

Received & Inspected

JAN 11 2018

FCC Mailroom

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

TRS State Certification Application

)  
)  
)

CG Docket No. 03-123

DOCKET FILE COPY ORIGINAL

**Application for Recertification of  
Pennsylvania Telecommunications Relay Service (PA TRS)**

**and**

**Application for Recertification of  
Pennsylvania Captioned Telephone Relay Service (PA CTRS)**

**for**

**2018 - 2023**

Louise Fink Smith  
Assistant Counsel  
PA Attorney ID No. 77373

Kathryn G. Sophy  
Deputy Chief Counsel

Bohdan R. Pankiw  
Chief Counsel

Eric Jeschke, Analyst

Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 787-5000  
December 20, 2017

Att. of Costas rec'd  
List ABOVE

0

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

TRS State Certification Application	)	
	)	CG Docket No. 03-123
	)	

**Application for Recertification of  
Pennsylvania Telecommunications Relay Service (PA TRS)**

**And**

**Application for Recertification of  
Pennsylvania Captioned Telephone Relay Service (PA CTRS)**

**For 2018 – 2023**

**BACKGROUND**

Pursuant to Title IV of the Americans with Disabilities Act of 1990, Section 225 of the Communications Act of 1934, as amended, 47 U.S.C. § 225, and Sections 64.601 – 64.605 of the Code of Federal Regulations, 47 C.F.R. §§ 64.601 – 64.605, and in accordance with the Federal Communications Commission’s (FCC) Public Notice, released July 19, 2017, at DA 17-697, the Pennsylvania Public Utility Commission (PA PUC), on behalf of the Commonwealth of Pennsylvania (Pennsylvania), hereby applies for renewal of the Pennsylvania Telecommunications Relay Service (PA TRS) certification and for renewal of the Pennsylvania Captioned Telephone Relay Service (PA CTRS) certification for the 5-year period beginning July 26, 2018, and ending July 25, 2023.<sup>1</sup> The PA TRS has been certified by the FCC since July 26, 1993. The PA CTRS has

---

<sup>1</sup> CTRS is an optional offering pursuant to the federal regulations.

been certified by the FCC since July 26, 2008. The PA TRS and PA CTRS are currently certified by the FCC through July 25, 2018.

#### **PA TRS AND PA CTRS PROVIDERS**

Hamilton Relay Inc. (Hamilton Relay) is certificated by the PA PUC as the service provider for the PA TRS. Hamilton Telephone Company d/b/a Hamilton Telecommunications (Hamilton Telephone) is the contracted provider for the PA CTRS. These two entities are affiliated subsidiaries of Nedelco Inc. of Aurora, Nebraska. They provide relay services in several other state jurisdictions. Both service providers assisted in the preparation of this application.

#### **EQUIPMENT DISTRIBUTION FOR LOW INCOME RELAY SERVICE USERS**

Pennsylvania provides free customer premises equipment to low-income relay service users. The Pennsylvania Department of Labor and Industry oversees that program, known as the Pennsylvania Telecommunications Device Distribution Program (TDDP).

#### **COMPLIANCE WITH 47 C.F.R. § 64.404**

Pursuant to 47 C.F.R. § 64.604, the PA TRS and PA CTRS must:

1. Meet all operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604;
2. Be subject to adequate procedures and remedies for enforcement of requirements.
3. Not conflict with federal law.

#### **1. Operational, Technical, And Functional Standards**

The legislative mandate in Pennsylvania's *Universal Telecommunications and Print Media Access Act* (UTPMA), 35 P.S. §§ 6701.1 – 6701.4, endows the PA PUC with the responsibility “to

design and implement a telecommunications relay service program for [Pennsylvania] that is consistent with and meets or exceeds the requirements of the Americans with Disabilities Act of 1990 (Public Law 101-336, 104 Stat. 327).” Section 6701.4(b) of UTPMA further authorizes the PA PUC “to seek on behalf of [Pennsylvania] certification of the telecommunications relay service program” from the FCC. The documentation included in the Appendices to this application details Pennsylvania’s compliance with the FCC’s operational, technical, and functional minimum standards at 47 C.F.R. § 64.604. Changes to relay service in Pennsylvania are documented by PA PUC orders at Docket Nos. M-00900239, *et al.*

