

Complaint Resolution 47 C.F.R. § 64.604(c)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint supports timely & effective complaint resolution.
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint does not offer incentives to IP CTS users directly/indirectly. Sprint prohibits incentives to hearing health professionals & does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration & Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint complies with the final FCC rule requiring the collection of each new customer's name, address, telephone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification information, except as required by law/regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint's default setting for the IP CapTel phone is to have captions on.
IP CTS Equipment Fee & Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling on Sorenson v FCC & no longer applies. Sprint fully complies with the remainders of the order to provide a warning label on all IP CTS equipment & software.
TRS calls requiring multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint complies for VCO-VCO calls between multiple captioned telephone relay service users, IP CTS/CTS users & IP CTS users; CTS/IP CTS users & TTY users; CTS/IP CTS users & VRS users.
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	Meets	Sprint's emergency calling service is in full compliance with the FCC's rules. For Sprint IP, Sprint handles & routes emergency calls to the applicable PSAP; immediately attempts to re-establish contact in the event of disconnection; automatically places 911 calls at the front of call queues; & obtains registered location info from its users. For IP CTS calls, Sprint provides captioning for emergency calls, & the customer's underlying carrier handles call routing & delivery to/from the PSAP. Sprint provides its users with methods of updating their registered locations.
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	Meets	Sprint provides IP users the ability to register Sprint as their default provider. Sprint assigns 10-digit local numbers, routes, & delivers inbound & outbound calls. Sprint updates the TRS Numbering Directory for

			users who select Sprint as their default IP provider, as required under the FCC. Sprint complies with all porting requirements. Sprint's promo materials include advisories for E911, processes for obtaining a number, number portability, & updating location information.
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Training

Communications Assistant (CA) Training

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

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

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

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

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

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

- ◆ Lectures
- ◆ Visual graphics
- ◆ Flow charts
- ◆ Videos
- ◆ Role-play scenarios

- ♦ Simulated on-line call handling
- ♦ Observation of live-call handling

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

Orientation	<ul style="list-style-type: none"> ♦ Welcome and Introductions ♦ Introduction to Each Other ♦ Sprint (or Vendor Company) ♦ Sprint Values ♦ Sprint Corp Overview ♦ History of Sprint Corporation ♦ Local Telecommunications ♦ Wireless 	<ul style="list-style-type: none"> ♦ Internet Services ♦ Product Distribution ♦ The Sprint Campus (if applicable) ♦ Telecommunications Relay Service ♦ What is Relay? ♦ Relay Agent Training ♦ Relay - Connect to Your Future Video ♦ Observation Guidelines ♦ How a Call Reaches Sprint Relay
Connecting to Relay	<ul style="list-style-type: none"> ♦ The Role of a Relay Agent ♦ Connecting to Relay ♦ 711 ♦ Dedicated Toll-Free Numbers ♦ Equipment ♦ TTY ♦ TTY Basics ♦ TTY Etiquette ♦ Closing a Conversation ♦ Agent Responsibility ♦ Call Set Up ♦ Call Closing ♦ TTY to Voice Closing a Conversation ♦ Operator Role Closure ♦ Operator Close Protocol Guide: ♦ Disallowed Calls ♦ Glossary of Abbreviations & Terms ♦ TTY Practice Session ♦ Auto-Corrected Abbreviations ♦ Standard Abbreviations ♦ Typing Variations ♦ Internet Characters ♦ Non-Baudot Supported Characters ♦ Verbatim - Style ♦ Contraction Spelling ♦ Punctuation ♦ Agent/Operator Role ♦ SKSK ♦ Background Noises while TTY user is Typing ♦ Typing Monetary Units ♦ 711 ♦ TTY Garble During Typing ♦ XXX to Correct Typing Error ♦ Other Communication Devices ♦ Data Transmission Speed ♦ Turbo Code ♦ Turbo Code Interrupt ♦ Enhanced Turbo Dial Thru - (ETurbo) ♦ Disable Turbo Code Mode 	<ul style="list-style-type: none"> ♦ Sprint IP user connects to Agent but wants Customer Service ♦ Sprint IP Two Line VCO ♦ Fed IP Relay ♦ Fed IP Relay call processing ♦ Fed IP Relay Reporting ♦ Fed IP Relay variations ♦ Sprint/Fed IP Relay International Calling ♦ Sprint/Fed IP Variations ♦ Sprint/Fed IP Fast Busy ♦ Sprint/Fed IP 2-Line VCO ♦ Sprint/Fed IP Conversation Lag Time ♦ Sprint/Fed IP Interrupts ♦ Voice Mail Greeting ♦ Cellular & Wireless Phones ♦ Video Relay Service ♦ Devices & Pagers ♦ TTY Public Payphone ♦ Sprint National Relay ♦ Sprint International ♦ Inbound international calling ♦ Sprint International Variations ♦ Non-Standard TTY ♦ Outbound International calling ♦ Transfer Menu ♦ Reseller call processing ♦ CapTel ♦ Relay-CapTel ♦ CapTel-Relay ♦ CapTel Transfers ♦ Dedicated State CapTel Transfer ♦ Alternate Languages ♦ Spanish Language Customer Service ♦ Relay Caller ID ♦ True Caller ID ♦ Per Call Block ♦ Per Line Block ♦ Permanent Call Blocking ♦ Caller ID Blocking - True Caller ID

	<ul style="list-style-type: none"> ✦ American Standard Code Information Interchange (ASCII) ✦ ASCII Interrupts ✦ Sprint IP - Internet Relay ✦ Sprint IP call processing ✦ Internet Relay variations ✦ 'GA' is optional ✦ Sprint IP Standard Svc Explanation ✦ Text Flow ✦ Interruptions without garble ✦ Conversational flow ✦ ASL Emoticons – Text Message Abbreviations ✦ IP Acronyms ✦ Sprint IP Variations 	<ul style="list-style-type: none"> ✦ Connecting Variations ✦ Misdialed Relay Phrase ✦ Dialed 711 Instead of 911 ✦ 711 Spanish ✦ Request for Relay Numbers ✦ Cellular/Wireless problem reaching 711 ✦ 611/811 (LEC Service Access) ✦ 700 ✦ 900 Numbers & Call Processing ✦ Correctional Facility/Prison Calls ✦ Use of Relay through Correctional Facilities: Correctional Facility Call Processing, Relay Abuse ✦ Spanish & French Language Service ✦ International calling restrictions ✦ Info Digit list ✦ 911 Emergency Calls
Overview of System & Equipment	<ul style="list-style-type: none"> ✦ System Overview ✦ Login/Logout ✦ Agent Profile ✦ Clicking the Mouse ✦ Dragging/Dropping ✦ Copy/Paste ✦ Drop Down Boxes ✦ Lists ✦ Radio Button ✦ Scroll Bars ✦ Sliders ✦ Tables ✦ Accessing a Program ✦ Screen Displays ✦ Call Handling Screen ✦ Title Bar ✦ Banner ✦ Conversation Area ✦ Disconnect Message Status ✦ Color Scheme ✦ Agent Text Transmission ✦ Cancel Key ✦ Information Bar ✦ Profile ✦ Help ✦ Call Type 	<ul style="list-style-type: none"> ✦ Dial Window ✦ Scratch Pad ✦ Transfer Panel ✦ Headset Panel ✦ Status Bar ✦ Record Feature ✦ Function Keys ✦ Block ✦ Ctrl-Switch ✦ Switch ✦ The Keyboard ✦ Alpha Keys ✦ Call Handling Keys ✦ Numeric Keys ✦ Cursor Movement Keys ✦ Arrow Keys ✦ Backspace ✦ Error Correction Function ✦ Single Word Edit Function ✦ Word Substitution Feature ✦ Macros Table ✦ Ctrl-Function Keys ✦ Glossary of Telephony Terms ✦ Background Noises ✦ Voice Tones/Descriptive Words ✦ Standard Abbreviations
Phone Image (Tone of Voice)	<ul style="list-style-type: none"> ✦ Professional Phone Image ✦ How phone image is created ✦ Provide warm & friendly greeting ✦ Conversational Tone ✦ Voice Inflection ✦ Audibility & breath control ✦ Pitch ✦ Quality ✦ Operator Role ✦ Relay Role ✦ Relay Skills ✦ Conversational Flow ✦ Staying focused ✦ Listening skills ✦ Customer service skill ✦ Coping skills 	<ul style="list-style-type: none"> ✦ Voice Person Speaking in Third Person ✦ Pacing the Voice Customer ✦ Brief pacing phrases ✦ Repeating information ✦ Voice Customer does not say "GA" ✦ Handling Interruptions ✦ Voice Tone ✦ How Phone Image is Created ✦ Why Conversational Tone? ✦ Transparency, Caller Control & Confidentiality ✦ Rudeness ✦ Create an Exceptional Customer Experience ✦ Announce ✦ Closing ✦ Suggested Redirect Phrases ✦ Transparency & Caller Control

