., "Good morning") and closings (e.g., "Thank you for using Relay).*		X
47	Gender ID	X	
48	Hearing Carry-Over (HCO)	X	
49	HCO-HCO	X	
50	HCO Greeting Identifier	X	
51	HCO Permanent Branding	X	
52	HCO-TTY	X	
53	HCO with Privacy	X	
54	Inform relay user of call type (local, LD, 900, etc…)	X	
55	Inbound International	X	
56	Intelligent Call Router	X	
57	Intercept Messages	X	
58	Last Number Redial – *Users can redial the last number for up to 2 years (rather than just 24 hours).*		X
59	LEC Calling Services		(see below)
60	• True Caller ID (SS7)	X	
61	• CID Blocking (Global or Per-Call) – *Relay users can block Caller ID or ask the CA to do it for them.*		X
62	• CID Blocking Macros	X	
63	• Call Screening (Rejection and Block)	X	
64	• Call Acceptance	X	
65	• Anonymous Call Rejection	X	
66	• Preferred Call Forwarding	X	
67	• Unique Flash	X	
68	• Three-way Calling	X	
69	• Call Forwarding	X	
70	Local/Extended Area Service	X	

	Standard Relay Product Feature	Identical Fashion	Different Fashion
71	Machine Recording Capabilities (Hot Key)	X	
72	N11 Dialing Access	X	
73	No Typing Corrections – *Relay users can request no manual typing corrections for faster service.*		X
74	Operator Services - *Relay users can choose to have the call relayed or be transferred directly to Operator Services for the Deaf (OSD).*		X
75	Pager/Beeper Access	X	
76	Quicker Dialing – *CAs dial most calls within 5 seconds (or 10 seconds with detailed instructions).*		X
77	Regionally Directed Toll-Free Numbers	X	
78	Regionally Restricted Toll-Free Numbers	X	
79	Remote Captioning for Conference Calls (Value- Added) – *Our service is available for either in-person or remote captioning of conference calls.*		X
80	Reverse 2-Line HCO	X	
81	Reverse 2-Line VCO	X	
82	Roaming Service	X	
83	Slow Type Buffer	X	
84	Spanish TRS	X	
85	Spanish-to-English Translation	X	
86	Speech Disabled Indicator	X	
87	Speech-to-Speech (STS)	X	
88	• STS Customer Service (Training Line) – *Available from every state and free of charge, our STS Customer Service staff will assist STS users and*		X
89	• STS Call Set-Up via Email– *STS users can email call set-up instructions directly to the STS CA.*		X
90	• STS in Spanish	X	
91	• STS to other Relay call types	X	
92	• STS with VCO	X	
93	• Video-Assisted STS	X	
94	Three -way Calling – *Relay users set up the call using their LEC feature or ask the CA to set-up the 3-way call.*		X
95	Toll Discounts	X	
96	Tone of Voice Descriptions – *Our CA software features almost 100 pre-approved tone of voice descriptions to enhance the conversation.*		X
97	Transfer Gate Capabilities	X	
98	TTY Operator Services (OSD)		X
99	TTY To TTY Call Release (Call Set-Up)	X	
100	Turbo Code^{TM}	X	
101	Two-Line HCO	X	
102	Two-Line VCO	X	
103	Variable Time Stamp Macro – *When the called party disconnects while the inbound user is typing, we will inform the caller of the time and the last few words relayed.*		X
104	Verification of Unfamiliar Proper Nouns	X	
105	Voice Call Progression		X
106	Voice Carry Over (VCO)	X	

	Standard Relay Product Feature	Identical Fashion	Different Fashion
107	VCO Gated Services	X	
108	VCO Greeting (Identifier)	X	
109	VCO Permanent Branding	X	
110	VCO-HCO and HCO-VCO	X	
111	VCO-TTY and TTY-VCO	X	
112	VCO-VCO	X	
113	VCO w/Privacy (No "GA")	X	
114	Voice Gender ID	X	
115	1010 Numbers	X	
116	7-1-1 Dialing (including CTS access)	X	
117	900 Pay Per Call Services		X

Network, Reporting and Disaster Recovery	
1	Automated Alarms (e.g., capacity, error detection)
2	Automatic Number Identification
3	Automatic Re-routing of Calls to Prevent Service Outage
4	Call Detail Record with Validation Process
5	Comprehensive Reporting System
6	Courtesy Messages
7	Enhanced Back-up Power
8	Inbound Network Redundancy
9	Intercept Messages
10	Outbound Network Redundancy
11	Proven Disaster Recovery Program
12	Redundant Call Routers
13	Self-Learning Database
14	Switching Redundancy
15	Separate TRS Test Environment (including TRS switch)

Customer Service, Outreach and Personnel	
1	24 hour Customer Service (TTY, Voice, ASCII, STS, CTS)
2	Advanced CA Training
3	Back-up call centers supporting all types of calls
4	CA Counseling Services
5	Centralized Traffic Management team
6	Complete Confidentiality
7	Customer Contact Options (Email, website, fax, mail, etc.)
8	Employee Resource Groups
9	Quality Assurance Management team
10	Remote Monitoring of CAs
11	Specialty Customer Service and Training Lines (CTS, STS, VCO)
12	State-specific Outreach and websites

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TAB 4: PRICE PROPOSAL

We are very interested in providing TRS and CTS for the State of Colorado. Accordingly, we are offering a value unmatched by other provider. Our Price Proposal includes all products, features and enhancements included in our Technical Proposal and Value Added Services, including but not limited to the following:

♦ An experienced and professional Account Manager with dozens of years of experience

♦ A comprehensive Outreach Program with an annual budget of $100,000 plus several bonus features, including the following:

- **Paid TV Commercials:** Paid TV commercials are the fastest way to spread a consistent message. With an annual investment of $50,000 towards CTS commercials, we will provide an additional annual investment of $150,000 – as a BONUS - at no charge. This investment in paid television commercials means we can reach more people in our target market, including the Latino/Hispanic market.

- **CTS** Outreach Expert: As a part of our contract with our CTS subcontractors, we will make a local, full-time outreach expert available in the State – at no additional charge. This CTS outreach expert will perform up to 3 outreach events or presentations per month supporting CTS users in the State. This bonus equates to 108 extra outreach events over the life the contract. In addition, the CTS outreach expert will support approximately 25 CTS installations per month in the region.

- Special Veteran Captioned Telephone Offer: To recognize the service of our veterans, we offer presentations and captioned telephones to qualified veterans, at no additional cost. We have paid TV commercials that feature veterans. In addition to our Account Manager and Outreach Specialists, we also have a manager who is dedicated to providing support to federal employees, including veterans. She will provide presentations, training, and one-on-one support for veterans and those who support them.

- Subsidized CTS Devices: We strongly believe that every person with a hearing loss who could benefit from a CTS phone should have access. Money should never be a barrier. Therefore, we offer highly subsidized CTS devices. With the new FCC rulings, we are happy to announce that if the Colorado Commission for the Deaf and Hard of Hearing (i.e., the Equipment Distribution Program provider) supplies a 3rd party

TAB 4: PRICE PROPOSAL

We are very interested in providing TRS and CTS for the State of Colorado. Accordingly, we are offering a value unmatched by other provider. Our Price Proposal includes all products, features and enhancements included in our Technical Proposal and Value Added Services, including but not limited to the following:

♦ An experienced and professional Account Manager with dozens of years of experience

♦ A comprehensive Outreach Program with an annual budget of $100,000 plus several bonus features, including the following:

- **Paid TV Commercials:** Paid TV commercials are the fastest way to spread a consistent message. With an annual investment of $50,000 towards CTS commercials, we will provide an additional annual investment of $150,000 – as a BONUS - at no charge. This investment in paid television commercials means we can reach more people in our target market, including the Latino/Hispanic market.

- **CTS** Outreach Expert: As a part of our contract with our CTS subcontractors, we will make a local, full-time outreach expert available in the State – at no additional charge. This CTS outreach expert will perform up to 3 outreach events or presentations per month supporting CTS users in the State. This bonus equates to 108 extra outreach events over the life the contract. In addition, the CTS outreach expert will support approximately 25 CTS installations per month in the region.

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certification for an IP CTS phone, we will provide a IP CTS phone at no cost to the user.

♦ Video-Assisted STS at no additional charge above the standard billable rate

♦ STS E-Mail Call Set-Up at no additional charge above the standard billable rate

♦ Customized Relay Colorado Customer Service and specialized Customer Service and Training Lines for Speech-to-Speech, CTS, and VCO users

As requested in the RFP, we have provided one combined price-per-minute for all services (including both TRS and CTS services). Please see below.

Description	Unit of Measure	Firm, Fixed Price
Year One	Session Minute	$ 1.72
Year Two	Session Minute	$ 1.72
Year Three	Session Minute	$ 1.72

CAPTIONING FOR CONFERENCE CALLS

Our proposal includes 10,000 annual minutes of the captioning for conference calls service for the three-year contract term with the following conditions:

♦ The number of minutes, hours, or partial hours for any event shall equal the "actual" minutes, hours, or partial hours of the event.
♦ Minimum Incremental Billing Unit: 15 minutes for Real-time Reporting/Streaming Services with an initial minimum of 1/2 hour.
♦ Minimum Fee for any Event: One half (1/2) of the Hourly Rate for the Event
♦ All events will be billed in full for the amount of time requested and in 15-minute increments thereafter unless cancelled with a 24-hour notice of cancellation.

Based on other State's usage, we anticipate this number of free minutes for the service will be adequate to cover the anticipated demand. If usage is greater than anticipated, the service can be continued for a small additional cost over the standard relay rates, as noted in the chart below.

