

**APPLICATION OF THE VIRGIN ISLANDS
PUBLIC SERVICES COMMISSION FOR
REAUTHORIZATION OF THE VIRGIN
ISLANDS TELECOMMUNICATIONS RELAY
SERVICE**

***CG DOCKET No. 03-123
TRS STATE CERTIFICATION APPLICATION***

Submitted to:

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Washington D.C. 20554

Submitted by:

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REAUTHORIZATION OF THE VIRGIN ISLANDS TELECOMMUNICATIONS
RELAY SERVICE**

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TAB 1

Introduction



**APPLICATION OF THE VIRGIN ISLANDS PUBLIC SERVICES COMMISSION FOR
REAUTHORIZATION OF THE VIRGIN ISLANDS TELECOMMUNICATIONS RELAY SERVICE AND
SUPPORTING DOCUMENTATION**

Introduction

This is an application submitted by the Virgin Islands Public Services Commission (“VIPSC”) for renewal of the certification of Telecommunications Relay Service in the Territory of the Virgin Islands pursuant to the rules and procedures set forth by the Federal Communications Commission (“FCC”). The Virgin Islands Relay Service has been certified for the certification period beginning July 26, 2013 and ending July 25, 2018 and seeks renewal for an additional-five year period beginning July 26, 2018.

The VIPSC 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, 2017.¹ 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. This TRS certification renewal application was prepared with the assistance of the Virgin Islands Telephone Corp. d/b/a Viya (formerly Innovative Telephone) (“Viya”) and Sprint Accessibility (formerly Sprint Relay).

Viya contracted with Sprint Accessibility to provide Telecommunications Relay Service to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the first page of the Contract Award to operate TRS for the period of May 1, 2013 to April 30, 2018, and a copy of the Outreach Agreement effective May 1, 2016. Viya intends to renew its contract with Sprint Accessibility as the service provider of Telecommunications Relay Service in the US Virgin Islands for the next five years. All of the minimum mandatory TRS requirements are listed in Appendix B. Please note that although

¹ See *Consumer and Government Affairs Bureau Reminds State Telecommunications Relay Service Programs to Seek Recertification*, Public Notice, 32 FCC Rcd 5701 (CGB 2017). The VIPSC was unable to submit the instant recertification application to the Federal Communications Commission (“FCC”) by the date requested by the FCC in the foregoing Public Notice as a result of the disruption to normal-course activities in the United States Virgin Islands caused by Hurricanes Irma and Maria.

Sprint Accessibility provides Internet Protocol (IP) web-based services, Viya does not contract to provide these services in the Virgin Islands, nor is Viya 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.

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

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PUBLIC NOTICE

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News Media Information 202-418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 13-1530
Released: July 8, 2013

NOTICE OF CERTIFICATION OF STATE TELECOMMUNICATIONS RELAY SERVICES (TRS) PROGRAMS

CG DOCKET NO. 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Governmental Affairs Bureau (Bureau) hereby grants certification to the state telecommunication relay services (TRS) programs listed below,² pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 225(f)(2), and section 64.606(b) of the Commission's rules.³ On the basis of the state applications received, the Bureau has determined that:

- (1) The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;⁴
- (2) The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs;⁵ and
- (3) The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.⁶

² For purposes of this proceeding, the term "state" refers to states, U.S. territories, and the District of Columbia, where applicable.

³ 47 C.F.R. § 64.606(b).

⁴ 47 U.S.C. § 225(f)(2)(A); 47 C.F.R. § 64.604.

⁵ 47 U.S.C. § 225(f)(2)(B).

⁶ 47 C.F.R. § 64.606(d).

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of ongoing compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states, as needed, to ensure compliance with such rule changes.

This certification, as conditioned herein, shall remain in effect for a five (5) year period, beginning July 26, 2013, and ending July 25, 2018, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2017, the states may apply for renewal of their TRS program certification by filing documentation in accordance with the Commission's rules, pursuant to 47 C.F.R. §§ 64.606(a) and (b).

STATES APPROVED FOR CERTIFICATION

File No: TRS-46-12

Alabama Public Service Commission
State of Alabama

File No: TRS-19-12

Department of Commerce
State of Alaska

File No: TRS-47-12

Arkansas Deaf and Hearing Impaired
State of Arkansas

File No: TRS-02-12

Commission for the Deaf and Hard of Hearing
State of Arizona

File No: TRS-32-12

California Public Utilities Commission
State of California

File No: TRS-23-12

Colorado Public Utilities Commission
State of Colorado

File No: TRS-48-12

Connecticut Department of Public Utility
State of Connecticut

File No: TRS-35-12

Delaware Public Service Commission
State of Delaware

File No: TRS-49-12

Public Service Commission
District of Columbia

File No: TRS-50-12

Florida Public Service Commission
State of Florida

File No: TRS-51-12

Georgia Public Service Commission
State of Georgia

File No: TRS-22-12

Hawaii Public Utilities Commission
State of Hawaii

File No: TRS-43-12

Idaho Public Service Commission
State of Idaho

File No: TRS-10-12

Illinois Commerce Commission
State of Illinois

File No: TRS-08-12

Indiana Telephone Relay Access Corporation
State of Indiana

File No: TRS-03-12

Iowa Utilities Board
State of Iowa

File No: TRS-07-12

Kansas Relay Services, Inc.
State of Kansas

File No: TRS-13-12

Louisiana Relay Administration Board
State of Louisiana

File No: TRS-33-12

Telecommunications Access of Maryland
State of Maryland

File No: TRS-54-12

Michigan Public Service Commission
State of Michigan

File No: TRS-55-12

Mississippi Public Service Commission
State of Mississippi

File No: TRS-56-12

Telecommunications Access Program
State of Montana

File No: TRS-25-12

Relay Nevada
State of Nevada

File No: TRS-45-12

New Jersey Board of Utilities
State of New Jersey

File No: TRS-16-12

New York State Department of Public Service
State of New York

File No: TRS-12-12

Information Technology Department
State of North Dakota

File No: TRS-57-12

Oklahoma Telephone Association
State of Oklahoma

File No: TRS-58-12

Pennsylvania Bureau of Consumer Services
Commonwealth of Pennsylvania

File No: TRS-59-12

Division of Public Utilities and Carriers
State of Rhode Island

File No: TRS-52-12

Kentucky Public Service Commission
Commonwealth of Kentucky

File No: TRS-53-12

Maine Public Utilities Commission
State of Maine

File No: TRS-34-12

Department of Telecommunications and Cable
Commonwealth of Massachusetts

File No: TRS-39-12

Minnesota Department of Commerce
State of Minnesota

File No: TRS-15-12

Missouri Public Service Commission
State of Missouri

File No: TRS-40-12

Nebraska Public Service Commission
State of Nebraska

File No: TRS-42-12

New Hampshire Public Service Commission
State of New Hampshire

File No: TRS-14-12

Commission for the Deaf and Hard of Hearing
State of New Mexico

File No: TRS-30-12

Department of Health and Human Service
State of North Carolina

File No: TRS-37-12

Public Utilities Commission of Ohio
State of Ohio

File No: TRS-36-12

Oregon Public Utilities Commission
State of Oregon

File No: TRS-28-12

Telecommunications Regulatory Board
Puerto Rico

File No: TRS-62-12

Micronesian Telecommunications Corporation
Saipan

File No: TRS-11-12

South Carolina Office of Regulatory Staff
State of South Carolina

File No: TRS-60-12

Department of Human Services
State of South Dakota

File No: TRS-20-12

Tennessee Regulatory Authority
State of Tennessee

File No: TRS-17-12

Texas Public Utility Commission
State of Texas

File No: TRS-61-12

Virgin Islands Public Service Commission
U.S. Virgin Islands

File No: TRS-09-12

Public Service Commission
State of Utah

File No: TRS-44-12

Vermont Department of Public Service
State of Vermont

File No: TRS-04-12

Department for the Deaf and Hard of Hearing
Commonwealth of Virginia

File No: TRS-27-12

Office of the Deaf and Hard of Hearing
State of Washington

File No: TRS-06-12

Public Service Commission of West Virginia
State of West Virginia

File No: TRS-01-12

Wisconsin Department of Administration
State of Wisconsin

File No: TRS-18-12

Division of Vocational Rehabilitation
State of Wyoming

The full text of this *Public Notice* and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Room CY-A257, Washington, DC 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their website: www.bcpweb.com or call (202) 488-5300. Filings may also be viewed on the Commission's Electronic Comment Filing System (ECFS) at <http://apps.fcc.gov/ecfs/> (insert docket No. **03-123** in the proceeding number fill-in block, and the state identification number, (e.g., TRS-46-12) assigned for that specific state application in the bureau identification number fill-in block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* can also be downloaded in Word and Portable Document Format (PDF) at <http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs>.

For further information regarding this *Public Notice*, contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disabilities Rights Office, (202) 418-2247 (voice), or e-mail Dana.Wilson@fcc.gov.

- FCC -

TAB 2

Operational Standards

OPERATIONAL STANDARDS

(The information in Tab 2 is provided by Sprint Accessibility)

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

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

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

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

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

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

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

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

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

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

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

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint Accessibility's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories. STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on STS. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy. The STS training outline is displayed in the following figure:

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

CA Quality Assurance Programs

Sprint Accessibility Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Accessibility Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in five Relay Centers across the 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 develops and delivers its training and consumer education programs in consultation with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities.

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

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

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

Neither Virgin Islands Relay nor Viya contracts to provide VRS services, and they are not responsible for the oversight of VRS. As of January 2012, Sprint Accessibility no longer provides VRS services.

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

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

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

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

- Shift change
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:

- Sprint Accessibility attempts to honor any requests for a specific gender during call transitions.
- The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

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

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

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

All conversations relayed between voice and TTY callers are transmitted in real-time. Virgin Islands 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 multiple languages including English and Spanish.

§64.604(a)(1)(viii) STS providers shall offer STS users the option to have their voices muted so that the other party to the call will hear only the CA and will not hear the STS user's voice.

Sprint Accessibility offers STS users the option to have their voice muted during the call. This enhancement allows the CA to hear the STS user's voice while the other party hears only the CA's voice. STS users can request this feature as a part of their Customer Profile or on a per call basis.

A.2 Confidentiality and Conversation Context

§64.604(a)(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

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

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

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

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

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

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

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

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

During training and throughout employment, it is stressed that CAs are prohibited from discussing calls with one another. It is understood that failure to respect confidentiality will result in termination. CAs are taught they may discuss with a Supervisor a general situation with which they need assistance in order to clarify how to process a particular type of relay call. CAs are trained to ask questions about procedures without revealing names or specific information that will identify the caller. As a part of training, CAs roleplay various scenarios which demonstrate the correct way to ask for assistance from a Supervisor without divulging call specifics. Examples of confidentiality breaches are reviewed and discussed with CAs. The only exceptions to disclosing customer information are when required for processing emergency calls, threats to the CA or the Relay Center or other life-threatening situations. Names and specific information may be disclosed by the CA to a Supervisor to expeditiously address only those unique situations.

STS Limited Exception of Retention of Information

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

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

Verbatim Relay and the Translation of ASL

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

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

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

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

STS Facilitation of Communication

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

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

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

- STS CA may ask the user to spell the word

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

A.3 Types of Calls

§64.604(a)(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.

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

§64.604(a)(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.

In August of 2016, Sprint Accessibility received an ongoing waiver of end user selection of carrier from the FCC. The waiver is renewed every six months and Sprint Accessibility does not expect the waiver to be cancelled. As a result, Sprint Accessibility is offering **domestic and international calling at no charge** with no long distance fees or long distance call billing for all TRS users through Virgin Islands Relay. Sprint Accessibility's optimal approach provides less cost to the end user, fewer billable minutes to the Virgin Islands, greater functional equivalence, and fewer customer complaints.

Sprint Accessibility's approach as an affiliate of a global telecommunication provider includes the following benefits for Virgin Islands Relay, Viya, and its end users:

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

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

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

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

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

§64.604(a)(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.

Virgin Islands Relay provides access to all available relay call types. The contract between Sprint Accessibility and Viya in conjunction with Virgin Island Relay, 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 Virgin Islands Relay are:

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

§64.604(a)(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

Virgin Islands 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. Virgin Islands Relay adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the per-minute reimbursement.

Speed Dialing Functionality

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

Three-Way Calling

Virgin Islands 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 Virgin Islands Relay. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method. TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

§64.604(a)(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.

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

Virgin Islands Relay has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted

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

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

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

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

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

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

A.4 Handling of Emergency Calls

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

Call Processing Procedures

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

1.	CAs act upon the word “emergency”. Calls placed to fire, police, ambulance, and rescue squads are considered emergency calls.
2.	The CA hits a Phoenix function key (hot key) which designates the call as an Emergency. This key also prompts the system to use the caller’s NPA/NXX to automatically route the call to the PSAP which is closest to the caller’s rate center. This hot-key also “freezes” the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller’s information is available to be shared with the PSAP.
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 PSAP 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 Virgin Islands Relay. They are calling from (caller’s telephone number). This is CA # 1234, one moment please.”
6.	The CA advises the inbound caller that the emergency services is on the line. For example, “(POLICE ON LINE NOW)” and then types the way the PSAP 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 a PSAP routing error, the CA will fill out a technical “trouble ticket” for additional investigation.