	<ul style="list-style-type: none"> ♦ Phrases ♦ Background Noises ♦ Voice Tones/Descriptive Words 	
TTY-Voice & Voice-TTY	<ul style="list-style-type: none"> ♦ TTY to Voice Introduction ♦ Connecting to outbound customer ♦ Announcement ♦ Explanation of service ♦ Deaf or Hard-of-Hearing Explanation ♦ International Announcement ♦ TTY-Voice Procedures ♦ TTY-Voice Specific Person Request ♦ Variations Specific Person Request ♦ TTY-Voice Answered TTY ♦ Voice Person Not Available ♦ TTY-TTY Call Release ♦ TTY-Voice Answer TTY (TTY-TTY) ♦ TTY-TTY Specific Person Request ♦ TTY-Voice No Answer ♦ Types of Busy Signals ♦ Redialing 	<ul style="list-style-type: none"> ♦ TTY-Voice Busy Signals ♦ Regional 800 ♦ Voice-TTY ♦ Voice-TTY Introduction ♦ Connecting to the outbound customer ♦ Voice Greeting ♦ Voice call progress ♦ Announcement ♦ Voice-TTY call (Hearing Person Answer) ♦ Explanation of service ♦ Voice-TTY Procedures ♦ Voice-TTY Specific Person Request ♦ Voice-TTY Answered Voice ♦ Voice-TTY No Answer ♦ Voice-TTY Busy Signal
Branding	<ul style="list-style-type: none"> ♦ Inbound Answer Type Branding ♦ Database Branding 	<ul style="list-style-type: none"> ♦ Branding procedures
Recordings, Answering Machines, Pagers, & Answering Machine Retrieval (AMR)	<ul style="list-style-type: none"> ♦ Introduction ♦ Recording Feature ♦ Information Line Recording (TTY/ Voice) ♦ Touch Tone Dialing ♦ Using Touch Tones (TTY/Voice) ♦ Audio text interaction ♦ Variations for Recordings ♦ Record Feature Tips ♦ TTY-Voice Recordings ♦ TTY-Voice Recording Information ♦ TTY-Voice Answering Machine ♦ Variations: Answering Machine/ Recording/Pagers ♦ Voice Mail Retrieval 	<ul style="list-style-type: none"> ♦ AMR ♦ TTY-Voice Pager/Beeper (known) ♦ TTY-Voice Pager/Beeper (unknown) ♦ Voice-TTY Pager ♦ Voice-TTY Answering Machine ♦ Other Recording Variations ♦ Voice Mail System ♦ Privacy Manager/Call Intercept ♦ Automatic Redial System Recordings ♦ Switchboards ♦ Redialing Voicemail through Switchboard ♦ TTY-Voice Asking for Specific Person ♦ Live person On Answering Machine Redial
VCO (Voice Carry-Over)	<ul style="list-style-type: none"> ♦ VCO Introduction ♦ VCO Announcement ♦ VCO Service Explanation ♦ VCO Equipment ♦ Non-Branded VCO ♦ Branded VCO ♦ VCO No Answer ♦ VCO Busy ♦ VCO Privacy ♦ VCO Answering Machine ♦ Voice-VCO Answered TTY ♦ Voice-VCO Answered VCO ♦ Two-Line VCO (2LVCO) Intro 	<ul style="list-style-type: none"> ♦ Reverse 2LVCO Intro ♦ Reverse 2LVCO Procedure ♦ VCO Variations ♦ VCO comes in Voice Line ♦ 2LVCO Conference Calls ♦ VCO Requests Relay to give Relay # ♦ VCO Privacy while leaving message ♦ VCO Voice Mail Retrieval ♦ 2LVCO Voice Mail Retrieval ♦ VCO Types and Voices ♦ Inbound Customer Requests VCO/HCO ♦ VCO Requests CA gives name in notes ♦ 2LVCO Procedure
Billing	<ul style="list-style-type: none"> ♦ Introduction ♦ Local call description ♦ Paid by Inbound ♦ Toll Free Calls ♦ Calls that Cannot Be Processed ♦ Specific Person Request 	<ul style="list-style-type: none"> ♦ Inbound tells wrong # ♦ Agent dials wrong # ♦ Marine ♦ Roaming Feature ♦ Restricted Roaming ♦ Unrestricted Roaming
HCO (Hearing Carry-Over)	<ul style="list-style-type: none"> ♦ HCO Intro ♦ HCO Announcement 	<ul style="list-style-type: none"> ♦ Voice-HCO Answered ♦ Voice-HCO Answered TTY (1) (2)

	<ul style="list-style-type: none"> ✦ HCO Service Explanation ✦ People with speech disabilities "S" ✦ Non-Branded HCO ✦ Branded HCO ✦ HCO with Privacy ✦ HCO No Answer ✦ HCO Busy ✦ HCO-Voice Answering Machine 	<ul style="list-style-type: none"> ✦ Voice-HCO recorded message answers ✦ 2LHCO Intro ✦ Two-Line HCO Procedure ✦ Reverse Two-Line HCO ✦ HCO Variations ✦ Inbound requests VCO/HCO ✦ HCO User Requests to Speak
Customer Database	<ul style="list-style-type: none"> ✦ Enhanced Customer Database Profile ✦ Household Profile ✦ Edit Household Profile ✦ Navigating Customer Database ✦ Household Profile Panels ✦ Frequently Dialed Numbers ✦ Preferences ✦ Restrictions ✦ Blocked ✦ Emergency Numbers ✦ STS ✦ STS Messages 	<ul style="list-style-type: none"> ✦ Customer Profile Introduction ✦ Use/Edit/New/Delete Customer Profile ✦ Verify Customer Password for Agent ✦ Verify Customer Password – CSR Only ✦ Customer Profile Panels ✦ Personal Information ✦ Notes ✦ Frequently Dialed #s ✦ Emergency #s ✦ STS ✦ STS Messages ✦ Database Profile Macros
Directory Assistance (DA)	<ul style="list-style-type: none"> ✦ DA Intro ✦ Interstate DA ✦ Intrastate DA ✦ Automated DA ✦ DA City & State Given; Area Code Unknown ✦ DA Variations ✦ International Transfer Menu ✦ Call Processing – Calling Intl 	<ul style="list-style-type: none"> ✦ Call Processing – Calling from International Number ✦ Sprint International Variations ✦ Non-Standard TTY ✦ Answered Foreign Language ✦ Transfer Menu ✦ 900 # Call Processing ✦ 211/311/511 Requests
Device-to-Device Calls	<ul style="list-style-type: none"> ✦ Device to Device Intro ✦ Function Keys & Banner Messages ✦ VCO-TTY & TTY-VCO ✦ VCO-VCO ✦ TTY-HCO & HCO-TTY 	<ul style="list-style-type: none"> ✦ VCO-HCO & HCO-VCO ✦ HCO-HCO ✦ Device to Device Variations ✦ Alternate Call Type reaches recording
Call Processing Variations	<ul style="list-style-type: none"> ✦ CA information ✦ Area Code Only In From Number ✦ Conversational Flow ✦ Static or Poor Connection ✦ Profanity towards Agent ✦ Redialing ✦ Young Children ✦ Inbound Does Not Connect ✦ Inbound ASCII ✦ Tone Judgments ✦ Repeating Information ✦ Restricted Calls ✦ Two calling from numbers ✦ LEC Service Office ✦ 611/811 ✦ Double Letters ✦ Call Waiting Feature ✦ Conference Calls ✦ Party Line Calls ✦ Three-Way Calling ✦ Hard of hearing customer Answers TTY Line ✦ Spanish Calls to Spanish Speaking Agents ✦ Request for Alternate Language ✦ Caller Types in Alternate Language 	<ul style="list-style-type: none"> ✦ Request for Length of Call ✦ T-V Call & V Requests Supervisor Call Backs for TTYs ✦ Multiple Calls ✦ Sensitive Topics ✦ Suicide ✦ Abuse ✦ Illegal Calls ✦ Answering Machines ✦ Hangs Up Before Message Left ✦ Do Not Type Recorded Messages ✦ Answering Machine Full ✦ Change Answering Machine Message ✦ VCO Requests Leave Message 1st out dial ✦ Leaving a Message V-TTY Ans V ✦ Retrieving Messages from TTY V Answering Machine ✦ TTY Screener ✦ Request to Leave TTY Message on Answering Machine ✦ Recordings ✦ Regional 800 ✦ TTY Requests "Dial That Number" ✦ Recording with Relay Option ✦ Alternate Call Recording Reached