Description	Unit of Measure	Firm, Fixed Price[26]
Captioning for Conference Calls	With Voicing	$ 2.96
Captioning for Conference Calls	For VCO users	$ 2.62

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[26] The same terms and conditions will apply for billing increments and cancellation policy.

a. State of Colorado

b. REQUEST FOR PROPOSAL COVER SHEET & SIGNATURE PAGE

Date:	TBA	**RFP Number:**	RFP-SGA-TBA CO TRS
Submit Sealed Proposals to:	Department of Regulatory Agencies Procurement Office 1560 Broadway, Suite 1550 Denver, CO 80202	**Purchasing Agent**:	Tammy Baca
RFP Submission Deadline:	TBA, 2:00 p.m. (Mountain Time) Caution: Daily mail may not be received prior to 4 pm. Vendors are responsible to ensure timely receipt.	**Number of Copies:**	One Original non-blind hard copy, One Original blind copy, ___ blind copies

All Bids Shall be Quoted F.O.B. Destination unless Otherwise Specified

COLORADO TELECOMMUNICATIONS RELAY SERVICES

Per the attached specifications, terms and conditions

F.E.I.N.: _____

Delivery Date: _____

Payment Terms:
(Minimum of Net 30) _____

Authorized Signature: _____

Typed/Printed Name: _____

Title: _____

Company Name: _____

Address: _____

City: _____ **State:** _____ **Zip:** _____

Phone Number: _____ **Fax Number:** _____

Contact for Clarifications: _____

Title: _____

Phone Number: _____ **Fax Number:** _____

E-mail Address: _____

IMPORTANT: The following information must be on the outside of the Bid Return Envelope:

Bid Number -Opening Date and Time

Please be advised that telegraphic or electronic bids (Fax, Western Union, Telex, e-mail, etc.) cannot be accepted in the Purchasing Office as a sealed proposal. Offerors are urged to read the solicitation document thoroughly before submitting a proposal. Offerors are required to submit Federal Employer Identification Number (F.E.I.N.) prior to payment from the State of Colorado.

_____ Confirm that you are aware that the award notice will be published on BIDS.

My company is registered on Colorado BIDS. _____Yes _____No

THIS PAGE MUST BE COMPLETED, SIGNED AND RETURNED WITH RESPONSE

TABLE OF CONTENTS

Section 1 – Administrative Requirements

1.01   Official Means of Communication

During the solicitation process for this RFP, all official communication with Offerors will be via notices on Colorado's *BIDS* system. Notices may include any modifications to administrative or performance requirements, answers to inquiries received, clarifications to requirements, and the announcement of the apparent winning offeror(s). ***It is incumbent upon Offerors to carefully and regularly monitor BIDS for any such notices.***

1.02   Bid Information and Distribution System (BIDS) and Registration

This solicitation is published using the Colorado Bid Information and Distribution System (BIDS). Offerors must be registered on BIDS in order to download solicitation documents and information and to be considered responsive at the time of proposal due date. BIDS and its registration information may be linked through the State Purchasing Office link at http://www.gssa.state.co.us.

1.03   Structure of this Request for Proposal

The State of Colorado Solicitation Instructions and Terms and Conditions linked through the BIDS Solicitation Page govern except as modified or supplemented in these instructions.

1.04   RFP Cancellation

The State reserves the right to cancel this entire Request for Proposal or individual phases at any time, without penalty.

1.05   Scope of the RFP/Basis for Award

The purpose of this Request for Proposals (RFP) is to solicit proposals to establish a contract with one organization experienced in providing Telecommunications Relay Services. While numeric evaluations may be used in some aspects of the process to identify strengths and weaknesses of proposals, and to establish a ranking, the final decision will be a business decision by the State and will not be based on a numerical score.

Award will be made to the Offeror whose proposal is determined to be most advantageous to the State considering the evaluation factors set forth in Section 6 below.

1.06   Number of Awards

The State will award one contract as a result of this RFP.

1.07   Term of the Contract

The initial contract will be effective upon approval by the State Controller for three years. The contract may be renewed for up to two additional one-year periods, with a total contract term not to exceed five years, at the sole discretion of the State, contingent upon contractual requirements being satisfied and funds being appropriated, budgeted, and otherwise made available.

1.08   Issuing Office

This Request for Proposal (RFP) is issued by the Department of Regulatory Agencies. The agency below is the sole point of contact concerning this RFP. Offerors should not contact any other state office or individual regarding this RFP or this project.

1.09   Inquiries

Offerors may make email inquiries concerning this RFP to obtain clarification of requirements. No inquiries will be accepted after the date and time indicated in the Schedule of Activities. The Department of Regulatory Agencies (DORA) Procurement Office prefers that all inquiries be sent by electronic mail with the RFP number and RFP Title in the subject line to:

Tammy.baca@dora.state.co.us
Department of Regulatory Agencies
Procurement Office
1560 Broadway, Suite 1550
Denver, Colorado 80202

Response to Offeror's inquiries (if required) will be published as a modification on the BIDS system in a timely manner. Offerors should not rely on any other statements, either written or oral, that alter any specification or other term or condition of the RFP during the open solicitation period. Offerors should not contact any other state office or individual regarding this RFP or this project. Offerors are responsible for monitoring BIDS for publication of modifications to this solicitation.

1.10 News Releases

News releases pertaining to this RFP shall NOT be made prior to execution of the contract without prior written approval by the State.

1.11 Submission of Blind Copies

DORA is requiring that blind copies be submitted to be evaluated by the evaluation committee. It is important that all Offerors follow the guidelines in this RFP concerning the submission of blind copies. (See Section 5.3 for requirement to submit blind copies.) In addition to excluding the Offeror's name or acronym throughout the proposal, Offerors must also exclude the titles/names of products or programs specific or otherwise identifying to the Offeror. Names of personnel also need to be blind throughout the proposal, including resumes. Offerors must use substitute language. Offerors, for example, may replace their company name with the "Company", their system as the "System", personnel as "Employee", etc., or a similar structure throughout their proposal.

Also it is important that Offerors do not indicate their current or past relationships with DORA. For example, Offerors must not use the following sorts of phrases: "as the current vendor", "as the previous vendor", "our relationship with DORA", etc. Evaluators are instructed to ONLY consider the submitted proposal. Existing or past relationships with DORA are not a consideration for award.

In addition, this solicitation requires that Offerors provide a list of the jurisdictions where they provide their services. In these instances, the name of the jurisdiction in the blind copies should be replaced with the "State", "City", etc. Names of contacts and addresses for these jurisdictions also must be replaced with substitute language.

Offerors should not attach articles, papers, publications, etc., which cannot be blinded. Any and all appendices must be blinded as well. If appendices cannot be blinded, offerors should make their best effort to describe the information without submitting the appendices.

It is imperative that Offerors use substitute wording to blind their proposal (including appendices and other attachments). Offerors must not blind their proposal by simply redacting information (that is, blacking-out words, sentences, or paragraphs). Such redacting makes it very difficult for evaluators to read and understand the proposal.

For questions on what is acceptable with respect to blind copies, Offerors should contact Tammy Baca at 303-894-7765 or by e-mail to tammy.baca@state.co.us.

Proposals will be reviewed by the Procurement Office to ensure these guidelines for the submission of blind copies are followed prior to distribution to the Evaluation Committee. If it is found that there are areas that should be blinded per the above criteria, there is no guarantee that Offerors will be given the opportunity to correct.   Proposals received that are not sufficiently blinded per the criteria in this section are subject to disqualification and may be returned to the Offeror without being evaluated. It is wholly the Offerors responsibility to ensure that their proposal meets the criteria in this section.

1.12   Proposal Submission/Copies

Detailed instructions on proposal preparation and submission are in Sections 5 and 6. It is the responsibility of the Offeror to ensure that the DORA Procurement Office receives the proposal on or before the proposal opening date and time, regardless of the delivery method used.

Caution: Daily mail may not be received prior to 4 pm. Vendors are responsible to ensure timely receipt. Telegraphic or electronic proposals (fax, e-mail, etc.) will not be accepted.

The State of Colorado Request for Proposal Cover Sheet MUST be signed in ink, preferably in blue ink, by the Offeror or an officer of the Offeror legally authorized to bind the Offeror to the proposal. Proposals that are determined to be at a variance with this requirement may not be accepted.

1.13   Proprietary/Confidential Information

Any restrictions of the use or inspection of material contained within the proposal shall be clearly stated in the proposal itself. Written requests by the Offeror for confidentiality shall be submitted to the Department of Regulatory Agencies Office in advance of the RFP submission deadline. Please allocate sufficient time prior to the RFP submission deadline to allow for a response by the State. The Offeror must state specifically what elements of the proposal are to be considered confidential/proprietary and must state the statutory basis for the request under the Public (open) Records Act. (Section 24-72-201 *et seq.*, C.R.S.).

Confidential/Proprietary information must be readily identified, marked and separated/packaged from the rest of the proposal. Co-mingling of confidential/proprietary and other information is not acceptable. Neither a proposal, in its entirety, nor proposal price information will be considered confidential and proprietary. Any information that will be included in any resulting contract cannot be considered confidential.

The DORA Procurement Office will make a written determination as to the apparent validity of any written request for confidentiality. In the event the DORA Procurement Office does not concur with the Offeror's request for confidentiality, the written determination will be sent to the offeror. Ref. Section 24-72-201 *et. seq.*, C.R.S., as amended, Public (open) Records Act.

Offeror(s) acknowledge that they may come into contact with confidential information contained in the records or files of the State in connection with any resulting contract or in connection with the performance of its obligations under any resulting contract. The awarded Offeror(s) shall keep such records and information confidential and shall comply with [specific statutory citations (if any) and,] all laws and regulations concerning the confidentiality of such records to the same extent as such laws and regulations apply to the State.

The awarded Offeror(s) shall notify its employees that they are subject to the confidentiality requirements as set forth above, and shall provide each employee with a written explanation of the confidentiality requirement before the employee is permitted access to confidential data. Awarded Offeror(s) shall provide and maintain a secure environment that ensures confidentiality. The confidentiality of all information will be respected and no confidential information shall be distributed or sold to any third party nor used by awarded Offeror(s) or its assignees and/or subcontractors in any way except as authorized by this contract. Confidential information shall not be retained in any files or otherwise by awarded Offeror(s). Disclosure of such information may be cause for legal action against the awarded Offeror(s). Defense of any such action shall be the sole responsibility of the awarded Offeror(s). Unless directed otherwise, awarded Offeror(s) is required to keep all State information in a secure, confidential manner.

1.14   RFP Response Material Ownership

The State of Colorado has the right to retain the original proposal and other RFP response materials for its files. As such, the State of Colorado may retain or dispose of all copies as is lawfully deemed appropriate. Proposal materials may be reviewed by any person after the "Notice of Intent to Make an Award" letter(s) has/have been issued, subject to the terms of Section 24-72-201 et seq., C.R.S., as amended, Public (open) Records. The State of Colorado has the right to use any or all information/material presented in reply to the RFP, subject to limitations outlined in the clause, Proprietary/Confidential Information. Offeror expressly agrees that the State may use the materials for all lawful State purposes, including the right to

reproduce copies of the material submitted for purposes of evaluation, and to make the information available to the public in accordance with the provisions of the Public Records Act.