Back up Procedures

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

Training and Support Materials

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

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were

established for many of these “variations” to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center

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

Voice Emergency Calls

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

A.5 STS Called Numbers

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

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

§64.604(a)(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.

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

§64.604(a)(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.

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

TAB 3

Technical Standards

TECHNICAL STANDARDS

(The information in Tab 3 is provided by Sprint Accessibility)

B.1 ASCII and Baudot

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

Viya, in conjunction with Virgin Islands 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 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(b)(2)(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.

Viya, in conjunction with Virgin Islands Relay, contracts with Sprint Accessibility, who currently has 13 TRS centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS calls. Sprint Accessibility samples the average answer time a minimum of every 15 minutes for each 24-hour period. Sprint Accessibility's Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service. Sprint Accessibility's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

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

§64.604 (b)(2)(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately

being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

A requirement of the contract between Viya, in conjunction with Virgin Islands Relay, and Sprint Accessibility is 85 percent of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. Virgin Islands Relay expects Sprint Accessibility will continue to review TRS data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. 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.

Sprint Accessibility utilizes relay centers geographically dispersed throughout the U.S. that handle TRS and Relay Customer Service calls. Sprint Accessibility maintains the TRS platform technology, training, and workforce management for all TRS call centers. Sprint Accessibility is able to provide diverse call routing options and can guarantee greater redundancy since the call centers are geographically separated.

Call Center Capacity, Staffing, and Expansion

Sprint Accessibility's centralized workforce scheduling software allows us to handle daily number of relay calls and the CA's amount of work more efficiently. The software gives Sprint Accessibility real-time insight which gives Sprint Accessibility options on how to handle the daily activity. Sprint Accessibility ensures there is adequate staff scheduled at all times for all call types to meet relay users' needs. Sprint Accessibility forecasts relay call volumes every 15 minutes. To develop the 15-minute forecast, Sprint Accessibility considers historical information, current trends, and special events (including weather and scheduled events). Sprint Accessibility's combined workforce scheduling software also directly benefits CAs. Giving CAs more information and allowing them to manage their own time at work can make a big difference in morale, helping to reduce CA turnover, and attendance problems that can add up to considerable costs. Sprint Accessibility's scheduling software also provides information about how well our CAs adhere to their schedule. This means Virgin Islands Relay users will not experience unnecessary wait time when making calls. Sprint Accessibility's current workforce management tool utilizes up to 13 weeks of stored call trends, traffic patterns, occupancy targets and a predetermined Service Level standard to produce CA requirements and schedules for each TRS call center every 15 minutes of every day.

Sprint Accessibility will continue to provide a sufficient number of CAs and facilities to meet CA standards. Sprint Accessibility maintains the largest network of TRS call centers in the country with a centralized Traffic Management Control Center (TMCC). In response to any traffic fluctuations, the TMCC makes final CA requirements for each 15-minute period after any line adjustment. Sprint Accessibility will also periodically review Virgin Islands Relay's historical data to determine trends, taking into account any

call-affecting issues such as weather, holidays, or technical problems. Utilizing this information, a network forecast is developed for each upcoming scheduling week. Sprint Accessibility reviews each center 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 supported and accounted for by each of the centers. Virgin Islands Relay will continue to have the benefit of Sprint Accessibility's intelligent call routing technology that ensures each call is answered by the next available CA. This provides Virgin Islands Relay with a large resource pool and ensures the most efficient and cost effective method for processing various call types.

Sprint Accessibility's intelligent call routing platform allows for seamless call routing 24x7. Routing logic allows network calls to be routed automatically to the best available target center with available CA's. In the event of inclement weather, holidays, or other issues, inherent routing logic is fluid and does not normally need adjustment, but TMCC can adjust as necessary in real time to ensure Virgin Island Relay's service standards are continually met.

Sprint Accessibility continually monitors and manages all areas of capacity, including traffic, CA work stations, personnel staffing, facilities, and other relay service equipment. Sprint Accessibility plans expansion when usage studies indicate system components are operating at greater than 75 percent capacity. Virgin Islands Relay will not incur any additional charges if additional expansion is required throughout the life of the contract.

Sprint Accessibility's use of the excess 25 percent capacity was apparent when hurricanes struck the State of Florida, causing significant damage to wireline and wireless providers. However, those customers reaching a Sprint Accessibility TRS Center experienced uninterrupted, exceptional service. This was due to Sprint Accessibility's experience in staffing with additional capacity.

Proactive Monitoring

The key to providing a consistent quality experience is to ensure routine, periodic analysis of all components of the Relay Service. Usage studies of TRS system components ensure optimum capacity requirements are met to keep costs at a minimum while ensuring maintenance to all service standards detailed in the RFP.

Capacity reports, including busy-hour information, are captured and reviewed daily and weekly to ensure capacity levels remain within thresholds.

Sprint Accessibility reviews historic call volume to determine short-term and long-term personnel staffing needs on a periodic reoccurring basis.

Equipment utilization, including the number of CA positions, is monitored weekly and quarterly.

§64.604(b)(2)(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.

Virgin Islands 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)(2)(ii)(B) Abandoned calls shall be included in the speed-of-answer calculation.

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

§64.604(b)(2)(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 Virgin Islands Relay on a monthly basis.

§64.604(b)(2)(ii)(D) The system shall be designed to a P.01 standard.

Through the TRS contract between Viya, in conjunction with Virgin Islands Relay, and Sprint Accessibility, ensures all relay call centers are provided with sufficient facilities and staffing to provide a GOS of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint Accessibility's Relay system ensures an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604(b)(2)(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 Virgin Islands 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 Virgin Islands Relay.

§64.604(b)(2)(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.

Virgin Islands 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.

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

Sprint Accessibility's approach as an affiliate of a global telecommunication provider includes the following benefits for Virgin Islands Relay and its end users:

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

B.4 TRS Facilities

§64.604(b)(4)(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.

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

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

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

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

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

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

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

Virgin Islands 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.

Virgin Islands 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.

Virgin Islands 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, Virgin Islands Relay will continue to provide Caller ID service where the 10-digit number of the calling party is passed through to the called-party for

local and long-distance calls. Virgin Islands 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 Virgin Islands, Sprint Accessibility offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

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

Wireless Access – STS (*787)

In early 2012, Sprint Accessibility announced the first wireless short-code solution for STS users. Sprint Accessibility wireless customers are able to dial *STS (*787) to reach a STS CA quickly and easily. This service is available to both callers with and without a speech disability who need to place an STS call. Voice callers needing to place a call to an STS user may also use this service. When Virgin Islands Relay customers travel, callers automatically will be connected to STS based on their physical location. If they are in a place where Sprint Accessibility is the Relay provider, the caller is connected to the Virgin Islands' STS. If not, callers are automatically transferred to Sprint Accessibility's interstate STS, where they will be able to place interstate calls only. This enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

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

STS Called Numbers

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

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

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

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

STS with Privacy Option

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

STS Contact Information

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

Emergency Numbers

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

B.6 Caller ID

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

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

Customer Control

With Sprint Accessibility's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis. The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether 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's network interfaces with all global Carriers and major LECs, CLECs, and ILECs. Sprint Accessibility's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and other call information elements such as: the Calling Party Number, Charge Number, and Originating Line Information. Sprint Accessibility passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

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

Selective Call Acceptance

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

Selective Call Rejection

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

Selective Call Forward

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

Privacy ID (Anonymous Call Rejection)

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

Instant Access List (Preferred Caller List)

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

Caller's Access Code

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

B.7 STS 711 Calls

§64.604(b)(7) An STS provider shall, at a minimum, employ the same means of enabling an STS user to connect to a CA when dialing 711 that the provider uses for all other forms of TRS. When a CA directly answers an incoming 711 call, the CA shall transfer the STS user to an STS CA without requiring the STS user to take any additional steps. When an interactive voice response (IVR) system answers an incoming 711 call, the IVR system shall allow for an STS user to connect directly to an STS CA using the same level of prompts as the IVR system uses for all other forms of TRS.

Sprint Accessibility supports access to all services through the short-code 711 access number. When dialing 711, if the caller's Customer Profile contains a request for a specialist CA (Spanish, STS), the caller is placed immediately in the appropriate queue. Likewise, if the Virgin Islands Relay user has a Customer Profile with a communication preference (VCO, TTY, ASCII) the caller will be immediately connected to the CA using that method of communication. If it is the Virgin Islands Relay user's first time calling into 711 from that telephone number, the call will be answered using voice (to avoid sending TTY tones to Virgin Islands Relay users). If there is no response from the caller, the call will next be answered in TTY mode, followed by ASCII if no connection is made in TTY mode.

Sprint Accessibility will continue to offer the Automated 711 feature for STS and Spanish. Sprint Accessibility is making it easier for customers who use STS or Spanish

to use 711. Sprint Accessibility's TRS CAs are trained to immediately transfer STS callers to STS CAs upon request (without requiring the caller to redial).

B.8 Voluntary at-home VRS call handling pilot program

§64.604(b)(8) Any VRS provider that holds a conditional or full certification to receive compensation from the TRS Fund pursuant to § 64.606 as of March 23, 2017 may participate in the voluntary at-home VRS call handling pilot program. The pilot program shall be in effect for one year, for service provided by participants beginning November 1, 2017, and ending October 31, 2018.

The Virgin Islands does not provide VRS services, does not contract to provide VRS services, and is exempt from this section.

TAB 4

Functional Standards

FUNCTIONAL STANDARDS

(The information in Tab 4 is provided by Sprint Accessibility)

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.

Virgin Islands 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. Virgin Islands 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 this information. Each report will include the following information:

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

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

Customer Contacts Online Database (CCOD)

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

C.2 Contact Persons

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

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C.3 Public Access to Information

§64.604(c)(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.

Community Outreach, Public Relations and Educational Programs

The Virgin Islands Relay Service provides community and business outreach and promotes a public awareness campaign to educate all Virgin Islands citizens about the relay service. These efforts educate and heighten public awareness of 7-1-1 and TRS throughout the Virgin Islands through marketing, advertising and community involvement. In compliance with FCC requirements, which call for outreach to all telephone users, the Virgin Islands Relay Service's outreach initiatives focus on the need

to educate the hearing community. As it has been in the past, the primary outreach concern is the number of hearing people who hang up on relay calls. Through participation in promotional events, presentations, workshops and instructional seminars, the Virgin Islands Relay Service reaches out to all relay user communities and always adjusts its programs to meet the specific needs of every audience.

The Virgin Islands Relay Service's outreach and awareness efforts specifically target individuals who are deaf, hard of hearing, late deafened, deaf-blind or have difficulty speaking, as well as their family, friends and caregivers. The Virgin Islands Relay Service performs a variety of activities to inform the public about relay and regularly participates in activities held by Virgin Islands organizations that serve relay users.

The outreach team offers informative presentations on the features of relay services to organizations, relay user groups, businesses, educators and students, health care providers, 9-1-1 call centers, emergency, fire and law enforcement personnel, libraries, senior centers, and public and private entities. The Virgin Islands Relay Service's territory wide outreach and awareness efforts includes:

- Presentations
- Exhibits
- 911 Education
- Strategies for reaching Hard to Reach Relay Users
 - Hard of Hearing and Elderly Strategies
 - Speech to Speech
 - Deaf Blind
- Outreach to Businesses and Educational Institutions
- Outreach to Spanish
- Equipment Distribution Programs
- Involvement of Deaf and Territory Agencies
- Customized Outreach materials
- Promotional Materials
- Variety of Brochures
- Description of Complaint Procedures in Printed Materials
- Bill Inserts and Directory Pages
- Newsletters
- TRS Web site
- Social Media
- Press Release and Public Relations
- Print Advertising
- Media Advertising

Please refer to Appendix E for sample outreach materials and a list of the outreach activities the Virgin Islands Relay Service has accomplished

Website

Viya maintains and operates the <https://viyavi.com/telephone/vi-relay-service/> website, which explains the relay service, and provides contact information. See Appendix E for a

screenshot of this website.

C.4 Rates

§64.604(c)(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

In August of 2016, Sprint Accessibility received from the FCC an ongoing waiver of end user selection of carrier. The waiver is renewed every six months and Sprint Accessibility do not expect the waiver to be cancelled. As a result, Sprint Accessibility is offering **domestic and international calling at no charge** with no long-distance fees or long-distance call billing for all TRS users through Virgin Islands Relay. Sprint Accessibility's optimal approach provides less cost to the end user, fewer billable minutes to the Virgin Islands, greater functional equivalence, and fewer customer complaints.

Sprint Accessibility's approach as an affiliate of a global telecommunication provider includes the following benefits for Virgin Islands Relay and its end users:

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

C.5 Jurisdictional Separation of Costs

§64.604(c)(5)(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.

Costs of Providing TRS

The Virgin Islands Relay Service's provider presents the Interstate TRS Fund with a

billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate costs are recovered in Viya's rates for local telephone service.

Cost Recovery

Intrastate Calling

The Virgin Islands Relay Service receives intrastate funding directly from Viya, which recovers the intrastate costs in the rates for local telephone service. There is no separately stated TRS charge for these calls. All intrastate TRS callers are only billed local telephone rates which are the same as all local callers. No intrastate toll charges are applicable in the U.S. Virgin Islands.

