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October 13, 2017

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Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: **CG Docket No. 03-123**  
TRS State Certification Application of Alabama Relay

Dear Ms. Dortch:

Please find attached hereto the application of Alabama Relay for recertification of the state telecommunications relay system operated in Alabama under the jurisdiction of the Alabama Public Service Commission. Should you have any questions regarding said application, please do not hesitate to contact me at (334)242-5200.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Garner", with a long horizontal flourish extending to the right.

John A. Garner  
Executive Director

JAG:klr  
Attachment  
via FedEx Overnight



## Alabama Relay Service FCC Certification Renewal and Supporting Documents

### Introduction

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

The State of Alabama first contracted with Sprint Accessibility to provide Telecommunications Relay Service effective March 1, 2004, and over the years, additional RFPs and Amendments were carried out. The most recent contract awarded to Sprint Accessibility became effective on October 1, 2016, to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606 until September 30, 2019. This contract may be extended two times through September 30, 2021. Included with this TRS Certification Renewal Application is a copy of this Contract Award and all of the minimum mandatory TRS requirements which are listed in **Appendix B**. Please note that although Sprint Accessibility provides Internet Protocol (IP) and Captioned telephone (CapTel) web-based services, Alabama Relay does not contract to provide these services in Alabama, nor is Alabama Relay responsible for oversight of IP and VRS or to other Internet- or web-based relay services.

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

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## **Operational Standards**

### **A.1 Communication Assistants (CAs)**

***§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.***

### **CA Employment Standards**

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

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

A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment. Sprint Accessibility TRS CA applicants are required to pass a valid and unbiased 12<sup>th</sup>-grade level spelling test to be considered for employment. Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality. If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

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

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

- CapTel CA Trainees spend 2-3 weeks training in a classroom setting.

- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel CAs are scheduled for one-week of transition training, while being monitored and supported by another CapTel CA or an Instructor.
- All CapTel CAs must continue to qualify for live call handling each month.
- Sprint Accessibility CapTel CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel CA is evaluated on a minimum of one call each shift.
- There is also a monthly test each CapTel CA must pass in order to remain qualified to caption live calls.

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

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

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

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

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

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint Accessibility's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories. STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training

specifically on STS. Sprint Accessibility's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call, including retention of information at the user's request and verification of what is said to verify accuracy. The STS training outline is displayed in the following figure:

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

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

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

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

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

### **CA Quality Assurance Programs**

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

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

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

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

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

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

### **In-Call Replacement of CAs**

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

- The customer requests a CA of the opposite gender or different CA,
- End user verbally abuses or uses obscenity towards the CA,
- Call requires a specialist (STS, Spanish, other),
- CA illness,
- At the request of the customer for any reason, and/or

- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

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

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

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

In section §64.604 (a)(1) (v), Alabama Relay honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or on a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.

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

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

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

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

## **A.2 Confidentiality and Conversation Context**

***§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state***

***or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.***

#### **Confidentiality Policies and Procedures**

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

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

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

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

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

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

Alabama Relay CapTel CAs must comply with the same rules TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS. Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer. A CapTel agent may have problems, complaints or stress from handling the call. The CA may ask to speak to a supervisor or other member of management (as long as it was not their call) in a private area.

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

#### **STS Limited Exception of Retention of Information**

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

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

#### **Verbatim Relay and the Translation of ASL**

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

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

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

At the request of the relay user, Alabama Relay CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial

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

Alabama Relay CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Alabama does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring that VRS interpreters maintain confidentiality.

### **STS Facilitation of Communication**

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

Alabama Relay STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech-disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

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

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

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

### **A.3 Types of Calls**

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

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

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

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

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

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

*The following information is applicable beginning June 1, 2017:*

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

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

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

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

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

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

If a long-distance provider declines to complete a call because credit authorization is denied, Sprint Accessibility will relay the message verbatim to the relay user and follow the user's instructions.

*The following information is applicable beginning June 1, 2017:*

Due to the waiver described in the previous question, long-distance billing is no longer applicable. Sprint is offering **domestic and international calling at no charge** with no long-distance fees or long-distance call billing for all TRS and CTS users through Alabama Relay.

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

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

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

*The following information is applicable beginning June 1, 2017:*

Due to the previously described waiver, Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

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

Alabama Relay provides access to all available relay call types. Through the State's contract with Sprint Accessibility, the State meets and in some cases exceeds, the requirements for text-to-voice,

voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Standard services provided by Alabama Relay are:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA
- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

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

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

#### **Call Release Functionality**

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

#### **Speed Dialing Functionality**

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

number. The CapTel phone is equipped with the ability to program in three speed dial numbers and a recently dialed number.