1.15   Acceptance of Proposal Content

The contents of the proposal and the terms of this request for proposals will become contractual obligations of the successful offeror.

1.16   Proposal Prices and Payment Schedule

Prices are expected to be firm, fixed price, with payment due at milestones as defined in this request for proposals. Estimated proposal prices are not acceptable. Pricing must be United States funds. Proposals submitted must include all related costs, for example surcharges, travel, etc. Any costs not included as part of the proposal will be disallowed.

Subsequent to the expiration of the initial one-year period, the awarded vendor may request to increase its rates by providing 30 days written notice to the State. The State may accept, reject, or negotiate such request for increase. Rate increases will be limited to no more than one per year. Approved work in progress at the time of a requested rate change shall not be subject to the rate increase. If the price increase is determined not to be in the best interest of the State, the State reserves the right to cancel the contract and re-solicit.

1.17   Selection of Successful Proposal and Notice of Intent to Award

The State reserves the right to make an award on receipt of initial proposals, so Offerors are encouraged to submit their most favorable proposal at the time established for receipt of proposals. Offerors not meeting the requirements identified in the RFP shall be ineligible for further consideration. The State may conduct discussions with Offerors in the competitive range for the purpose of promoting understanding of the State's requirements and the Offeror's proposal, to clarify requirements, make adjustments in services to be performed, and in prices. Changes to proposals, if permitted, will be requested in writing from Offerors.

Upon review and approval of the evaluation committee's recommendation for award, the DORA Procurement Office will issue "Notice of Intent to Make an Award" letter(s) to all Offerors. In addition, the Intent to Award will be posted on the BIDS system.

Section 6 provides additional information related to the evaluation and award of this solicitation.

1.18   Parent Company

If an Offeror is owned or controlled by a parent company, the name, main office address and parent company's tax identification number shall be provided in the proposal[CEL1] .

1.19   Certification of Independent Price Determination

1.19.1   By submission of this proposal each Offeror certifies, and in the case of a joint proposal each party, thereto, certifies as to its own organization, that in connection with this procurement:

a) The prices in this proposal have been arrived at independently, without consultation, communication, or agreement, for the purpose of restricting competition, as to any matter relating to such prices with any other Offeror or with any competitor;

b) Unless otherwise required by law, the prices which have been quoted in this proposal have not been knowingly disclosed by the Offeror and will not knowingly be disclosed by the Offeror prior to opening, directly or indirectly to any other Offeror or to any competitor; and

c) No attempt has been made or will be made by the Offeror to induce any other person or firm to submit or not to submit a proposal for the purpose of restricting competition.

1.19.2 Each person signing the Request for Proposal Cover Sheet of this proposal certifies that:

a) He/She is the person in the Offeror's organization responsible within that organization for the decision as to the prices being offered herein and that he has not participated, and will not participate, in any action contrary to 1.18.1(a) through 1.18.1(c) above; or

b) He/She is not the person in the Offeror's organization responsible within that organization for the decision as to the prices being offered herein but that he has been authorized in writing

to act as agent for the persons responsible for such decision in certifying that such persons have not participated, and will not participate, in any action contrary to 1.18.1(a) through 1.18.1(c) above, and as their agent does hereby so certify; and he has not participated, and will not participate, in any action contrary to 1.18.1(a) through 1.18.1(c) above.

1.19.3   A proposal will not be considered for award where 1.18.1(a), 1.18.1(c), or 1.18.2 above has been deleted or modified where 1.18.1(b) above has been deleted or modified, the proposal will not be considered for award unless the Offeror furnishes with the proposal a signed statement which sets forth in detail the circumstances of the disclosure and the head of the agency, or his designee, determines that such disclosure was not made for the purpose of restricting competition.

1.20   Standard (Model) Contract

Except as modified herein, the standard State Contract Terms and Conditions and the Model Contract (attached separately on BIDS as Appendix C – Model Contract) included in this RFP shall govern this procurement and are hereby incorporated by reference. Please note this Model Contract lists the State's required legal provisions but does not include the specific scope of work and requirements for this RFP.

The Offeror shall review the attached Model Contract and note exceptions. Offerors agreeing to abide by the requirements of the RFP are also agreeing to abide by the terms of the Model Contract. Unless the Offeror notes exceptions in its proposal, the conditions of the Model Contract will govern. It may be possible to negotiate some of the wording in the final contract; however, there are many provisions, (such as those contained in the Special Provisions pages) which cannot be changed. Offerors are cautioned that the State believes modifications to the standard provisions, terms and conditions, and Special Provisions constitute increased risk to the state and increased costs. Therefore, the scope of requested exceptions is considered in the evaluation of proposals.

The members on the evaluation committee, shall only consider the number of exceptions taken to the Colorado Terms and Conditions, and not make determination on the legality of each exception and whether a specific clause could be negotiated. It is not feasible to conduct a legal review of proposals during the evaluation process.   Upon initial review of contracts, per Section 1.16, excessive exceptions to the Colorado Terms and Conditions may cause an Offeror's proposal to be deemed ineligible for further consideration.   The State will be the sole judge in determining what is considered excessive in regards to the amount of exceptions.

1.21   Legislative Changes

The State of Colorado reserves the right to amend the contract in response to legislative changes that affect this project.

1.22   Order of Precedence

In the event of any conflict or inconsistency between terms of this request for proposal and the offer, such conflict or inconsistency shall be resolved first, by giving effect to the terms and conditions of the contract, second to the request for proposal, and third, to the proposal.

1.23   Venue

The parties agree that venue for any action related to performance of this contract shall be in the City and County of Denver, Colorado.

1.24   Audit

The successful Offeror may be required to have a process audit conducted of the program at least once every three years. If the successful Offeror has not had such an audit prior to awarding of this contract, one may be required to begin within six months of the award of this contract. A complete copy of the audit must be provided to the project manager as identified in the final contract within five working days of its completion. The State will negotiate directly with the Offeror regarding any exceptions or findings from the audit.

1.25 Organizational Conflict of Interest—Requirements of this Solicitation and Any Subsequent Contract

Any business entity or person is prohibited from being awarded a contract if the business entity or person has an "Organizational Conflict of Interest" with regard to this solicitation and the resulting contract(s).

No person or business entity who was engaged by the State to prepare the original RFP shall be eligible to participate (directly or indirectly) in the submission of a proposal for this solicitation **IF**:

a) Such person or entity had prior access to source selection information related to this procurement process, and

b) That prior access included, but was not limited to: requirements, statements of work, or evaluation criteria.

The State considers such engagement or access to be an Organizational Conflict of Interest, which would cause such business entity or person to have an unfair competitive advantage.

If the State determines that an Organizational Conflict of Interest exists, the State, at its discretion, may cancel the contract award. In the event the successful Offeror was aware of an Organizational Conflict of Interest prior to the award of the contract and did not disclose the conflict to the procuring agency, the State may terminate the contract for default. The provisions of this clause must be included in all subcontracts for work to be performed by subcontractors in connection with the performance of the contract, with the terms "contract," "contractor," and "contracting officer" modified appropriately to preserve the State's rights.

1.26 Submission

By submission of a proposal, Offeror agrees as follows:

· Except as replaced, modified, or supplemented by DORA Procurement Office for this solicitation, all items in the State of Colorado Solicitation Instructions/Terms and Conditions are considered part of, and are incorporated by reference into this document.

· Offeror testifies that bid prices were arrived at independently and there was no collusion involved.

· The Bidder/Offeror/Vendor guarantees to the State that it understands and agrees to the terms and conditions of this solicitation and that they will not default from performance by virtue of a mistake or misunderstanding. Offerors shall seek clarification from DORA Procurement Office of any specifications, terms and/or conditions that they determine to be unclear. The failure of a bidder to seek clarification may be deemed a waiver of any such clarification.

· Pursuant to CRS 24-30-202.4 (as amended), the State controller may withhold debts owed to State agencies under the vendor offset intercept system for: (a) unpaid child support debt or child support arrearages; (b) unpaid balance of tax, accrued interest, or other charges specified in Article 22, Title 39, CRS; (c) unpaid loans due to the student loan division of the department of higher education; (d) owed amounts required to be paid to the unemployment compensation fund; and (e) other unpaid debts owing to the State or any agency thereof, the amount of which is found to be owing as a result of final agency determination or reduced to judgment as certified by the controller.

· Reciprocity is mandated by statute. CRS 8-18-101 states, "When a contract for commodities or services is to be awarded to a bidder, a resident bidder…shall be allowed a preference against a nonresident bidder equal to the preference given or required by the state in which the nonresident bidder is a resident." The DORA Procurement Office will apply this statute to the extent necessary for all solicitations posted on the B.I.D.S.

· The DORA Procurement Office reserves the right to reject any and all proposals or parts thereof, and to waive informalities or irregularities.