	<ul style="list-style-type: none"> ✦ Voice Customer Hangs Up During Call ✦ Variable Time Stamp ✦ Customer Misdialed Phrase ✦ TTY Customer Hangs Up During Call ✦ Non Standard TTY Capability ✦ Relaying Internet Characters ✦ TTY User Does Not Type GA ✦ Dispatch Calls – Pizza, Taxi, etc. ✦ Customer Referral Guidelines ✦ V-T Calls answered by Fax ✦ Customer Requests ✦ Holding for Inbound prior to out dial ✦ Request for Company Information ✦ Request for M/F Agent ✦ Request Specific Agent ✦ Agent Knows Customer ✦ Request for Relay Number ✦ Customer Requests to Call Relay Service ✦ Request for Calling From Number ✦ Request Telephone Number Referral ✦ Request for Date/Time ✦ User Requests Agent to Modify Call 	<ul style="list-style-type: none"> ✦ English/Spanish ✦ Pound ✦ Touch Tone Phone ✦ Advertisements ✦ Do Not Type Recordings ✦ Get Live Person/Rep ✦ Conversation Being Recorded ✦ Dial Number from Recorded Announcement ✦ VCO ✦ Conference Calls ✦ Leave Relay Number ✦ Voice Mail Retrieval ✦ VCO Types & Voices ✦ Prompting ✦ Data Transmission Box ✦ Prompting VCO on Hold ✦ Requests VCO/HCO ✦ HCO ✦ Requests VCO/HCO ✦ Alternate Call Type Recording ✦ Bridge Left Open
Call Take Over Procedures	<ul style="list-style-type: none"> ✦ FCC Rule ✦ Protocol & process flow ✦ TTY-Voice and Voice-TTY ✦ ASCII 	<ul style="list-style-type: none"> ✦ VCO ✦ VCO-VCO ✦ HCO ✦ VCO-TTY & TTY-VCO
Customer Service	<ul style="list-style-type: none"> ✦ Functions ✦ Language Services 	<ul style="list-style-type: none"> ✦ Procedures
Transparency	<ul style="list-style-type: none"> ✦ Non-Emergency Calls ✦ Emergency Center Evacuation 	<ul style="list-style-type: none"> ✦ Network Failure
Emergency Call Procedures	<ul style="list-style-type: none"> ✦ Emergency Calls Intro ✦ Emergency Services ✦ FCC Requirements ✦ Emergency Call Processing ✦ Emergency Reporting ✦ TTY-Emergency 	<ul style="list-style-type: none"> ✦ TTY-Emergency TTY Call Release ✦ Internet-Emergency ✦ Instant Messenger (IM) Emergency ✦ Emergency Call Processing Variations ✦ Emergency Form ✦ Voice-Emergency
Federal Relay Service	<ul style="list-style-type: none"> ✦ FedRelay Intro ✦ FedRelay Announcement ✦ FedRelay Service Explanation ✦ FedRelay Procedures ✦ FedRelay call types 	<ul style="list-style-type: none"> ✦ FedRelay Confidentiality Policy ✦ FedRelay Customer Information Requests ✦ FedRelay Customer Contacts ✦ FedRelay Reporting
STS (Speech-to-Speech)	<ul style="list-style-type: none"> ✦ STS Introduction & History ✦ STS Description ✦ Disabilities ✦ Characteristics of STS users ✦ Stereotypes ✦ Clarifying Phrases ✦ Phrases to Avoid ✦ STS Phone Image ✦ STS Agent Tools ✦ Consistency ✦ Patience ✦ Ask Yes/No Questions ✦ No Personal Conversation ✦ Phrases ✦ STS Alphabet ✦ Transparency/Call Control/ Confidentiality 	<ul style="list-style-type: none"> ✦ Ways to Reduce/Streamline Notes ✦ Standard Abbreviations (STS) ✦ STS-Voice ✦ Voice-STS ✦ STS VCO-Voice ✦ Voice-STS VCO (TTY answer) ✦ Voice-STS VCO (VCO answer) ✦ STS VCO – 2 Line VCO ✦ TTY-STS ✦ STS-TTY ✦ Non-branded HCO-STS ✦ STS-HCO ✦ STS Hold Message ✦ STS Call Takeover ✦ Confidentiality & Transparency ✦ Personal Conversations requests

