



Relay Texas FCC Certification Renewal and Supporting Documents

Introduction

Relay Texas, a program under the Public Utility Commission, Texas, 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 Texas** prepared this TRS Certification Renewal Application with the assistance of Sprint Accessibility.

Public Utility Commission of Texas contracted with Sprint to provide Telecommunications Relay Service effective date of effective contract date 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 (month) (year). 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 Texas does not contract to provide these services in Texas, nor is Relay Texas 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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Operational Standards

A.1 Communication Assistants (CAs)

§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.

**Please note – In this document, questions/Requirements are in black, bold, italicized font and are taken directly from the FCC. Texas uses Relay Agents (RAs), not Communications Assistants (CAs). We have used “RA” where appropriate, but we have not edited the FCC’s verbiage.*

RA Employment Standards

Relay Texas contracts with Sprint to provide the hiring, training and oversight of RAs for Relay Texas. Sprint has established a successful procedure to attract qualified applicants for TRS RA positions. Sprint’s Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as an RA 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. RAs are required to have a high school diploma or GED, which ensures 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 RA 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 RA 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 RA 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 RA applicants are required to pass a valid and unbiased 12th grade level spelling test to be considered for employment. TRS RA 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 an RA. 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 RA applicants are hired to work at Sprint Accessibility centers

Sprint provides an enhanced VCO service called Captioned Telephone (CapTel) Services. Sprint requires all CapTel RAs have a high school graduate equivalency as a minimum qualification for the job. Sprint ensures all CapTel RAs 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 RA Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel RA 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 RAs are scheduled for one-week of transition training, while being monitored and supported by another CapTel RA or an Instructor.
- All CapTel RAs must continue to qualify for live call handling each month.
- Sprint CapTel RAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel RA is evaluated on a minimum of one call each shift.
- There is also a monthly test each CapTel RA 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 Texas, through their contract with Sprint, has shown Sprint RAs 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 RAs to possess clear and articulate voice communications. RAs are given five written and three hands-on performance evaluations demonstrating the ability to process calls. Sprint RAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. RAs must demonstrate their ability to:

- Sprint RAs 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 RA 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 RAs who provide Speech to Speech (STS). RA applicants must successfully achieve the following:

- Six months of employment as an RA
- Recommendation and/or approval from supervisor or manager
- Attend and complete STS 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 table:

STS TRAINING OUTLINE	
Sprint Values and Goals	
Training Agenda	
<ul style="list-style-type: none"> Objectives / Training Outline Introduction and History Video Service Description Characteristics of Customers Stereotypes 	<ul style="list-style-type: none"> Speech-Disabilities Attributes of Speech-to-Speech Relay RAs Speech-to-Speech versus Traditional Relay FCC Requirements Speech-to-Speech Variations Assessment
Work Performance Components	
<ul style="list-style-type: none"> Basic Call Processing Call set up Customer Database Frequently Dialed Numbers Customer Requests Emergency Call Processing 	<ul style="list-style-type: none"> Confidentiality Transparency Personal Conversations Developmental Skill Practice Audio Observation
Participation	
<ul style="list-style-type: none"> RA training Taking over calls – 15 minute CA work performance 	<ul style="list-style-type: none"> Call Focus Teamwork – support peer
Confidentiality and Transparency	
<ul style="list-style-type: none"> Discuss call speech patterns Discuss techniques customer uses Have two RAs on one call, if necessary or customer requests. 	<ul style="list-style-type: none"> Unacceptable to: Have conversation regarding information discussed on calls Discuss customers in general

All CapTel RAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel RA 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 RA 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 RAs 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 Operator to interpret typewritten ASL.

RA 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 concerns,

and how to address them. The training team is located in seven Relay Centers across the country. This team along with the support of the Location Managers, Supervisors, and RAs has just one goal: to provide excellent service to our 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 Texas 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 RAs typed an average of 83.9 wpm, with at least 95 percent accuracy. In fact, almost a third of Sprint's RAs 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 Texas 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.