· *Award(s) resulting from this solicitation shall be available for use by DORA Procurement Office.*

Section 2 – Schedule of Activities & Inquiries

2.1 Schedule Of Activities   **Deadline**   (Mountain **Times**)

	Activity	Deadline	
1.	RFP Notice Published On The CORE/VSS	**TBA**	
2.	Prospective Offerors Written Inquiry Deadline (No Questions Accepted After This Date/Time)	**TBA**	**5:00 PM**
3.	Written Answers Provided for All Written Inquiries	**TBA**	
4.	Proposal Submission Deadline (One Original plus Five Hard Copies & One Electronic Copy on CD/Disk Required in MS WORD and/or Excel/ or other software specified.)	**TBA**	**[Mountain time]PM**
5.	Oral Presentations/Site Visits (**Held at State's Discretion**)	**TBD**	
6.	Contract Award (initial period - estimated)	**TBA** THRU	

Section 3 – Background Information

c. 3.1 Background

TRS permits full and simultaneous communication between individuals using teletypewriters (TTY) with those using conventional telephone equipment. TRS is defined in the Americans with Disabilities Act (ADA) as "telephone transmission services that provide the ability for an individual who has a hearing or speech disability to communicate using voice communications services by wire or radio. TRS provides full telephone accessibility to people who are deaf, hard of hearing or speech disabled." During the 1989 session of the Colorado Legislature, legislation was enacted creating a commitment by the State to provide TRS to Colorado citizens with speech or hearing impairments requiring these services in order to provide equal access to basic telecommunications services available to everyone else. The legislation also created the Colorado Disabled Telephone Users Fund. During the 1992 session, Article 17 of Title 40, Colorado Revised Statutes, was revised, placing the administration of TRS under the Colorado Public Utilities Commission and providing a funding mechanism to provide these services.

d. 3.2 Overview

The Colorado Public Utilities Commission is empowered to contract for TRS and oversee the Disabled Telephone Users Fund. The source of revenue for the fund is a surcharge upon each telephone access line provided by each local exchange company in Colorado. The current surcharge is five cents per month per access line and the Colorado Public Utilities Commission has statutory authority to increase the surcharge, as needed, without having to receive any additional authorization from the legislature. The Colorado Public Utilities Commission is also responsible for promulgating rules and regulations to implement the TRS program and ensure that it complies with the ADA, and meets or exceeds the certification requirements of the Federal Communications Commission (FCC). The purpose of this RFP is to procure TRS authorized by statute for a period of three years with provision for the State to elect to continue the service for two (2) additional one-year extensions.

e. 3.3 Requirements

TRS, including captioned telephone service, must be provided 24 hours a day, every day of the year, and a viable contingency plan must be in place to prevent any significant disruptions or impairments to service in the event of adverse man-made or natural occurrences. The State intends to maintain FCC certification for its TRS, so these services must meet current FCC requirements for the types and quality of services provided. Future enhancements required by the FCC will also be met and/or the State may determine that enhancements not required by the FCC should be initiated. In either instance, this would likely result in negotiated price changes with the Offeror.

For the two most recent Fiscal Years, Colorado's monthly volume by type is provided. In **FY 2013**, from July 1, 2012 to June 30, 2013, traditional relay call volumes averaged 3,476 calls per month and 22,406 call session minutes; captioned telephone call volumes for the same period averaged 19,312 calls per month and 64,338 call session minutes. In **FY 2014**, from July 1, 2013 to June 30, 2014, traditional relay call volumes averaged 2,792 calls per month and 20,375 call session minutes; captioned telephone call volumes for the same period averaged 16,022 calls per month and 54,101 call session minutes.

A detailed breakout of monthly call volumes by type for FY 13 and FY 14 is provided in Appendix A to this RFP. Existing legislation for the relay program will enable the state to generate increased revenues, as needed to pay for any anticipated increases in call volumes.

f.   3.4   Definitions

In order to facilitate Offeror understanding of this RFP, the following definitions apply:

3.4.1 *711.* The abbreviated dialing code for accessing all types of TRS anywhere in the United States of America.

3.4.2 *American Sign Language (ASL).* A visual language based on hand shape, position, movement and orientation of the hands in relation to each other and the body.

3.4.3 *American Standard Code (ASCII).* The standard 8-bit code for transferring information asynchronously on local and long distance telecommunication lines.

3.4.4 *Baudot.* A seven bit code, only five of which are information bits. Baudot is used by some text telephones to communicate with each other at a 45.5 baud rate.

3.4.5 *Blocked Calls:* Calls reaching the relay switch which do not terminate by ringing a CA position.

3.4.6 *Call release.* A TRS feature that allows the CA to sign-off or be "released" from the telephone line after the CA has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached though a voice-only interface, such as a switchboard.

3.4.7 *Captioned telephone.* An enhanced form of VCO that utilizes a telephone that utilizes a captioned telephone unit or computer. The person with the hearing disability is able to speak directly to the other end user. The CA transcribes each spoken word by the other end user and text is displayed on the captioned telephone unit or computer screen by utilizing voice-recognition technology. This technology may incorporate additional technological features, modifications and standards.

3.4.8 *Captioned Telephone (CapTel®).* A telephone unit that displays captions, manufactured by Ultratec, Inc.

3.4.9 *Caption Call Telephone®.* A telephone unit that displays captions, distributed by Sorenson Communications.

3.4.10 *Common carrier or carrier.* Any common carrier engaged in interstate communication by wire or radio as defined in section 3(h) of the Communications Act of 1934, as amended (the Act), and any common carrier engaged in intrastate communication by wire or radio, notwithstanding sections 2(b) and 221(b) of the Act.

3.4.11 *Communications assistant (CA).* A person who transliterates or interprets conversation between two end users of TRS. CA supersedes the term "TDD operator."

3.4.12 *Hearing Carry-Over (HCO).* This includes the following: Hearing Carry-Over to TTY (HCO-TTY), Hearing Carry-Over to Hearing Carry-Over (HCO-HCO), and Hearing Carry-Over to Voice Carry Over (HCO-VCO). Hearing Carry-Over allows a person with hearing capability and a speech disability to make a call by typing a conversation to a CA. The CA reads the HCO user's typed messages to the other party, whose vocal responses can be heard by the HCO user. HCO TRS includes three specific services: HCO-TTY, HCO-HCO and HCO-VCO, all of which are defined as follows: *HCO-TTY* allows a person with a speech disability to type their

conversation directly to the TTY user, and then listen while the CA reads the TTY response. *HCO-HCO* allows both users to communicate with each other through relay. The CA reads the typed message from the HCO user and voices to the other HCO user, who listens and then types a response back in the same manner. *HCO-VCO* allows a VCO user to speak directly to a person who can hear but may have a speech disability. The VCO user's voice will be heard by the HCO user and the typed response will be read by the VCO user.

3.4.13 *Internet Relay.* Transmission of a relay call with the TTY/VIDEO user connected over the Internet instead of over regular telephone lines. Internet transmissions include Video Relay. If the initiating caller is the TTY/VIDEO user, it has not yet been determined how to identify what state the caller is from, and therefore which state should be billed for relaying the call.

3.4.14 *Non-English language relay service. A telecommunications relay service that allows persons with hearing or speech disabilities who use languages other than English to communicate with voice telephone users in a shared language other than English, through a CA who is fluent in that language. At present Relay Colorado provides these services in Spanish and French.*

3.4.15 *Public Safety Answering Point (PSAP).* A facility that has been designated to receive 911 calls and route them to emergency services personnel as provided for in Emergency Telephone Service - Title 29, Article 11, C.R.S.

3.4.16 *Qualified interpreter.* An interpreter who is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

3.4.17 *Speech-to-speech relay service (STS).* A TRS that allows people with speech disabilities to communicate with voice telephone users through the use of specially trained CAs who understand the speech patterns of persons with disabilities and can repeat the words spoken by that person.

3.4.18 *Speed of Answer.* The time required for an inbound call to be answered by a CA ready to service relative to the initial incoming signal receipt at the providers call equipment.

3.4.19 *Speed dialing. A TRS feature that allows a TRS user to place a call using a stored number maintained by the TRS facility. In the context of TRS, speed dialing allows a TRS user to give the CA a "short-hand" name or number for the user's most frequently called telephone numbers.*

3.4.20 *State Relay Administrator (SRA).* SRA is an acronym usually used in reference to the Colorado State Relay Administrator. The SRA is assigned to administer relay program by the Colorado Public Utilities Commission (CO PUC), within the Department of Regulatory Agencies (DORA).

3.4.21 *Telecommunications Service Priority.* The Telecommunications Service Priority (TSP) Program is a federal program used to identify and prioritize telecommunications services that support national security or emergency preparedness (NS/EP) missions.

3.4.22 *Telecommunications relay services (TRS).* Telephone transmission services that provide the ability for an individual who has a hearing or speech disability to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing or speech disability to communicate using voice communication services by wire or radio. Such term includes services that enable two-way communication between an individual who uses a text telephone or other non-voice terminal device and an individual who does not use such a device, speech-

to-speech services, video relay services and non-English TRS. TRS supersedes the terms "dual party relay system," "message relay services, "and "TDD Relay."

3.4.23 *Text telephone (TTY).* A machine that employs graphic communication in the transmission of coded signals through a wire or radio communication system. TTY supersedes the term "TDD" or "telecommunications device for the deaf," and TT.

3.4.24 *Three*-way *calling feature.* A TRS feature that allows more than two parties to be on the telephone line at the same time with the CA.

3.4.25 *Turbo Code. Enhanced Baudot transmission speed up to 110 words per minute. This enhancement enables TTY callers to interrupt during the transmission.*

3.4.26 *Voice Carry-Over (VCO).* A feature that enables a user with a hearing disability to utilize his useable speech for direct expression of voice communications and to use the CA for conversation of the other user's communications from voice to TTY.

3.4.27 *Video relay service (VRS).* A TRS that allows people with hearing or speech disabilities whom use sign language to communicate with voice telephone users through video equipment. The video link allows the CA to view and interpret the parties signed conversation and relay the conversation back and forth with a voice caller.

Section 4 – Statement of Work

The purpose of this RFP is to procure TRS authorized by statute for a period of three years beginning TBA, with the provision for the State to elect to continue the service for an additional two (2) one-year extensions.

All Offerors must respond to Section 4.1 regardless for which service(s) they are responding.

g. **4.1** *Requirements for Both Traditional TRS and Captioned Telephone Services*

h. **4.1.1** **Functional Standards**

4.1.1.1 Consumer complaint handling. Offerors shall describe the steps to be taken in resolving complaints regarding services or personnel. The complaint procedures, or a reference to them, must be included in all printed materials about the relay service for the community outreach program and any material distributed for the public or relay users. The Offeror shall ensure that any caller to the relay center will be able to reach a supervisor or administrator while still on line during a relay call if they have a complaint. Proposals must guarantee that a consumer complaint log and that complaint resolution procedures meeting FCC requirements will be maintained by the TRS vendor. The log must include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. The Offeror shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the State by June 15 of each year. Proposals must include a sample of the written notification that will be sent to all consumers registering a complaint that explains the procedures for the resolution of complaints, including contact information for both the SRA and the FCC should they not be satisfied with the resolution of the complaint by the TRS vendor. To enable the State to both meet its complaint

resolution responsibilities to the FCC and to monitor the TRS being provided to ensure that the Offeror is providing good TRS and making reasonable efforts to resolve complaints, the TRS vendor will make the full contents of the complaint log available, on request, and provide the names and address or phone numbers of any complainant available to the SRA upon request. Offerors shall propose a method to make the resolution of any complaint available for such review. One acceptable method is the issuance of a unique identifier (number) that will enable the SRA to request a sample of complaints and receive the details and contact information of the complainants from the TRS vendor.