		<ul style="list-style-type: none"> ♦ STS Variations
Healthy Detachment	<ul style="list-style-type: none"> ♦ Healthy Detachment Intro ♦ Objectives ♦ Survival Skills ♦ Relay Traps 	<ul style="list-style-type: none"> ♦ Perception ♦ Ways to Reduce Stress ♦ Hospitality ♦ Phrases
Healthy Relay	<ul style="list-style-type: none"> ♦ Introduction ♦ Objectives ♦ Ergonomics ♦ Stretching Exercises ♦ Agent Reinforcement ♦ Ergonomic Review 	<ul style="list-style-type: none"> ♦ Setting up Workstation ♦ GUAM - Get Up and Move ♦ Ergonomic Relief ♦ Slowing the Customer Down ♦ Overtime ♦ Relaxation
Adult Learner	<ul style="list-style-type: none"> ♦ Understanding the Needs of the Adult Learner ♦ The Learning Continuum ♦ Use of Different Modalities ♦ Edgar Dale's Cone of Experience ♦ Elements of Lesson Design ♦ Focus ♦ Objective & Purpose ♦ Input ♦ Trust in Management 	<ul style="list-style-type: none"> ♦ Modeling ♦ Checking For Understanding ♦ Guided Practice ♦ Independent Practice ♦ Summary ♦ Evaluation ♦ How to Give Effective Instruction ♦ Questioning Guidelines ♦ Feedback - Training & Coaching Technique
Assessing Performance	<ul style="list-style-type: none"> ♦ The Assessment Process in Training ♦ Assessment - What is involved? ♦ Practice Time ♦ Spelling Test ♦ Written tests ♦ Side by side evaluations ♦ Typing 	<ul style="list-style-type: none"> ♦ Acceptable Time Frame ♦ Acceptable Is Relative ♦ Ways to "Coach" ♦ Feedback ♦ Maintain Self-esteem & Motivate ♦ Pass/Fail Guidelines ♦ Introduce Assessment Form ♦ Form Set-Up
Introduction to Diversified Culture	<ul style="list-style-type: none"> ♦ Introduction to Diversified Culture ♦ Diversification ♦ Who Uses Relay ♦ Understanding Our Customer ♦ Special Communication Needs ♦ Pathological vs. Cultural View of Deafness 	<ul style="list-style-type: none"> ♦ Why is there Deaf Culture? ♦ What Do You Know About Deafness ♦ Myths About Deafness ♦ Two Views of Deafness ♦ Loudness Levels ♦ Characteristics of Deafness ♦ The Deaf Community
Deaf Heritage	<ul style="list-style-type: none"> ♦ History in Europe ♦ History in North America ♦ Alexander Graham Bell 	<ul style="list-style-type: none"> ♦ Edward Miner Gallaudet ♦ Oral/Combined Debate ♦ Timeline of Deaf History
The Deaf Community	<ul style="list-style-type: none"> ♦ Introduction to the Deaf Community ♦ National Association of the Deaf ♦ Contributions to Society ♦ Mainstreamed Schools ♦ Sign Language Interpreters ♦ Different Communication Systems ♦ Exposure to English ♦ DEAF President Now ♦ Attitude Changes toward the Deaf Community 	<ul style="list-style-type: none"> ♦ American Athletic Association of the Deaf ♦ National Theatre of the Deaf ♦ Assistive Devices ♦ Gaining Acceptance in the Deaf Community ♦ Changes in the Deaf Community ♦ Working with a Sign Language Interpreter ♦ Interpreting Standards ♦ Equal Access ♦ Cochlear Implant Controversy
American Sign Language (ASL) Pt. 1	<ul style="list-style-type: none"> ♦ What is ASL? ♦ History of ASL ♦ ASL Recognized as Language 	<ul style="list-style-type: none"> ♦ Rules of ASL ♦ Five Parameters of ASL ♦ English vs. ASL Idioms
American Sign Language (ASL) Pt. 2	<ul style="list-style-type: none"> ♦ Evolution of ASL ♦ ASL Syntax 	<ul style="list-style-type: none"> ♦ Translate ASL to English and Vice Versa
TTYPhony & TTY Courtesy	<ul style="list-style-type: none"> ♦ First Teletypewriter ♦ Evolution & History of the TTY ♦ Telecom Laws of Accessibility 	<ul style="list-style-type: none"> ♦ TTY Courtesy ♦ Development of Relay Service Market
Deaf Customers	<ul style="list-style-type: none"> ♦ Statistics from NIDCD 	<ul style="list-style-type: none"> ♦ Relaying for Deaf Customers

Hard of hearing & Late-Deafened Customers	<ul style="list-style-type: none"> ♦ Characteristics of Deaf Customers ♦ Assistive Devices for Deaf Customers ♦ Establishment of Assoc. of Late-Deafened Adults 	<ul style="list-style-type: none"> ♦ Establishment of Hearing Loss Association of America ♦ Deaf Seniors ♦ Military Veterans ♦ Relaying for Late-Deafened Customers
DeafBlind Customers	<ul style="list-style-type: none"> ♦ What Does DeafBlind Mean ♦ Assistive Devices for the DeafBlind ♦ Relaying for the DeafBlind 	<ul style="list-style-type: none"> ♦ DeafBlind Pacing – Allows the CA to slow down the transmission to the Braille machine
Relaying for Speech/ Cognitively Disabled Customers	<ul style="list-style-type: none"> ♦ Speech-Challenged Customers ♦ Assistive Devices ♦ Physically &/or Cognitively Challenged Customers 	<ul style="list-style-type: none"> ♦ Traumatic Brain Injury ♦ Stroke ♦ Communication Related Effects
Relaying for Hearing Customers	<ul style="list-style-type: none"> ♦ Statistics 	
Ethics & Confidentiality	<ul style="list-style-type: none"> ♦ Interpreting Standards ♦ ADA & FCC regulations for the Provision of TRS ♦ Regulations pertaining to call content 	<ul style="list-style-type: none"> ♦ TRS Rules – Operator Standards ♦ Relay Center Agreement Regarding Confidential Customer Info

On-Going Quality Focus Skill Training

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

- ♦ Quality Focus Skill training - monthly
- ♦ Diversified Culture Awareness training - monthly
- ♦ Customer Service Initiative – monthly
- ♦ Check for Understanding – monthly
- ♦ Grammar and Spelling Rules - bi-annual

Quality Focus Skill Training topics from 2016/2017:

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

Feb 2017	Determining familiarity with relay services, Call type appropriate service explanations, Appropriate macro use (EXPLAINING RELAY)?
Mar 2017	Following customer note and customer typed Instructions
Apr 2017	Announcement protocol including a prompt state-specific announcement/greeting used/ID number given, Call closing protocol, Appropriate closing and macro for call type.
May 2017	Specific person announcement procedure
Jun 2017	Call transfer procedure, Adapting to call procedures changes as directed by the customer, 711 transfer compliance

Ongoing Diversified Culture Awareness Training

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

Diversified Culture Awareness Training topics from 2016/2017:

Jan 2016	Diversified Culture-What's That? Diversification in Communication, Considerations, Who uses the relay service? Why is it important for us to understand our customers? Why is it important for us to recognize their special communication needs?
Feb 2016	The History of Deafness
Mar 2016	Ways to Detach
Apr 2016	Deaf Nation Expo is...
May 2016	American Sign Language is..., CODA means...
June 2016	All About CapTel, How it works
July 2016	Baseball Signs originated from Sign Language
Aug 2016	Accessibility for All, Sprint corporate responsibility
Sept 2016	Diversity-Equality-Inclusion
Oct 2016	Disability is Diversity, Stretches to do at your desk
Nov 2016	Disability Awareness
Dec 2016	Disability Advocacy
Jan 2017	View of a person's abilities
Feb 2017	Highlight: Edward Verne Roberts – American Disability Activist
Mar 2017	Disability Awareness
Apr 2017	Parkinson's Awareness Month
May 2017	Limb Loss Awareness Month

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

**Check For Understanding
Quality Focus March 2017**

Please return to your supervisor by March 7, 2017.

- Name _____ Supervisor _____
- 1) What is the first thing an agent should look at when a call comes to their station?
 - 2) If a customer requests that the agent verifies the Calling To number before dialing out the agent should type or say something like, _____
 - 3) The IP Call number to dial is entered by the inbound, therefore you DO NOT need to verify the Calling To number before outdialing on an IP call, even if it's in the Customer Notes to do so.
TRUE FALSE
 - 4) The record feature may be used on conference calls.
TRUE FALSE
 - 5) If the customer has TYPE RECORDINGS as a preference or instruction the agent should not transmit _____. This instruction indicates that the customers the agent to type the _____ recording.
 - 6) If a device user requests that you do not announce relay, the agent should:
 - a) Not identify that this call is through a relay service or ask if the voice person has had a relay call before.
 - b) Inform the customer they must answer the question (HOW WOULD YOU LIKE YOUR CALL ANNOUNCED Q) GA.
 - c) Inform the caller they are required to announce the call.
 - 7) What is the purpose of the customer notes?
 - a) To assist the agent in processing the call how the customer prefers.
 - b) To annoy the operator.
 - c) To ensure the customer does not have to repeat their instructions before every call.
 - d) Both A and C.
 - 8) When using <ALT >, agents should send it:
 - a) Only once and then pause a few moments before sending it again.
 - b) Twice and then pause a few moments before sending it again.
 - c) As many times as they want since they are in the buffer and can be canceled when the phone is answered.

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

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

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

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



GRAMMAR MATTERS

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

I and Me Usage

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

Examples:

I

1. Harry and I went to the store.

Test: Me went to the store. (Incorrect!)

Test: I went to the store. (Correct!)

2. Jake invited Brian and I over for dinner.

Test: Jake invited I over for dinner. (Incorrect!)

Test: Jake invited me over for dinner. (Correct!)

Me

1. Will you take my brother and me to the movies?

Test: Will you take I to the movies? (Incorrect!)