Interstate Calling

The Virgin Islands Relay Service recovers the costs of interstate calls originating in the Virgin Islands by billing the federal TRS fund in accordance with Section 64.404(c)(5)(iii) of the Commission's rules.

Telecommunications Relay Fund

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

§64.604(c)(7)(N)(1-4) pertain to VRS providers.

The Virgin Islands does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

C.6 Complaints

§64.604(c)(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.

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

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

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and

resolved by an on-site technician. The Sprint Accessibility CRM is responsible for tracking all technical complaints and following-up with customers on resolutions. If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Virgin Islands Relay customers also have the option of calling Sprint Accessibility's 24-hour Customer Service department (800-676-3777), or the Sprint Accessibility Customer Relations Manager to file complaints or commendations. Virgin Islands 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. Virgin Islands Relay submits all complaints from June 1 - May 31 to the FCC by the annual July 1st deadline.

See Appendix F for Years 2013 – 2017 complaint logs.

C.7 Treatment of TRS Customer Info

§64.604(c)(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.

Virgin Islands Relay, through Sprint Accessibility's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint Accessibility will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format. Sprint Accessibility does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint Accessibility will not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order. The current contract with Sprint Accessibility will expire on April 30, 2018 but will be renewed for an additional five years.

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

§64.606(f)(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.

The Virgin Islands Relay Service understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and certifies that the state TRS program continues to meet federal minimum standards.

By this application Viya intends that the operation of the Virgin Islands Relay Service will continue to be in compliance with the Federal Communication Commission rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Virgin Islands Service to be out of compliance, Viya agrees to take such action as may be reasonably required to bring Virgin Islands Relay Service into compliance.

APPENDIX A

APPENDIX A

FCC TRS PUBLIC NOTICE, JULY 19, 2017



PUBLIC NOTICE

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

News Media Information 202 / 418-0500

Internet: <https://www.fcc.gov>

TTY: 1-888-835-5322

Released: July 19, 2017

CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION CG Docket No. 03-123

Under Section 225, states wishing to operate their own telecommunications relay service (TRS) programs for the provision of intrastate and interstate TRS must have certification from the Federal Communications Commission (FCC or Commission) to do so.⁷ Commission rules provide that states and covered territories may receive TRS certification in five year increments.⁸ This Public Notice alerts states and territories that the certifications they now hold will expire on July 25, 2018. Under the Commission's rules, each certified state or territory may file an application for renewal of its certification one year prior to expiration, i.e., beginning July 25, 2017.⁹ Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2017, to give the Commission sufficient time to review and rule on the applications prior to expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),¹⁰ codified at Section 225 of the Communications Act of 1934, as amended (Act).¹¹ TRS enables persons with hearing and speech disabilities to access the

⁷ 47 U.S.C. § 225(f). TRS are "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio."
⁴⁷ U.S.C. § 225(a)(3). *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, para. 3 & n.18 (2004) (describing how a traditional TRS call works). Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. *See* 47 U.S.C. § 225(d)(3).

⁸ 47 CFR § 64.606(c)(1). The Consumer and Governmental Affairs Bureau (CGB or Bureau), under delegated authority, issued its last round of certification grants in July 2013. *Notice of Certification of State Telecommunications Relay Services (TRS) Programs*, Public Notice, 28 FCC Rcd 9987, 9987 (CGB 2013).

⁹ 47 CFR § 64.606(c)(1).

¹⁰ Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

¹¹ 47 U.S.C. § 225.

telephone system to communicate with other individuals.¹² Under the Act, the Commission must ensure that the provision of TRS is functionally equivalent to voice telephone services.¹³ The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.¹⁴

All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and speech-to-speech relay (STS) service.¹⁵ States may also offer captioned telephone relay service (CTS).¹⁶ Each state seeking renewal of its certification must submit documentation to the Commission that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose.¹⁷ In addition, a state must establish that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.¹⁸ This certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The Commission's TRS rules further explain that documentation should be submitted in narrative form, and that the Commission shall provide the public with notice of and an opportunity to comment on such applications.¹⁹

Per the following schedule, the Bureau will release for public comment each application for renewal, after which it will review each application to determine whether the state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules.²⁰ The state must also establish that the program does not conflict with federal law.²¹ In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program.²² The Bureau will release public notices of renewal of certification for each state on a rolling basis.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	FCC ACTION	PROCESS
Beginning	CGB will issue Public	Comments are due within 30 days of

¹² *Id.* § 225(a)(3).

¹³ *Id.* § 225(a)(3).

¹⁴ *See* 47 CFR § 64.604.

¹⁵ *See* 47 CFR § 64.603.

¹⁶ Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling, 18 FCC Rcd 16121 (2003).

¹⁷ 47 U.S.C. § 225(f); 47 CFR § 64.606(a).

¹⁸ 47 CFR § 64.606(b)(1)(ii).

¹⁹ *Id.* § 64.606(a).

²⁰ 47 U.S.C. § 225(f)(2)(A). *See* 47 CFR § 64.604.

²¹ 47 CFR § 64.606(b)(1)(iii).

²² 47 U.S.C. § 225(f)(2)(B).

July 2017	Notices seeking comment on state TRS applications that have been filed.	release of the Public Notices; reply comments are due within 15 days thereafter.
July 2017 - May 2018	CGB will review applications for TRS recertification for compliance with 47 CFR §§ 64.604 and 64.606.	If necessary, the Bureau will send deficiency letters requesting additional information from states to ensure compliance with TRS mandatory minimum standards and other certification requirements.
May 2018 - July 2018	CGB will issue certification renewals on a rolling basis.	

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned “TRS State Certification Application.”

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission’s electronic comment filing system (ECFS): <http://apps.fcc.gov/ecfs/>. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and CG Docket No. 03-123.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filing for the Commission’s Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. Filings also may be found by searching on the Commission’s Electronic Comment Filing System (ECFS) at <http://apps.fcc.gov/ecfs/> (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice) or e-mail at Dana.Wilson@fcc.gov.

-FCC-

APPENDIX B

APPENDIX B

CONTRACT AWARD AND OUTREACH AGREEMENT

Contract between Viya and Sprint (first page only):

No.: CNMS01222013-TRS

Date: February 13, 2013

MASTER SERVICES AGREEMENT

Customer Name: Virgin Islands Telephone Corporation d/b/a Innovative Telephone
Address: 4611 Tutu Park #200
St. Thomas, VI 00802

This Master Services Agreement is entered into between SPRINTCOM, INC., ("Sprint") and VIRGIN ISLANDS TELEPHONE CORPORATION D/B/A INNOVATIVE TELEPHONE ("Customer").

1. GENERAL

- 1.1 **Applicability.** This Agreement contains general provisions that apply to all Products and Services that Customer purchases from Sprint including, but not limited to, TRS Services. "Agreement" refers to this Master Services Agreement and all Attachments, documents incorporated by reference, and related Order(s).
- 1.2 **Rates and Conditions Website.** Customer's use of Sprint Products or Services is also governed by the applicable Product and Service annexes attached to this Agreement or accessible from the Rates and Conditions Website <http://www.sprint.com/ratesandconditions> (the "Rates and Conditions Website").
- 1.3 **Order of Precedence.** Customer's solicitation for proposals and Sprint's response (if any) are incorporated into the Agreement by this reference. If a conflict exists among provisions within the documents that form the Agreement, the following order of precedence will apply: (a) this Agreement, including all relevant attachments; (b) posted or referenced terms; (c) Sprint's response to Customer's request for proposal or similar solicitation (if any); and (d) Customer's solicitation (if any). Furthermore, specific terms will control over general provisions and negotiated, added, or attached terms, conditions or pricing will control over standardized, posted or non-negotiated terms, conditions and pricing, to the extent permitted by law.

2. **TERM.** This Agreement is binding once signed by both parties. The initial term of the Agreement ("Initial Term") shall begin on May 1, 2013 ("Effective Date") and expires on April 30, 2018.

3. **ATTACHMENTS.** The following attachments are incorporated into this Agreement by reference:

Attachment A: Sprint TRS Pricing
Attachment B: Sprint Proposal to Innovative Telephone dated January 30, 2013

4. CHARGES

4.1 Orders

Copy of the Outreach Agreement (first page only):

Date: May 9, 2016

**SECOND AMENDMENT TO
MASTER SERVICES AGREEMENT
#CNMS01222013-TRS**

This Second Amendment is made to the Master Service Agreement #CNMS01222013-TRS between **SPRINT COMMUNICATIONS COMPANY, L.P.** ("Sprint") and **VIRGIN ISLANDS TELEPHONE CORPORATION D/B/A INNOVATIVE TELEPHONE** ("Customer"), signed by Customer on February 13, 2013 and Sprint on February 18, 2013 (the "Agreement") as amended by the First Amendment dated May 6, 2013.

The following modified and added terms and conditions are made a part of the Agreement effective on May 1, 2016 ("Second Amendment Effective Date").

Sprint and Customer agree as follows:

1. Beginning as of the Second Amendment Effective Date, a Sprint Relay representative will conduct four (4) community outreach events ("Outreach Events") on each of the three islands (i.e., St. Thomas, St. Croix and St. John's) in support of the Virgin Islands Relay service for a total of twelve (12) Outreach Events to be conducted by Sprint during the remaining Initial Term of the Agreement. Outreach Events will be conducted approximately every six (6) months.
2. The Agreement is amended by deleting Attachment A ("Sprint TRS Pricing") in its entirety and replacing with a new Attachment A attached hereto.
3. All other terms and conditions in the Agreement, not amended above, will remain in effect. This Second Amendment and any information concerning its terms and conditions are Sprint's proprietary information and are governed by the Confidential Information provision of the Agreement. Alterations to this Second Amendment will not be valid unless accepted in writing by a Sprint officer or authorized designee. To become effective, this Second Amendment must be signed by a Customer representative; delivered to Sprint; and signed by a Sprint officer or authorized designee.

SPRINT COMMUNICATIONS COMPANY, L.P.

**VIRGIN ISLANDS TELEPHONE CORPORATION D/B/A
INNOVATIVE TELEPHONE**

By:


Authorized Signature

By:


Authorized Signature

Date:

6/22/2016

Date:

6-15-16

Name and Title:

Michaela Clairmonte – Manager,
Contract Negotiations & Management

Name and Title:

Mark Linton
(please print) Secretary & Treasurer

(please print)

Address:

12502 Sunrise Valley Drive
Reston, VA 20196

Address:

4611 Tutu Park #200
St. Thomas, VI 00802

Approved by
Public Sector Legal
as to legal form

DL - 6/22/16

FCC Matrix; TRS and STS Training Outlines

The tables and training materials in this Appendix were provided by Sprint Accessibility. Information on Captioned Telephone Service (CTS) is included even though the Virgin Islands Relay Service does not contract for that service.

Please see the following table for a point-by-point explanation of how we meet and/or exceed each of the minimum federal standards. Please note, we have included information regarding Captioned Telephone (CTS) standards.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint offers a comprehensive training program designed to offer the best quality to all relay users. Sprint's 2-3 week program includes training on Diversified Culture, compliance with regulatory requirements, & the operation of Sprint's systems.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS, IP Relay (Partially waived for CTS, IP CTS)	Exceeds	Sprint ensures all CAs are skilled in typing, grammar, spelling, & interpretation of typewritten ASL (as applicable), familiar with hearing & speech disability culture, language, & etiquette; & have clear & articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS, IP Relay (Waived/partially waived for CTS, IP CTS)	Exceeds	Sprint's CAs type &/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	As a general rule, Sprint allows CA takeovers only when necessary. Sprint's CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation &/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's sophisticated software enables real-time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, IP Relay, CTS, IP CTS)	Meets	Sprint offers STS users the option to mute their voice so the other party to the call will hear only the CA & will not hear the STS user's voice. STS users can request this feature as a part of their Customer Profile or on a per-call basis.
Confidentiality Rule	TRS, STS, CTS,	Meets	Sprint has systematic & operational processes

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
47 C.F.R. § 64.604(a)(2)(i)	IP CTS, IP Relay		intended to prevent disclosure of call content &/or Customer Proprietary Network Info (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain info from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint bars its CAs from intentionally altering the conversations they relay, except to the extent necessary to: (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide info to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint never limits the length of a Relay call.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Except to the extent the requirements are waived, not permitted, or as the FCC determines that it is not technologically feasible to do so, Sprint services are capable of handling any type of call normally provided by telecommunications carriers.
Credit Authorization 47 C.F.R. § 64.604(a)(3)(iii)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Meets	Sprint understands it is permitted to decline a call if the user cannot pay or because a credit authorization for toll calls is denied.
Pay Per Calls 47 C.F.R. § 64.604(a)(3)(iv)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Sprint processes pay per calling for TRS & CapTel users with blocks available via the Customer Profile.
Call Combinations 47 C.F.R. § 64.604(a)(3)(v)	TRS (Partially waived for CTS, IP CTS, IP Relay)	Meets	Sprint's Relay services support all mandatory FCC call types.
Call Release 47 C.F.R. § 64.604(a)(3)(vi)(1)	TRS (Waived for CTS, IP CTS, IP Relay)	Meets	Sprint provides TTY-TTY call set-up which allows the CA to set-up the call & drop off the line, if not needed to facilitate conversation.
Speed Dial 47 C.F.R. § 64.604(a)(3)(vi)(2)	TRS, STS, CTS, IP Relay (Waived for IP Relay)	Meets	Sprint's TRS/CTS speed dial is available with a Customer Profile. CapTel users can select 3 speed dial buttons & a phone book for contacts.
Three-Way Calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	TRS, STS, CTS, IP Relay (Waived for IP CTS)	Meets	Sprint supports LEC-based three-way calling for its customers.
Interactive Menus & Voicemail	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint electronically captures recordings & makes interactive recordings & voicemail/

