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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.

CA Employment Standards

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

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

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

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

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

§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.

Puerto Rico Relay, through a contract between The TRB and Sprint Accessibility, has shown Sprint Accessibility CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint Accessibility requires all CAs to possess clear and articulate voice communications. CAs are given



five written and three hands-on performance evaluations demonstrating the ability to process calls. Sprint Accessibility CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Sprint Accessibility CAs must type 60 wpm prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Sprint Accessibility's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint Accessibility'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 Accessibility provides an extensive process for hiring CAs who provide Speech-to-Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA.
- Recommendation and/or approval from supervisor or manager.
- Attend and complete speech to speech 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 Accessibility'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. Sprint Accessibility's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy. The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE	
Sprint Accessibility 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 CAs ▪ Speech-to-Speech verses 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 	<ul style="list-style-type: none"> ▪ Confidentiality ▪ Transparency ▪ Personal Conversations



STS TRAINING OUTLINE	
Sprint Accessibility Values and Goals	
<ul style="list-style-type: none"> Frequently Dialed Numbers Customer Requests Emergency Call Processing 	<ul style="list-style-type: none"> Developmental Skill Practice Audio Observation
Participation	
<ul style="list-style-type: none"> CA 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 CAs 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

CA Quality Assurance Programs

Sprint Accessibility Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Accessibility Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in five Relay Centers across the U.S. This team along with the support of the Location Managers, Supervisors, and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint Accessibility 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 the 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.

Sprint Accessibility provides a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint Accessibility 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 Sprint Accessibility's CAs typed an average of 83.9 wpm, with at least 95 percent accuracy. In fact, almost a third of Sprint Accessibility's CAs type over 90 wpm.

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

The TRB does not contract to provide VRS services, and is not responsible for the oversight of VRS. As of January 2012, Sprint Accessibility 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.

Through the TRB's contract with Sprint Accessibility, Puerto Rico Relay exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint Accessibility,



calls are not taken over unless it is absolutely necessary to do so. Sprint Accessibility CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of 10 minutes include:

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

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

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

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

As stated in section §64.604 (a)(1) (v), Puerto Rico Relay honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available.

§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. Puerto Rico Relay relies on Sprint Accessibility'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.

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

The TRB contracts with Sprint Accessibility to oversee all TRS CAs for Puerto Rico. In accordance with FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

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

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Accessibility Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Accessibility Center's Agreement Regarding Confidential Customer Information requires CAs to:



- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

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, day of week, time of day, city, state, or any other details that could in some way identify a consumer. The CA may ask to speak to a supervisor or other member of management (as long as it was not their call) in a private area.

STS Limited Exception of Retention of Information

At the request of a Puerto Rico Relay caller, STS CAs will retain information from a call, in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Please see **Appendix E** 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

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

STS and TRS Training: Sprint Accessibility puts control of the call with the users.

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

At the request of the Puerto Rico Relay user, CAs translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training and throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate 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. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability



to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

STS Facilitation of Communication

STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise, or interject personal opinions. STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint Accessibility understands each STS user may also find one technique to be most comfortable. STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible. STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him/her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:

- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask "yes" or "no" questions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user to spell the word

To ensure STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available and observed by supervisors who are available in the STS CA work area to monitor performance. If a development area is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls

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

Puerto Rico Relay, through Sprint Accessibility, provides 24x7 TRS for standard (voice), Text Telephone (TTY), wireless, or personal computer users to place calls. Puerto Rico Relay 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 Puerto Rico Relay retain full control of the length and number of calls placed anytime through relay.

§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:



Puerto Rico Relay, through Sprint Accessibility, works in conjunction with the Local Exchange Carrier (LEC) 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 (IXC). Puerto Rico Relay will also process calls to or from restricted lines (hotel rooms and pay telephones).

All TRS 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. Puerto Rico Relay gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Puerto Rico Relay, through Sprint Accessibility, works with the LEC and IXCs to compile and make available to all TTY users a list of acceptable calling cards. The user's carrier of choice (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 Accessibility 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 Accessibility received a waiver of end user selection of carrier from the FCC. As a result, Sprint Accessibility is offering **domestic and international calling at no charge** with no long-distance fees or long distance call billing for all TRS users through Puerto Rico Relay. Sprint Accessibility's optimal approach provides less cost to the end user, fewer billable minutes to Puerto Rico, greater functional equivalence, and fewer customer complaints.

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

- **Correctional Facilities:** Sprint Accessibility 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 (non-relay callers).
- **Payphones:** Sprint Accessibility will **provide domestic and international calling at no charge** for Puerto Rico Relay callers using payphones.
- **International Locations:** Sprint Accessibility will provide **outbound international calling at no charge** for TRS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint Accessibility is offering **access to Directory Assistance at no charge** for Puerto Rico Relay callers.