4.1.1.2   Long distance calls. Offerors must provide billing for long distance services and state how the FCC's carrier of choice requirement will be met. TRS users shall pay rates for intrastate and interstate long distance calls that are no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination. Offerors shall specify the long distance service to be used if the caller does not specify a carrier of choice, and whether any special discounts will be provided to TRS calls.

4.1.1.3   Treatment of TRS customer information. Consistent with FCC requirements, should a different TRS vendor be selected to provide TRS for the State in the future, the TRS vendor awarded a contract as a result of this RFP shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days before the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order. The vendor may not use any information obtained from relay calls to support other business interests.

4.1.1.4   Staffing. Offeror shall provide a listing of proposed additional staffing that will be required to handle the State's calls, either in a separate new relay center or additional staffing system wide, including, if appropriate, shift supervisors, clerical staff, CAs, management personnel and other needed positions on the various shifts during a week. Include job descriptions and qualifications for the various positions that will be added. Describe any efforts that will be made for the active recruitment of employees with ASL and relay service experience and with expertise working within the Deaf community. Include an example of the form CAs will be required to sign pledging to protect the confidentiality of TRS users. The relay center shall not utilize volunteers as CAs.

4.1.1.5   Proficiency testing. Provide an example copy or detailed description of a standardized, quantifiable, performance-based Relay Operator Proficiency Examination or other screening procedures that covers spelling, typing, dictation, procedures, characteristics of ASL as it may be reflected in the written language of TTY users, Deaf culture, ethics and confidentiality, and professional judgment that ensures that CAs hired and retained by the Offeror will meet or exceed the minimum qualifications identified in this RFP and/or established by the FCC. Explain the provisions that will be taken to ensure that material from these tests are not available to CAs prior to taking the test and changes that are made to the tests to ensure that CAs are truly qualified, not just familiar with specific items that will be on the test. Describe the procedures that will be used to ensure that CAs continue to meet the minimum requirements after they are hired.

4.1.1.6   Independent Service Evaluation. The Colorado Public Utilities Commission reserves the right to contract with an independent entity to conduct a random proficiency evaluation of the services provided, including quality assurance reports.

4.1.1.7   Staff development and American Call Center(s). Each Offeror shall demonstrate how they will provide ongoing staff training. The provisions for operator training shall include, but not be limited to, ASL "gloss" and grammar, Deaf culture, and operation of the relay telecommunications equipment. Offerors shall provide a description of their training plan in their proposals. In-service training for operators shall be provided by experts in the field of sign language interpreting, ASL and Deaf culture, or the Offeror must demonstrate that they have on their own staff such experts. This is to be considered only part of the in-service training program. Due to the complexity of ASL and Deaf culture, the importance of accurate translation, including clear and accurate voicing by CAs, the Offeror is required to route relay calls to calling centers located within the United States of America. Evaluation ratings for this section will be evaluated as poor for failure to meet this vital ASL and Deaf culture requirement. This requirement is waived in the event of overflow relay calls rerouted to other relay centers with sufficient capacity to handle the additional load, in the event of a power outage, fire, cut trunk line or other disaster, making the USA relay center inoperable for a period of time.

4.1.1.8   Consumer input. The State Relay Advisory Committee is established as one mechanism for consumer input on the operation and improvement of the State's relay program. The main mechanism for obtaining consumer input, obviously, shall be the Offeror's account representative meetings with community groups and the Offeror's consumer complaints system. Offerors are invited to provide other examples of how they would obtain and use consumer input (e.g., relay user or internal CA surveys, etc.).

i.   4.1.2   Billing Adjustment for Missing ASA and Blockage Rate Standards

The SRA, at his or her sole discretion, may adjust the billing for a given month by reducing the payment by $2000.00 for any day in which the FCC standards related to blockage rate (less than one percent) or average speed of answer (less than ten seconds 85 percent of the time) are not met.   If there is a reoccurrence of the same problem within ten calendar days, the SRA may adjust the payment by an additional $4000 for that day, $6000 for a third problem day within ten days of the second, etc. The SRA will assess the adjustment only after consideration of any natural or man-made problems (weather event, line cut, etc.), whether the Offeror is making reasonable efforts to restore service to established standards and whether there are indications that the State's service by the Offeror has fallen significantly below that provided to other states by the same Offeror. Offerors should comment on this provision, including describing any alternate mechanisms they feel would accomplish the same goals.

j.   4.1.3   Call Efficiency

The reimbursement rate paid to the Offeror shall be on a cost per call-minute basis, but the ultimate cost of the TRS to the State will be based on three factors: the cost per call-minute, the number of calls and the efficiency of the TRS center in handling calls. It is anticipated that a more efficient TRS could handle calls more rapidly, perhaps resulting in fewer minutes per call and a reduced cost to the State per call. It is also anticipated that increased call efficiency would also make the TRS more attractive to both voice and TTY users, thus resulting in greater use of TRS and possible increased and very justifiable costs to the State. Lacking a way to measure call efficiency precisely, Offerors shall indicate the combination of hardware, software, staffing, training or procedural innovations they will use to maximize call efficiency. Offerors should report the results of any internal studies conducted to measure improvements made in call efficiency that could be expected as part of the proposed services.

k. 4.1.4   Multiple/Additional Services (Value Added)

This RFP specifies minimum requirements for the State's TRS. Nothing in this section or other sections of the RFP is intended to prohibit an Offeror from offering additional telecommunications services to users and the State at no additional cost. Offerors should specify any additional services that will be provided at no additional cost. Additional consideration may be awarded by the Evaluation Team for those Offerors offering additional services at no cost. The Offeror should also describe other services they could provide at a small additional cost.

l. 4.1.5   Additional Requirements for FCC Certification

Offerors shall identify other FCC requirements for certification related to TRS vendor operational, technical or functional performances not otherwise listed in this section of the RFP and specify how those requirements will be met.

m. 4.1.6   Location and Capabilities of Relay Center(s)

The Offeror must demonstrate its ability to put in place a fully functioning relay center (or centers) meeting the operational, technical and functional standards described previously and elsewhere in this section of the RFP. If the Offeror proposes either building a new relay center or expanding the capability of existing relay centers, it must provide documentation demonstrating that they will be able to secure the needed building space, telecommunications and other necessary equipment and trained personnel to provide the proposed services. Areas to be addressed in an Offeror's proposal should include:

4.1.6.1   **Building Requirements**. Offerors shall document ability to provide building space for a relay center to handle the State's calls, perform all necessary site preparation work, provide all office furniture and office supplies and furnish all recurring and non-recurring physical plant needs. There also shall be individual workstations for operators of each terminal. Building and office space shall demonstrate expansion capability to handle any increased call volume. An Offeror already operating one or more relay centers should provide details of their existing facilities and document how they would accomplish needed building expansion to handle the State's relay calls and their ability to further expand to respond to increased call volumes system-wide.

4.1.6.2   **Telecommunications Service Priority (TSP).** The Offeror shall meet Federal TSP requirements pertaining to TSP in terms of providing redundant services.

4.1.6.3   **Location**. The building housing the operators may be located in the State of Colorado; however, it must be located within the United States of America. Offerors may propose various combinations of in-state and out-of-state facilities to handle the Colorado relay operation at different times of the day or days of the week. Offerors proposing that any portion of TRS be provided at an in-state center can route calls to an existing relay center outside the State for as long as they wish prior to establishing an in-state center.

4.1.6.4   **Equipment.** Offeror shall furnish all necessary telecommunications equipment and provide and arrange for all telephone service into and out of the relay center. The Transmission circuits shall meet or exceed interexchange performance standards for circuit loss and noise. The center must have telecommunications equipment capable of receiving and transmitting in both Baudot and ASCII codes. Relay systems must be capable of automatically identifying incoming TTY signals as either Baudot or ASCII.

4.1.6.5 **Back-up.** Offeror shall demonstrate an adequate back-up system, or show how relay calls could be rerouted to another relay center with sufficient capacity to handle the additional load in the event of a power outage, fire, cut trunk line or other disaster making a relay center inoperable for a period of time. If the Offeror has experienced relay centers going off line in the past, they should provide information on how that contingency was handled, and the extent of the disruption in service that was experienced by relay users. If the Offeror does not own a back-up relay center, then proof of a contractual agreement with a proposed back-up center must be provided. The Offeror shall also demonstrate how it will maintain an auxiliary source of power which is functionally equivalent to normal central office auxiliary sources of power so that the TRS will continue to function during power outages.

n. 4.1.7 Account Representative

The Offeror shall assign an account representative for the State's TRS. The account representative shall possess good communication skills in both American Sign Language (ASL) and written English. The account representative may also be the representative for other states served by the Offeror. Offerors shall describe the full duties and qualifications of the account representative including a job description, what other states besides Colorado will be assigned to the representative, where the individual will maintain his/her primary office, what portion of the time the representative will actually be in Colorado, the community and business group meetings that will be attended, and the respective roles of the account representative and other support staff who will be handling consumer complaints, billing, reporting, contract management, communications, concerns and ideas. The individual assigned as account representative is subject to approval by the State Relay Administrator.

Additional consideration shall not be given to Offeror's who assign an account representative who resides in state as opposed to being located out of the state.

o. 4.1.8 Outreach, Education and Related Expenses

The State shall provide limited funds for pre-approved outreach efforts. The selected vendor is the primary beneficiary of increased TRS usage resulting from marketing and outreach efforts. As such, the selected vendor shall primarily fund such efforts.

Because the resultant contractual services are being provided as Colorado Relay services, the selected vendor must consult with and obtain approval from the State Relay Administrator for the appropriateness of all outreach associated with Colorado Relay.

The selected vendor shall design and prepare an annual ***Relay Colorado Outreach Plan***.

This outreach plan, and accompanying budget, must be annually submitted to the SRA by MARCH 1. The Offeror must provide a high-level summary of the *Relay Colorado Outreach Plan* in the bid that will indicate the amount of the budget and staffing to be dedicated to the various[BT2] outreach and educational efforts in the plan.