In-Call Replacement of RAs

Through their contract with Sprint, State Relay Program (i.e. OTRS) exceeds all FCC minimum requirements regarding changing RAs during a call. As a matter of practice at Sprint, calls are not taken over unless it is absolutely necessary to do so. Sprint RAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the RA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, an RA may be relieved if it is appropriate. The only situations in which an RA would transition during a call prior to the FCC minimum standard of 10 minutes include:

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

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

- Shift change

- RA 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 RAs 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 RA 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 Texas honors the requests of all callers when they request a specific RA gender. Relay users may request a specific RA gender through the Customer Profile or a per-call basis directly with the RA. The transfer of the RA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel RAs.

§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 Texas 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 RAs 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 RA 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

Relay Texas contracts with Sprint to oversee all TRS RAs, including CapTel RAs for the State of Texas. 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, RAs 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 Texas STS RAs 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. Relay Texas' 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 RAs undergo a thorough background investigation and screening.
- During initial training, RAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. RAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- RAs perform their work in cubicles that are 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 RAs 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 Texas CapTel RAs 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.

A CapTel RA may have problems, complaints or stress from handling the call. The RA may ask to speak to a supervisor or other member of management (as long as it was not their call) in a private area. 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 RAs understand and abide by the confidentiality policy. Any RA 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 Texas STS RAs will retain information from a call in order to facilitate the completion of consecutive calls. STS RAs may utilize the TRS system designed electronic scratchpad to aid the RA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the RA 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 Texas RAs 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.

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

At the request of the relay user, Relay Texas RAs 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 an RA’s employment. In order to successfully complete initial training, the RA must demonstrate competent skills to accurately reflect the TTY user’s intent and the RA’s role in the Relay process. RA 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 RA is provided with an ASL workbook. This workbook is completed by the RA and returned to the Supervisor. The Supervisor and RA together review the workbook and the RA’s ability to translate ASL to conversational English. The RA keeps this manual for future reference. A

RA continues to be evaluated on translation skills through individualized monthly surveys. Relay Texas CapTel RAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

The State of Texas 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.

STS Facilitation of Communication

Relay Texas STS RAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Relay Texas STS RAs 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 RAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible. Relay Texas STS RAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS RAs 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 RAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS RAs 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 RA will use that tactic. Otherwise the STS RA may clarify unsure including the following:

- STS RAs may simply ask STS user to repeat the word or phrase
- STS RAs may ask “yes” or “no” questions
- STS RAs may ask the STS user to use the word in another sentence
- STS RA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS RA may ask the user to spell the word

To ensure STS RAs follow established call processing procedures, STS RAs 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 RA work area to monitor performance. If a development area is identified in any area of call processing the STS RA will receive specific feedback and additional training. If the STS RA 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 operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Relay Texas provides 24x7 TRS for standard (voice), Text Telephone (TTY), wireless, or personal computers PC users to place local, intrastate, interstate, and international calls. Relay Texas 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 Texas retain full control of the length and number of calls placed anytime through relay. Relay Texas CapTel RAs are currently waived by the FCC for outbound calls because the CapTel RA 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 RA to refuse sequential calls or limit length of calls. Relay Texas CapTel RAs 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 RA 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 Texas, through Sprint Accessibility, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint Accessibility 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 Missouri 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 Texas gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Relay Texas 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 COC 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 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 Texas Service. 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 Texas 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 Texas 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** for Relay Texas Service.

- **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.

§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 Texas Service.

§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 Missouri 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 Texas 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 are provided by Relay Texas:

- 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 Texas 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 Texas' TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the RA has both TTY parties on line, the RA releases the call and the conversation is removed from the RA'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 Texas adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the RA, 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 Texas 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 RA 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 RA will dial the associated 10-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 Texas 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 Texas. 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 Texas 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 Texas, through Sprint, provides an advanced Phoenix platform which contains RA-generated macros (e.g., pre-programmed phrases) which allow the RA 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 Texas 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 RA to assist in processing the call is considered customer-sensitive information and is deleted from the RA's screen, after the call has ended. The only information retained is information in the Call Detail Record necessary to bill the call. Relay Texas 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 RA 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 an RA needs to redial to process these calls, the RA 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 Texas 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.