Test: Will you take me to the movies? (Correct!)

2. Sam, Jennifer, and me went to the beach.

Test: Me went to the beach. (Incorrect!)

Test: I went to the beach. (Correct!)

There, Their, and They're Usage

pronounced the same	When to Use	How to Test
there	naming a place, a thing, or the existence of something	if you can replace "there" with "there" you have it right!
their	showing possession	if you can substitute "their" with "our" you have it right!
they're	combining the words "they" and "are"	"they" is a pronoun and "are" is the verb. if you can substitute "We are" you have it right!

Have and Has Usage

	Singular	Plural	Hint
1 st Person	I have	we have	"have" and "has" are both present tense conjugations of the verb "to have", and we use "have" or "has" depending on the subject. if the subject is 3 rd person singular, then you use "has". All other subjects take on "have".
2 nd Person	you have	you have	
3 rd Person	has/hasn't has	they have	

It's and Its Usage

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

Ten Common Spelling Rules

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

Staff Training

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

All Sprint employees are required to take ethics and confidentiality training. The Sprint Code of Conduct is applicable to Sprint employees and its controlled subsidiaries, the Sprint Board of Directors and anyone we authorize to act on Sprint's behalf. The Code establishes the basic foundation of Sprint's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders, and the communities in which we do business. The Sprint Code of Conduct outlines our ethical and legal responsibilities as employees, as well as our interactions with customers, competitors and suppliers. One of our most valuable assets is our reputation for honesty and fairness, and our commitment to uphold this responsibility. The Code is

a go-to resource when questions of legal or ethical appropriateness arise. We are bound by the Code and the specific operational policies of Sprint. Annual Code certification is required. Sprint also maintains an Ethics Helpline, a 24-hour resource for employees and other stakeholders to confidentially and safely seek advice or report any suspected violation of the Code of Conduct, such as fraud, sexual harassment, discrimination, or any illegal conduct in the workplace.

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

Appendix C: TRS Pledge of Confidentiality

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

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

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

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

Sprint Code of Conduct

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

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an

investigation may be subject to corrective action up to and including termination. This information is contained within Sprint's Code of Conduct all employees are required to complete annually.

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

Training on Ethics

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

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

Confidentiality

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

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

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

To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.

elaboration. Maintain a professional and friendly image with customers.	
It is appropriate to discuss with a member of management technical or procedural components of a call. For example, to say you had problems placing a calling card call from a pay phone.	It is not appropriate to discuss call content or conversations with others, ever.
It is appropriate to call for a Supervisor to look at your screen for assistance with the call.	It is not appropriate to request assistance from the agent sitting next to you.

All relay center personnel are required to sign and abide by the Sprint Relay policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. The relay center Code of Ethics requires the following:

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

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

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

CTI Confidentiality Form

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

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

Under no circumstance are identifiers to be used while discussing a call (terminology that would identify personal information about a caller including, but not limited to, gender, name, address, and business information). The standard, objective way off referring to callers is to identify the person using the captioned telephone as the "client," while the other party or parties are referred to as the "doc(s)." Furthermore, any person not employed by CapTel, Inc. or its parent company shall not be allowed on or near the call floor.

Nor shall information regarding CapTel clients be discussed or posted in any public forum.

Employees agree to abide by the following:

- I shall only discuss the content of a CapTel call (production, training, timing, or otherwise) with a member of the administrative team under the guidelines provided above. I will not discuss the content of a CapTel call with other persons (CAs, friends, family members, etc.).
- I shall disclose only appropriate information regarding a training/timing call to a member of the administrative team according to the guidelines documented above.
- I shall not divulge specific information related to the work or calls I have heretofore processed, upon termination of my employment at CapTel or at any time thereafter.
- I shall not disclose information which could be used to identify specifics about a particular consumer to anyone except a member of the administrative team according to the guidelines documented above.
- I shall not act upon any information received via a CapTel call.
- I shall not listen to, get involved in, or position myself to observe a CapTel call being processed by another employee.
- I shall not disclose information which could be used to identify specifics about any employee including, but not limited to, name, CA number, and schedule, except as is necessary to appropriate individuals and/or institutions or services.
- I shall not divulge my personal CA number in conjunction with my name except as required by a member of the administrative team.
- I shall not disclose the technical aspects of my position to anyone not employed by CapTel/Ultratec.
- I shall not bring visitors, including children, onto the call floor.
- I shall remain off of the call floor if I am not scheduled to be at work.

Employee Name (please print)

Employee Signature and Date

Sprint Confidentiality Form

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

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

- 1 ALL TELECOMMUNICATIONS RELAY SERVICE (TRS) CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL.** I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.
- 2 NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TRS CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES.** I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.
- 3 NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER.** I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.
- 4 NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER.** I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.
- 5 TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.**
- 6 I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.**
- 7 ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.**

I have read and understand the Sprint Relay Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action

that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE AND DATE

MANAGER/SUPERVISOR SIGNATURE AND DATE

Sprint Federal Confidentiality Form

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

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

~ Employee and Subcontractor Role ~

- 1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
- 2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
- 3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
- 4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
- 5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as \$5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
- 6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than \$1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
- 7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(l)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000.00.
- 8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.

9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).

10) This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

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

Employee/Subcontractor Signature Date

Supervisor Signature Date

Company Name (Print or Type)

Service Type (check one)

_____ Captioned Telephone/CapTel

_____ Relay Conference Captioning/RCC

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

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

Appendix D: Disaster Recovery

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

Call Center Power Solutions

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

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

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

Emergency Procedures Training

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

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

- ◆ **Tabletop Exercises:** In a round-table setting, members of the response team meet to discuss responsibilities and describe how to react as a team in an emergency.

- ◆ Walk-Through Drills: Both the response team and management perform their emergency functions within the emergency response location.
- ◆ Functional Drills: Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. Often, these functions are tested separately to help identify improvement areas and to eliminate confusion.
- ◆ Full-scale Exercises: Exercises simulated to be as close as possible to a real-life disaster. They may involve a combination of response teams, management, field operations, and outside agencies.
- ◆ After Action Reviews (AARs): Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- ◆ Maturity: Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Business Continuity

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

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

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

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

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

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

Call Center Evacuation Events

Sprint has plans in place to deal with call center events such as fires. Each call center has a designated Safety Marshal and clear chain of command. As a first step, the situation is identified and the threat is assessed. If evacuation is necessary, the local authorities (e.g., 911) are immediately alerted along with the Call Center Service Assurance Center (CCSA) and the Traffic Management Control Center (TMCC). Call center management and Sprint Corporate Security are also alerted.

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

Proactive Measures

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

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

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

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

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

- ◆ Wind burst that blew off a portion of the roof of our Syracuse, NY call center

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

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

TRS Data Center Disaster Planning

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

TRS Winter Preparedness Plan

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

Known Event

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

Unknown Event

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

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

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

CapTel-Specific Disaster Recovery Information

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

CapTel has established contingency plans in the event of a complete and extended loss of a CapTel call center. The plan includes a number of steps based on the estimated duration of the outage and takes advantage of the relative short travel time between the Wisconsin CapTel call centers. The first phase is organized to initiate the recovery process within hours and can be fully completed within days. This involves expanding service into available space in the operating call center locations and other CapTel facilities

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

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

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

Customer Notification Procedures

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

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

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

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

- ◆ How the problem occurred

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

Temporary Delay Message

If approved by the state, Sprint can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack or natural disaster that significantly increased the number of calls to the relay center, Sprint can add a temporary recording that alerts voice and TTY users, such as: "THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER."