## 2. Enforcement

The PA PUC is committed to ensuring that there are adequate procedures and remedies available for enforcing the state requirements and to ensuring compliance with FCC requirements. Hamilton Relay operates the PA TRS pursuant to its certificate of public convenience and a filed tariff. Hamilton Telephone operates the PA CTRS pursuant to a contract that was negotiated with the PA PUC after being selected in a competitive request-for-proposal process. Each service provider is obligated to comply with federal and state laws and regulations. A service provider’s failure to provide relay service equal to or better than the requisite minimum standards could result in sanctions up to and including loss of the privilege to provide the service. Pursuant to the provisions of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 101 - 3316, the PA PUC has the power to revoke a public utility’s certificate of public convenience and impose civil penalties for violation of the Public Utility Code, PA PUC regulation, final direction, or order. *See, e.g.*, 66 Pa. C.S. §§ 501 – 502. The PA PUC also has the power to cancel or to decline to renew the PA CTRS contract for violation of the Public Utility Code, PA PUC regulation, final direction, order, or contract non-conformance.

**3. No Conflicts**

The PA TRS and PA CTRS service providers are not authorized to operate in any way that conflicts with federal law or regulation.

There have been two program changes to the relay service available in Pennsylvania since the last FCC recertification in July 2013. On January 26, 2015, the PA PUC provided a Secretarial Letter to the FCC regarding notice of the replacement of AT&T Corp with Hamilton Relay as Pennsylvania's intrastate TRS provider. Additionally, the PA PUC recently granted the Hamilton entities temporary partial waivers of the state obligations relative to equal access and billing option at PA PUC Docket Nos. P-2017-2596198 (TRS, Hamilton Relay) and P-2017-2596108 (CTRS, Hamilton Telephone). The PA TRS and PA CTRS service providers requested the state waivers in conjunction with temporary partial waivers granted by the FCC in *In the Matter of TRS and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Hamilton Relay, Inc., and Sprint Corp.; Petitioners for Interim Waiver of Sections 64.604(b)(3) and 64.604(a)(3)(ii)*, CG Docket No. 03-123, (DA 16-963) 31 FCC Rcd 9511 (2016).

**EXEMPTIONS FOR COIN SENT-PAID CALLS**

Currently, the PA PUC is exempt from the requirement to handle coin sent-paid calls until the technology will allow provisioning of such calls. The PA PUC notes that, presently, calls made from payphones in Pennsylvania are in accordance with the FCC's "Alternative Plan" at CC Docket No. 90571, which enables TRS and CTRS users to: (1) to make local TRS and CTRS payphone calls free of charge and (2) to make toll calls by calling card or prepaid (debit) cards with rates equivalent to or less than those that would apply to a similar non-TRS or non-CTRS call made using coin sent-paid service. As such technology remains out of reach, the PA PUC requests a continuing exemption,

until technology will allow such call provisioning, from the requirement that the PA TRS and/or PA CTRS handle coin sent-paid calls.

## CONCLUSION

Therefore, the PA PUC, on behalf of the Commonwealth of Pennsylvania, seeks recertification of PA TRS and PA CTRS for the period from July 26, 2018, until July 25, 2023. The PA PUC was granted an extension of time to file this application. If you have any questions concerning this application for certification renewal, please feel contact Louise Fink Smith, PA PUC Law Bureau, [finksmith@pa.gov](mailto:finksmith@pa.gov), or Eric Jeschke, PA PUC Telecom Group, Bureau of Technical Utility Services, [ejeschke@pa.gov](mailto:ejeschke@pa.gov).

