



May 14, 2018

Dana Wilson
Federal Communications Commission
Consumer and Governmental Affairs Bureau
Disability Rights Office
445 12th Street, SW
Washington, DC 20554

CG DOCKET NO. 03-123

New York Relay FCC Certification Renewal Supplemental Information

Dear Ms. Wilson,

Pursuant to the Commission's request, New York Relay hereby supplements previously filed TRS recertification application with the enclosed information.

I hereby certify that New York Relay is in compliance with the rule sections noted in the Commission's follow up inquiry email.

If there are any questions regarding this filing, please contact me via the information below. Thank you for your assistance.

Respectfully submitted,

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64.604(a)(v) Mandatory Minimum Standards

CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party.

NY Response:

Consistent with the new requirement of 64.604(a)(1)(v), Sprint CAs answering or placing a STS call stay with the call for a minimum of twenty minutes.

64.606(d) Method of Funding

Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

NY Response:

Communications promoting understanding of New York Relay, such as information on a local telephone bill, are labeled in a manner that is respectful and does not offend the public. As such, New York Relay is in compliance with this requirement.

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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.**

NY Response:

Contact for:

<https://www.fcc.gov/general/trs-state-and-territories>

Chelsea Kruger
NYS Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350
Telephone Numbers: Voice 518-474-2501 - TTY: 800-662-1220
Email: Chelsea.Kruger@dps.ny.gov

<https://www.fcc.gov/general/trs-points-contact-complaints>

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NYS Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350
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64.5105 – 64.5110 TRS Customer Proprietary Network Information

Because 64.606(b)(1)(i) requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604, and 64.604(d) incorporates by reference the CPNI rules, the states are required to establish that their programs comply with the CPNI rules.

NY Response:

New York Relay certifies that the New York TRS program meets or exceeds all operational, technical, and functional minimum standards and is in compliance with the CPNI rules. (See Attachment A.)

As New Yorks' state contractor, Sprint files Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") compliance certification with FCC annually as required. (See Attachment B.)

Attachment A

New York Relay's Statement of CPNI Compliance

New York Relay certifies that the New York TRS program is compliant with all requirements of the CPNI rules and meets or exceeds all operational, technical, and functional minimum standards.

ATTACHMENT B

SPRINT'S STATEMENT OF CPNI COMPLIANCE

Sprint Corporation ("Sprint") complies with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") minimum standards with respect to Sprint's role as a contractor supporting New York's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is New York's responsibility to certify New York TRS program every 5 years. The following statement only explains the operating procedures established by Sprint to ensure its compliance with the CPNI rules (see 47 C.F.R. §64.5101 *et seq.*) as a contractor supporting the State TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address New York compliance as the New York TRS program administrator or the activities of any other contractors that New York may use to support the New York TRS program. Per the FCC, New York has an obligation to provide a CPNI statement to the FCC in accordance with FCC 47 C.F.R. §64.604(d) and 64.606(c)(1).

Data Brokers

As the New York contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

CPNI Complaints

As the New York contractor, Sprint did not receive any complaints during the certification period concerning the unauthorized release of TRS CPNI.

Use, Disclosure and Access to CPNI

As the New York contractor, Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Sprint did not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c).

Safeguards

As the New York contractor, Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI. Consistent with Sprint's commitment to

preserving customer privacy, as the New York contractor, Sprint has a variety of training programs for its employees and subcontractors. The training explains how Sprint employees and subcontractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. During the certification period, all Sprint employees and all subcontractors who had access to TRS CPNI took CPNI training.

As the New York contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to subcontractors, Sprint enters into agreements with strict privacy and confidentiality provisions that require the subcontractor to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires subcontractors with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

Authentication

Sprint does not currently offer users of the New York TRS service telephonic, online, or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not applicable at this time with respect to Sprint's role as New York contractor.

Notification of Account Changes

Sprint provides notice to New York TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within scope of Sprint's responsibilities.

Notification of CPNI Breaches

In accordance with the FCC's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement. Sprint did not have any breaches of New York TRS CPNI during the certification period.