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
47 C.F.R. § 64.604(a)(3)(vii)/(viii)			answering machines available to Relay customers. Sprint supports Sprint IP Text Mail so Sprint IP users can receive voicemail messages via email, when unable to answer.
Emergency Calls for TTY-based providers 47 C.F.R. § 64.604(a)(4)	TRS, STS (N/A for CTS, IP CTS, IP Relay)	Meets	Sprint automatically & immediately connects emergency calls to an appropriate Public Safety Answering Point (PSAP) which is capable of dispatching emergency services.
STS Called Numbers 47 C.F.R. § 64.604(a)(5)	STS (N/A for TRS, CTS, IP CTS, IP Relay)	Exceeds	Sprint allows STS users to register a Customer Profile which includes Speed Dial & other enhancements.
Privacy Screens 47 C.F.R. § 64.604(a)(6)	VRS	N/A	This requirement is not applicable to the services being offered.
International Calls Non-reimbursable 47 C.F.R. § 64.604(a)(7)	VRS, IP Relay (N/A for TRS, STS CTS, or IP CTS)	N/A	This requirement is not applicable to the services being offered. Sprint IP has procedures in place to prohibit international usage.
ASCII & Baudot 47 C.F.R. § 64.604(b)(1)	TRS, STS (Waived for CTS, IP CTS) (N/A for IP Relay)	Exceeds	Sprint's TRS (TTY) platform supports all communication modes generally in use including Baudot (domestic & international), ASCII, Turbo Code, & Enhanced Turbo Code (E-Turbo).
Speed of Answer & Blockage 47 C.F.R. § 64.604(b)(2)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint Accessibility answers at least 85 percent of all calls on a daily basis within 10 seconds, including abandons. Sprint's systems exceed the P.01 standard.
Equal Access to Interexchange Carriers (IXCs) 47 C.F.R. § 64.604(b)(3)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Except to the extent the requirements are waived, Sprint's TRS & CTS platforms support the billing & rating of toll calls through other carriers.
TRS Facilities 47 C.F.R. § 64.604(b)(4)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides mandated services 24/7 using redundant facilities functionally.
Technology 47 C.F.R. § 64.604(b)(5)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint exceeds the minimum mandatory services & routinely upgrades its products to increase functional equivalency.
Caller ID 47 C.F.R. § 64.604(b)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides Caller ID. If not blocked by the customer, the number of the calling party is transmitted.
STS 711 Calls 47 C.F.R. § 64.604(b)(7)	TRS, STS (N/A to CTS, IP CTS, or IP Relay)	Exceeds	Sprint offers multiple solutions to meet this requirement include: Auto 711 Routing for STS users connects callers with a Customer Profile directly to STS CAs. CAs answering 711 for callers without a profile will immediately transfer the caller to a STS CA.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
			Sprint offers a wireless short code to STS for Sprint wireless users. Sprint's 711 Interactive Voice Response (IVR) allows connectivity directly to an STS CA using the same level of prompts the IVR uses for other forms of TRS.
Consumer Complaint Logs & Procedures 47 C.F.R. § 64.604(c)(1)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint maintains 24/7 Customer Service & logs all complaints received. Sprint provides the State a summary that meets FCC standards.
Contact Persons 47 C.F.R. § 64.604(c)(2)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's point of contact for complaints is Customer Service at: Sprint Accessibility Customer Service PO Box 29230 Shawnee Mission, KS 66201-9230 800-676-3777 (English) 800-676-4290 (Spanish) 877-787-1989 (Speech to Speech) 877-877-3291 (Fax)
Public Access to Information 47 C.F.R. § 64.604(c)(3)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint provides Viya Outreach services through state programs. The FCC does not allow IP Relay providers to include the cost of outreach in their yearly costs. Sprint continues to publicize the availability of IP services through promo materials, on-line marketing, & public service announcements. (Sprint does not include the cost of these activities in its yearly cost submissions to the FCC).
Rates 47 C.F.R. § 64.604(c)(4)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint ensures TRS/CTS users, who rely on Sprint's Relay platforms to establish billing for toll calls, are charged no more than traditional phone users.
Cost Information & Data Submission 47 C.F.R. § 64.604(c)(5)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint contributes to the Interstate TRS Fund & submits the required cost data to the FCC & to the Fund administrator to receive reimbursement.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(M)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has provided copies of the whistleblower protections to all of its employees including instructions for reporting noncompliance to the FCC's whistleblower hotline.
Complaint Resolution 47 C.F.R. § 64.604(c)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint supports timely & effective complaint resolution.
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide

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

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

Training

Communications Assistant (CA) Training

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

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

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

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

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

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

- Lectures
- Visual graphics
- Flow charts
- Videos
- Role-play scenarios
- Simulated on-line call handling
- Observation of live-call handling

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

POLICY AND PROCEDURE TOPICS		
Orientation	<ul style="list-style-type: none"> ◆ Welcome and Introductions ◆ Introduction to Each Other ◆ Sprint (or Vendor Company) ◆ Sprint Values ◆ Sprint Corp Overview ◆ History of Sprint Corporation ◆ Local Telecommunications ◆ Wireless 	<ul style="list-style-type: none"> ◆ Internet Services ◆ Product Distribution ◆ The Sprint Campus (if applicable) ◆ Telecommunications Relay Service ◆ What is Relay? ◆ Relay Agent Training ◆ Relay - Connect to Your Future Video ◆ Observation Guidelines ◆ How a Call Reaches Sprint Accessibility
Connecting to Relay	<ul style="list-style-type: none"> ◆ The Role of a Relay Agent ◆ Connecting to Relay ◆ 711 ◆ Dedicated Toll-Free Numbers ◆ Equipment ◆ TTY ◆ TTY Basics ◆ TTY Etiquette ◆ Closing a Conversation ◆ Agent Responsibility ◆ Call Set Up ◆ Call Closing ◆ TTY to Voice Closing a Conversation ◆ Operator Role Closure ◆ Operator Close Protocol Guide: ◆ Disallowed Calls ◆ Glossary of Abbreviations & Terms ◆ TTY Practice Session ◆ Auto-Corrected Abbreviations ◆ Standard Abbreviations 	<ul style="list-style-type: none"> ◆ Sprint IP user connects to Agent but wants Customer Service ◆ Sprint IP Two Line VCO ◆ Fed IP Relay ◆ Fed IP Relay call processing ◆ Fed IP Relay Reporting ◆ Fed IP Relay variations ◆ Sprint/Fed IP Relay International Calling ◆ Sprint/Fed IP Variations ◆ Sprint/Fed IP Fast Busy ◆ Sprint/Fed IP 2-Line VCO ◆ Sprint/Fed IP Conversation Lag Time ◆ Sprint/Fed IP Interrupts ◆ Voice Mail Greeting ◆ Cellular & Wireless Phones ◆ Video Relay Service ◆ Devices & Pagers ◆ TTY Public Payphone ◆ Sprint National Relay ◆ Sprint International

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ Typing Variations ◆ Internet Characters ◆ Non-Baudot Supported Characters ◆ Verbatim - Style ◆ Contraction Spelling ◆ Punctuation ◆ Agent/Operator Role ◆ SKSK ◆ Background Noises while TTY user is Typing ◆ Typing Monetary Units ◆ 711 ◆ TTY Garble During Typing ◆ XXX to Correct Typing Error ◆ Other Communication Devices ◆ Data Transmission Speed ◆ Turbo Code ◆ Turbo Code Interrupt ◆ Enhanced Turbo Dial Thru - (ETurbo) ◆ Disable Turbo Code Mode ◆ American Standard Code Information Interchange (ASCII) ◆ ASCII Interrupts ◆ Sprint IP - Internet Relay ◆ Sprint IP call processing ◆ Internet Relay variations ◆ 'GA' is optional ◆ Sprint IP Standard Svc Explanation ◆ Text Flow ◆ Interruptions without garble ◆ Conversational flow ◆ ASL Emoticons – Text Message Abbreviations ◆ IP Acronyms ◆ Sprint IP Variations ◆ 911 Emergency Calls 	<ul style="list-style-type: none"> ◆ Inbound international calling ◆ Sprint International Variations ◆ Non-Standard TTY ◆ Outbound International calling ◆ Transfer Menu ◆ Reseller call processing ◆ CapTel ◆ Relay-CapTel ◆ CapTel-Relay ◆ CapTel Transfers ◆ Dedicated State CapTel Transfer ◆ Alternate Languages ◆ Spanish Language Customer Service ◆ Relay Caller ID ◆ True Caller ID ◆ Per Call Block ◆ Per Line Block ◆ Permanent Call Blocking ◆ Caller ID Blocking - True Caller ID ◆ Connecting Variations ◆ Misdialed Relay Phrase ◆ Dialed 711 Instead of 911 ◆ 711 Spanish ◆ Request for Relay Numbers ◆ Cellular/Wireless problem reaching 711 ◆ 611/811 (LEC Service Access) ◆ 700 ◆ 900 Numbers & Call Processing ◆ Correctional Facility/Prison Calls ◆ Use of Relay through Correctional Facilities: Correctional Facility Call Processing, Relay Abuse ◆ Spanish & French Language Service ◆ International calling restrictions ◆ Info Digit list
Overview of System & Equipment	<ul style="list-style-type: none"> ◆ System Overview ◆ Login/Logout ◆ Agent Profile ◆ Clicking the Mouse ◆ Dragging/Dropping ◆ Copy/Paste ◆ Drop Down Boxes ◆ Lists ◆ Radio Button 	<ul style="list-style-type: none"> ◆ Dial Window ◆ Scratch Pad ◆ Transfer Panel ◆ Headset Panel ◆ Status Bar ◆ Record Feature ◆ Function Keys ◆ Block ◆ Ctrl-Switch

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ Scroll Bars ◆ Sliders ◆ Tables ◆ Accessing a Program ◆ Screen Displays ◆ Call Handling Screen ◆ Title Bar ◆ Banner ◆ Conversation Area ◆ Disconnect Message Status ◆ Color Scheme ◆ Agent Text Transmission ◆ Cancel Key ◆ Information Bar ◆ Profile ◆ Help ◆ Call Type 	<ul style="list-style-type: none"> ◆ Switch ◆ The Keyboard ◆ Alpha Keys ◆ Call Handling Keys ◆ Numeric Keys ◆ Cursor Movement Keys ◆ Arrow Keys ◆ Backspace ◆ Error Correction Function ◆ Single Word Edit Function ◆ Word Substitution Feature ◆ Macros Table ◆ Ctrl-Function Keys ◆ Glossary of Telephony Terms ◆ Background Noises ◆ Voice Tones/Descriptive Words ◆ Standard Abbreviations
Phone Image (Tone of Voice)	<ul style="list-style-type: none"> ◆ Professional Phone Image ◆ How phone image is created ◆ Provide warm & friendly greeting ◆ Conversational Tone ◆ Voice Inflection ◆ Audibility & breath control ◆ Pitch ◆ Quality ◆ Operator Role ◆ Relay Role ◆ Relay Skills ◆ Conversational Flow ◆ Staying focused ◆ Listening skills ◆ Customer service skill ◆ Coping skills ◆ Phrases 	<ul style="list-style-type: none"> ◆ Voice Person Speaking in Third Person ◆ Pacing the Voice Customer ◆ Brief pacing phrases ◆ Repeating information ◆ Voice Customer does not say “GA” ◆ Handling Interruptions ◆ Voice Tone ◆ How Phone Image is Created ◆ Why Conversational Tone? ◆ Transparency, Caller Control & Confidentiality ◆ Rudeness ◆ Create an Exceptional Customer Experience ◆ Announce ◆ Closing ◆ Suggested Redirect Phrases ◆ Transparency & Caller Control ◆ Background Noises ◆ Voice Tones/Descriptive Words
TTY-Voice & Voice-TTY	<ul style="list-style-type: none"> ◆ TTY to Voice Introduction ◆ Connecting to outbound customer ◆ Announcement ◆ Explanation of service ◆ Deaf or Hard-of-Hearing Explanation ◆ International Announcement ◆ TTY-Voice Procedures ◆ TTY-Voice Specific Person Request 	<ul style="list-style-type: none"> ◆ TTY-Voice Busy Signals ◆ Regional 800 ◆ Voice-TTY ◆ Voice-TTY Introduction ◆ Connecting to the outbound customer ◆ Voice Greeting ◆ Voice call progress ◆ Announcement