Respectfully submitted,  
Pennsylvania Public Utility Commission

Louise Fink Smith, Esq., Assistant Counsel  
Pennsylvania Public Utility Commission  
P.O. Box 3263  
Harrisburg, PA 17105-3265  
(717) 787-5000  
Email: [finksmith@pa.gov](mailto:finksmith@pa.gov)

December 20, 2017

**SUMMARY OF THE  
PA TRS and PA CTRS**

In September 1989, the Pennsylvania Telephone Association (PTA) transmitted a *White Paper Summary of Findings* to the PA PUC relative to the provision of relay service. In it, PTA iterated the needs of the hard-of-hearing and deaf community and advocated the establishment of a statewide relay system. In October 1989, the PA PUC responded to PTA, agreeing with PTA's suggestion to establish a statewide relay system. The PA PUC requested that PTA submit a definite plan in the form of a *Petition to Establish a Pennsylvania Relay System (PA TRS)*. In February 1990, PTA submitted a *Request for Proposal (RFP) for Relay Service*, which was reviewed and accepted by the PA PUC. Formal offers (applications) to provide the contemplated PA TRS were submitted by four prospective service providers and reviewed by a Bid Committee. On May 29, 1990, the PA PUC, at Docket No. M-00900239, granted the PTA Petition and established the PA TRS. The PA PUC also granted AT&T's application at Docket No. A-310125 for a Certificate of Public Convenience (CPC) to provide PA TRS, in response to the RFP. AT&T continued, until December 16, 2014, to provide PA TRS under a CPC at PA PUC Docket No. A-311163, consistent with its AT&T PA PUC Tariff No. 24.

In conjunction with establishment of the PA TRS, the TRS Advisory Board was formed to provide the PA PUC with constituent input on relay matters. The PA PUC's May 29, 1990 Order further established a uniform monthly surcharge (TRS surcharge) based on total access lines in service as the funding mechanism to recover costs associated with the operation the PA TRS. Pennsylvania's Local Exchange Carriers (LECs) collect the TRS surcharge from residential and business wireline access line customers. The funds are remitted monthly to a Fund Administrator. The TRS surcharge is recalculated at least annually by the PA PUC.

In 1995, the PA TRS and the TRS Surcharge were codified at 35 P.S. § 6701.4.<sup>2</sup> At the same time, the Pennsylvania Telecommunication Device Distribution Program (PA TDDP or PA TDD Program) was created by 35 P.S. § 6701.3. The PA TDDP provides free customer premises equipment to low-income relay service users in Pennsylvania. The TDD Program is operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry. Pennsylvania's Initiative on Assistive Technology (PIAT), Institute on Disabilities at Temple University (IDT) located in Philadelphia, Pennsylvania, is the current PA TDD Program manager under contract to OVR. The PA TDDP is funded through the TRS Surcharge.

In 2003, the PA PUC began a trial of captioned telephone relay service (CTRS). The trial progressed to interim service, and in 2006, a contract CTRS provider was selected through an RFP process. The contract was finalized in 2007, and Hamilton Telephone began providing PA CTRS. The PA TDDP also provides free customer premises equipment to low-income CTRS users in Pennsylvania. Hamilton Telephone's current contract runs through June 30, 2019.

---

<sup>2</sup> This statute was further amended in 2004 to add the Print Media Access System Program (PMASP) at 35 P.S. § 6701.3a, and is now known as the *Universal Telecommunications and Print Media Access Act* (UTPMA Act). The PMASP provides a reading service which gives access to print media for persons who are blind. The PMASP is also funded by the TRS surcharge but is not subject to FCC oversight.

In 2014, AT&T advised the PA PUC that it wished to abandon its CPC to provide TRS in Pennsylvania. An RFP for a new TRS provider was issued. On December 4, 2014, at Docket No. A-2014-2447601, the PA PUC approved the application of Hamilton Relay to operate as Pennsylvania's certificated intrastate TRS provider pursuant to its responsive bid. A CPC to provide TRS was issued to Hamilton Relay on January 9, 2015. AT&T's CPC to provide TRS was cancelled. As of December 16, 2014, Hamilton Relay received the hand-off from AT&T and began providing the Pennsylvania intrastate TRS.