### **Three-Way Calling**

Alabama Relay provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to tie the third party directly into the conversation or to tie the third party in by making a second call to the Relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her LEC can use this feature when placing a call through Alabama Relay. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method. TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

Alabama Relay provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

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

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

Alabama Relay has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

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

Alabama Relay CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

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

#### **Retrieving Answering Machine and Voicemail Messages**

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

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

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

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

- Press the CapTel menu button until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.

- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

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

#### **A.4 Handling of Emergency Calls**

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

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

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

#### **Call-Processing Procedures**

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

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

### **Back up Procedures**

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

### **CapTel Emergency Calling**

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

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

### **Two-Line CapTel Emergency Calling**

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

### **Training and Support Materials**

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

### **Variations**

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

#### ***Caller Disconnects Before Connecting to 911 Center***

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

### **Voice Emergency Calls**

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance." When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

### **A.5 STS Called Numbers**

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

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

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

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

**§64.604 (7) International calls.** *VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.*

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

## **Technical Standards**

### **B.1 ASCII and Baudot**

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

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

### **B.2 Speed of Answer**

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

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

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

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

**§64.604 (b) (2) (ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.**

A requirement of the Alabama Relay contract with Sprint Accessibility is that 85 percent of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. Alabama Relay's CapTel speed of answer meets or exceeds the FCC's requirement to answer 85 percent of all calls within 10 seconds. Alabama Relay expects Sprint Accessibility will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint Accessibility develops a Network forecast for each upcoming scheduling week.

Sprint Accessibility also reviews each center's results for the previous six weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint Accessibility ensures total network traffic is accounted for by each of the centers. By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

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

Alabama Relay considers the call "delivered" when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center. Sprint Accessibility furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint Accessibility's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

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

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

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

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

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

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

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

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

***§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.***

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

### **B.3 Equal Access to Interexchange Carriers**

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

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

Alabama Relay TRS and CapTel users have equal access to their chosen IXC through Relay to the same extent access is provided to voice users.

TRS and CapTel users are encouraged to register their preferred Carrier of Choice (COC) with Customer Service. Users who have not registered their preferred Carrier of Choice are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their COC preferences for CapTel calls.

Voice-in users calling CapTel users are also notified their call may incur long-distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating their call may include long-distance charges.

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

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

Sprint Accessibility encouraged all Carriers to participate in its COC program. When the requested Carrier was not a COC participant, Sprint Accessibility had established a procedure where the Carrier

was notified, verbally and in writing, of its obligation to provide access to relay users and encouraged their participation.

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

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

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

*The following information is applicable beginning June 1, 2017:*

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

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

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

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

#### **B.4 TRS Facilities**

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

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

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

Alabama Relay contracts with Sprint Accessibility's Relay centers, which are equipped with an UPS, generator, and sufficient fuel to provide power for 24 hours following a power failure. These back-up power systems can continue to provide power beyond 24 hours as long as fuel is readily available. Working in parallel with the UPS is Sprint Accessibility's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Accessibility system and routes the calls to other operating call centers. Alabama Relay customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air-conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored.

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

Please see Sprint Accessibility's Disaster Recovery Plan and the Network Support Plan in **Appendix D**.

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

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

**§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of**

***use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.***

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

#### **B.5 Technology**

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

Alabama Relay through Sprint Accessibility, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability. In order to achieve functional equivalence, Alabama Relay will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Alabama Relay receives calling party identifying information including blocking information, from all relay users. Sprint Accessibility's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and other call information elements such as:

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

#### **State-of-the-Art Technology**

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

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

#### **Wireless Access – STS (\*787)**

In early 2012, Sprint Accessibility announced the first wireless short-code solution for STS users. Sprint Accessibility wireless customers are able to dial \*STS (\*787) to reach a STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the state are automatically connected to an STS CA. This service is available to both callers with and without a speech disability who need to place an STS call. Voice callers needing to place a call to an STS user may also use this service. When Alabama TRS customers travel outside of the state, callers will

automatically connected to STS based on their physical location. If they are in a state where Sprint Accessibility is the Relay provider, the caller is connected to the State's STS. If not, callers are automatically transferred to Sprint Accessibility's interstate STS, where they will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

### **STS Message Retention**

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

### **STS Called Numbers**

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

#### **Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):**

*Note: Limit 30 characters per name*

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

*If you need to add more information, go to the Additional Information section on the page 1.*

### **STS with Privacy Option**

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

### **STS Contact Information**

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

user's hours and days of availability. In this manner, the inbound caller can be connected with the STS user at their location.

### **Emergency Numbers**

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

### **B.6 Caller ID**

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

Alabama Relay, through their contract with Sprint Accessibility, provides true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint Accessibility will receive calling party identifying information including blocking information, from all TRS users.

### **Customer Control**

With Sprint Accessibility's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis. The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen.