Telecommunications Service Priority (TSP)

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

Appendix I: Complaint Logs from 2013-2017

Complaint Log 2012-2013

Complaint Tracking for MS (06/01/2012-05/31/2013). Total Customer Contacts: 1

Tally	Date of Compl.	Cat. # Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution	Status
1	05/07/13	617	Customer reports the Communication Assistant was rude. The customer explained the Communication Assistant interacted with frustrating remarks and sighs. The customer explained she has been speaking with her deaf sister on the Relay for many years, and the service today was intolerable. The supervisor will be notified. Follow up requested.	05/07/13	Communication Assistant ID currently not assigned. Attempted to contact customer at 8:45am and 11:51am on May 6th, no answer. On May 6th, at 10:47am follow up message was left for the customer.	C

Date Generated: Wed, Dec. 10th, 2014 @ 11:12:27 AM CT

Complaint Log 2013-2014

Complaint Tracking for MS (06/01/2013-05/31/2014). Total Customer Contacts: 0

Tally	Date of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
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Date Generated: Mon, Jan. 26th, 2014 @ 01:55:14 PM CT

Complaint Log 2014-2015

Complaint Tracking for MS (06/01/2014-05/31/2015). Total Customer Contacts: 1

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/04/15	Customer's daughter reported that customer is experiencing some delays in captions behind the spoken words on the CapTel phone.	06/17/15	Customer Service Representative investigated and identified two calls with delays outside the norm of 4-6 seconds. Call details were sent to the Call Center for follow-up with the Communication Assistant by the supervisor. Communication Assistant's supervisor increased monitoring and checking to optimize the Communication Assistant's captioning performance. Customer Service Representative sent a follow-up email to the customer reporting action taken and offered further follow-up on any future calls.

Complaint Log 2015-2016

Complaint Tracking for MS (06/01/2015 - 05/31/2016). Total Customer Contacts: 1

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	07/26/15	Speech to Speech customer says the 24-hour message rule is ludicrous! People with speech problems having to repeat over and over is ridiculous. Communication Assistants have ALWAYS saved messages before when it was supposed to be for a live person not voice mail. Assistant Supervisor documenting the concern apologized for the inconvenience. Follow-up requested via phone call. Internal Update Performed	07/26/15	Called customer to assist and to explain about STS service. Was unable to make contact because the customer hung-up on me several times. Referred the Customer Contact to the Handling Center to follow-up.

Date Generated: Mon, Jan. 26th, 2016 @ 11:47:16 AM CT

Complaint Log 2016-2017

Complaint Tracking for MS (06/01/2016-05/31/2017). Total Customer Contacts: 0

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
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Date Generated: Fri, Jan. 2nd, 2017 @ 07:56:46 AM CT

Consumer Need to Know Information

Mississippi Telecommunications Relay Service

This service allows customers who use text telephones to communicate with others. A special operator, called a Communication Assistant (CA), translates text messages into speech for non-text telephone users and vice versa.

Customers may place a call through the relay center by calling toll free 7-1-1, 1-800-855-1000 (Voice), 1-800-562-2233 (TTY) or 1-800-855-1234 [ASCII (PC)] and providing the Communication Assistant the necessary information to set up the call, including the carrier of choice on calls outside the Calling Zone.

Public Telephone Calls Using Relay Services

People who use relay services to make long distance calls on pay telephones may pay for these calls with a calling card. A calling card allows you to have calls billed to your telephone or to your card account. Calling cards may be used at coin telephones as well as any other telephone. The calls are billed at the same rate as long distance calling card calls that do not use relay services.

Local calls through a relay service from a pay telephone are free of charge.

TTY Operator/Directory Assistance

Call 1-800-855-4000
(TTY* only. Nationwide service is provided by Sprint)

AT&T Contact

	Residence	Business
AT&T MISSISSIPPI		
Establishing Phone Service (att.com/newservice)	1-800-268-2020	1-866-620-6000
Repair (24/7 or repair.att.com)	1-877-737-2478	1-866-620-6900
Billing (att.com/pay)	1-800-268-2020	1-866-620-6000

Public Utility Commission Contact

The Mississippi Public Service Commission regulates AT&T Mississippi and other utilities and is located at P.O. Box 1174, Jackson, MS 39215-1174.

Main Number:
601-961-5400

Main Number:
601-961-5400

Main Number:
601-961-5400

Northern District Complaint Number:
601-961-5450

Central District Complaint Number:
601-961-5442

Southern District Complaint Number:
601-961-5440

In-State Toll-Free Number:
1-800-356-6428

In-State Toll-Free Number:
1-800-356-6430

In-State Toll-Free Number:
1-800-356-6429

Annual Report

July 2015 – June 2016

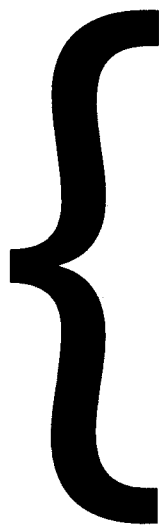






Make calls anytime.

CONTENTS



From the Customer Relations Manager I

Outreach and Deliverables

Mississippi Relay Statistics

Sprint Relay News

Sprint Relay Team

Appendices



**MISSISSIPPI
RELAY SERVICE
JUST DIAL**

MISSISSIPPI RELAY

2013: Recertified by the Federal Communications Commission until 2018.

2013

RECERTIFIED BY THE FCC FOR
FIVE YEARS.

2014: Awarded contract extension through June 30, 2017.

**Attended 120 events in 41 cities,
educating over 60,000 people.**

2015

SPRINT RELAY CELEBRATED
25 YEARS.

2015: Sprint Relay celebrated 25 years.

2016: Revamped Mississippi Relay website.

2016

REVAMPED
MISSISSIPPI RELAY
WEBSITE.

[FROM THE CUSTOMER RELATIONS MANAGER I]

Dear Mississippi Public Service Commission:

Sprint Relay is appreciative of the opportunity to provide relay services, education, and customer support to Mississippi consumers from July 2015 to June 2016.

With support from the Mississippi Relay outreach specialists, Mississippi Relay activities included exhibitions at:

- Tyson Food Health Fair in Forest; 500 attended.
- Senior Day at the State Fair in Jackson; 1,000 attended.
- Mississippi Speech-Hearing-Language Association three-day conference in Jackson; 300 attended.
- National Association of Social Workers (NASW) three-day conference in Biloxi; 300 attended.
- Mississippi Early Detection and Intervention Program (EHDI-MS) in Jackson; 100 attended.
- Mississippi Disability Mega Conference in Jackson; 500 attended.

Mississippi Relay accomplishments included:

- Acquiring an Outreach Experts, Inc., outreach specialist for CapTel phone and service education.
- Revamping the Mississippi Relay website.
- Lending 326 pieces of specialized equipment to consumers.
- Working with an intern for three days from the Mississippi School for the Deaf, in partnership with the Dept. of Vocational Rehabilitative Services.

Session minutes this fiscal year showed:

- *TTY*: A significant decrease of 18.2%, or 30,315 minutes
- *Speech-to-Speech*: An increase of 367%, or 1,867 minutes
- *CapTel*: A decrease of 8.8%, or 43,276 minutes

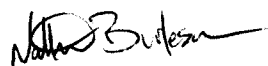
With each year, the number of TRS users has consistently declined. This reporting year saw 20,247 TRS users, a significant decrease of 26.6% or 7,350 fewer users, compared to last year.

Sprint Relay continued to provide excellent customer support and customer satisfaction for TRS and CapTel, as evidenced by only a single TRS complaint and no CapTel complaints by consumers.

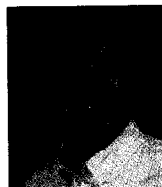
To ensure continued compliance with consumers statewide and nationwide, I completed mandatory trainings and testings provided by Sprint on topics such as complying with ethics, maintaining professional conduct during work activities, avoiding conflicts of interest, and securing customer proprietary network information. I also became certified after completing the Federal Communications Commission's Internet Protocol CapTel Service Consent Decree course.

Thanks go to the Mississippi Public Service Commission, the Mississippi Relay Equipment Distribution Program coordinator, the CapTel outreach specialist, and the Mississippi Relay users for allowing us to provide services.