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

POLICY AND PROCEDURE TOPICS		
HCO (Hearing Carry-Over)	<ul style="list-style-type: none"> ◆ HCO Intro ◆ HCO Announcement ◆ HCO Service Explanation ◆ People with speech disabilities “S” ◆ Non-Branded HCO ◆ Branded HCO ◆ HCO with Privacy ◆ HCO No Answer ◆ HCO Busy ◆ HCO-Voice Answering Machine 	<ul style="list-style-type: none"> ◆ Voice-HCO Answered ◆ Voice-HCO Answered TTY (1) (2) ◆ Voice-HCO recorded message answers ◆ 2LHCO Intro ◆ Two-Line HCO Procedure ◆ Reverse Two-Line HCO ◆ HCO Variations ◆ Inbound requests VCO/HCO ◆ HCO User Requests to Speak
Customer Database	<ul style="list-style-type: none"> ◆ Enhanced Customer Database Profile ◆ Household Profile ◆ Edit Household Profile ◆ Navigating Customer Database ◆ Household Profile Panels ◆ Frequently Dialed Numbers ◆ Preferences ◆ Restrictions ◆ Blocked ◆ Emergency Numbers ◆ STS ◆ STS Messages 	<ul style="list-style-type: none"> ◆ Customer Profile Introduction ◆ Use/Edit/New/Delete Customer Profile ◆ Verify Customer Password for Agent ◆ Verify Customer Password – CSR Only ◆ Customer Profile Panels ◆ Personal Information ◆ Notes ◆ Frequently Dialed #s ◆ Emergency #s ◆ STS ◆ STS Messages ◆ Database Profile Macros
Directory Assistance (DA)	<ul style="list-style-type: none"> ◆ DA Intro ◆ Interstate DA ◆ Intrastate DA ◆ Automated DA ◆ DA City & State Given; Area Code Unknown ◆ DA Variations ◆ International Transfer Menu ◆ Call Processing -- Calling Intl 	<ul style="list-style-type: none"> ◆ Call Processing -- Calling from International Number ◆ Sprint International Variations ◆ Non-Standard TTY ◆ Answered Foreign Language ◆ Transfer Menu ◆ 900 # Call Processing ◆ 211/311/511 Requests
Device-to-Device Calls	<ul style="list-style-type: none"> ◆ Device to Device Intro ◆ Function Keys & Banner Messages ◆ VCO-TTY & TTY-VCO ◆ VCO-VCO ◆ TTY-HCO & HCO-TTY 	<ul style="list-style-type: none"> ◆ VCO-HCO & HCO-VCO ◆ HCO-HCO ◆ Device to Device Variations ◆ Alternate Call Type reaches recording
Call Processing Variations	<ul style="list-style-type: none"> ◆ CA information ◆ Area Code Only In From Number ◆ Conversational Flow ◆ Static or Poor Connection ◆ Profanity towards Agent ◆ Redialing ◆ Young Children ◆ Inbound Does Not Connect 	<ul style="list-style-type: none"> ◆ Request for Length of Call ◆ T-V Call & V Requests Supervisor Call Backs for TTYs ◆ Multiple Calls ◆ Sensitive Topics ◆ Suicide ◆ Abuse ◆ Illegal Calls

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ Inbound ASCII ◆ Tone Judgments ◆ Repeating Information ◆ Restricted Calls ◆ Two calling from numbers ◆ LEC Service Office ◆ 611/811 ◆ Double Letters ◆ Call Waiting Feature ◆ Conference Calls ◆ Party Line Calls ◆ Three-Way Calling ◆ Hard of hearing customer Answers TTY Line ◆ Spanish Calls to Spanish Speaking Agents ◆ Request for Alternate Language ◆ Caller Types in Alternate Language ◆ Voice Customer Hangs Up During Call ◆ Variable Time Stamp ◆ Customer Misdialed Phrase ◆ TTY Customer Hangs Up During Call ◆ Non Standard TTY Capability ◆ Relaying Internet Characters ◆ TTY User Does Not Type GA ◆ Dispatch Calls – Pizza, Taxi, etc. ◆ Customer Referral Guidelines ◆ V-T Calls answered by Fax ◆ Customer Requests ◆ Holding for Inbound prior to out dial ◆ Request for Company Information ◆ Request for M/F Agent ◆ Request Specific Agent ◆ Agent Knows Customer ◆ Request for Relay Number ◆ Customer Requests to Call Relay Service ◆ Request for Calling From Number ◆ Request Telephone Number Referral ◆ Request for Date/Time ◆ User Requests Agent to Modify Call 	<ul style="list-style-type: none"> ◆ Answering Machines ◆ Hangs Up Before Message Left ◆ Do Not Type Recorded Messages ◆ Answering Machine Full ◆ Change Answering Machine Message ◆ VCO Requests Leave Message 1st out dial ◆ Leaving a Message V-TTY Ans V ◆ Retrieving Messages from TTY V Answering Machine ◆ TTY Screener ◆ Request to Leave TTY Message on Answering Machine ◆ Recordings ◆ Regional 800 ◆ TTY Requests “Dial That Number” ◆ Recording with Relay Option ◆ Alternate Call Recording Reached ◆ English/Spanish ◆ Pound ◆ Touch Tone Phone ◆ Advertisements ◆ Do Not Type Recordings ◆ Get Live Person/Rep ◆ Conversation Being Recorded ◆ Dial Number from Recorded Announcement ◆ VCO ◆ Conference Calls ◆ Leave Relay Number ◆ Voice Mail Retrieval ◆ VCO Types & Voices ◆ Prompting ◆ Data Transmission Box ◆ Prompting VCO on Hold ◆ Requests VCO/HCO ◆ HCO ◆ Requests VCO/HCO ◆ Alternate Call Type Recording ◆ Bridge Left Open
Call Take Over Procedures	<ul style="list-style-type: none"> ◆ FCC Rule ◆ Protocol & process flow ◆ TTY-Voice and Voice-TTY 	<ul style="list-style-type: none"> ◆ VCO ◆ VCO-VCO ◆ HCO

POLICY AND PROCEDURE TOPICS		
	<ul style="list-style-type: none"> ◆ ASCII 	<ul style="list-style-type: none"> ◆ VCO-TTY & TTY-VCO
Customer Service	<ul style="list-style-type: none"> ◆ Functions ◆ Language Services 	<ul style="list-style-type: none"> ◆ Procedures
Transparency	<ul style="list-style-type: none"> ◆ Non-Emergency Calls ◆ Emergency Center Evacuation 	<ul style="list-style-type: none"> ◆ Network Failure
Emergency Call Procedures	<ul style="list-style-type: none"> ◆ Emergency Calls Intro ◆ Emergency Services ◆ FCC Requirements ◆ Emergency Call Processing ◆ Emergency Reporting ◆ TTY-Emergency 	<ul style="list-style-type: none"> ◆ TTY-Emergency TTY Call Release ◆ Internet-Emergency ◆ Instant Messenger (IM) Emergency ◆ Emergency Call Processing Variations ◆ Emergency Form ◆ Voice-Emergency
Federal Relay Service	<ul style="list-style-type: none"> ◆ FedRelay Intro ◆ FedRelay Announcement ◆ FedRelay Service Explanation ◆ FedRelay Procedures ◆ FedRelay call types 	<ul style="list-style-type: none"> ◆ FedRelay Confidentiality Policy ◆ FedRelay Customer Information Requests ◆ FedRelay Customer Contacts ◆ FedRelay Reporting
STS (Speech-to-Speech)	<ul style="list-style-type: none"> ◆ STS Introduction & History ◆ STS Description ◆ Disabilities ◆ Characteristics of STS users ◆ Stereotypes ◆ Clarifying Phrases ◆ Phrases to Avoid ◆ STS Phone Image ◆ STS Agent Tools ◆ Consistency ◆ Patience ◆ Ask Yes/No Questions ◆ No Personal Conversation ◆ Phrases ◆ STS Alphabet ◆ Transparency/Call Control/Confidentiality 	<ul style="list-style-type: none"> ◆ Ways to Reduce/Streamline Notes ◆ Standard Abbreviations (STS) ◆ STS-Voice ◆ Voice-STS ◆ STS VCO-Voice ◆ Voice-STS VCO (TTY answer) ◆ Voice-STS VCO (VCO answer) ◆ STS VCO -- 2 Line VCO ◆ TTY-STS ◆ STS-TTY ◆ Non-branded HCO-STS ◆ STS-HCO ◆ STS Hold Message ◆ STS Call Takeover ◆ Confidentiality & Transparency ◆ Personal Conversations requests ◆ STS Variations
Healthy Detachment	<ul style="list-style-type: none"> ◆ Healthy Detachment Intro ◆ Objectives ◆ Survival Skills ◆ Relay Traps 	<ul style="list-style-type: none"> ◆ Perception ◆ Ways to Reduce Stress ◆ Hospitality ◆ Phrases
Healthy Relay	<ul style="list-style-type: none"> ◆ Introduction ◆ Objectives ◆ Ergonomics ◆ Stretching Exercises ◆ Agent Reinforcement ◆ Ergonomic Review 	<ul style="list-style-type: none"> ◆ Setting up Workstation ◆ GUAM - Get Up and Move ◆ Ergonomic Relief ◆ Slowing the Customer Down ◆ Overtime ◆ Relaxation

POLICY AND PROCEDURE TOPICS		
Adult Learner	<ul style="list-style-type: none"> ◆ Understanding the Needs of the Adult Learner ◆ The Learning Continuum ◆ Use of Different Modalities ◆ Edgar Dale's Cone of Experience ◆ Elements of Lesson Design ◆ Focus ◆ Objective & Purpose ◆ Input ◆ Trust in Management 	<ul style="list-style-type: none"> ◆ Modeling ◆ Checking For Understanding ◆ Guided Practice ◆ Independent Practice ◆ Summary ◆ Evaluation ◆ How to Give Effective Instruction ◆ Questioning Guidelines ◆ Feedback - Training & Coaching Technique
Assessing Performance	<ul style="list-style-type: none"> ◆ The Assessment Process in Training ◆ Assessment - What is involved? ◆ Practice Time ◆ Spelling Test ◆ Written tests ◆ Side by side evaluations ◆ Typing 	<ul style="list-style-type: none"> ◆ Acceptable Time Frame ◆ Acceptable Is Relative ◆ Ways to "Coach" ◆ Feedback ◆ Maintain Self-esteem & Motivate ◆ Pass/Fail Guidelines ◆ Introduce Assessment Form ◆ Form Set-Up
Introduction to Diversified Culture	<ul style="list-style-type: none"> ◆ Introduction to Diversified Culture ◆ Diversification ◆ Who Uses Relay ◆ Understanding Our Customer ◆ Special Communication Needs ◆ Pathological vs. Cultural View of Deafness 	<ul style="list-style-type: none"> ◆ Why is there Deaf Culture? ◆ What Do You Know About Deafness ◆ Myths About Deafness ◆ Two Views of Deafness ◆ Loudness Levels ◆ Characteristics of Deafness ◆ The Deaf Community
Deaf Heritage	<ul style="list-style-type: none"> ◆ History in Europe ◆ History in North America ◆ Alexander Graham Bell 	<ul style="list-style-type: none"> ◆ Edward Miner Gallaudet ◆ Oral/Combined Debate ◆ Timeline of Deaf History
The Deaf Community	<ul style="list-style-type: none"> ◆ Introduction to the Deaf Community ◆ National Association of the Deaf ◆ Contributions to Society ◆ Mainstreamed Schools ◆ Sign Language Interpreters ◆ Different Communication Systems ◆ Exposure to English ◆ DEAF President Now ◆ Attitude Changes toward the Deaf Community 	<ul style="list-style-type: none"> ◆ American Athletic Association of the Deaf ◆ National Theatre of the Deaf ◆ Assistive Devices ◆ Gaining Acceptance in the Deaf Community ◆ Changes in the Deaf Community ◆ Working with a Sign Language Interpreter ◆ Interpreting Standards ◆ Equal Access ◆ Cochlear Implant Controversy
ASL Pt. 1	<ul style="list-style-type: none"> ◆ What is ASL? ◆ History of ASL ◆ ASL Recognized as Language 	<ul style="list-style-type: none"> ◆ Rules of ASL ◆ Five Parameters of ASL ◆ English vs. ASL Idioms
ASL Pt. 2	<ul style="list-style-type: none"> ◆ Evolution of ASL 	<ul style="list-style-type: none"> ◆ Translate ASL to English and Vice Versa

POLICY AND PROCEDURE TOPICS		
	♦ ASL Syntax	
TTYPhony & TTY Courtesy	♦ First Teletypewriter ♦ Evolution & History of the TTY ♦ Telecom Laws of Accessibility	♦ TTY Courtesy ♦ Development of Relay Service Market
Deaf Customers	♦ Statistics from NIDCD	♦ Relaying for Deaf Customers
Hard of hearing & Late-Deafened Customers	♦ Characteristics of Deaf Customers ♦ Assistive Devices for Deaf Customers ♦ Establishment of Assoc. of Late-Deafened Adults	♦ Establishment of Hearing Loss Association of America ♦ Deaf Seniors ♦ Military Veterans ♦ Relaying for Late-Deafened Customers
DeafBlind Customers	♦ What Does DeafBlind Mean ♦ Assistive Devices for the DeafBlind ♦ Relaying for the DeafBlind	♦ DeafBlind Pacing – Allows the CA to slow down the transmission to the Braille machine
Relaying for Speech/Cognitively Disabled Customers	♦ Speech-Challenged Customers ♦ Assistive Devices ♦ Physically &/or Cognitively Challenged Customers	♦ Traumatic Brain Injury ♦ Stroke ♦ Communication Related Effects
Relaying for Hearing Customers	♦ Statistics	
Ethics & Confidentiality	♦ Interpreting Standards ♦ ADA & FCC regulations for the Provision of TRS ♦ Regulations pertaining to call content	♦ TRS Rules – Operator Standards ♦ Relay Center Agreement Regarding Confidential Customer Info

On-Going Quality Focus Skill Training

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

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

The skills training provided during 2016/2017 is further set forth below. Substantially similar skills training will be provided on a going forward basis.