The Relay Colorado Outreach Plan will be funded by the State and the Offeror. The State anticipates providing an annual amount of $100,000 or less for Outreach. Regarding the dollar amount budgeted for the Offeror's portion of the outreach plan, the State's position is that the Offeror is the primary beneficiary of marketing and outreach, and therefore, the state does not want to set a specific dollar maximum on the Offeror's portion of the plan. The State does require, *at minimum*, that the Offeror *match* the State's portion for the year's *Relay Colorado Outreach Plan*, and should the Offeror decide to apportion additional funding for the Offeror's portion of the plan, the State will leave the dollar determination to the judgment of the Offeror.

The State's portion of outreach will be reimbursed to the vendor through the monthly invoicing process based on actual pre-approved reimbursable expenses. The State's portion of outreach is not a fixed monthly charge nor should it be calculated into the price per minute[CEL3] .[BT4]

Offerors must indicate in their response to this section in their annual budget for the Relay Colorado Outreach Plan.

4.1.8.1 **Advertising and Demonstration Equipment** The Offeror shall have primary responsibility for advertising in Colorado. The State may fund limited advertising that has been pre-approved by the SRA for such things as sponsorships, promotional items, production and airing of Public Announcements and/or other advertising that shall be reimbursed by the State through the following month's billing. The Offeror shall provide demonstration equipment, such as the latest and most up-to-date wireless handsets, iPads, captioned telephone units, text telephone units and / or any other equipment as designated by the SRA. Reimbursement for demonstration equipment shall be obtained from the State through the following month's billing[CEL5] .[BT6]

4.1.8.2 **Relay Colorado Website.** The Offeror shall maintain and update the Relay Colorado website (www.relaycolorado.com) using the Content Management System (CMS) tools that the State has purchased from the website designer and server host. The Offeror shall ensure the website content reflects current relay services and shall consult with the SRA on content. The Offeror will provide additional website functionality at the request of the State and pre-approved by the SRA. Annual website hosting expenses and any additional functionality will be reimbursed by the State through the following month's billing.

4.1.8.3 **Additional Community Outreach.** Offerors should provide examples of community outreach activities that would be part of its community outreach efforts. The PUC has in place a State Relay Advisory Committee (SRAC) of six-to-eight members from different groups of relay users, including members of the Deaf, hard of hearing and speech disabled communities. The Offeror will arrange and provide interpreting services as well as other services required for these meetings that are typically held annually. These associated expenses will be reimbursed by the State through the following month's billing. There may be community outreach activities that go beyond those normally performed by the Offeror that, when pre-approved by the SRA, will be reimbursed by the State through the following month's billing.

4.1.8.4 **Travel reimbursement**. The Offeror will pay for travel reimbursement for SRAC members to attend the annual meetings and for the SRA and/or other PUC technical or management staff to attend the National Association of State Relay Administration yearly meeting, possible yearly meetings of SRAs from states served by the same vendor, site visits to TRS call centers, and/or other travel directly related to effective administration of the relay program. The Offeror will be reimbursed by the State through the following month's billing.

p. **4.1.9 Reports**

The Offeror shall provide monthly a billing statement, performance reports and complaint reports that will enable the SRA to monitor whether the TRS is meeting each of the FCC and State performance standards.

4.1.9.1 **Invoice (Billing Statement).** This information must be reconcilable data taken from a switch report or other similar audible mechanized source. The Colorado Public Utilities Commission would prefer to receive billing summaries in electronic format via email with the ability to access the full billing statements upon request. Please be advised that

these invoice requirements are subject to modification at the request of the SRA:

· Total costs for TTY and captioned telephone service.
· Total Monthly Intrastate/IntraLATA Minutes of Service
· Total Monthly Reimbursable Outreach Expenses

4.1.9.2   Performance Reports. This information should ideally be available electronically, preferably through a web interface that would allow the SRA the ability to run these reports as needed.

· Total number of relayed calls handled by the TRS for any given time period.

· Traditional TRS and captioned telephone statistical information as requested by the State Relay Administrator.

· Call volume reports showing percentages of each of the following types of calls: local, toll free, intrastate intraLATA, intrastate interLATA and interstate, separated by originating area code.

· Average holding time per call and supporting documentation.

· Average answer time and supporting documentation.

· Number of calls originated by TTYs.

· Average daily and monthly blockage rate.

· Summary report of the above for any given time period.

4.1.9.3   Complaint Reports. A log of customer complaints to include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

4.1.9.4   Proprietary Reports. After receiving authorization from the Colorado Public Utilities Commission, the selected Offeror may request designation of certain written reports as proprietary, consistent with the Colorado Open Records Law. If so designated by the Colorado Public Utilities Commission, these reports will be available only to the Colorado Public Utilities Commission and their staff, who are bound to keep such information from being publicly disclosed. (Information related to pricing or statistical components that reflect what is being paid for, generally, will not be considered proprietary information).

q. 4.2   Traditional TTY Requirements

The following provides the requirements for Offerors seeking to provide traditional TRS services.

i. 4.2.1 *FCC Operational Standards*

ii.

4.2.1.1   **Communication assistants (CA).** TRS Offerors are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities. CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications. CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Offerors must give oral-to-oral type tests of CA speed. CAs answering and placing a TTY-based TRS call must stay with the call for a minimum of ten minutes. CAs answering and placing a STS call must stay with the

call for a minimum of fifteen minutes. TRS Offerors must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA. TRS shall transmit conversations between TTY and voice callers in real time. These standards also apply to Captioned Telephone CAs, whenever applicable. However, Captioned Telephone waivers, per the FCC's declaratory ruling of July 25, 2003 (CC Docket No.98-67), regarding captioned telephone service, are described elsewhere in this RFP.

4.2.1.2   ***Confidentiality and conversation content.*** Except as authorized by section 705 of the Communications Act, 47 U.S.C. § 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with State or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls. CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, State or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

4.2.1.3   ***Types of calls.*** Consistent with the obligations of common carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing TRS. TRS shall be capable of handling any type of call normally provided by common carriers and the burden of proving the infeasibility of handling any type of call will be placed on the carriers. The TRS Offeror is required to provide the following types of TRS calls: Text-to-voice and voice-to-text, captioned telephone (Captioned Telephone), VCO, VCO with Privacy, 2LVCO, VCO/TTY, VCO/HCO, HCO, HCO/TTY, HCO/HCO, HCO/VCO, Non-English TRS, STS, and three-way calling. TRS providers shall provide, as TRS features, answering machine and voice mail retrieval including interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages. Providers of TRS are permitted to decline to complete a call because credit authorization is denied. TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

4.2.1.4   ***Emergency calls.*** Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner. Providers must indicate in their response that their handling of emergency calls through relay will meet all Federal Communications Commission rules and regulations for these emergency calls.

Responders shall describe, in detail, their policies, procedures, training, and access for handling emergency calls through relay. Further the CA must provide the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

9-1-1 Database Provider. Responders shall indicate if they subcontract with a third-party 9-1-1 (PSAP) database provider to route relay calls to the appropriate PSAP. If so, responders shall include the name of the 9-1-1 database provider and detail the provider's process for routing calls to the appropriate PSAP. The relay contract provider shall notify the State Relay Administrator prior to changing 9-1-1 (PSAP) database providers.

Misdialed Emergency Calls. Responders shall describe how misdialed calls by hearing individuals who intended to dial 9-1-1 but dial 7-1-1 in error will be handled.

Report Calls Placed to Public Safety Answering Points. The State would like to receive a report indicating the number of outbound Relay Colorado calls placed to 9-1-1 during the month. The report should indicate, by day of the month and by type of relay call (i.e. TTY, STS, CTS, Voice, etc.), the number of emergency calls relayed by the CA and the number directly transferred to the PSAP. The responder must indicate in their response to this RFP if responder is willing to report this information, on a monthly basis, to the State Relay Administrator.

4.2.1.5 *In-call replacement of CAs.* CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

4.2.1.6 *CA gender preferences.* TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

4.2.1.7 *STS called numbers.* Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers, which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

iii. **4.2.2** *Additional Colorado Operational Standards*

4.2.2.1 **Standard Relay Product Features.** The State and TRS users currently consider the services listed in Appendix B to be standard features. Offerors must demonstrate that they can provide all of these services and the prices per call session minutes in their proposal should be for TRS that include all these services. To facilitate a comparison of proposals, Offerors should review the list of features and indicate which services they provide in an identical fashion, which they provide, but in a different fashion and what those differences are, and which they do not provide. Offerors should also list additional services they would provide as standard features that are not included on the list.

4.2.2.2 **Placing Calls.** Offers will adhere to the FCC rule requiring 85% of all calls to be answered in ten seconds by any method which results in the TRS caller's call immediately being placed, not put in a queue or on hold.

Calls to the relay which are placed on hold shall not be on hold longer than one minute. Calls identified as emergency calls shall receive immediate priority over other calls and must be referred to the nearest 9-1-1 Public Safety Answering Point (PSAP).

4.2.2.3 **Relaying the full content of communication.** CAs must convey the full content, context and intent of the communication they translate. CAs shall, to the best of their abilities, let the deaf or hearing-impaired user know the tone of voice the hearing caller is using. For example, they can type in parenthesis that a person is being rude, is yelling, is being humorous, is laughing, is impatient, or other characterizations of behavior. CAs shall also keep the user

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informed on the status of the call, such as dialing, ringing, busy, disconnected, on hold, or explaining the relay to a hearing caller. When speaking for the TTY user, the CA shall adopt a conversational tone of voice appropriate to the type of call being made. CAs shall indicate to the TTY user if another person (hearing) comes on the line. CAs shall also announce to both parties to the call when there is a change of operators during a call.

4.2.2.4   **Prohibited communications.** CAs shall not counsel, advise or interject personal opinions or additional information into any relay call. This also means the CAs shall not make any value judgments on the obscenity of any messages. Furthermore, the operators shall not hold personal conversations with anyone calling the Colorado TRS. The State will not reimburse for any call session minutes that violate this standard.

4.2.2.5   **Preserving confidentiality.** Proposals shall specify the policies the Offeror will use to preserve confidentiality. Such policies may include mechanisms employees are encouraged to use to prevent unintentional disclosure of relayed conversations, denying employment as CAs to those who have deaf family members or acquaintances, and other methods. Proposals shall specify the policy for handling violations of confidentiality.

4.2.2.6   **Spanish-to-Spanish calls.** In view of Colorado's significant Hispanic population, English-to-English and Spanish-to-Spanish as well as English-to-Spanish and Spanish-to-English translation are considered standard features within Colorado TRS and should be included in the Offeror's proposal.