With appreciation,



Nathan Burleson
Customer Relations Manager I



Nathan A. Burleson, Customer Relations Manager I
900 S. Shackleford Suite 300 | Little Rock, AR 72211
nathan.burleson@sprint.com | (501) 246-8227 V/VP | (501) 221-3241 Fax

OUTREACH & DELIVERABLES

The Mississippi Relay manager, Equipment Distribution Program coordinator, and outreach specialist promoted relay service awareness through product and service demonstrations, exhibitions, presentations, and information dissemination throughout the state, and via the revamped www.mississippirelay.com website. Activities focused on traditional TRS, Speech-to-Speech (STS), and CapTel. Some highlights from this reporting year include:

- Armed Forces retirement home in Gulfport; 30 attended.
- Tyson Food Health Fair in Forest; 500 attended.
- Mississippi Association of Housing and Redevelopment three-day conference in Biloxi; 400 attended.
- Mississippi Association of the Deaf picnic in Hattiesburg; 125 attended.
- Senior Day at the State Fair in Jackson; 1,000 attended.
- Mississippi Department of Education – Office of Special Education in Jackson; 100 attended.
- Mississippi Speech-Hearing-Language Association three-day conference in Jackson; 300 attended.
- National Association of Social Workers three-day conference in Biloxi; 300 attended.
- Mississippi Early Hearing Detection and Intervention Program in Jackson; 100 attended.
- Mississippi Disability Mega Conference in Jackson; 500 attended.



The Mississippi Relay outreach team also went to places of worship, senior centers, county fairs, and senior living complexes. Towns where outreach education was provided included:

- | | |
|---------------|-----------------|
| • Batesville | • Holly Springs |
| • Biloxi | • Jackson |
| • Brookhaven | • Pearl |
| • Clinton | • Port Gibson |
| • Forest | • Senatobia |
| • Gulfport | • Vicksburg |
| • Hattiesburg | |



Personnel

An Outreach Specialist from the Outreach Experts, Inc. (OEI), team was brought onboard in 2015. This individual, who resides in Jackson, promotes education throughout the state about Internet-based CapTel phones and services. OEI and Mississippi Relay operate on a separate plan and budget.

For three days in June, Mississippi Relay worked with an intern (at left) from the Mississippi School for the Deaf in partnership with the Department of Vocational Rehabilitative Services. The high school senior assisted with filing, packing and shipping equipment, organizing the storage room, setting up the exhibition booth, and identifying on a map the towns of where applications came from.

Public Service Announcements

During this reporting year, two 30-second public service announcements (PSAs) about the CapTel and the Spanish CapTel phone and service were developed, produced, and reviewed for broadcasts in the winter of 2016-2017.

Equipment Distribution Program

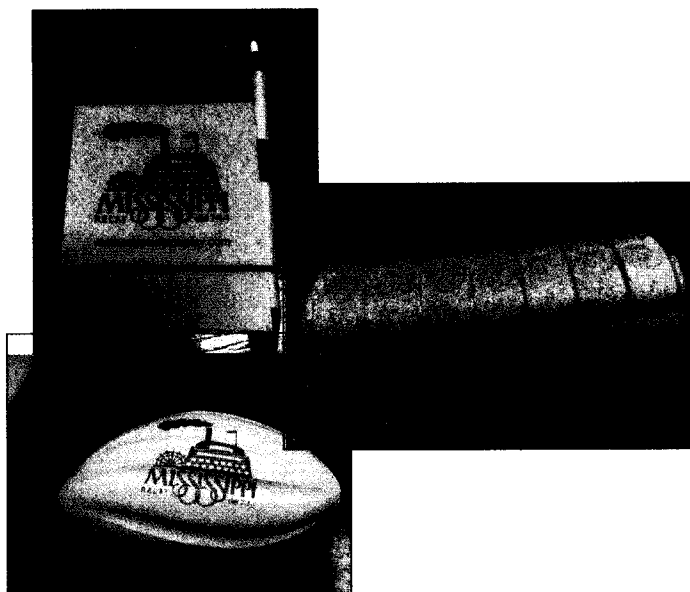
To borrow equipment at no charge, such as a specific assistive device or a mobile wireless device, customers may complete an application. An on-site equipment distribution program coordinator is available to assist with the application process. See Figure 1 for a breakdown by equipment.

Fig. 1: Distributed Equipment

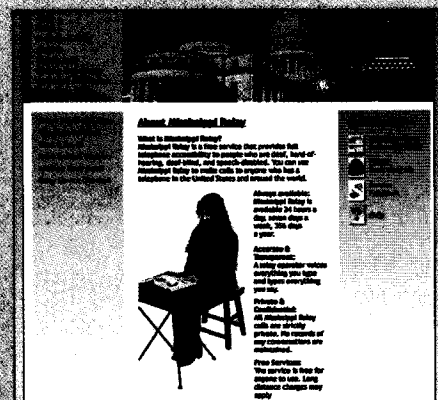
CapTel 840	87	Clarity Cordless Phone D704	2
CapTel 840i	6	Clarity D714 Amplified Cordless Phone	3
CapTel 880i	1	Ultratec Miniprint 425 TTY	1
CapTel 2400i	57	Ultratec Uniphone 1140 TTY	5
Wireless Devices	25	Clarity XLc3.4 Combo Cordless Phone	1
Sonic Ring Jr. Tr50	135	Clarity Xlc Clarity	3

Promotional Items

Promotional items were distributed at outreach events as an educational and exciting way to share information about Mississippi Relay services. Promotional items included footballs, notepads, and pill holders.

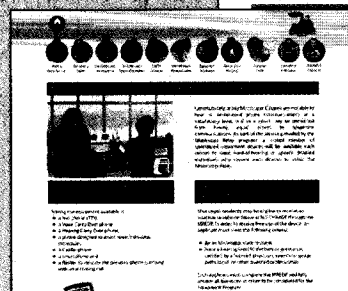
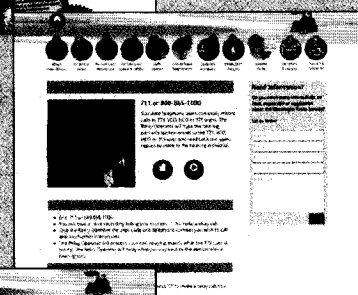
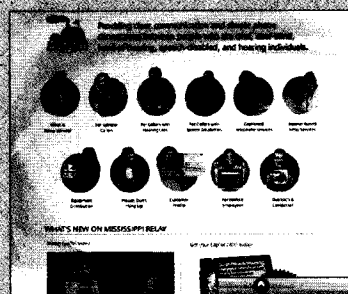


Website



The Mississippi Relay website, at www.mississippirelay.com, provides information and videos explaining how calls are handled, outlines the Mississippi Relay Equipment Distribution Program (MREDP), and has additional resources.

After months of preparation, updates, and revisions, the Mississippi Relay website was completely revamped in January 2016. The website uses HTML5, which conforms to the latest technological standards, and is also mobile, tablet, and desktop-friendly.



MISSISSIPPI RELAY STATISTICS

Telecommunications Relay Service

The following information indicates the trends in the annual total number of session minutes, Speech-to-Speech minutes, calls placed by end users, calling trends, call origination, average speed of answer and service level, and contacts with customers. The numbers reflect the traditional relay services (such as TTY, Voice, Spanish TTY and Voice, Voice Carry-Over [VCO], Telebraille, and Speech-to-Speech [STS]) currently provided by Mississippi Relay.

TRS Session Minutes

Figure 2 indicates the total monthly session minutes processed through Mississippi Relay. The total of 136,306 minutes includes all aspects of TRS services including interstate, interstate directory assistance, international, toll-free, and 900 numbers. Speech-to-Speech and CapTel minutes are reported separately.

This represents a decrease of 18.2%, or 30,315 minutes, compared to the previous year.

Fig. 2: Session Minutes

July	11,518	January	11,862
August	11,137	February	9,726
September	12,293	March	10,436
October	12,699	April	10,573
November	12,626	May	11,725
December	11,262	June	10,450

Speech-to-Speech Session Minutes

This fiscal year contained 2,376 Speech-to-Speech (STS) session minutes, which represents an increase of 367%, or 1,867 minutes, compared to the previous year. See Figure 3 for a monthly breakdown of STS minutes processed through Mississippi Relay.