Since inception of the PA TRS, PA LECs have remitted the monthly TRS surcharge collections to a Fund Administrator which disburses the fund monies necessary for the operation of the PA TRS, CTRS, TDDP, PMASP, and TRS Board operations. In 2008, the PA PUC modified its policy guidelines relative to the TRS surcharge and codified the TRS surcharge process in regulations at 52 Pa. Code § 63.37. The modification and codification added specific penalties for the failure of a LEC to comply with TRS surcharge requirements. Hamilton Telephone and Hamilton Relay are compensated monthly by the Fund Administrator based on the reported call volumes for the preceding month. Currently, the PA TRS Fund Administrator is US Bank Institutional Trust & Custody in Philadelphia, PA.

PA TRS is accessible via 711 abbreviated dialing. PA CTRS users can be reached by calling 877-243-2823 (English) or 866-217-3365 (Spanish). Both the PA TRS and the PA CTRS have significant consumer education components. Hamilton Relay and Hamilton Telephone respond to customer issues and complaints consistent with federal and PA PUC requirements. All PA TRS and PA CTRS users have access to the full array of the PA PUC's consumer protections and complaint procedures if there are unresolved issues with either relay service. The PA TRS Board is another avenue for PA TRS and PA CTRS users to bring matters to PA PUC attention.

In addition to ensuring that the PA TRS and PA CTRS providers comply with state requirements, PA PUC staff regularly participate in National Association for State Relay Administration (NASRA) functions to ensure the highest level of conformance with national TRS and CTRS standards and to ensure that there are no conflicts with federal law in the operation of PA TRS and PA CTRS. Further, the PA TRS, PA CTRS, and PA TDDP are subject to audit provisions and whistleblower protections.



Before the  
Federal Communications Commission  
Washington, DC 20554

PA TRS and PA CTRS Certification Application

TABLE OF CONTENTS

**Section 1 – Introduction ..... 10**

**Section 2 – Contract Status ..... 12**

**Section 3 – Operational Standards ..... 13**

**Section 4 – Technical Standards ..... 27**

**Section 5 – Functional Standards ..... 33**

**Section 6 – Captioned Telephone Service (CTRS in Pennsylvania) ..... 42**

**Section 7 – Exceeding FCC Minimum Standards ..... 49**

**Appendices**

- ORDER *Hamilton Relay*, Pennsylvania PUC Docket No. A-2014-2447601 (order entered December 4, 2014)
- Certificate of Public Convenience Hamilton Relay
- Tariff TRS PA P.U.C. No. 1
- OPENION & ORDER Pennsylvania TRS Relay Annual Surcharge Recalculation, M-2017-2582552
- ORDER Petition of Hamilton Relay (P-2017-2596198) and Hamilton Telecommunications (P-2017-2596108) Waiver of Equal Access & Billing Requirements
- Pennsylvania TRS Advisory Board By-Laws

## Section 1 Introduction

This is an application on behalf of the Commonwealth of Pennsylvania and the Pennsylvania Public Utility Commission (PA PUC), submitted by the PA PUC's Bureau of Technical Utility Services (TUS) and the PA PUC's LAW Bureau to have the Pennsylvania Telecommunications Relay Service (PA TRS) be recertified as a Telecommunications Relay Service (TRS and CTRS) pursuant to the rules and procedures set forth by the Federal Communications Commission (FCC). The Commonwealth of Pennsylvania is currently certificated for TRS and CTRS for the period July 26, 2013, through July 25, 2018.