4.2.2.7   **Internet relay calls.** The technical capability exists for TTY users to initiate relay calls using the Internet instead of regular phone lines, but there are several unresolved issues that remain. These issues must be resolved at the national level before Internet relay calls can be processed and paid for appropriately at the state level.

4.2.2.8   **CA community contacts.** Offerors shall propose a method for a relay user to uniquely identify a relay agent in the event a complaint is filed or a user wants to praise the work of the CA. Offerors proposing an in-state center shall describe how they will handle the confidentiality concerns related to possible social contact or the provision of other services by relay agents for members of the deaf and hearing impaired community that use the relay.

iv. 4.2.3   FCC Technical Standards

4.2.3.1   *ASCII and Baudot.* TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

4.2.3.2   *Speed of answer.* TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Abandoned calls shall be included in the speed-of-answer calculation.

A TRS provider's compliance with this rule shall be measured on a daily basis.

The system shall be designed to a P.01 standard.

A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to SRAs and TRS providers upon request.

4.2.3.3 **_Equal access to interexchange carriers._** TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

4.2.3.4 **_TRS facilities._** TRS shall operate every day, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. TRS shall transmit conversations between TTY and voice callers in real time. Adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. TRS that are not mandated by the FCC are not required to be provided every day, 24 hours a day. This definition is more detailed than the FCC requirement.

4.2.3.5 **_Technology_ and Caller ID.** No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use Signal System 7 (SS7) technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq. Regarding Caller ID, when a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

4.2.3.6 **_Voice mail and interactive menus._** CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls that must be made by the relay user in order to complete calls involving recorded or interactive messages.

4.2.3.7 **Pay-per-call calls.** TRS shall be capable of handling pay-per-call calls.

r. 4.3 Captioned Telephone Requirements

The following provides the requirements for Offerors seeking to provide Captioned Telephone services.

i. 4.3.1 Captioned Telephone TRS

Captioned Telephone TRS was inaugurated in Colorado in March 2004 to provide services to Colorado's significant hard-of-hearing population. Cap Tel® units, a product of Ultratec, Inc., were utilized to provide this service. Captioned telephone TRS is now considered by Colorado to be a basic service and is required in the Offeror's proposal. The State will consider the utilization of other captioned telephone equipment in this proposal, including Caption Call®,

distributed by Sorenson Communications. Offerors must indicate in their response to this proposal that they clearly understand that, should the FCC's position change on captioned telephone waivers and/or standards that they will adhere to FCC captioned telephone policy."

ii. 4.3.2 Captioned Telephone TRS Facilities

Captioned telephone TRS shall operate every day, 24 hours a day. Captioned telephone TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Captioned telephone TRS shall transmit conversations between captioned telephone users and voice callers in real time. Adequate network facilities shall be used in conjunction with captioned telephone TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. Features that are not mandated by the FCC are not required to be provided every day, 24 hours a day. This definition is more detailed than the FCC requirement.

iii. 4.3.3 Captioned Telephone Compatibility

The Offeror shall provide captioned telephone services which must be compatible with the State's current form of captioned telephone, currently CapTel®. Offerors may utilize captioned telephones from Caption Call®. However captioned telephone TRS must work with existing equipment currently being used by Colorado consumers.

iv. 4.3.4 Pay-per-call calls

Captioned telephone TRS shall be capable of handling pay-per-call calls.

v. 4.3.5 2-Line Captioned Telephone Service

The Offeror shall ensure captioned telephone services support 2-line functionality.

s. 4.4 Management Requirements (Mandatory)

i. 4.4.1 Prime Contractor Responsibilities

The selected contractor will be required to assume responsibility for all services offered in the proposal whether or not the contractor produces them or utilizes a subcontractor to perform the work. Further, the Department of Regulatory Agencies will consider the selected contractor to be the sole point of contact with regard[BT7] [CEL8] to contractual matters. If any part of the work is to be subcontracted, the prime contractor must provide a complete description of work subcontracted and descriptive information about the subcontractor's organization and capabilities. The contractor will be held totally responsible for subcontractor's performance and adherence to all contract provisions.

ii. 4.4.2 Contract Period and Performance Review

The initial contract term shall be for a term of three years, with two one-year renewals, not to exceed a total contract term of five years.
The Department of Regulatory Agencies may review contractor's performance during the course of the contract and may also require an independent performance analysis. Such review will encompass service quality, including marketing, responsiveness to clients and the Department

of Regulatory Agencies personnel, timeliness of required reporting, and any other specifics as required under terms of the contract. Review results, along with recommendations for change, will be distributed to the contractor. Performance reviews will be conducted at the Department of Regulatory Agencies direction and at the contractor's expense.

Unsatisfactory results of a review may result in cancellation of the contract.

Should the contractor desire, a meeting will be arranged between all concerned parties within ten (10) calendar days of the date the contractor received, or could reasonably have been expected to receive, the review results. This meeting will provide the contractor with an opportunity to appeal the review recommendation to the Executive Director of the Department of Regulatory Agencies.

iii. 4.4.3   Compliance with Applicable Laws

The selected contractor will be required to administer the program pursuant to all statutory and rule requirements as well as terms and conditions outlined in this RFP, the contract, and any other applicable laws including the Health Insurance Portability and Accountability Act. Nothing in this section shall be construed to supersede any Federal **privacy** or confidentiality requirement, including the regulations promulgated under section 264(c) of the **Health Insurance Portability** and **Accountability Act** of **1996** (Public Law 104-191; 110 Stat. 2033) and section 290dd-2 of this title.

iv. 4.4.4   Audit/Inspection of Records, Monitoring and Reporting Requirements

The awarded contractor must permit State, Federal Government, or any other duly authorized agent of a governmental agency to audit, inspect, examine, excerpt, copy and/or transcribe contractor's records during the term of the contract and for a period of three (3) years following the termination of contract or final payment, whichever is later, to assure compliance with the contract terms, or to evaluate the contractor's performance. The contractor shall also permit these same described entities to monitor all activities conducted by the contractor pursuant to the terms of the contract. As the monitoring agency may in its sole discretion deem necessary or appropriate, such monitoring may consist of internal evaluation procedures, examination of program data, special analyses, on-site check, or any other reasonable procedure.

The successful Offeror may also have a performance review conducted of its program at the Department of Regulatory Agencies' determination. This performance review and any financial audit will be at the Offeror's expense.

The Department of Regulatory Agencies reserves the right to require the awarded contractor to have a financial audit conducted during the term of the contract[CEL9] . [BT10] If this is required, the audit must be carried out by one of the major accounting firms, preferably one that does not currently conduct the contractor's fiscal audits. A complete copy of the audit including the management letter must be provided to the Department of Regulatory Agencies within five working days of its completion. The Department of Regulatory Agencies will negotiate directly with the contractor regarding any exceptions or findings from the audit. The awarded contractor shall be responsible for payment of this audit.

The awarded contractor shall provide financial statements, including balance sheets and income statements to the Department of Regulatory Agencies on a semi-annual and annual basis to account for the monies received and spent pursuant to the contract. The awarded contractor shall provide any further financial data requested by the Department of Regulatory Agencies or its authorized agent.

4.4.5   Contract Acceptance

Offeror shall list any exception that it has to the provisions, terms and conditions in the State of Colorado Model Contract, which is attached as Appendix C. Please refer back to Section 1.19 for additional information on this section.

t.   4.4.6   *Sub-Contractors*

Planned use of sub-contractors shall be clearly explained in the proposal, including terms of any subcontract. However, the Offeror shall be responsible for contract performance whether or not sub-contractors are used. Current employees of the State of Colorado may not participate as sub-contractors of the award. The only contact with the State will be the Offeror[CEL11] .

u.   4.4.7   *Compliance*

All Offerors will submit positive statements with respect to their willingness to comply with all

work requirements described in this RFP and with the general contract requirements and the terms and conditions specified this section of the RFP. The TRS must meet all requirements necessary for certification by the FCC; therefore, if any of the following requirements conflict with current FCC certification requirements, the FCC requirements shall prevail. All Offerors will clearly describe and explain any proposed deviations from or changes to the RFP or contract requirements for consideration by the State in the appropriate section of the proposal and in the transmittal letter. The State reserves the right to reject any proposal including such deviations or changes.

v.   4.4.8   *Ownership*

All reports, documentation, and material developed or acquired by the contractor, as a direct requirement specified in the contract, shall become the property of the State of Colorado. The contractor shall agree and understand that all discussions with the contractor and all information gained by the contractor as a result of the contractor's performance under the contract shall be confidential and that no reports, documentation, or material prepared as required by the contract shall be released to the public without the prior written consent of the State. Upon expiration, termination, or cancellation of the contract, all documents, data, reports, supplies, equipment, and accomplishments prepared, furnished or completed by the contractor pursuant to the terms of the contract shall become the property of the State.

w.   4.4.9   *Employment of State Personnel*

The Offeror shall not knowingly engage on a full time, part time or other basis during the period of the contract, any individual involved in preparation of this RFP, or the selection and/or award of the resulting contract.

4.4.10 Transition Requirements

4.4.10.1   Upon award of the contract, the Offeror shall work with the Colorado Public Utilities Commission and any other organizations designated by the Colorado Public Utilities Commission to insure an orderly transition of services and responsibilities under the contract and to ensure the continuity of those services required by the Colorado Public Utilities Commission.

4.4.10.2   Upon expiration, termination, or cancellation of the contract, the Offeror shall assist the Colorado Public Utilities Commission to ensure an orderly transfer of responsibility

and/or the continuity of those services required under the terms of the contract to an organization designated by the Colorado Public Utilities Commission, if requested in writing.

4.4.10.3   The Offeror shall deliver, FOB destination, all records, documentation, reports, data, recommendations, or printing elements, etc., which were required to be produced under the terms of the contract to the Colorado Public Utilities Commission and/or to the Colorado Public Utilities Commission's designee within seven (7) days after receipt of the written request in a format and condition that are acceptable to the Colorado Public Utilities Commission.

4.4.10.4   The Offeror shall agree to continue providing any part or all of the services in accordance with the terms and conditions, requirements and specifications of the contract for a period not to exceed 150 calendar days after the expiration, termination or cancellation date of the contract for a price not to exceed those prices set forth in the contract.

4.4.10.5   The Offeror shall discontinue providing service or accepting new assignments under the terms of the contract, on the date specified by the Colorado Public Utilities Commission, in order to ensure the completion of such service prior to the expiration of the contract.