Retrieving Answering Machine and Voicemail Messages

Relay Texas has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint Accessibility's Phoenix platforms, RAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users. When a user

requests the RA to retrieve messages from a voice mail system or PBX mailbox, the RA will follow the following process:

- The RA will inform the caller 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 Texas uses advanced recording technology to slow down the playback of the messages. If an RA needs to redial to process these calls, the RA 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 RA 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 Texas service.
- Sprint Accessibility's platform provides the technology necessary to retrieve voicemail 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 RA's position to ensure that the customer's information is kept confidential.

Like TRS users, Relay Texas' 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 RA 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 Texas accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Relay Texas has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

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

1.	Relay Texas RAs act upon the word "emergency". Calls placed to fire, police, ambulance, and rescue squad are considered emergency calls.
2.	The RA 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 E911 center closest to the caller's rate center. This hot-key "freezes" the screen with an emergency banner so 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 RA presses a key to notify the Supervisor. The Supervisor will assist the RA in processing the call, if needed. The Supervisor does not take over the RA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (telephone number) is passed to the E-911 as Caller ID.
5.	The RA 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 Relay Texas Service. They are calling from (caller's number). This is RA # 1234, one moment please."
6.	The RA advises the inbound caller 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 RA relays the call. Unlike other Relay calls, RAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the RA connects the TTY caller directly to the PSAP (TTY).
9.	The RA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E911 routing error, the RA will fill out a technical "trouble ticket" for additional investigation.

Back up Procedures

Through their contract with Sprint, Relay Texas 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 a valid number is not available, the RA 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 Center in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 Center.
- The 911 system renders the appropriate emergency response.

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 response Centers. 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 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 Texas RAs 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 RAs when an emergency call occurs. RAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that 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 RAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The RA or Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center 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 RA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The RA 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 RA 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 a 911 center 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 5 seconds after the notification phrase is read the RA will attempt to complete the call to connect the caller to emergency services. The RA 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 Texas offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Relay Texas' 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 described below, will be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the RA 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 RA 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 Texas 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 Texas 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 Texas 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 RA 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 both the RA 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 RA. If the call is answered by a voice person, the RA 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 Texas 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 RA requirement for each 15-minute period of the day
- Total number of RAs scheduled for each-15 minute period
- The number of RAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each RA group and the RA 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 Texas 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 Texas' CapTel speed of answer meets or exceeds the FCC's requirement to answer 85 percent of all calls within 10 seconds. Relay Texas expects that 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, and any 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, RA 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 Texas 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 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 Texas 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 Texas on a monthly basis.

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

Relay Texas, 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 State 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 Texas 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 operator 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 Texas 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 their call may include long distance charges.

Relay Texas 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.

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 (payphone). Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (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 RAs to process COC calls and subsequent instructions to relay callers:

- Sprint Accessibility RA 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 RA 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 RA 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 RA relays the COC call between the caller and the called-party.

Sprint Accessibility had 260 carriers participating in the Sprint Accessibility's TRS COC program. Participation of Carriers in Texas was dependent on whether carrier is authorized to provide service in Texas and connectivity to the Sprint Accessibility 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 Texas service. 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 Texas 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 Texas 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** for Relay Texas Service.
- **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 Texas and Sprint Accessibility Customer Service are both available 24 hours a day, every day of the year for all TRS services. Relay Texas, 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 Texas 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 Texas 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 basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning/heating in the computer room), RA 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 Texas 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 Texas 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 Texas 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 Texas 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/long-distance calls. Relay Texas 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 Texas, 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 RA quickly and easily from anywhere in the nation. All callers who are physically located within the state are automatically connected to an STS RA. 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 Texas 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 read to the called party. This feature allows the STS user to request 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. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request 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 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 RA 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 RA 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	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
2	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
3	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
4	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
5	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

*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 RA hearing the voice party. If this option is selected, the RA 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 RA. The STS RA 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 Texas, 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/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 SS7 connectivity with Sprint. Sprint's 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 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 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 RA. 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 does not, 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 Texas 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 RA identification number, the nature of the complaint, and the result of any investigation and the date of resolution. Relay Texas 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), RA 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, RA 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 Texas via email of any complaint entry, ensuring 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 Texas 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 Texas callers may file intrastate complaints and commendations regarding Relay Texas services through the following contacts:

Olivia V. Dominguez
1321 Rutherford Lane, Ste. 100
Austin, TX 78753
www.relaytexas.com
Olivia.dominguez@sprint.com
512-354-7002 Voice
512-354-2075 Fax

Jay Stone
Program Administrator, CTCM, CTPM
Public Utility Commission of Texas
Work: (512) 936-7425
Fax: (512) 936-7058
jay.stone@puc.texas.gov

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.

