

May 21, 2018

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

Re: TRS Customer Proprietary Network Information Compliance Certification
CG Docket No. 03-123

I, Rochelle Garrow, administrator of Minnesota's Telecommunications Relay Services (TRS) program, certify that I have personal knowledge that Minnesota's TRS provider, Sprint, has established operating procedures that are adequate to ensure compliance with the FCC's TRS Customer Proprietary Network Information (CPNI) rules. (See 47 C.F.R. 64.5101, et seq.)

Minnesota's contract for the provision of TRS includes the following requirement:

The awarded Contract Vendor shall provide Telecommunications Relay Services (TRS), including Captioned Telephone Services, that are in full compliance with the requirements and intent of Title IV of the Americans with Disabilities Act of 1990, 47 U.S.C. § 225, and Federal Communications Commission (FCC) regulations codified at 47 C.F.R. §§ 64.601 through 64.605 (at the time of proposal and subsequent to it), which are hereby incorporated by reference as mandatory standards required in the context of this RFP and resulting awarded Contract, whether or not said standards are specifically mentioned, named, or referred to in this RFP.

As required by 47 C.F.R. § 64.5109(e), Minnesota's TRS provider, Sprint, files a TRS CPNI Compliance Certification with the FCC on an annual basis (as applicable), in which it certifies that it has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules. Sprint's certifications include information on how it complies with the CPNI requirements.

I am not aware of any instance in the past year in which Minnesota's TRS Provider, Sprint (or its agents or subcontractors), used, disclosed, or permitted access to CPNI without complying with the approval procedures specified in the TRS CPNI rules.

If you have any questions, or require additional documentation, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Rochelle Renee Garrow".

Rochelle Garrow

Telecommunications Access Minnesota Administrator

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