Quality Focus Skill Training topics from 2016/2017:

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

Ongoing Diversified Culture Awareness Training

Training continues to bring focus to serving relay customers and disability awareness. Sprint Accessibility provides additional training in Diversified Culture in conjunction with each state's local deaf, hard of hearing, Deafblind, late deafened, and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with trainers ensure all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness. Sprint Accessibility will utilize live presentations, videos, audio recordings, role-plays, group activities, written materials, and/or discussion groups to deliver ongoing Diversified Culture training. As a part of ongoing Diversified Culture Training, each employee is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding. The Diversified Culture Awareness Training provided during 2016/2017 is further set forth below. Substantially similar training will be provided on a going forward basis.

Diversified Culture Awareness Training topics from 2016/2017:

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

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

**Check For Understanding
Quality Focus March 2017**

Please return to your supervisor by March 7, 2017.

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

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

Customer Service Initiative (CSI) program: A discussion of support techniques to enhance service for customers and an avenue for sharing relay agent peer to peer suggestions toward accomplishing superior service. Year 2016 - 2017 CSI topics are provided in the following table. Substantially similar training will be provided on a going forward basis.

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

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



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

I and Me Usage

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

Examples:

I
 1. Harry and I **me** went to the store.
 Test: Me went to the store. (Incorrect!)
 Test: I went to the store. (Correct!)
 2. Jake invited Brian and I **me** over for dinner.
 Test: Jake invited I over for dinner. (Incorrect!)
 Test: Jake invited me over for dinner. (Correct!)

Me
 1. Will you take my brother and I **me** to the movies?
 Test: Will you take I to the movies? (Incorrect!)
 Test: Will you take me to the movies? (Correct!)
 2. Sam, Jennifer, and I **me** went to the beach.
 Test: I/me went to the beach. (Incorrect!)
 Test: I went to the beach. (Correct!)

There, Their, and They're Usage

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

Have and Has Usage

	Singular	Plural	Hint
1 st Person	I have	we have	"Have" and "has" are both present tense conjugations of the verb "to have", and we use "have" or "has" depending on the subject. If the subject is 3 rd person singular, then you use "has". All other subjects take on "have".
2 nd Person	you have	you have	
3 rd Person	he/she/it has	they have	

It's and Its Usage

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

Ten Common Spelling Rules

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

Staff Training

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

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

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

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

APPENDIX C

APPENDIX C

TRS PLEDGE OF CONFIDENTIALITY

(The information in Appendix C is provided by Sprint Accessibility)

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

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

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

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

Sprint Code of Conduct

The Sprint Code of Conduct describes the ethical and legal responsibilities of employees of Sprint and anyone we authorize to act on Sprint's behalf. Sprint and all TRS employees (including Communication Service for the Deaf [CSD] staff) are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records

Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an investigation may be subject to corrective action up to and including termination. This information is contained within Sprint's Code of Conduct all employees are required to complete annually.

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

Training on Ethics

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

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

Confidentiality

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

Sprint employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs are taught using various scenarios which demonstrate

the correct way to request assistance from a supervisor without divulging call-specifics. Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs annually sign a confidentiality agreement to maintain confidentiality.

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

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without elaboration. Maintain a professional and friendly image with customers.	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.
It is appropriate to discuss with a member of management technical or procedural components of a call. For example, to say you had problems placing a calling card call from a pay phone.	It is not appropriate to discuss call content or conversations with others, ever.
It is appropriate to call for a Supervisor to look at your screen for assistance with the call.	It is not appropriate to request assistance from the agent sitting next to you.

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

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

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

- ◆ Sprint Accessibility does not modify a customer's record based on experience.
- ◆ All Customer Profile database entries contain time and date stamps and note the identification number of the CA who processed the request.

- ♦ Relay users register a username and password/PIN. Sprint Accessibility also asks customers to register a security question and answer only known to them in case the username and password is lost or forgotten.
- ♦ Sprint Accessibility's Customer Profile information is encrypted and protected from outside access by firewalls.

Sprint Accessibility Confidentiality Form

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

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

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

I have read and understand the Sprint Accessibility Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE AND DATE

MANAGER/SUPERVISOR SIGNATURE AND DATE

Sprint Federal Confidentiality Form

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

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

training, workshops and reading of current literature in the field.

~ Employee and Subcontractor Role ~

- 1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
- 2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
- 3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
- 4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
- 5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as \$5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
- 6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than \$1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
- 7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(I)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000.00.
- 8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.
- 9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).
- 10) This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

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

Employee/Subcontractor Signature Date

Supervisor Signature Date

Company Name (Print or Type)

Service Type (check one)

_____ Captioned Telephone/CapTel

_____ Relay Conference Captioning/RCC

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

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

APPENDIX D

APPENDIX D

DISASTER RECOVERY

(The information in Appendix D is provided by Sprint Accessibility)

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

Call Center Power Solutions

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

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

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

Emergency Procedures Training

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

Sprint Accessibility's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is proprietary to Sprint. Additionally, as part of the nation's critical

infrastructure, Sprint participates in coordinated situation drills with Federal Emergency Management Agency (FEMA), the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster.

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

Business Continuity

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

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

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

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

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

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

Call Center Evacuation Events

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

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

Proactive Measures

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

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

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

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

- ◆ Sprint Accessibility automatic routes calls away from a center undergoing a service recovery event. For example, if a fire drill forces CAs to evacuate, the call router automatically sends calls to other relay centers.

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

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

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

TRS Data Center Disaster Planning

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

TRS Winter Preparedness Plan

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

Known Event

- ◆ Four days prior - TMCC and the Operations Manager will make a determination as to the severity and number of centers which might be affected.
- ◆ Three days prior - TMCC and the Operations Manager will verify previous day's potential impact and begin calling to non-effected centers to post overtime (OT). All centers will be advised to put a list together of employees who will work overnight and weekends. TMCC will notify one of the Managers of Customer Relations and CCSA of our "game plan"
- ◆ Two days prior - TMCC will meet with the Operations Manager to update impacts and plan. All non-impacted centers will be called to update OT requirements and overnight requests.
- ◆ One day prior - TMCC will meet with the Operations Manager to update impacts and plan.

- ◆ Day of Event - TMCC will invoke emergency call routing as required. TMCC will be the point of contact for all notifications. Affected centers will update TMCC every four hours. TMCC will update the Operations Manager who will update BC Manager through executive level. Management is also responsible for notifying the BCT.

Unknown Event

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

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

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

Customer Notification Procedures

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

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

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

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

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

Temporary Delay Message

If approved by the Virgin Islands, Sprint Accessibility can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack

or natural disaster that significantly increased the number of calls to the relay center, Sprint Accessibility can add a temporary recording that alerts voice and TTY users, such as: “THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER.”

Telecommunications Service Priority (TSP)

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

APPENDIX E

VIYA'S (FORMERLY INNOVATIVE) DISABILITY GROUP OUTREACH

Outreach via Viya Website and Telephone (2013 to Present)

Viya Wireless

- We provide information on our website regarding features offered for the Hearing impaired to include HAC compatible handsets. The website also provides detailed information regarding how to choose the right device as we know that the level of loss of hearing is individualized.
- All HAC compatible handsets are listed on our website along with their HAC ratings and the list is updated as needed.

Viya Telephone

- Information regarding the VI Relay Service is provided under the telephone section of the Viya website. The services provided enable hearing impaired, hard of hearing or speech impaired persons to communicate by telephone seven days a week, 24 hours a day.
- Information regarding the VI Relay Service is also available in Viya Telephone's directory which is issued on an annual basis to all residential and business subscribers.

Outreach Telecommunications Relay Service Sessions (April-2013)

Viya Wireless and Viya Telephone

- 3-day meetings were held on St. Thomas, St. John and St. Croix with the hearing impaired community to foster feedback on their needs and preferences regarding communication avenues. Qualified representatives who specialize in the Sprint Relay service and are well known and respected in the hearing impaired community led the meetings on Viya's behalf.

Other Outreach (2013 to 2016)

- Viya sponsored a space at Viya's St. Croix Business Office for the Virgin Islands Multiple Sclerosis Support Group's monthly meetings from 2013 until 2016 when the Estate Diamond location was sold.
- October 2014 - Viya's CBS-TV2 aired a documentary "Forgotten in Paradise" which focused on the mentally disabled. The documentary chronicled the history of the territory's mental health service system from its inception in the 1940s to today, with touching firsthand accounts from St. Croix people with mental illness, their families, and their struggle to have better mental health care services.

2015 Initiatives for Disabled Community Outreach

- Viya incorporated educational sessions for the disabled community to provide information and answered questions about our products and services that cater to their needs at activities such as the annual Agriculture and Food Fair and the EVO Celebration that occurred after the completion of the Company's major network upgrade.
- Established promotions (in coordination with the Marketing/Sales team) highlighting the products and services for the disabled (HAC compatible handsets and Video Relay).
- Continued ongoing discussions/research for new product and service developments that benefit customers with disabilities (Marketing/Sales initiative).

2016 Initiatives for Disabled Community Outreach

- Viya incorporated educational sessions for the disabled community to provide information and answer questions about our products and services that cater to their needs at 2016 annual Agriculture and Food Fair held on February 13 to 15, 2016.
- Viya held educational sessions for the disabled community on all three islands to disseminate information on the communications services and equipment available to the deaf, hearing impaired and speech impaired persons. The sessions were also instructional in demonstrating how to use the services and equipment. The sessions were held on September 26, 2016 on St. John, on September 28, 2016 on St. Thomas and on September 28, 2016 on St. Croix.

2017 Initiatives for Disabled Community Outreach

- Viya incorporated educational sessions for the disabled community to provide information and answer questions about our products and services that cater to their needs at 2017 annual Agriculture and Food Fair held on February 18 to 20, 2017.
- Viya held educational sessions for the disabled community on all three islands to disseminate information on the communications services and equipment available to the deaf, hearing impaired and speech impaired persons. The sessions were also instructional in demonstrating how to use the services and equipment. The sessions were held on June 5, 2017 on St. John, on June 6, 2017 on St. Thomas and on June 7, 2017 on St. Croix.

Viya Companies will continue to work on fulfilling its outreach initiative obligations and will work closely with the disabled community throughout the Territory.



©KAT STEVENS

CLASS FEATURES (CONT'D):

FORWARDING

This feature allows you to forward your calls to another number.

Call Forwarding Activation *71

Call Forwarding Deactivation *72

Residential\$1.75 per month

Business\$3.50 per month

Note to subscribers with phone numbers beginning with 718-XXXX and EVO service subscribers: If the courtesy call is not answered, hang up and immediately repeat the procedure. In this case, no courtesy call is required to enable the feature.

CALL WAITING

While on the phone you will hear a tone indicating that another party is trying to call you. (The calling party only hears the normal ringing). Quickly depress the hook switch or push the "flash" button to answer the call. To switch back to the original call, simply depress the hook switch or hit "flash" again.

Residential\$2.35 per month

Business\$4.70 per month

SPEED DIALING

This feature allows you to program up to nine numbers that you can dial using two digits.

To activate: Dial 73 and wait for the dial tone to return. Dial the code number you select, between two (2) to nine (9). Dial the phone number you wish to store. For long distance numbers include "1" plus the area code, if different from your own. Local numbers must be entered as seven digit numbers. To change a number in the memory, simply repeat these steps, selecting the code for the number you wish to change.

Residential\$1.75 per month

Business\$3.20 per month

THREE WAY CONFERENCE CALLING

With this feature, you can have a three-way conversation without an operator's assistance. Three-Way Conference Calling allows for the addition of a third party to a connection between two numbers.

No Activation Code Needed

Residential\$2.35 per month

Business\$3.50 per month

VOICE MAIL

Now you can get fast, easy access to your messages when you're on the phone, Internet or away from home. Dial *98 and your 4-digit pin to hear messages from home. To hear your messages when you are away from home, dial 770-MAIL (6245), then enter your ten-digit home number, then your 4-digit pin. The Family Mailbox feature allows each family member to have their own personal mailbox. Innovative voicemail works during power outages.

Residential\$3.95-\$8.95 per month

Business\$11.95-\$19.95 per month

LIFELINE

Lifeline provides reduced monthly rates for basic telephone service. To be eligible for Lifeline you must be a resident of the Virgin Islands, be a minimum of 18 years of age and be the head of the household, have a gross annual household income not to exceed limits stipulated by the FCC and/or PSC and be certified for participation in the Lifeline program by the U.S. Virgin Islands Department of Human Services. If you qualify for participation in Lifeline, you will receive a credit on your local monthly wireline telephone bill of \$9.25 (Federal credit) and \$10.55 (local credit). In addition, credit will be issued on the Universal Service Fee, the Recovery Charge (ARC) and the Local Number Portability (LNP) charge.