We have provided outreach information in appendices included in a PDF file submitted with this response.

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.

Prior to March 17, 2016:

Relay Texas users are not charged more for services than for those charges paid by standard “voice” telephone users. TRS users, who select Sprint Accessibility as their interstate carrier, will be rated and invoiced by Sprint Accessibility. The caller will only be billed for conversation time.

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

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	\$0.03	\$0.07
Evening (7 PM – 10:59 PM)	\$0.03	\$0.07
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	\$0.03	\$0.07

March 17, 2016 through May 31, 2017:

In states where Sprint is the contracted TRS provider, INTRASTATE Sprint long distance rates for TRS users will be 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 Texas relay 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 RLSA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RLSA for reimbursement.

ADA Requires TRS Services

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

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)(M) does not pertain to State programs. However, the state of Texas 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 Texas 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 Texas 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 RA, 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 RAs
- 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. Texas customers also have the option of calling Sprint's 24-hour Customer Service department (800-676-3777), the Sprint Accessibility Account Manager or the Public Utility Commission of Texas to file complaints or commendations.

Relay Texas 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 Texas 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 Texas, through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, COC, 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 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.

Relay Texas was approved for TRS Certification Renewal by the FCC in 2013.

§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.

There have not been substantive changes to the program during the certification period.



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

DA 17-697
Released: July 19, 2017

Appendix A

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

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 Speech Disabilities*, Declaratory Ruling, 18 FCC Rcd 16121 (2003).

any 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. 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.

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).

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.

-FCC-

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 RAs 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 RAs type &/or transcribe conversations at a rate greater than 60 words per minute. RA 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 RA takeovers only when necessary. Sprint's RAs 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 RA 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 RA & 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 CPNI, except as authorized by 47 U.S.C. § 605. STS RAs 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 RAs 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 RAs 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.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
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 it is not technologically feasible to do so, Sprint services are capable of handling any type of call normally provided by telecommunications 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 RA 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 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 incl. Baudot (domestic & intl.), 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 daily within 10 seconds, including abandons. Sprint's 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, 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.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
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. § 64.604(b)(7)	TRS, STS (N/A to CTS, IP CTS, or IP Relay)	Exceeds	Sprint offers multiple solutions to meet this requirement include: Auto 711 Routing for STS users connects callers with a Customer Profile directly to STS RAs. RAs answering 711 for callers without a profile will immediately transfer the caller to an STS RA. Sprint offers a wireless short code to STS for Sprint wireless users. Sprint's 711 IVR allows connectivity directly to an STS RA using the same level of prompts used 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 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, & PSAs. (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	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
47 C.F.R. § 64.604(c)(7)			not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint provides 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, phone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification info, 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 CapTel 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 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 by 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 info.

Training

Relay Agent (RA) Training

Sprint knows a well-trained RA has the skills and tools to provide the best customer experience. The education and continued development of all RAs 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 RAs' commitment to providing quality service.

Training has been developed in coordination and cooperation with the relay user communities. RA 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 RAs 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 RAs 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, RAs are trained and evaluated on how to accurately reflect the TTY user's intent and the RA'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 RA must demonstrate competent skills to translate calls as requested. When training is complete, an RA 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 State 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	<ul style="list-style-type: none"> ◆ Welcome and Introductions ◆ Introduction to Each Other ◆ Sprint (or Vendor Company) ◆ Sprint Values ◆ Sprint Corp Overview ◆ History of Sprint Corporation ◆ Local Telecommunications ◆ Wireless 	<ul style="list-style-type: none"> ◆ Internet Services ◆ 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	<ul style="list-style-type: none"> ◆ 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 & 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 ◆ 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 	<ul style="list-style-type: none"> ◆ 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

