



STATE OF ALABAMA
PUBLIC SERVICE COMMISSION
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May 22, 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 (TRS Recertification of Alabama Relay)

Dear Ms. Wilson,

Pursuant to the request of the Federal Communications Commission (the "FCC" or the "Commission") received via email on May 11, 2018, from Ms. ShaVonne Morris, Alabama Relay hereby supplements its previously filed TRS recertification application with the enclosed information.

As the Executive Director of the Alabama Public Service Commission (the "APSC") and the Chairman of the Alabama Dual Party Relay Board of Trustees, I hereby certify that Alabama Relay is in compliance with each of the regulations noted in the follow-up email inquiry received on May 11, 2018. Appendix A attached hereto outlines Alabama Relay's specific response regarding each rule for which the FCC sought clarity. Appendix B is the Statement of Customer Proprietary Network Information ("CPNI") Compliance of Alabama Relay's underlying carrier, Sprint Corporation ("Sprint" or Sprint Relay"). Appendix C is Alabama Relay's certification of compliance with the applicable CPNI rules.

If there are any questions regarding this filing or any other matters, please contact me by phone at (334)242-5200 or by email through my assistant at eileen.lawrence@psc.alabama.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "John A. Garner", is written over a horizontal line.

John A. Garner
Executive Director, Alabama Public Service Commission
Chairman, Alabama Dual Party Relay Board of Trustees

JAG:klr
Attachments

APPENDIX A

1. 64.604(a)(1)(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.

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.

2. 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.

As Alabama's TRS contractor, Sprint files a Customer Proprietary Network Information ("CPNI") compliance certification with the FCC annually as required. Attachment B hereto is Sprint's Statement of CPNI Compliance. The CPNI compliance certification of Alabama Relay is attached as Appendix C.

3. 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.

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

4. 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.

The proper contacts for all complaints and information requests for Alabama Relay are:

Missy McManus
Customer Relations Manager
Sprint Accessibility
411 Huger Street
Columbia, SC 29201
803.951.1660 (TTY)
803.403.9763 (Voice)
www.alabamarelay.com
www.sprintrelay.com
melissa.mcmanus@sprint.com

John A. Garner
Executive Director
Alabama Public Service Commission
Post Office Box 304260
Montgomery, AL 36130-4260
334.242.5200
eileen.lawrence@psc.alabama.gov

APPENDIX 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 Alabama's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is Alabama's responsibility to certify Alabama's 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 Alabama TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address Alabama's compliance as the Alabama TRS program administrator or the activities of any other contractors that Alabama may use to support the Alabama TRS program. Per the FCC, Alabama 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 Alabama's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

CPNI Complaints

As Alabama's 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 Alabama's 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 Alabama's 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 Alabama's 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 Alabama's contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigated 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 Alabama 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 Alabama's contractor.

Notification of Account Changes

Sprint provides notice to Alabama's TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within the 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 Alabama TRS CPNI during the certification period.

APPENDIX C

Annual TRS CPNI Certification CG Docket No. 03-123

Annual Section 64.5109 CPNI Certification
May 18, 2018
Alabama Public Service Commission – Relay Alabama

I, John A. Garner, hereby certify in my capacity as Executive Director of the Alabama Public Service Commission and Chairman of the Alabama Dual Party Relay Board of Trustees that I have knowledge that Sprint Relay has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules. (see 47 C.F.R. 64.5101, et seq.)

Sprint Relay has filed their TRS CPNI certification that included details outlining how their procedures ensure compliance with the requirements set forth in sections 64.5101 through 64.5111 of the Commission's rules. I am not aware of any instances in the past year in which Sprint Relay, or its agents or subcontractors, used, disclosed, or permitted access to CPNI without complying with the approval procedures specified in the TRS Customer Proprietary Network Information Rules.

I further certify that Alabama Relay is in all respects compliant with all applicable CPNI rules and regulations and meets or exceeds all operational, technical, and functional minimum standards related thereto.

Sincerely,

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

John A. Garner
Executive Director, Alabama Public Service Commission
Chairman, Alabama Dual Party Relay Board of Trustees