VIRGIN ISLANDS RELAY SERVICES (VIRS)

This service from INNOVATIVE TELEPHONE enables hearing impaired, hard of hearing or speech impaired persons to communicate by telephone seven days a week, 24 hours a day. To communicate, a hearing impaired, hard of hearing or speech impaired person uses a TT/TTY device to type out his or her part of the conversation. Specially trained Communications Assistants simultaneously relay messages between the TT/TTY user and the other person on the other end of the line, by reading the message to the hearing person. The hearing person's spoken words are then typed back to the TT/TTY caller. Every call is handled in the strictest confidence. Customers who need to use this service may dial 711. For additional information call the Business Office at 779.9999.

TO ORDER CLASS AND CUSTOM CALLING FEATURES DIAL 779.9999





Services

Support

My Viya

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News



Account



Restoration



We're committed
to providing great customer
service everyday.

Viya

VI Relay Services

This service from VIYA enables hearing impaired, hard of hearing or speech impaired persons to communicate by telephone seven days a week, 24 hours a day. To communicate, a hearing impaired, hard of hearing or speech impaired person uses a TT/TTY device to type out his or her part of the conversation. Specially trained Communications Assistants simultaneously relay messages between the TT/TTY user and the other person on the other end of the line, by reading the message to the hearing person. The hearing persons spoken words are then typed back to the TT/TTY caller. Every call is handled in the strictest confidence. Customers who need to use this service may dial 711.

For additional information call the Business Office at 340.777.Viya(8492)

Find a Store



Contact Us



Phone

340.777.VIYA (8492)

Services

Mobile
Internet
TV
Phone
Service Bundles
Vipowernet Email
Vitelcom Email

Support

Residential
Business
FAQ's
My Viya Support
Careers

Follow Us



My Viya

Pay Bill
Manage Account
Relocate

Want to learn about Virgin Islands Relay services for people who are deaf, deafblind, hard of hearing or have a speech disability?



Come and meet our Virgin Islands Relay Team!

■ **St. Thomas**

Tuesday, June 6 at 5:30 – 7:30 PM

Roy Schneider Hospital

Breeze Cafe in the Sun Room

9048 Sugar Estate Road

Charlotte Amalie, St. Thomas

■ **St. Croix**

Wednesday, June 7 at 4:00 – 6:00 PM

The Palms at Pelican Cove

4126 LaGrande Princesse

Christiansted, St Croix

-
- Get to know the Virgin Islands Relay team
 - Learn about different relay services
 - Refreshments will be served
 - For more information, contact:
Stephanie Brown
sbvial@gmail.com (email)

Outreach Report

St. John – June 5, 2017



Health Clinic – spoke with executive director and assistant



Nazareth Church – spoke with pastor



School (through 8th grade) – spoke with office employee



Public Service Commission Legislative Building - Spoke with Lucinda Jerger, the Complaint Officer

Roman Catholic Church - Left literature, including Spanish language



Outreach Report

St. John – June 5, 2017



Smith Multipurpose Center – Sales presented to senior citizens for thirty minutes; as a result, seven interested consumers requested additional information.

Jim gained a new friend in a cute baby chick.

Outreach Report

St. Thomas – June 6, 2017



Administrators received Virgin Islands Relay polo shirts.



Sales and Customer Relations Manager hosted a workshop at the Schneider Medical Center where approximately twenty-five attendees learned about Virgin Islands Relay services.

A VIYA camera person filmed parts of this event. The two administrators were in attendance to answer some questions.

Heavy refreshments (chicken wings, sandwiches, fruit tray and drinks) were served.

Several attendees use VRS, others do not have an internet connection. Most did NOT know about TTYs and want one.



Outreach Report

St. Thomas – June 6, 2017

The VIAIL has a van; perhaps we can use it to bring other residents to upcoming events?



TTY in the Virgin Islands Association of Independent Living office.

St. Croix – June 7, 2017

Sales and Customer Relations Manager hosted a workshop at a hotel meeting room where approximately thirty attendees learned about Virgin Island Relay services. Viya staff explained and answered questions about their wireless phones as well. J. King and a camera person were also in attendance.

Light refreshments (trail mix, varieties of large cookies, pretzels and drinks) were served.



Virgin Islands Relay Customer Profile

For more information: mysprintrelay.com



The Customer Profile form allows those of you who access relay through a toll-free number to submit your preferences. You will have the flexibility of updating your preferences as needed. Your information is confidential and secure. When completed, please return to:

Virgin Islands Relay Customer Service
P.O. Box 29230 – KSOPHR0312-3A
Shawnee Mission, KS 66201-9230

or fax to **877-877-3291**

If you have questions or need assistance, contact Virgin Islands Relay Customer Service:

866-883-4038 (Voice/TTY)
800-676-4290 (Español)
877-787-1989 (Speech-to-Speech)
866-931-9027 (Voice Carry-Over)
Sprint.TRSCustServ@sprint.com (Email)

Important Information for Speech-to-Speech (STS)

Virgin Islands Relay Service offers a unique Customer Profile specifically designated for STS users. With Virgin Islands Relay's system, persons calling STS users who have difficulty sharing telephone numbers can be automatically connected to the STS user at the STS user's registered locations.

Go to **www.mysprintrelay.com**.

After you enter your username and password, go to the menu list and click **STS Contacts**.

For assistance, call STS Customer Support at **877-787-1989**.

Your Personal Information:

Last Name	<input type="text"/>		
First Name	<input type="text"/>	Middle Initial	<input type="text"/>
Area Code & Phone Number	<input type="text"/>		Ext. Number <input type="text"/>
Street Address (No P.O. Box)	<input type="text"/>		
City	<input type="text"/>	State	<input type="text"/> Zip <input type="text"/>
Email	<input type="text"/>		

Your Contact Numbers (For Sprint IP or Federal IP users only)

Area Code & Telephone Number

If you want to register to get your new 10-digit phone number, go to **www.mysprintrelay.com/Login**

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

	Name: (Limit 30 characters per name)	Area Code & Phone Number
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>

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

Virgin Islands Relay Customer Profile

Emergency Numbers (Speed Dial for Emergency Calls Only):

Name: (Limit 30 characters per name)

Area Code & Phone Number

1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>

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

Your Preferences:

Gender Preference

☐

Female

☐

Male

☐

No Preference

Answer
Type

☐

TTY

☐

ASCII 300 Baud

☐

Voice Carry-Over

☐

2-Line VCO

☐

Voice

☐

ASCII 1200 Baud

☐

Hearing Carry-Over

☐

DeafBlind TTY

☐

Turbo Code

☐

ASCII 2400 Baud

☐

Speech-to-Speech

☐

DeafBlind ASCII

Language

☐

English

☐

Spanish

Announce Relay

☐

No

Long Hold Times

☐

No

Explain Relay

☐

No

Caller ID

☐

No

Background Noises

☐

No

Type Slow

☐

No

Tone of Voice

☐

No

Abbreviation

☐

No

Type Recordings

☐

No

Typing Correction

☐

No

Outdial Restrictions:

Select one

☐

No Long-Distance Calls

☐

No 800 Number

☐

No Marine Calls

☐

No Operator Assistance

☐

No International Calls

☐

No 900 Number

☐

No 976 Number

☐

No Directory Assistance

Virgin Islands Relay Customer Profile

Block Outgoing Calls:

	Name (Limit 30 characters per name)	Area Code & Phone Number
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>

If you need to add more information, go to the **Additional Information** section below.

Your Notes: (Limit 60 characters per note)

1	<input type="text"/>
2	<input type="text"/>
3	<input type="text"/>
4	<input type="text"/>
5	<input type="text"/>

If you need to add more information, go to the **Additional Information** section below.

Additional Information: (Limit 30 characters per name or 60 characters per note)

<input type="checkbox"/> Non-Emergency Speed Dial	<input type="checkbox"/> Emergency Speed Dial	<input type="checkbox"/> Block Outgoing Call	<input type="checkbox"/> Note
Name/Phone # or Note <input type="text"/>			
<input type="checkbox"/> Non-Emergency Speed Dial	<input type="checkbox"/> Emergency Speed Dial	<input type="checkbox"/> Block Outgoing Call	<input type="checkbox"/> Note
Name/Phone # or Note <input type="text"/>			
<input type="checkbox"/> Non-Emergency Speed Dial	<input type="checkbox"/> Emergency Speed Dial	<input type="checkbox"/> Block Outgoing Call	<input type="checkbox"/> Note
Name/Phone # or Note <input type="text"/>			
<input type="checkbox"/> Non-Emergency Speed Dial	<input type="checkbox"/> Emergency Speed Dial	<input type="checkbox"/> Block Outgoing Call	<input type="checkbox"/> Note
Name/Phone # or Note <input type="text"/>			
<input type="checkbox"/> Non-Emergency Speed Dial	<input type="checkbox"/> Emergency Speed Dial	<input type="checkbox"/> Block Outgoing Call	<input type="checkbox"/> Note
Name/Phone # or Note <input type="text"/>			

Security Question: *We do not share your information with other parties.

What is your security question?

What is your answer?

Virgin Islands Relay STS Profile

For more information: mysprintrelay.com



Access **My STS Profile** to decide how your calls are handled and update your preferences as needed.

Questions or need help with your customer profile, contact My Support:

Phone: **877-787-1989**

Email: **Sprint.TRSCustServ@sprint.com**

When completed, please return to:

STS Customer Service

P.O. Box 29230 - KSOPHR0312-3A

Shawnee Mission, KS 66201-9230

or fax to **877-877-3291**

All customer information is confidential and secure.

My Personal Information:

Last Name	<input type="text"/>	First Name	<input type="text"/>
Area Code & Phone Number	<input type="text"/>	Ext. Number	<input type="text"/>
Street Address (No P.O. Box)	<input type="text"/>		
City	<input type="text"/>	State	<input type="text"/>
Zip	<input type="text"/>		
Email	<input type="text"/>		

My Name:

Username	<input type="text"/>	Password	<input type="text"/>
----------	----------------------	----------	----------------------

My Place: What is your time zone? ☐ EST ☐ CST ☐ MST ☐ PST Other:

Location #1: (e.g., home)

Phone Number:

- ☐ Monday
- ☐ Tuesday
- ☐ Wednesday
- ☐ Thursday
- ☐ Friday
- ☐ Saturday
- ☐ Sunday

Time:

From am / pm

Until am / pm

Location #2: (e.g., office)

Phone Number:

- ☐ Monday
- ☐ Tuesday
- ☐ Wednesday
- ☐ Thursday
- ☐ Friday
- ☐ Saturday
- ☐ Sunday

Time:

From am / pm

Until am / pm

Location #3: (e.g., mobile phone)

Phone Number:

- ☐ Monday
- ☐ Tuesday
- ☐ Wednesday
- ☐ Thursday
- ☐ Friday
- ☐ Saturday
- ☐ Sunday

Time:

From am / pm

Until am / pm

Virgin Islands Relay STS Profile

My Preferences:

My Operator Preference ☐ Female ☐ Male ☐ No Preference
My Language Preference ☐ English ☐ Spanish

My Style: ☐ Repeat everything ☐ Repeat when unclear

My Phone Book (Speed Dial for Non-Emergency Calls):

	Name <i>(Limit 30 characters per name)</i>	Area Code & Phone Number
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>
6	<input type="text"/>	<input type="text"/>
7	<input type="text"/>	<input type="text"/>
8	<input type="text"/>	<input type="text"/>
9	<input type="text"/>	<input type="text"/>
10	<input type="text"/>	<input type="text"/>
11	<input type="text"/>	<input type="text"/>
12	<input type="text"/>	<input type="text"/>
13	<input type="text"/>	<input type="text"/>
14	<input type="text"/>	<input type="text"/>
15	<input type="text"/>	<input type="text"/>

My Emergency Contacts:

	Name <i>(Limit 30 characters per name)</i>	Area Code & Phone Number
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>

Virgin Islands Relay STS Profile

My Blocks:

- ☐ No Long-Distance Calls ☐ No 800 Number ☐ No Marine Calls ☐ No Operator Assistance
☐ No International Calls ☐ No 900 Number ☐ No 976 Number ☐ No Directory Assistance

My Blocked Numbers:

	Name <i>(Limit 30 characters per name)</i>	Area Code & Phone Number
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>
6	<input type="text"/>	<input type="text"/>
7	<input type="text"/>	<input type="text"/>
8	<input type="text"/>	<input type="text"/>
9	<input type="text"/>	<input type="text"/>
10	<input type="text"/>	<input type="text"/>

My Notes: *(Limit 60 characters per note)*

1	<input type="text"/>
2	<input type="text"/>
3	<input type="text"/>
4	<input type="text"/>
5	<input type="text"/>
6	<input type="text"/>
7	<input type="text"/>
8	<input type="text"/>
9	<input type="text"/>
10	<input type="text"/>

Security Question: **We do not share your information with other parties.*

What is your security question?

What is your answer?

Need to make a phone call to
someone who has a hearing
loss or speech disability?

Get Connected
with Virgin Islands Relay!



Bring people together

with VIRGIN ISLANDS RELAY

HOW DOES THE VIRGIN ISLANDS RELAY SERVICE WORK?