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ Conversational flow ◆ ASL Emoticons – Text Message Abbreviations ◆ IP Acronyms ◆ Sprint IP Variations ◆ International calling restrictions 	<ul style="list-style-type: none"> ◆ Use of Relay through Correctional Facilities: Correctional Facility Call Processing, Relay Abuse ◆ Spanish & French Language Service ◆ Info Digit list ◆ 911 Emergency Calls
Overview of System & Equipment	<ul style="list-style-type: none"> ◆ 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 	<ul style="list-style-type: none"> ◆ 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)	<ul style="list-style-type: none"> ◆ Professional Phone Image ◆ How phone image is created ◆ Provide warm & friendly greeting ◆ Conversational Tone ◆ Voice Inflection ◆ Audibility & breath control ◆ Pitch ◆ Quality ◆ Operator Role ◆ Relay Role ◆ Relay Skills ◆ Conversational Flow ◆ Staying focused ◆ Listening skills ◆ Customer service skill ◆ Coping skills ◆ Phrases ◆ Background Noises 	<ul style="list-style-type: none"> ◆ 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 ◆ Voice Tones/Descriptive Words
TTY-Voice & Voice-TTY	<ul style="list-style-type: none"> ◆ 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 	<ul style="list-style-type: none"> ◆ 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)

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ♦ 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 No Answer ♦ Types of Busy Signals 	<ul style="list-style-type: none"> ♦ Explanation of service ♦ Voice-TTY Procedures ♦ Voice-TTY Specific Person Request ♦ Voice-TTY Answered Voice ♦ Voice-TTY No Answer ♦ Voice-TTY Busy Signal ♦ Redialing
Branding	<ul style="list-style-type: none"> ♦ Inbound Answer Type Branding ♦ Database Branding 	<ul style="list-style-type: none"> ♦ Branding procedures
Recordings, Answering Machines, Pagers, & Answering Machine Retrieval (AMR)	<ul style="list-style-type: none"> ♦ 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 	<ul style="list-style-type: none"> ♦ AMR ♦ TTY-Voice Pager/Beeper (known) ♦ TTY-Voice Pager/Beeper (unknown) ♦ Voice-TTY Pager ♦ Voice-TTY Answering Machine ♦ Other Recording Variations ♦ Voicemail 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)	<ul style="list-style-type: none"> ♦ 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 	<ul style="list-style-type: none"> ♦ 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 RA gives name in notes ♦ 2LVCO Procedure
Billing	<ul style="list-style-type: none"> ♦ Introduction ♦ Local call description ♦ Paid by Inbound ♦ Toll Free Calls ♦ Calls that Cannot Be Processed ♦ Specific Person Request 	<ul style="list-style-type: none"> ♦ Inbound tells wrong # ♦ Agent dials wrong # ♦ Marine ♦ Roaming Feature ♦ Restricted Roaming ♦ Unrestricted Roaming
HCO (Hearing Carry-Over)	<ul style="list-style-type: none"> ♦ 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 	<ul style="list-style-type: none"> ♦ 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	<ul style="list-style-type: none"> ♦ Enhanced Customer Database Profile ♦ Household Profile ♦ Edit Household Profile ♦ Navigating Customer Database ♦ Household Profile Panels 	<ul style="list-style-type: none"> ♦ Customer Profile Introduction ♦ Use/Edit/New/Delete Customer Profile ♦ Verify Customer Password for Agent ♦ Verify Customer Password – CSR Only ♦ Customer Profile Panels

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ Frequently Dialed Numbers ◆ Preferences ◆ Restrictions ◆ Blocked ◆ Emergency Numbers ◆ STS ◆ STS Messages 	<ul style="list-style-type: none"> ◆ Personal Information ◆ Notes ◆ Frequently Dialed #s ◆ Emergency #s ◆ STS ◆ STS Messages ◆ Database Profile Macros
Directory Assistance (DA)	<ul style="list-style-type: none"> ◆ DA Intro ◆ Interstate DA ◆ Intrastate DA ◆ Automated DA ◆ DA City & State Given; Area Code Unknown ◆ DA Variations ◆ International Transfer Menu ◆ Call Processing -- Calling Intl 	<ul style="list-style-type: none"> ◆ Call Processing -- Calling from International Number ◆ Sprint International Variations ◆ Non-Standard TTY ◆ Answered Foreign Language ◆ Transfer Menu ◆ 900 # Call Processing ◆ 211/311/511 Requests
Device-to-Device Calls	<ul style="list-style-type: none"> ◆ Device to Device Intro ◆ Function Keys & Banner Messages ◆ VCO-TTY & TTY-VCO ◆ VCO-VCO ◆ TTY-HCO & HCO-TTY 	<ul style="list-style-type: none"> ◆ VCO-HCO & HCO-VCO ◆ HCO-HCO ◆ Device to Device Variations ◆ Alternate Call Type reaches recording
Call Processing Variations	<ul style="list-style-type: none"> ◆ 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 	<ul style="list-style-type: none"> ◆ 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