Official notices, documentation and correspondence related to this application should be directed to:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, PO Box 3265  
Harrisburg, PA 17105-3265

PA PUC Docket No. M-00900239 and  
PA PUC File No. Bp8 2615659

Operational questions about PA TRS and PA CTRS may also be directed to the following:

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1006 12<sup>th</sup> Street  
Aurora, NE 68818  
Voice/TTY: 402-694-5101  
Fax: 402-694-5037  
E-mail: [dixie.ziegler@hamiltonrelay.com](mailto:dixie.ziegler@hamiltonrelay.com)  
Website: [www.hamiltonrelay.com](http://www.hamiltonrelay.com)

## **Request for Renewal of Current Pennsylvania Certification**

PA TRS provides traditional (teletype- or TTY-based) TRS, Spanish language traditional TRS, and speech-to-speech relay (STS) service. PA CTRS also offers captioned telephone relay service. In this Application for renewal of its certification, the PA PUC has included documentation that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose. This Application also demonstrates that the Pennsylvania relay programs make available informational materials on Pennsylvania and FCC complaint procedures sufficient for users to know the proper procedures for filing complaints. This Application is submitted in narrative form.

This Application sufficiently documents that PA TRS and PA CTRS meet or exceed all the applicable operational, technical and functional mandatory minimum standards set forth in Section 64.604 of the FCC's rules, 47 C.F.R. § 54.604. This Application also demonstrates that the PA PUC relay programs do not conflict with federal law.

Wherefore, the PA PUC requests that the FCC certify the Pennsylvania relay programs provided through Hamilton Relay, Inc. (for PA TRS) and The Hamilton Telephone Company d/b/a Hamilton Telecommunications (for PA CTRS) (respectively Hamilton Relay and Hamilton Telephone and collectively, "Hamilton"). The Hamilton entities are subsidiaries of Nedelco Inc. and are located in Aurora, Nebraska.

## Section 2 Status of Service Providers

Hamilton Relay holds a certificate of public convenience (CPC) to provide TRS in Pennsylvania pursuant to a tariff: TRS PA P.U.C. No. 1, at Docket No. A-2014-2447601.

Hamilton Telephone provides CTRS in Pennsylvania under contract with the PA PUC. The contract commenced July 1, 2012, and has been extended to run through June 30, 2019.

### Supporting Documentation included in Appendices:

- ORDER *Hamilton Relay*, Pennsylvania PUC Docket No. A-2014-2447601 (order entered December 4, 2014)
- Certificate of Public Convenience Hamilton Relay
- Tariff TRS PA P.U.C. No. 1
- OPENION & ORDER Pennsylvania TRS Relay Annual Surcharge Recalculation, M-2017-2582552
- ORDER Petition of Hamilton Relay (P-2017-2596198) and Hamilton Telecommunications (P-2017-2596108) Waiver of Equal Access & Billing Requirements
- Pennsylvania TRS Advisory Board By-Laws

### Section 3 Operational Standards

#### § 64.604 Mandatory minimum standards.<sup>3</sup>

##### (a) Operational standards –

##### (1) Communications assistant (CA).

(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(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.

(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.

Recognizing that a high-quality relay Communications Assistant (CA) is critical to providing consumer satisfaction, Hamilton Relay thoroughly trains its relay CAs to meet the specialized communications needs of individuals who are deaf, hard of hearing or have difficulty speaking. All PA TRS CAs possess clear and articulate voice communications. They have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with the various cultures of relay users, languages and etiquette. All PA TRS CAs provide a typing speed of a minimum of 60 words per minute, which is verified through oral-to-type tests.

CAs are trained to relay calls in a manner that meets and often exceeds FCC standards. The following describes how PA TRS's service provider trains its CAs to meet operational proficiency standards stated above. Before hiring, exams are given to each applicant in the following areas to ensure that the candidate has the needed skills to become a fully trained relay CA:

- (1) Spelling skills (must achieve at least 90% correct)
- (2) Reading skills (must be able to read clearly and distinctly)
- (3) Typing proficiency

Additional details about these requirements are as follows:

#### **Spelling Skills**

The minimum spelling skill required of PA TRS CA is the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. CAs must pass a spelling exam to be

---

<sup>3</sup> Unless indicated otherwise, all citations are to 47 CFR Chapter 64.

eligible to work as a PA TRS CA and score in at least the 90<sup>th</sup> percentile. The spelling skills exam is based on a 12<sup>th</sup> grade spelling level. PA TRS performs similar testing for Spanish language CAs.