VIRGIN ISLANDS RELAY can offer calling freedom!

Making calls through **Virgin Islands Relay** is liberating, enjoyable and convenient. **Virgin Islands Relay**, a free, 24-hour service, allows callers who are deaf, hard of hearing, deafblind or speech disabled to call anybody using relay services.

Just dial 711 and call anyone, anywhere and anytime with **Virgin Islands Relay**.

RELAY NUMBERS

TTY

711 or 800-440-8477

Voice

711 or 800-809-8477

Speech to Speech (STS)

711 or 800-940-0712

Voice Carry-Over (VCO)

711 or 877-826-2255

Spanish Relay

711 or 800-940-0656

HOW TO CONNECT?

- Dial 711 to connect with a relay operator.
- Give the relay operator the phone number you want to call.
- The relay operator will then dial the other party's number.
- The relay operator will relay the conversation between you and the other party by typing or voicing.



For people with **speech disabilities** who **prefer to speak** for themselves on the phone.

Speech to Speech

711 or 800-940-0712

Virgin Islands Relay Speech to Speech (STS) is a free service for people who have a speech disability or use a voice synthesizer. STS allows them to speak for themselves on the phone. A trained STS operator listens to the conversation and repeats the STS user's message whenever needed.

- 1** The STS user speaks directly to the other party.
- 2** If needed, the relay operator repeats the STS user's spoken words.
- 3** The other party talks directly to the STS user.

ENHANCED STS

This feature makes call setup much easier for STS users.

In order to speed up the setup of the call, Virgin Islands Relay offers **My Email Set Up**. Now, you can email call instructions or information 2 to 24 hours prior to the call. This can include information such as:

- the number to be dialed
- the name of the person being called
- any special instructions
- the nature of the call
- anything that makes it easier for you to complete the call

4



For people with **a hearing loss**
who **prefer to speak**.

Voice Carry-Over

711 or 877-826-2255

Virgin Islands Relay offers **Voice Carry-Over (VCO)**, a free service that enables a person with hearing loss or who became deafened later in life to use their voice to speak directly to the other party on the phone.

- 1** Mother speaks to her son directly.
- 2** The son speaks to his mother, and the relay operator types everything the son says, word for word, to the mother.
- 3** The mother reads on a TTY screen what her son says.



OTHER VCO FEATURES

Virgin Islands Relay also offers three call features: VCO to TTY, VCO to VCO, and VCO to HCO.

Para personas que prefieren
comunicarse en español.

Relevo de Virgin Islands

- 1** La persona que llama marca 711 y se comunica con un operador de relevo. Luego, la persona que llama habla, "Hola. ¿Cómo estás?"
- 2** El operador de relevo escribe lo que dice la persona que llama.
- 3** El usuario de TTY lee en el dispositivo las palabras habladas.



1



2



3



6

711 o 800-940-0656
Español a español

El Servicio de Relevo de Virgin Islands es un servicio de asistencia gratis para todos que brinda acceso telefónico completo a fin de poder comunicarse con personas sordas, con dificultades para escuchar, sordociegos y aquellas personas con dificultad del habla. Llamando con un teléfono regular o teletexto (TTY, un teléfono especial con teclado similar a una máquina de escribir), el relevo facilita la comunicación, las 24 horas del día y los 365 días del año.

Los usuarios del servicio de relevo no necesitan memorizar el número de servicio de relevo. Simplemente marca 711 para comunicarte con el servicio de relevo. La confidencialidad entre el usuario y el operador de relevo está garantizada por la Comisión Federal de Comunicaciones (FCC, por sus siglas en inglés) mediante la reglamentación correspondiente.

Usar el servicio de Relevo de Virgin Islands es fácil. Una persona oyente o una persona sorda pueden marcar el 711 para comunicarse con un operador de relevo. El operador de relevo actúa como intermediario en la conversación, leyendo los mensajes escritos en el TTY a la persona oyente mientras escribe las respuestas en el TTY para la persona con dificultades para escuchar.

Other Relay Features

TTY Payphone

711 or 800-440-8477

TTY users using a TTY payphone can use Virgin Islands Relay to assist in connecting calls.

900 Pay Per Call

900-230-8090

Relay users can dial the toll-free 900 number to connect with Virgin Islands Relay. A relay operator will then dial the requested outbound 900 service number.

The caller is responsible for direct billing.

International Calls

605-224-1837

Virgin Islands Relay allows callers to place and receive calls to and from anywhere in the world in English or Spanish languages.

Directory Assistance

Virgin Islands Relay will relay Directory Assistance (DA) calls between relay users and a DA operator. After obtaining the number, the caller may choose to place the call through Virgin Islands Relay or dial directly.



Customer Profile

Customer profiles make relay services better for you.

The Customer Profile allows relay service users to submit their preferences, such as:

- Frequently dialed numbers
- Emergency numbers
- Customer notes

Relay callers have the flexibility of updating their preferences at any time by going to **mysprintrelay.com** or requesting a form through customer service.

A screenshot of the 'Virgin Islands Relay Customer Profile' form. The form is titled 'Virgin Islands Relay Customer Profile' and includes a 'RELAY 711' logo. It contains sections for 'Your Personal Information' (Name, Address, Phone, Email) and 'Your Contact Numbers' (Frequently dialed numbers, Emergency numbers). There is also a section for 'Frequently Dialed Numbers' with a table for listing numbers and names. The form is designed to collect user preferences for relay services.

Important

Dial 911 for Emergency Calls Only

711 is NOT an emergency number.

In case of an emergency, relay users should call the TTY-equipped 911 center or emergency services center in their communities.

Virgin Islands Relay can process emergency calls, but it may take longer.

TTY users who cannot obtain emergency services via 911 may call 711 and inform the relay operator there is an emergency.



For questions or feedback, contact us!

Virgin Islands Relay Customer Support

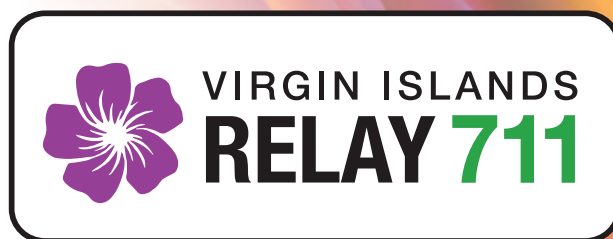
- TTY/Voice:
800-676-3777
- Speech to Speech only :
877-787-1989
- Voice Carry-Over only:
866-931-9027
- Email:
Sprint.TRSCustServ@sprint.com
- Website:
viyavi.com/telephone/vi-relay-service



Dial 711.

Connecting people to people ...

One call at a time!



Dialing **711** will connect you to Virgin Islands Relay, a free service which allows communication for people who are deaf, hard of hearing, deafblind, with speech disabilities, and hearing.

To make a phone call:

- 1) Dial **711** or use the toll-free numbers listed on the right.
- 2) Give the Communications Assistant the number of the person you are calling.
- 3) Communicate through a Communications Assistant who will relay the messages between you and the other person.

Questions? Contact:

Missy Whatmough McManus
Virgin Islands Relay Manager
melissa.mcmanus@sprint.com (Email)

Virgin Islands Relay Customer Service:

866-883-4038 (English)
800-676-4290 (Español)
877-787-1989 (Speech-to-Speech)

Virgin Islands Relay Website:

<https://viyavi.com/telephone/vi-relay-service>

* Some office phone systems do not work with 711.
The toll-free numbers are alternatives customized to callers' needs.

Virgin Islands Relay Services are provided by Viya.



TTY User

TTY to Voice
711 or 800-440-8477



Voice User

Voice to TTY
711 or 800-809-8477



Speech-to-Speech

711 or 800-940-0712



Hearing Carry-Over

711 or 800-440-8477



TeleBraille

711 or 800-440-8477



Relevo de Español (Spanish Relay)

711 or 800-940-0656

APPENDIX F



June 18, 2014

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: TRS Consumer Complaint Log Summaries for June 1, 2013 through May 31, 2014
CG DOCKET NO. 03-123

Dear Ms. Dortch,

Innovative Telephone respectfully submits the enclosed complaint log in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(ii) of the FCC's rules.

Sprint Communications Company, with corporate offices located at 12502 Sunrise Valley Drive, Reston, VA 20196, provided Telecommunications Relay Service to the Virgin Islands for the period June 1, 2013 through May 31, 2014. Innovative Telephone certifies that there was one (1) complaint in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(ii) of the FCC's rules for the reporting period.

Included is the following report:

- Annual Complaint Log which includes complaints received between June 1, 2013 and May 31, 2014 with the date of complaint, the nature of the complaint, the date of resolution and an explanation of the resolution

Sprint Communications Company tracked all complaints and all other customer service activity for the Virgin Islands Telecommunications Relay Service for the reporting period stated above.

Please feel free to contact me at 340-715-8341 or Marybeth Banks with Sprint Communications at 703-592-5111 with any questions regarding the above.

Sincerely,

Mickey Breton
VP Network Services

Complaint Tracking for VI (06/01/2013-05/31/2014). Total Customer Contacts: 1

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	07/19/13	The caller reported that the Communication Assistant reached an answering machine when dialing a number, then typed "answering machine hung up". That was not accurate; there was a beep and the caller wanted to leave a message. Communication Assistant did not clearly explain what the options were. Eventually, caller was able to leave a message but it took much longer than it should. Customer Service apologized for the inconvenience and told the customer that the report would be sent to the call center supervisor. No follow-up requested.	07/19/13	Supervisor met with the Communication Assistant. There were no call-processing notes for this call so when the Communication Assistant reached an answering machine, the Communication Assistant relayed the entire message and indicated to the caller that the answering machine was reached. The customer appeared to be confused. The Communication Assistant did request supervisor assistance.



June 19, 2015

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: TRS Consumer Complaint Log Summaries for June 1, 2014 through May 31, 2015
CG DOCKET NO. 03-123

Dear Ms. Dortch,

Innovative Telephone respectfully submits the enclosed complaint log in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(ii) of the FCC's rules.

Sprint Communications Company, with corporate offices located at 12502 Sunrise Valley Drive, Reston, VA 20196, provided Telecommunications Relay Service to the Virgin Islands for the period June 1, 2014 through May 31, 2015.

Innovative Telephone certifies that there were no (0) complaints in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(ii) of the FCC's rules for the reporting period.

Sprint Communications Company tracked all complaints and all other customer service activity for the Virgin Islands Telecommunications Relay Service for the reporting period stated above.

Please feel free to contact me at 340-715-8341 or Scott Freiermuth with Sprint Communications at 913-315-8521 with any questions regarding the above.

Sincerely,

Mickey Breton
VP Network Services

Complaint Tracking for VI (06/01/2014-05/31/2015). Total Customer Contacts: 0

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
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Date Generated: Thu, Jun. 4th, 2015 @ 02:36:28 PM CT



June 30, 2016

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: TRS Consumer Complaint Log Summaries for June 1, 2015 through May 31, 2016
CG DOCKET NO. 03-123

Dear Ms. Dortch,

Innovative Telephone respectfully submits the enclosed complaint log in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(1)(ii) of the FCC's rules.

Sprint Communications Company, with corporate offices located at 12502 Sunrise Valley Drive, Reston, VA 20196, provided Telecommunications Relay Service to the Virgin Islands for the period June 1, 2015 through May 31, 2016.

Innovative Telephone certifies that there were zero (0) complaints in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(1)(ii) of the FCC's rules for the reporting period.

Sprint Communications Company tracked all complaints and all other customer service activity for the Virgin Islands Telecommunications Relay Service for the reporting period stated above.

Please feel free to contact me at 340-715-8341 or Scott Freiermuth with Sprint Communications at 913-315-8521 with any questions regarding the above.

Sincerely,

Mickey Breton
VP Network Services

Complaint Tracking for Virgin Islands (06/01/2015-05/31/2016). Total Customer Contacts: 0

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
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June 30, 2017

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: TRS Consumer Complaint Log Summaries for June 1, 2016 through May 31, 2017
CG DOCKET NO. 03-123

Dear Ms. Dortch,

The Virgin Islands Telephone Corporation d/b/a VIYA respectfully submits the following information with respect to its complaint log in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(1)(ii) of the FCC's rules.

Sprint Communications Company, L.P., with corporate offices located at 12502 Sunrise Valley Drive, Reston, VA 20196, provided Telecommunications Relay Service to the Virgin Islands for the period June 1, 2016 through May 31, 2017.

VIYA certifies that there were zero (0) complaints in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(1)(ii) of the FCC's rules for the reporting period.

Sprint Communications Company tracked complaints and all other customer service activity for the Virgin Islands Telecommunications Relay Service for the reporting period stated above.

340-777-VIYA Viya.vi

📍 4006 Estate Diamond | St. Croix, VI 00820

📍 4611 Tutu Park #200 | St. Thomas VI 00802

Please feel free to contact me at 340-715-8341 or Scott Freiermuth with Sprint Communications at 913-315-8521 with any questions regarding the above.

Sincerely,



Mickey Breton



Vice President Network Services

340-715-8341 | mbreton@viya.vi

340-777-VIYA **Viya.vi**

 4006 Estate Diamond | St. Croix, VI 00820  4611 Tutu Park #200 | St. Thomas VI 00802

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

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
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