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> FCC Rule Protocol & process flow TTY-Voice and Voice-TTY ASCII 	<ul style="list-style-type: none"> VCO VCO-VCO HCO VCO-TTY & TTY-VCO
Customer Service	<ul style="list-style-type: none"> Functions Language Services 	<ul style="list-style-type: none"> Procedures
Transparency	<ul style="list-style-type: none"> Non-Emergency Calls Emergency Center Evacuation 	<ul style="list-style-type: none"> Network Failure
Emergency Call Procedures	<ul style="list-style-type: none"> Emergency Calls Intro Emergency Services FCC Requirements Emergency Call Processing Emergency Reporting TTY-Emergency 	<ul style="list-style-type: none"> TTY-Emergency TTY Call Release Internet-Emergency Instant Messenger (IM) Emergency Emergency Call Processing Variations Emergency Form Voice-Emergency
Federal Relay Service	<ul style="list-style-type: none"> FedRelay Intro FedRelay Announcement FedRelay Service Explanation FedRelay Procedures FedRelay call types 	<ul style="list-style-type: none"> FedRelay Confidentiality Policy FedRelay Customer Information Requests FedRelay Customer Contacts FedRelay Reporting
STS (Speech-to-Speech)	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Healthy Detachment Intro Objectives Survival Skills Relay Traps 	<ul style="list-style-type: none"> Perception Ways to Reduce Stress Hospitality Phrases
Healthy Relay	<ul style="list-style-type: none"> Introduction Objectives Ergonomics Stretching Exercises Agent Reinforcement Ergonomic Review 	<ul style="list-style-type: none"> Setting up Workstation GUAM - Get Up and Move Ergonomic Relief Slowing the Customer Down Overtime Relaxation
Adult Learner	<ul style="list-style-type: none"> Understanding the Needs of the Adult Learner The Learning Continuum Use of Different Modalities 	<ul style="list-style-type: none"> Modeling Checking For Understanding Guided Practice