### **English Reading, Speaking, and Writing Skills**

CAs must meet all grammar proficiency requirements, including reading, speaking, and writing English at a minimum of a 12<sup>th</sup> grade level prior to employment. Hamilton Relay also tests for diction, clear and articulate voice communications, and a neutral accent by requiring each prospective CA to complete a reading exam.

### **Typing Proficiency**

CAs must type 60 words per minute (wpm) for five minutes. PA TRS exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm. PA TRS CAs have an average typing speed of 79.6 wpm with 98% accuracy.

Newly hired CAs are required to meet the PA TRS minimum typing proficiency standard on an oral-to-text exam within a three-week period before they may take calls. PA TRS also tests its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If a CA is unable to meet the 60 wpm requirement, the CA is removed from live relay calls until further training and compliance can be accomplished.

PA TRS also uses a computer based typing program for continuing enhancement of keyboarding, spelling, and grammar skills. This program is available to all CAs.

PA TRS performs test calls to document current proficiency levels of the CAs and to make sure each is making progress over the term of their employment. Conducting typing tests during live relay calls also ensures that CAs are meeting all typing requirements during actual calls.

### **Culture Training**

All PA TRS staff, including management, receive 20 hours of initial training devoted solely to disability issues including ASL gloss, ASL style and grammar, tone of voice, deaf, hard-of-hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication), and the operation of relay telecommunications equipment, including answering machines and computerized services. This training is done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs are well trained to effectively meet the specialized needs of relay users. In addition to basic training during new hire training, Hamilton Relay provides an additional 12 hours of specialized/cultural training annually.

Spanish language relay CAs must complete the same training and testing as English language relay CAs and must pass tests confirming proficiency in the Spanish language.

### **Proficiency Examinations**

PA TRS CAs begin relaying calls at the end of the three-week training period, assuming all examinations have been passed and proficiency skills have been shown. In addition to these exams and

skill tests, CAs must successfully complete several relay call scenarios to demonstrate proficiency in simulated scenarios. PA TRS's service provider can then determine that a CA is meeting and exceeding all minimum FCC proficiency requirements. Tests are kept confidential, and portions of the tests are changed routinely. CAs are tested on a variety of topics monthly to ensure that they continue to meet all requirements. Individuals who do not pass any portion of the Proficiency Tests are retested and/or will undergo a retraining process.

#### **CA Performance Monitoring to Ensure Each CA Continues to Meet All Requirements**

Hamilton Relay's advanced relay platform includes a unique remote call monitoring system to continually monitor call performance. Such items as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated daily. Each CA is monitored monthly by a relay Supervisor and the Monitoring Supervisor. A minimum of two evaluations are completed each month: one formal call evaluation in which the call is observed from start to finish and one informal evaluation.

Additionally, informal spot checking occurs throughout the month to ensure that CAs are performing properly on every call. Spot checks are performed throughout the month by relay Supervisors, the Monitoring Supervisor and the Lead CAs. A call is observed, and the CA is scored based on the information that was collected during the session. Informal Monitors are used primarily as a coaching tool to provide real time coaching.

Through the call monitoring process, any CA not in compliance with quality standards is taken off duty for further training and re-testing. These CAs are returned to live calls on probation and monitored frequently to ensure continued improvement.

*(v) CAs answering and placing a TTY-based TRS or VRS<sup>4</sup> call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party. The obligation of the CA to stay with the call shall terminate upon the earlier of:*

*(A) The termination of the call by one of the parties to the call; or*

*(B) The completion of the minimum time period.*

#### **Change of a CA**

PA TRS, as a matter of practice, does not substitute agents in the middle of calls to accommodate breaks, quitting times, etc. PA TRS exceeds the FCC standard for substitution of CAs for all forms of TRS which requires that the CA shall stay with a relay call for a minimum of ten minutes.

PA TRS only substitutes a CA if the following should occur:

- If a caller requests a CA of another gender. When this occurs, that gender request is retained for the user throughout the relay call;

---

<sup>4</sup> Video Relay Service (VRS) is not a component of PA Relay.