With Sprint Accessibility's Caller ID, there are numerous benefits for TRS users, including:

- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen
- Phone numbers of hang-up callers
- Prompt emergency call processing

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

### **Technology**

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

### **Caller ID Enhancements**

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

### **Selective Call Acceptance**

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

### **Selective Call Rejection**

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

### **Selective Call Forward**

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

### **Privacy ID (Anonymous Call Rejection)**

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

### **Instant Access List (Preferred Caller List)**

Users may designate a list of up to 10 numbers that can bypass the Sprint Accessibility Privacy ID function. If a caller's number displays while their name does not, adding their number to this list will let their calls through.

### **Caller's Access Code**

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

### **Functional Standards**

#### **C.1 Consumer Complaint Logs**

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

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

Alabama Relay works closely with its TRS provider (Sprint Accessibility) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice, or STS), customer contact information (when given), CA identification numbers, the call handling center and over 45 contact categories including: complaints, inquires and unsolicited commendations.

Sprint Accessibility submits reports detailing the information above. Each report will include the following information:

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

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

#### **Customer Contacts Online Database (CCOD)**

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

#### **C.2 Contact Persons**

***§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.***

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

**Missy McManus**

Customer Relations Manager

Sprint Accessibility

411 Huger Street

Columbia, SC 29201

803 951 1660 (TTY)

803 403 9763 (Voice)

[www.alabamarelay.com](http://www.alabamarelay.com)

[www.sprintrelay.com](http://www.sprintrelay.com)

[melissa.mcmanus@sprint.com](mailto:melissa.mcmanus@sprint.com)

**John A. Garner**

Executive Director

Alabama Public Service Commission

Post Office Box 304260

Montgomery, AL 36130-4260

(334)242-5200

[eileen.lawrence@psc.alabama.gov](mailto:eileen.lawrence@psc.alabama.gov)

**C.3 Public Access to Information**

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

Outreach education is a significant method to inform relay and non-relay users about the varied free relay services available to them. A substantial amount of the funds are used on activities that publicize and educate the public at large regarding what services are available and how to access and properly use the available variety of relay services. The outreach plan is expanded monthly, dependent on the availability of community events and other advertising mechanisms. Outreach projects include:

**Outreach Specialists Program**

Promotes and increases awareness of AL Relay and AL CapTel Services and provides one-on-one training, home installations, product and service demonstrations, seminars/presentations and exhibits at local or statewide conference events. See **Appendix F** for examples of outreach performed.

**Business Outreach**

Networks with organizations, businesses and agencies to provide outreach education; this program targets audiences such as: health-related organizations, Department of Aging groups, retirement communities, audiologists, hearing aid dispensers, chamber of commerce offices, numerous others.

#### **Marketing Collateral and Promotional Items**

Provides promotional items to give to AL Relay and CapTel consumers with an imprinted AL Relay URL. Disseminates TRS and CapTel flyers and brochures.

#### **Mass Media Advertising**

Alabama Relay has utilized its experience in mass media campaigns. The use of media in public relations is essential to maximizing awareness to the general public about TRS and CapTel, including in the Spanish language. Alabama has utilized opportunities to educate the public about relay services through print: senior directories, organizational flyers, commercials on local news channels, public service announcements, and two websites: [www.alabamarelay.com](http://www.alabamarelay.com), and via our CapTel partner organization at [www.captelalabama.com](http://www.captelalabama.com). See **Appendix G** for examples of commercials.

#### **CapTel Advertisements**

Captioned Telephone (CapTel) service, as an enhanced Voice Carry-Over (VCO) service, was introduced to Alabama in 2004 and became a part of the Alabama contract. The CapTel program in Alabama has been successful and Alabama CapTel continues to air 30-second commercials for television and radio broadcasts over the past five years—including Spanish-language audio and open captions—to educate the public about the availability of the equipment and service throughout the state.

#### **TRS Information in Directories**

Placing Alabama Relay TRS numbers in directories throughout the state makes relay information visible and available to consumers. **Appendix H** contains an example of such information.

#### **Alabama TRS Literature**

Alabama Relay products and services continued to be promoted via outreach activities where brochures, instructional and marketing flyers, and advertisements in various publications are disseminated. During the past five years, the following Alabama TRS literature were developed:

- 12-page brochure outlining the specific AL Relay services
- TRS flyers listing specific Alabama Relay numbers, equipment distribution program info, customer service numbers, and website URL
- Customer Profile form for TRS and Speech-to-Speech preferences, respectively
- Flyers listing specific Alabama TRS numbers and providing a brief description of the CapTel service
- CapTel flyers explaining the service and phones available

See **Appendix I** for Alabama Relay literature.

#### **Websites**

Alabama Relay maintains and operates the [www.alabamarelay.com](http://www.alabamarelay.com) website, which provides information on the various relay services, explains how each relay call is handled, describes certain relay services through video, lists regional offices of the free-loan equipment distribution program, explains Spanish Relay in Spanish, view testimonial videos of CapTel users, and has additional resources. See **Appendix J** for selected screenshots of this website.