4.4.10.6   The Offeror shall make arrangements to transfer all toll-free telephone numbers used to provide intrastate relay services within Colorado to any subsequent contractor providing TRS as directed by the Colorado Public Utilities Commission.

x.   4.4.11 *Payment*

After the close of each month, the Offeror shall submit an invoice to the State Relay Administrator (SRA) for the previous month's work. Such invoice shall be delivered to the SRA by the 15ᵗʰ of the month. The SRA and/or the CO PUC Staff will review the monthly invoice and if it is determined that the invoice is erroneous, shall notify the Offeror of the error and request a correct copy. The State cannot process payment on an erroneous invoice. The Offeror must submit a true and correct copy of the monthly invoice before payment can be authorized. The State will make payment within forty-five (45) days of receipt of said invoice. Total reimbursement shall not exceed the total fixed bid per minute price submitted to and accepted by the State along with any other reimbursable charges.

y.   4.4.12 Records Maintenance

The Offeror shall maintain its records of TRS operations so as to permit review and determination of such operations. Such records shall be made available during normal business hours for inspection by the Colorado Public Utilities Commission or its designee. The Offeror shall maintain a complete file of all records, documents, communications and other materials which pertain to the operation of the service or the delivery of services under this agreement.

z.   4.4.13 Audit Requirements

The State is using a competitive bid process through issuance of this RFP as the primary mechanism to ensure it pays a fair price and receives excellent TRS. The State has not conducted a formal audit of its relay vendor since the inception of its relay program and does not envision a specific need to do so in the future. If reason exists for concern, a State audit would likely focus upon performance issues, including service quality, billing accuracies and/or financial stability of the vendor. The Offeror shall make all requested financial information available to the State for audit on request, including: salaries and benefits associated with both

operators and managerial employees, local exchange access charges, operating expenses, building rent and utilities, equipment depreciation, corporate overhead allocations, outside consultants and temporary help and account management. The Offeror shall also make all telecommunications hardware, software and procedures available for audit by an engineer sent by the State to check that calls and their duration are being accounted properly in billings and sent to the State.

As noted in section 4.1.1.6, the Colorado Public Utilities Commission reserves the right to contract with an independent entity to conduct a random proficiency audit.

aa.   **4.4.14 Identification of Possible Onerous Provisions of this RFP**

In issuing this RFP, the State does not anticipate that it has added any requirements beyond those already required for FCC certification or part of a State's basic relay service that should add significantly to the cost per minute charged by a relay vendor. If an Offeror agrees that there are no such requirements, it should so state. Alternatively, Offerors should identify any such requirement and an estimate of the cost per minute that would have to be charged to meet it.

4.4.15 Financial & Organizational Strength

4.4.15.1   Successful Offeror, together with any subcontractors, must demonstrate that they have the financial resources to perform all requirements of this RFP. Provide information on the financial strength of your organization, and include a copy of your audited (as applicable to your company's organizational structure) financial statements from the last three (3) years, or, if the Offeror has not been in business for three (3) years, since the business began.

4.4.15.2   Please explain how your company's business plan financially supports the awarded outsource examination contract in light of your organization's growth in the coming years.

4.4.15.3   Provide evidence of general liability insurance coverage and specific insurance you carry that covers professional losses, e.g. professional liability or errors and omissions insurance (see Sample Contract, Exhibit A for requirements of State).

bb. **4.5   Cost**

This section of the proposal must contain the Offeror's fixed price per call session minute. Pricing per call session minute must include all costs associated with the provisions of the proposed services. Cost must include the costs of both traditional TRS and captioned telephone TRS. The offer must indicate one firm fixed price for both traditional TRS and captioned telephone TRS.

Section 5 – Response Format & Proposal Instructions

cc. **5.1   Submission and General Instructions**

Proposals must be received on or before the date and time indicated in the Schedule of Activities, or as modified on the BIDS system. It is the responsibility of the Offeror to ensure that the DORA Procurement Office receives the proposal on or before the proposal opening date

and time, regardless of the delivery method used. Late proposals will not be accepted. Offerors are cautioned that daily mail may not be received prior to 4:00 p.m.; therefore, if proposal is not hand delivered, Offeror should ensure proposal is received by mail or delivery service the prior day.

Submit TBD of the proposal, as well as an electronic copy in Microsoft Word and/or Excel or other software specified. The proposal package shall be delivered or sent by mail to:

<div align="center">

Department of Regulatory Agencies
Procurement Office
1560 Broadway, Suite 110
Denver, Colorado 80202
Attention: Tammy Baca
RFP-15-SJI- CO TRS

</div>

The proposal must be signed in ink, preferable in blue ink, by an officer of the Offeror who is legally authorized to bind the Offeror to the proposal. Proposals that are determined to be at a variance with this requirement may not be accepted. A proposal signature page has been provided.

Proposals must be submitted and sealed in a package with an appropriate label affixed. The label must show the following information:

<div align="center">

Offeror's Name
RFP-No., RFP Title
Proposal Due Date and Time

</div>

Offerors must segregate the portion of the proposal responding to the pricing and funding proposal so the technical proposal can be evaluated without consideration of the price or funding model.

Offerors must fill out and return with the proposal the Vendor Disclosure Statement posted on the BIDS page.

The State desires and encourages that proposals be submitted on recycled paper, printed on both sides. While the appearance of proposals and professional presentation is important, the use of non-recyclable or non-recycled glossy paper is discouraged.

dd. 5.2   Page Limit

Unnecessarily elaborate proposals are not desired. Font size for basic narrative descriptions must be no smaller than 12 characters per inch. Indexes, tables of contents, lists of figures/tables, and glossary of terms will not be counted toward the overall page count. Allowance will be made for tabular or graphical presentations and screen prints, whether incorporated in the text of the technical description or attached as separate exhibits. Textual explanations of screen prints or graphic materials, standard commercial brochures or descriptions, or other standard product documentation that are attached in appendices or exhibits will not be counted against page limitation. However, evaluators cannot be expected to comprehend all material in exhibits whose content and relevance to the proposal description are not clearly integrated into the technical discussion.

ee. 5.3   Response Format

ff. 5.3.1 Executive Summary

Condense and highlight the contents of the proposal. The summary should provide the reader with an overall understanding of the proposal and Offeror's approach.

gg. 5.3.2 Technical Component

A. Restate each requirement and describe how you will address the deliverables set forth in Sections 4.1 through 4.3. Identify the Section number of each requirement. Indicate in detail the scope of services included in your proposal and identify any items requested by the State that are not included in your proposal. (Note: Section 4.1.4 will be addressed below in 5.3.5.)

hh. 5.3.3 Management and Experience Component

A. Restate each requirement and describe how you will address the deliverables set forth in Section 4.4. Identify the Section number of each requirement. Indicate in detail the scope of services included in your proposal and identify any items requested by the State that are not included in your proposal.

B.   Indicate key personnel who will be assigned to the project and describe their experience. Explain how you will ensure that equally qualified persons are assigned to the project if these individuals leave the project. The state expects that the awarded Offeror will continue to make the key project personnel available through the life of the contract as long as they remain in Offeror's employ. The state reserves the right to approve any replacement personnel.

C. The Offeror's proposal shall include evidence that it has the knowledge, skills, abilities and experience in the areas identified by the requirements in Section 4, Statement of Work.

D. Please return Appendix D, the "Company Experience and Demonstrated Capability (CEDC)" form (attached at the end of this RFP) with your proposal.

The following Offeror qualifications are required to ensure effective TRS services:

·   Demonstrated success of at least three years within the past five year time period in providing similar services required in this solicitation on a statewide or national basis

The State reserves the right to contact jurisdictions where Offeror's have had or currently has contracts with providing the same or similar services.

E.   Offerors must segregate their response to the exceptions, if any, to the Colorado Terms and Conditions.

ii. 5.3.4 Cost

The Offeror shall provide a fixed cost for each year (initial contract term of three years) for the work proposed in response to Section 4.5. Offerors must segregate the portion of the proposal responding to the pricing so the technical proposal can be evaluated without consideration of the cost.

5.3.5 Value Added

Offeror shall provide detail on any additional services it proposes to the State at no additional cost pursuant to Section 4.1.4.

Section 6 – Evaluation and Award Selection Process

This section supplements paragraph 1.5, "Scope of RFP/Basis of Award" in the Colorado Solicitation Instructions/Terms and Conditions that are available through the link on the BIDS solicitation page.

6.1   Evaluation Factors

The evaluation factors, in decreasing order of importance are:
- The technical proposal (Section 4.1 through 4.3), including
-       Soundness of Offeror's approach to the Scope of Work defined in Section 4,
-       Required commitment of state personnel, including reasonableness to accomplish objectives, secondary impact to existing programs.
- The management proposal (Section 4.4) including:
-       The Offeror's experience, qualifications, and key personnel, and the extent to which the qualifications, experience, and past performance are likely to foster successful, on-time performance.
-       The extent to which Offeror agrees to Colorado's basic contract terms and required Special Provisions without seeking exceptions.
- The Cost proposal (Section 4.5)
·   The Value Added proposal (Section 4.1.4)

6.2   Award Methodology

An Evaluation Committee will evaluate the merits of proposals received in accordance with the evaluation factors stated in Section 6.1 of this RFP and identify the proposal that is most advantageous to the state. While numeric evaluations may be used in some aspects of the process to identify strengths and weaknesses of proposals, and to establish a ranking, the final decision will be a business decision by the State and will not be based on a numerical score. A Decision Memorandum will document the basis for the award decision.

Failure of the Offeror to provide any information requested in this RFP may result in disqualification of the proposal. This responsibility belongs to the Offeror.

Offerors should not assume that they will have an opportunity for oral presentations, pre-award discussions, Best and Final Offers (BAFOs), or revisions of proposals, so they should submit their most favorable proposals as their initial proposal. If award is not made on receipt of initial proposals, Offerors in the competitive range (those most responsive to the requirements and reasonably susceptible of being selected for award) may be provided an opportunity to make an oral presentation. The oral presentation may be held for the purpose of clarification and to ensure full understanding of and responsiveness to solicitation requirements.

If proposal revisions are permitted after oral presentations and discussions, a date will be established in writing by the State for submission of best and final offers. Offerors will not be provided an opportunity for comprehensive proposal revisions.