§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 Accessibility is offering **domestic and international calling at no charge** with no long-distance fees or long distance call billing for all TRS users through Puerto Rico Relay.



§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 Puerto Rico Relay 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.

The following information is applicable beginning June 1, 2017:

Due to the previously described waiver, Sprint Accessibility will continue to process calls to 900 access numbers. The 900-service 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.

Puerto Rico Relay provides access to all available relay call types. The contract between The TRB and Sprint Accessibility 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.

Standard services provided by Puerto Rico Relay are:

- 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



§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

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

Speed Dialing Functionality

Puerto Rico Relay's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated 10-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number.

Three-Way Calling

Puerto Rico Relay 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 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 LEC can use this feature when placing a call through Puerto Rico Relay. 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.

§64.604(3)(vii) Voicemail 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.

Puerto Rico Relay, through Sprint Accessibility, provides an advanced Phoenix platform which contains CA-generated macros (pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint Accessibility's hot key sends text to the user which says "(RECORDING)." Sprint Accessibility's hot keys are available in all supported languages, including English and Spanish.

Puerto Rico Relay has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the



call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record (CDR) necessary to bill the call.

Puerto Rico Relay does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint Accessibility's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint Accessibility's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call over an ultra-watts line so the end user is not imposed charges for additional calls.

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

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

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

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint Accessibility will use the touch-tone capability embedded in Sprint Accessibility's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail, and recordings which redials the call so the end user is not imposed charges for additional calls. The following information is applicable for the timeframe through May 31, 2017: If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call. The following information is applicable beginning June 1, 2017: Sprint Accessibility 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 Puerto Rico Relay.
- Sprint Accessibility's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure the customer's information is kept confidential.

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.

Puerto Rico Relay accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate PSAP. Through the TRB's contract with Sprint Accessibility, Puerto Rico Relay has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 911 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

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

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

Back up Procedures

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

Training and Support Materials

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



Variations

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

Caller Disconnects Before Connecting to 911 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 CA 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 Accessibility always connects the caller to the police. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to 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 CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

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

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

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



Puerto Rico Relay does not provide, nor the TRB contracts 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.

Puerto Rico Relay does not provide, nor the TRB contracts 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.

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

B.2 Speed of Answer

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

The TRB contracts with Sprint Accessibility, who currently has 13 TRS centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS calls. Sprint Accessibility samples the average answer time a minimum of every 15 minutes for each 24-hour period. Sprint Accessibility's 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 Accessibility's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each 15-minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint Accessibility 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 contract requirement between the TRB and Sprint Accessibility is for Puerto Rico Relay to answer 85 percent of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. The TRB expects Sprint Accessibility will continue to review TRS data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint Accessibility develops a Network forecast for each upcoming scheduling week. Sprint Accessibility also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint Accessibility ensures that total network traffic is accounted for by each of the centers. By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

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

Puerto Rico Relay 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 Accessibility furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint Accessibility'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 the TRB's contract with Sprint Accessibility, Puerto Rico Relay 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 Accessibility measures Puerto Rico Relay's compliance with average speed-of-answer times on a daily basis and reports this information to the TRB on a monthly basis.

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

The TRS contract between the TRB and Sprint Accessibility ensures all relay call centers are provided with sufficient facilities and staffing to provide a GOS of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint Accessibility's Relay system ensures 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 Puerto Rico Relay toll-free number where it enters the Sprint Accessibility 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 TRB.

§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.

Puerto Rico Relay does not oversee VRS services, nor does the TRB 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:

Puerto Rico Relay TRS users have equal access to their chosen IXC through relay to the same extent access is provided to voice users.

TRS 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.

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

Sprint Accessibility provides the necessary network connections and signaling information in compliance with the standards accepted by the ATIS titled "ATIS-0300084, TRS" (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 CAs to process COC calls and subsequent instructions to relay callers:

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

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

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

- **Correctional Facilities:** Sprint Accessibility will process calls from inmates at correctional facilities without charge. Please note, ICS providers may assess fees directly to relay users – as is done for traditional phone users (non-relay callers).
- **Payphones:** Sprint Accessibility will **provide domestic and international calling at no charge** for Puerto Rico Relay callers using payphones.
- **International Locations:** Sprint Accessibility will provide **outbound international calling at no charge** for TRS. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering **access to DA at no charge** for Puerto Rico Relay.

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.

Puerto Rico Relay, through Sprint Accessibility Customer Service, is available 24x7 for all TRS services. Puerto Rico Relay, through Sprint Accessibility, 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.