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ Edgar Dale's Cone of Experience ◆ Elements of Lesson Design ◆ Focus ◆ Objective & Purpose ◆ Input ◆ Trust in Management 	<ul style="list-style-type: none"> ◆ Independent Practice ◆ Summary ◆ Evaluation ◆ How to Give Effective Instruction ◆ Questioning Guidelines ◆ Feedback - Training & Coaching Technique
Assessing Performance	<ul style="list-style-type: none"> ◆ The Assessment Process in Training ◆ Assessment - What is involved? ◆ Practice Time ◆ Spelling Test ◆ Written tests ◆ Side by side evaluations ◆ Typing 	<ul style="list-style-type: none"> ◆ 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 Diversified Culture	<ul style="list-style-type: none"> ◆ Introduction to Diversified Culture ◆ Diversification ◆ Who Uses Relay ◆ Understanding Our Customer ◆ Special Communication Needs ◆ Pathological vs. Cultural View of Deafness 	<ul style="list-style-type: none"> ◆ Why is there Deaf Culture? ◆ What Do You Know About Deafness ◆ Myths About Deafness ◆ Two Views of Deafness ◆ Loudness Levels ◆ Characteristics of Deafness ◆ The Deaf Community
Deaf Heritage	<ul style="list-style-type: none"> ◆ History in Europe ◆ History in North America ◆ Alexander Graham Bell 	<ul style="list-style-type: none"> ◆ Edward Miner Gallaudet ◆ Oral/Combined Debate ◆ Timeline of Deaf History
The Deaf Community	<ul style="list-style-type: none"> ◆ 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 	<ul style="list-style-type: none"> ◆ 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	<ul style="list-style-type: none"> ◆ What is ASL? ◆ History of ASL ◆ ASL Recognized as Language 	<ul style="list-style-type: none"> ◆ Rules of ASL ◆ Five Parameters of ASL ◆ English vs. ASL Idioms
American Sign Language (ASL) Pt. 2	<ul style="list-style-type: none"> ◆ Evolution of ASL ◆ ASL Syntax 	<ul style="list-style-type: none"> ◆ Translate ASL to English and Vice Versa
TTYPhony & TTY Courtesy	<ul style="list-style-type: none"> ◆ First Teletypewriter ◆ Evolution & History of the TTY ◆ Telecom Laws of Accessibility 	<ul style="list-style-type: none"> ◆ TTY Courtesy ◆ Development of Relay Service Market
Deaf Customers	<ul style="list-style-type: none"> ◆ Statistics from NIDCD 	<ul style="list-style-type: none"> ◆ Relaying for Deaf Customers
Hard of hearing & Late-Deafened Customers	<ul style="list-style-type: none"> ◆ Characteristics of Deaf Customers ◆ Assistive Devices for Deaf Customers ◆ Establishment of Assoc. of Late-Deafened Adults 	<ul style="list-style-type: none"> ◆ Establishment of Hearing Loss Association of America ◆ Deaf Seniors ◆ Military Veterans ◆ Relaying for Late-Deafened Customers
DeafBlind Customers	<ul style="list-style-type: none"> ◆ What Does DeafBlind Mean ◆ Assistive Devices for the DeafBlind ◆ Relaying for the DeafBlind 	<ul style="list-style-type: none"> ◆ DeafBlind Pacing – Allows the RA to slow down the transmission to the Braille machine
Relaying for Speech/ Cognitively Disabled Customers	<ul style="list-style-type: none"> ◆ Speech-Challenged Customers ◆ Assistive Devices ◆ Physically &/or Cognitively Challenged Customers 	<ul style="list-style-type: none"> ◆ Traumatic Brain Injury ◆ Stroke ◆ Communication Related Effects
Relaying for Hearing Customers	<ul style="list-style-type: none"> ◆ Statistics 	

POLICY AND PROCEDURE TOPICS		
Ethics & Confidentiality	<ul style="list-style-type: none"> ♦ Interpreting Standards ♦ ADA & FCC regulations for the Provision of TRS ♦ Regulations pertaining to call content 	<ul style="list-style-type: none"> ♦ TRS Rules – Operator 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, Operator 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 _____
- What is the first thing an agent should look at when a call comes to their station?
 - If a customer requests that the agent verifies the Calling To number before dialing out the agent should type or say something like, _____
 - 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
 - The record feature may be used on conference calls.
TRUE FALSE
 - 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.
 - If a device user requests that you do not announce relay, the agent should:
 - Not identify that this call is through a relay service or ask if the voice person has had a relay call before.
 - Inform the customer they must answer the question (HOW WOULD YOU LIKE YOUR CALL ANNOUNCED Q) GA.
 - Inform the caller they are required to announce the call.
 - What is the purpose of the customer notes?
 - To assist the agent in processing the call how the customer prefers.
 - To annoy the operator.
 - To ensure the customer does not have to repeat their instructions before every call.
 - Both A and C.
 - When using <ALT >, agents should send it:
 - Only once and then pause a few moments before sending it again.
 - Twice and then pause a few moments before sending it again.
 - 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, Operator/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:



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.	I do 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: I/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"	"I 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
1 st 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 3 rd person singular, then you use "has". All other subjects take on "have".
2 nd Person	You have	You have	
3 rd 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' ① Write <i>i</i> before <i>e</i> , except after <i>c</i> ② Write <i>ie</i> after <i>c</i> for words with a <i>sh</i> sound. ③ Write <i>ei</i> when the vowels sounds like an <i>e</i> as in 'weigh'	① achieve, believe, friend receive, receipt, perceive ② ancient, efficient, sufficient, conscience ③ neighbor, vein, reign, rein, deign	Exceptions: Words like counterfeit, either, neither, height, leisure, forfeit, foreign, science, species, seize, weird
2. 's' or 'es' ① Add <i>es</i> if a word ends in <i>ch</i> , <i>sh</i> , <i>ss</i> , <i>x</i> or <i>z</i> ② Add <i>es</i> for most words ending in <i>o</i>	① arch > arches, clash > clashes, class > classes, box > boxes, quiz > quizzes ② tomato > tomatoes, hero > heroes, go > goes, do > does, echo > echoes	Exceptions: Words like allos, duos, pianos, radios, solos, sopranos, studios, videos, typos
3. 'y' to 'i' or not ① For words ending in <i>y</i> preceded by a vowel, retain the <i>y</i> when adding <i>s</i> or a suffix. ② For words ending in <i>y</i> , retain the <i>y</i> when adding <i>ing</i> . ③ For words ending in <i>y</i> , preceded by a consonant, change the <i>y</i> to <i>i</i> before any other suffix	① convey > conveys, employ > employer ② try > trying, justify > justifying, certify > certifying, study > studying ③ try > tried, justify > justifies, certify > certifiable, mystify > mystified, laboratory > laboratories	Exceptions: Words like dryness, shyness
4. drop the final 'e' ① DROP the <i>e</i> when the suffix starts with a vowel. ② DROP the <i>e</i> when the word ends in <i>dge</i> . ③ DROP the final <i>e</i> when adding <i>-ing</i>	① save > saveable, use > usable ② judge > judgment ③ save > saving, manage > managing, trace > tracing, emerge > emerging	Exceptions: DO NOT DROP the <i>e</i> if the word ends in <i>ce</i> or <i>ge</i> (e.g. manage > manageable, trace > traceable)
5. 't' or 'tt' when adding -ing, -ed and some suffixes to verbs ① DOUBLE the <i>t</i> for verbs of one syllable with a single vowel, or a short vowel sound. ② DOUBLE the <i>t</i> for verbs of more than one syllable when the stress is on the last syllable.	① rot > rotting, rotted, rotten fit > fitting, fitted knot > knotting, knotted ②abet > abetting, abetting allot > allotting, allotted commit > committing, committed emit > emitting, emitted forget > forgetting, forgotten (but forgetful)	Exceptions: DO NOT DOUBLE the <i>t</i> 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 ① DOUBLE the <i>r</i> for verbs of one syllable when the final <i>r</i> is preceded by a single vowel. ② DOUBLE the <i>r</i> for words of more than one syllable when the stress does not fall on the first syllable.	①star > staring, starred, starry tar > tarring, tared war > warring, warred (but warfare) scar > scarring, scarred stir > stirring, stirred ②concur > 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 <i>r</i> for verbs of one syllable when the final <i>r</i> is preceded by a double vowel (e.g. fear > fearing, feared) DO NOT DOUBLE the <i>r</i> 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 <i>l</i> when it is preceded by a single vowel.	cancel > cancelling, cancelled, cancellation fulfil > fulfilling, fulfilled, fulfillment level > levelling, levelled travel > travelling, travelled, traveller/traveler	Exceptions: DO NOT DOUBLE the <i>l</i> 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, relay agents (RAs) 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." RAs 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, RAs 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 RAs.

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. RAs 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. RAs 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 RAs. During initial training, RAs 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 RAs.

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. RAs 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 RAs annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through our RAs' 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	It is not appropriate to discuss call content or conversations with others, ever.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
example, to say you had problems placing a calling card call from a pay phone.	
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 RA'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 RA 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 of 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

<p>content of a CapTel call with other persons (RAs, friends, family members, etc.).</p> <ul style="list-style-type: none"> • 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, RA identification number, and schedule, except as is necessary to appropriate individuals and/or institutions or services. • I shall not divulge my personal RA identification 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. <p>_____</p> <p>Employee Name (please print)</p> <p>_____</p> <p>Employee Signature and Date</p>
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Sprint Confidentiality Form

<p>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:</p> <p>AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:</p> <ol style="list-style-type: none"> 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. <p>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.</p>

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(l)(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.

Appendix D: Disaster Recovery

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) 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 RAs 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-affected 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.

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 RAs 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 RAs 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 manager (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 RA 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 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.