Fig. 3: STS Minutes

July	367	January	178
August	74	February	121
September	200	March	231
October	8	April	49
November	35	May	231
December	126	June	758

Fig. 4: Total Number of Calls Placed

July	4,704	January	4,791
August	4,441	February	3,560
September	4,389	March	4,155
October	4,903	April	3,937
November	4,547	May	4,742
December	4,637	June	4,122

Total Number of Calls Placed

The Total Number of Calls Placed (by end users) is the number of calls handled by the Communication Assistant. The numbers of calls shown in Fig. 4 include General Assistance calls (inbound calls that do not have an outbound leg); Busy Ring No Answer calls (outbound call attempts that do not result in a completed call); Completed calls (outbound calls that result in the inbound caller connecting with an end user). For this reporting period, there was a total of 52,928 relayed calls, representing a decrease of 22.7%, or 15,503 fewer calls, compared to the previous year.

Calling Trends

Figure 5 indicates where Mississippi TRS calls originated during May 2015. The highest concentrations are shown in red, then yellow, then green.

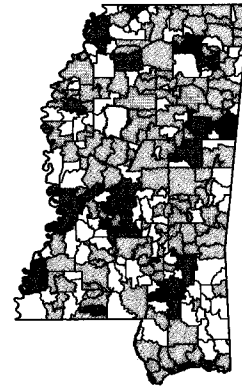
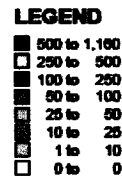


Fig. 5: Calling Trends

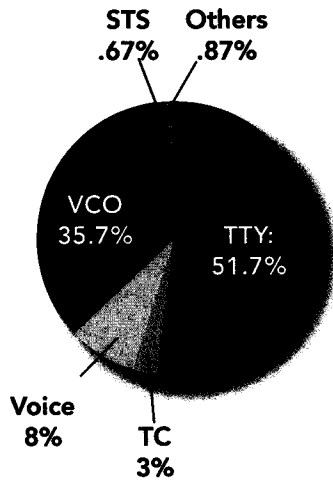


Fig. 6: Call Origination

Call Origination

On average, TTY and TurboCode consumers originated approximately 55% of Mississippi Relay calls. Figure 6 shows call type by percentage.

Average Speed of Answer and Service Level

Figure 7 illustrates that Sprint has exceeded the speed of answer requirement throughout the year. "Speed of answer" identifies the number of seconds required to answer a call. Mississippi Relay's daily requirement is that 85% of all calls are answered within 10 seconds. The Average Speed of Answer (ASA) for the first half of this fiscal year was **1.6 seconds** and the Service Level (SVL) was that **95.7% of calls were answered within 10 seconds**.

Fig. 7: ASA and SVL

Month	ASA	SVL	Month	ASA	SVL
July	1.2	96%	January	1.6	95%
August	1.2	96%	February	1.4	96%
September	1.5	95%	March	.9	98%
October	1.9	94%	April	.9	98%
November	3.0	92%	May	.8	98%
December	4.3	92%	June	.8	98%

FCC Annual Consumer Contact Log

Sprint prepares and submits an annual Consumer Contact Log Report on both TRS and CapTel from June 2015 to May 2016 to the Mississippi Public Service Commission administration, which then submits the report to the Federal Communications Commission (FCC). During this reporting year, there were no TRS commendations, one TRS complaint, and 335 TRS inquiries.

CapTel

The following information indicates the trends of the annual total number of session minutes, call volume, calling trends, and contacts with customers provided by Mississippi Relay.

Session Minutes

A breakdown of monthly session minutes is shown in Figure 8. This fiscal year's CapTel session minutes totaled 448,171. This represents a decrease of 8.8%, or 43,276 minutes, compared to the previous year.

Fig. 8: CapTel Session Minutes

July	40,521	January	35,772
August	40,333	February	32,116
September	36,749	March	38,344
October	40,332	April	36,349
November	39,595	May	37,261
December	40,994	June	29,806

Call Volume

A total of 136,438 CapTel calls were generated this fiscal year. A breakdown of monthly call volume is displayed in Figure 9, which represents a decrease of 12.4%, or 19,280 calls, from last year.

Fig. 9: CapTel Call Volume

July	12,743	January	9,997
August	12,436	February	9,815
September	11,786	March	11,434
October	11,582	April	11,674
November	10,821	May	12,112
December	11,394	June	10,644

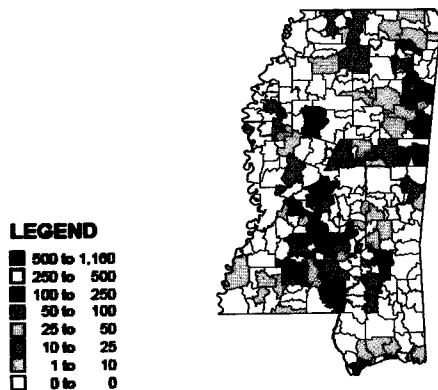


Fig. 10: CapTel Calling Trends

Calling Trends

Figure 10 indicates where Mississippi CapTel calls originated during May 2015. The highest concentrations are shown in red, then yellow, then green.

FCC Annual Consumer Contact Log

Sprint prepares and submits an annual Consumer Contact Log Report on both TRS and CapTel from June 2015 to May 2016 to the Mississippi Public Service Commission administration, which then submits the report to the FCC. During this reporting year, there were 3 CapTel commendations, 0 CapTel complaints, and 57 CapTel inquiries.

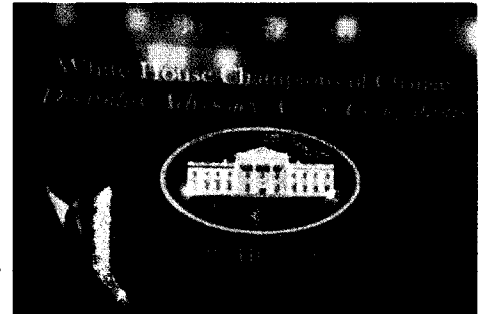
SPRINT RELAY NEWS

Sprint continuously strives to enhance relay products and services to bring an even better experience to all relay customers. This is possible through feedback, implementation, testing, and usage by consumers and team members.

White House Champion of Change Award

Sprint is proud to share that Mike Ellis, National Director for Sprint Relay, received the White House Champions of Change for Disability Advocacy across Generations award on July 27 at a ceremony at the White House. Ellis has worked for 23 years to advance accessible technology and ensure individuals with disabilities have the resources necessary to succeed in their business and personal lives.

Under his leadership, Sprint has developed a long-term commitment to empowering people with disabilities and ensuring they are included within the workplace, customer base, and the telecom industry. As a result of this commitment, Sprint was recently honored by the Disability Equality IndexSM survey as "One of the Best Places to Work for Disability Inclusion Policies and Practices."



**SPRINT RELAY
EXHIBITED AT 71
NATIONAL TRADESHOWS,
REACHING 204,500
PEOPLE**

National Tradeshows

Sprint Relay continues to have a highly visible presence at local, state, and national tradeshows. Attending tradeshows such as NASRA, TEDPA, Big E, and M-Enabling is a great opportunity for attendees to learn how they can improve communication access. Exhibits and presentations provide attendees the chance to learn about advancements in the relay industry. Customer testimonials and product demonstrations at these events provide a unique opportunity for users to see first-hand how various communication options can improve their lives.

Audiologist Kits

In 2015, Sprint created the Hearing Health Professionals' CapTel Kit for medical professionals to introduce Sprint CapTel services to their patients. Each kit includes a Third Party Certification form, a demonstration CapTel phone, brochures and a stand for waiting rooms, and more. Professionals interested in a kit can request one at <http://professionals.sprintcaptel.com>.