§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.

Sprint Accessibility's Relay centers are equipped with UPS, generator(s), 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 Accessibility's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Accessibility system and routes the calls to other operating call centers. Puerto Rico Relay customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and CDR 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 Accessibility's Disaster Recovery Plan and the Network Support Plan in **Appendix F**.

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

Puerto Rico Relay does not oversee VRS services, nor does the TRB 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.

Puerto Rico Relay does not oversee VRS services, nor does the TRB 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.

Puerto Rico Relay, through Sprint Accessibility, 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, Puerto Rico Relay will continue to provide Caller ID service where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Puerto Rico Relay receives calling party identifying information including blocking information, from all relay users. Sprint Accessibility'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 Accessibility 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 Puerto Rico, Sprint Accessibility 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 Accessibility announced the first wireless short-code solution for STS users. Sprint Accessibility wireless customers are able to dial *STS (*787) to reach a STS CA quickly and easily. 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 Puerto Rico Relay customers travel, callers will automatically connect to STS based on their physical location. If they are in a place where Sprint Accessibility is the relay provider, the caller is connected to Puerto Rico's STS. If not, callers are automatically transferred to Sprint Accessibility'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 Accessibility expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the

called party is unavailable (busy signal, no answer), the STS user may request the STS message be retained. Over the next 24 hours, the STS user can redial his/her STS service 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 Accessibility continues to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint Accessibility's speed dialing functionality (frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, can be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated 10-digit telephone number without delay. Please see the following graphic for the written Customer Profile form, which encourages STS users to register speed dial entries.

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

	Name	Area Code & Phone Number
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>

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

STS with Privacy Option

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

STS Contact Information

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

Emergency Numbers

In most emergency situations, STS callers dial 911 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to 10 additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local 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.

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

Customer Control

With Sprint Accessibility'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 to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen. With Sprint Accessibility'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's network interfaces with all global Carriers and major LECs, CLECs, and ILECs. Sprint Accessibility'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 Accessibility passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

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

Selective Call Acceptance

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

Selective Call Rejection

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

Selective Call Forward

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



Privacy ID (Anonymous Call Rejection)

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

Instant Access List (Preferred Caller List)

Users may designate a list of up to 10 numbers that can bypass the Sprint Accessibility 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.

Puerto Rico Relay includes 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 Accessibility ensures all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution. The TRB works closely with its TRS provider (Sprint Accessibility) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice, or STS), customer contact information (when given), CA identification numbers, the call handling center and over 45 contact categories including: complaints, inquires and unsolicited commendations. Sprint Accessibility submits reports detailing this information. Each report will include the following information:



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

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

Customer Contacts Online Database (CCOD)

To further support the complaint resolution process, Sprint Accessibility 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 Accessibility Customer Relationship Manager (CRM) assigned to Puerto Rico via email of any complaint entry, ensuring he/she receives timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC. By approximately June 15 of each calendar year, Sprint Accessibility submits a copy of 12-month complaint log report for the period of June 1 - May 31 to the TRB for review. Once the TRB approves this log, we prepare a finalized version of the Complaint Report, including a letter to the Office of the FCC Secretary; and submit via electronic filing on or before July 1 of each year. See **Appendix O**.

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.

Puerto Rico Relay callers may file complaints and commendations regarding Puerto Rico Relay services through the following contacts:

Missy McManus

Customer Relations Manager, Sprint Accessibility

411 Huger Street

Columbia, SC 29201

803 951 1660 (TTY)

803 403 9763 (Voice)

www.sprintrelay.com

melissa.mcmanus@sprint.com

Roberto Miranda

Special Aide, Puerto Rico Telecommunications Regulations Board

500 Ave. Roberto H. Todd

(PDA 18 - Santurce)

San Juan, PR 00907

787-756-0804 Ext: 3052

rmiranda@jrtpr.pr.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.

The TRB understands and complies. 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, do assure callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS do 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 did conduct ongoing education and outreach programs that publicized the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible via the Puerto Rico Relay outreach program.

Outreach projects include:

Outreach Activities

Promotes and increases awareness of Puerto Rico Relay TRS services, and provides presentations at their places of congregation and various agencies. Networks with organizations and businesses to provide outreach education; targets audiences such as: health-related organizations, independent living centers, community centers, schools for deaf and hard of hearing students, churches, and numerous others. See **Appendix H** for reports of events and examples of outreach performed.

In addition, Puerto Rico Relay statistics, industry updates, outreach, and other pertinent information is compiled, organized, written into annual report format, and submitted to the administrators for their review and record keeping. The previous three fiscal years of annual reports (2013-2014, 2014-2015- and 2015-2016) are found in **Appendix I**. The annual report for the fiscal year of 2016 – 2017 is still being finalized by Sprint Accessibility; and it's expected to be completed in early 2018.