Alabama Relay partners with Captioned Telephone, Inc. (CTI), for interested persons desiring to learn more about the CapTel phones and service: [www.captelalabama.com](http://www.captelalabama.com).

#### C.4 Rates

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

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

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

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

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

*March 17, 2016 through May 31, 2017*

In states where Sprint is the contracted TRS provider, INTRAstate Sprint long distance rates for TRS users will be assessed at a rate of \$0.03 per minute.

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

#### C.5 Jurisdictional Separation of Costs

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

All Alabama Relay intrastate and interstate minutes are reported separately and distinctly to the State on the Sprint Accessibility invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are billed through the State and reimbursed by the major telephone service providers in the State. On individual customer invoices, Sprint

Accessibility deducts minutes for which the Rolka Loubé Saltzer Associates (RLSA), the Interstate TRS Fund administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free, and 900. In accordance with FCC rules, states receive a 51 percent deduction for Toll Free and 900 minutes for which RLSA reimburses. For RLSA reimbursement, Sprint Accessibility uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RLSA for reimbursement.

#### **ADA Requires TRS Services**

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

An introductory excerpt of Alabama's 1987 Order is below:

#### **ORDER**

##### **BY THE COMMISSION:**

By notice issued August 4, 1987, this Commission sought comments pertaining to the establishment of a dual-party relay system which would entitle the hearing and speech impaired community of Alabama to the same access and use of the telephone network as those without such impairments. Comments have been received from AT&T Communi-

See Appendix K for the full Order mandating funds be applied to relay services.

#### **Telecommunications Relay Fund**

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

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

#### **C.6 Complaints**

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

Alabama Relay works in conjunction with the TRS provider, Sprint Accessibility, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the

complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

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

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

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Account Manager for resolution and follow up with the customer. Alabama Relay customers also have the option of calling Sprint Accessibility's 24-hour Customer Service department (800-676-3777), the Sprint Accessibility Relay Program Manager or the Alabama Public Service Commission to file complaints or commendations.

A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including relay websites.

Alabama Relay has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. Alabama Relay submits all complaints from June 1 - May 31 to the FCC by the annual July 1 deadline. See Appendix E for the past five years of consumer complaint logs.

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24x7 to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Alabama. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint states.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) complaints directly to the FCC from June 1 - May 31 of each year by the July 1 deadline. As mentioned, see Appendix E for the past five years of consumer complaint logs.

### **C.7 Treatment of TRS Customer Info**

***(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS***

***customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.***

Alabama Relay, through Sprint Accessibility's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, Carrier of Choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s), Sprint Accessibility will transfer all TRS database records in a usable format to the next incoming relay provider at least 60 days prior to the last day of service. Sprint Accessibility does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint Accessibility will not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order. All complaints filed with the Alabama Public Service Commission are assigned a complaint number and investigated thoroughly before an answer is provided to the customer. Upon the receipt of a complaint, the contract manager contacts Sprint for a full and prompt investigation of the complaint or inquiry. Complaints are not closed until a final resolution is achieved. Complaints are handled in a professional manner and resolved on an amicable basis.

#### **§64.606 State Certification**

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

#### **History**

By notice issued August 4, 1987, Informal Docket U-3089, the Alabama Public Service Commission sought comments pertaining to the establishment of a dual-party relay system which would entitle the hearing and speech-impaired community of Alabama to the same access and use of the telephone network as those without such impairments. Comments were received from various telecommunications companies and all comments were supportive of implementation of this system.

The Commission, being of the opinion that the implementation of the dual-party relay system is in the best interest of all citizens of Alabama, stated its intention to achieve implementation of this system at the earliest possible date and solicits the cooperation of all local exchange companies in the State to achieve the same. This docket was signed by the PSC president and two commissioners on December 10, 1987. The entire text can be found in Appendix K.

#### **Collecting Costs**

Through statute number 88-259 signed and dated by the Senate and House of Representatives on April 12, 1988, it gave authority to the Alabama Public Service Commission to enact a surcharge on each access line of each customer of the local exchange companies operating in Alabama to fund a dual-party relay system whereby a deaf or hearing-impaired person may communicate with other such persons or with standard hearing persons via telephone. The entire text can be read in **Appendix K**.

Today, a \$0.15 surcharge is collected on all local exchange companies and competitive local exchange customer's bills. Alabama users are charged no more for services than for those charges paid by standard "voice" telephone users. **See Appendix L.**

Alabama Relay was approved for TRS Certification Renewal by the FCC in 2013. For a copy of this letter, please see **Appendix M**.

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

Have substantive changes been made to Alabama's TRS program since July 2012?

There have been no substantive changes made to Alabama TRS program since July 2012.