Video

The use of video is essential to maximizing awareness to the general public about TRS. A video which is a little over five minutes in length and contains Spanish-language audio and captions, was produced and posted on the Puerto Rico Relay website: <https://www.puertoricorelay.com/what-is-relay>. See **Appendix J**.

Marketing Collateral and Promotional Items

Disseminates TRS flyers and booklets. Uses a Puerto Rico Relay tablecloth to place Puerto Rico Relay literature. Wears Puerto Rico Relay polo shirts to indicate employee representative. Provides



promotional items to give to Puerto Rico Relay TRS consumers with an imprinted Puerto Rico Relay URL.

TRS Information in Phone Directories

Placing Puerto Rico Relay TRS numbers in directories throughout the island makes relay information visible and available to consumers. **Appendix K** contains samples of TRS information and ads in yearly phonebooks and other phone directories.

Puerto Rico TRS Literature

Puerto Rico Relay products and services continued to be promoted via outreach activities where booklets and flyers are disseminated. Puerto Rico Relay TRS literature available for dissemination included:

- TRS flyer listing specific Puerto Rico Relay numbers, customer service numbers, website URL, and contact information
- Customer Profile form for TRS (in Spanish and English languages) and Speech-to-Speech preferences, respectively
- "Don't Hang Up" form in Spanish language for consumers
- Flyer indicating equipment available for free loan from the Equipment Distribution Program
- Application (in Spanish and English languages) to request specific free-loan equipment from the Equipment Distribution Program
- Booklet containing Puerto Rico Relay information about the various products and services available in both Spanish and English languages

See **Appendix L** for Puerto Rico Relay literature and Customer Profile forms.

Social Media Platforms

Puerto Rico Relay has information about its products and services for consumers to read, learn, and participate via its Facebook page at: <https://www.facebook.com/PuertoRicoRelay/> . See **Appendix M** for selected screenshots of this Facebook page.

Website

Puerto Rico Relay maintains and operates the www.puertoricorelay.com website, which provides information on the various relay services, the equipment distribution program, and the Lifeline and Link-Up programs; explains how each relay call is handled; describes certain relay services through videos; and has additional resources. See **Appendix N** for selected screenshots of this website.

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

The following information is applicable for the timeframe through May 31, 2017:

Puerto Rico Relay 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 (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
During late hours (11 PM – 6:59 AM)	10%	
Night/weekend (11 PM – 6:59 AM all day Saturday & Sunday)	10%	50%

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

Sprint's approach as a global telecommunication provider includes the following benefits for Puerto Rico Relay end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, ICS providers may assess fees directly to relay users – as is done for traditional phone users (non-relay callers).
- **Payphones:** Sprint will **provide domestic and international calling at no charge** for Puerto Rico Relay callers using payphones.
- **International Locations:** Sprint will provide **outbound international calling at no charge** for TRS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering **access to Directory Assistance at no charge** for Puerto Rico Relay.

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

ADA Requires TRS Services

In July 1990, the Americans with Disabilities Act (ADA) was passed by our Congress. Title IV of the ADA requires all states provide relay services to deaf and hard of hearing people 24x7. See **Appendix P** for related Acts and Rules pertaining or resulting in the establishment of TRS in Puerto Rico.

Telecommunications Relay Fund

\$64.604 (c)(5)(iii) through \$64.604 (c)(iii)(M) does not pertain to State programs. However, Innovative Communications, in conjunction with Puerto Rico, contracts with Sprint Accessibility who contribute and collect interstate funds through RLSA. It is Puerto Rico's understanding Sprint Accessibility complies with the appropriate mandates under this section.

\$64.604 (c) (7) (N) (1-4) pertain to VRS providers. Puerto Rico 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.

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

- Accept all types of complaints, issues, and comments
- Handle all service type complaints
- Resolve complaints with CA
- 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 Sprint Accessibility CRM 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. Puerto Rico Relay customers also have the option of calling Sprint Accessibility's 24-hour Customer Service department (800-676-3777), or the Sprint Accessibility Customer Relations Manager to file complaints or commendations. Puerto Rico Relay 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. The TRB submits all Puerto Rico Relay complaint reports from June 1 - May 31 to the FCC by the annual July 1 deadline. See Appendix O.

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.

Puerto Rico Relay, through Sprint Accessibility's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint Accessibility 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 Accessibility 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 Accessibility 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.

§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.

In the case of the TRB's Puerto Rico Relay, there have been no substantive changes made within the Puerto Rico Relay TRS, during the current certification period, which may require the TRB to notify the FCC.