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May 26, 2017

REDACTED – FOR PUBLIC INSPECTION

Accepted / Filed

MAY 26 2017

Federal Communications Commission
Office of the Secretary

Via Electronic Filing

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

G. Patrick Webre
Chief, Consumer and Government Affairs Bureau
TRS Certification Program
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Internet-Based TRS Certification Application of VTCSecure, LLC (CG Docket No. 03-123)

Dear Ms. Dortch:

On behalf of VTCSecure, LLC ("VTCSecure"), pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission's ("Commission") rules, please find enclosed one original and one copy of a redacted version of the enclosed Internet-Based TRS Certification Application ("Application"). VTCSecure is also submitting an electronic copy of the redacted version in the above captioned docket in ECFS. In addition, please find one original and four copies of a confidential version of the enclosed Application.

All information contained after the heading ***BEGIN CONFIDENTIAL*** and before the close heading ***END CONFIDENTIAL*** is confidential ("VTCSecure Confidential Information"). All such VTCSecure Confidential Information is proprietary and confidential commercial and business trade secret information that is not customarily

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disclosed to the public or within the industry and, as such, is subject to Exemption 4 under the Freedom of Information Act.[1]

As this information is submitted voluntarily and absent any requirement by statute, regulation, or the Commission, VTCSecure requests that, in the event that the Commission denies VTCSecure's request for confidentiality, the Commission return the materials without consideration of the contents therein pursuant to 47 C.F.R § 0.459(e)

If you have any questions concerning the enclosed Application, please do not hesitate to contact me at 202.659.6655 or at the email address above.

Sincerely,

/s/ James C. Falvey

James C. Falvey, Esq.

cc: Elliot Greenwald, Deputy Chief, Disability Rights Division

[1] 5 U.S.C. § 552(b)(4).

REDACTED – FOR PUBLIC INSPECTION

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Accepted / Filed

MAY 26 2017

Federal Communications Commission
Office of the Secretary

In the Matter of	)	
	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals	)	
with Hearing and Speech Disabilities	)	
	)	
	)	

INTERNET-BASED TRS CERTIFICATION APPLICATION

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I. INTRODUCTION AND SUMMARY

Pursuant to 47 C.F.R. § 64.606(a)(2), and in accordance with Federal Communications Commission ("Commission") Orders released on July 28 and October 17, 2011,[1] VTCSecure, LLC ("VTCSecure") submits this application for certification as a provider of Internet-based telecommunications relay service ("iTRS").

VTCSecure is a next generation software communications company that focuses on state-of-the-art communication access for people with disabilities. VTCSecure has made significant improvements in IP CTS technology which, when VTCSecure obtains its Commission certification, will allow VTCSecure to provide better communication services for the hard of hearing, significantly reduced rates, and new capabilities for identity assurance. VTCSecure provides Internet Protocol Captioned Telephone Service ("IP CTS") which allows hard of hearing and deaf users to communicate by telephone.

A. VTCSecure Has Made Significant Improvements in IP CTS Technology

Once certificated, VTCSecure will be providing a free "over-the-top" VoIP application to hard of hearing consumers ("VTCSecure App"). The VTCSecure App will include a North American Numbering Plan ("NANP") telephone number and the ability to call any other Public Switched Telephone Number ("PSTN") telephone number, as well as, *inter alia*, free long distance, 911, and operated assistance calling. VTCSecure will also be providing a free app to the public ("VTCSecure Public App") which anyone can use to communicate with those using

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[1] *In the Matter of Structure & Practices of the Video Relay Serv. Program, Second Report and Order and Order*, CG Docket No. 10-51, FCC 11-118 (Rel. Jul. 28, 2011); *Structure and Practices of the Video Relay Service Program, Sprint Nextel Corporation Expedited Petition for Clarification, Sorenson Communications, Inc. Petition for Clarification, AT&T Services, Inc. Petition for Reconsideration of AT&T*, CG Docket No. 10-51, Memorandum Opinion and Order, Order, and Further Notice of Proposed Rulemaking, FCC 11-155 (Rel. Oct. 17, 2011).

the VTCSecure App on VTCSecure's local VoIP network with any registered IP CTS consumer. The VTCSecure Public App is based on the FCC's open source ACE application. This means the application can run on smart phones, computers, and tablets running on iOS, Android, PC or Mac operating systems.

The Commission should grant VTCSecure certification because VTCSecure offers the following advancements in IP CTS technology:

1. **The ability to use video while on an IP CTS call:** a remote user can see the person they are talking to and read their lips, a valuable capability for IP CTS users. This results in much better overall communications and offers something no other IP CTS provider offers today.

2. **The ability to use HD voice:** HD voice results in much clearer communication between both parties. This means the hard of hearing person will be able to hear the remote user with more clarity resulting in more accurate communication. This is particularly valuable for the hard of hearing. HD voice also allows for a much higher accuracy rate when using Automated Speech Recognition ("ASR") software. Under ideal conditions, VTCSecure has seen over 99% accuracy in situations where there is no Communications Assistant ("CA") and the ASR engine is receiving HD voice.

3. **Supports and Uses for T.140 Real Time Text with Redundancy:**[2] Today there is no standard for IP CTS and no required interoperability between providers. VTCSecure, in line with the FCC's new T.140 rules, has implemented standards-based Real Time Text ("RTT") which should become the new standard.[3]

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[2] *See Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Rulemaking, FCC No. 16-169, CG Docket No. 16-145, GN Docket No. 15-178 (Rel. Dec. 16, 2016).

[3] There are many advantages to using T.140 Real time text: (a) it allows for faster real time transport of captioning in under a second; (b) it supports the new FCC standard required by mobile carriers meaning in the future users won't need an app; (c) it means users will be able to access IPCTS directly from the native dialer on any mobile device; (d) it allows for the remote user to also be able to see the captions. This means that in the future, if a CA cannot spell a word correctly or ASR software cannot get a particular word correct, the remote user will be able to use Real Time Text to type the word to the remote user. This will result in 100% accuracy for an interaction; (e) VTCSecure is working on adding text to speech which would allow a VRS user to use IPCTS instead of Video Relay Service ("VRS"), resulting in faster call setup times and, as discussed further below, a greatly reduced price because IP RELAY is significantly less expensive than VRS; (f) VTCSecure has added the ability to convert calls from RTT to text telephony ("TTY"). This means any registered IPCTS consumer can make direct calls to a TTY user.

B. Use of Automated Speech Recognition

VTCSecure has added the capability to use Automated Speech Recognition to its IP CTS service. This allows for a remote Artificial Intelligent ("AI") system to receive a live voice feed and convert the voice almost instantly into text. This text is converted to T.140 real time text and sent to both parties on the call. Advancements in ASR allow it to be extremely accurate and almost on par with human speech recognition.[4] It can also support several languages.

Another major advantages to using ASR is the speed at which the entire system works. Under ideal conditions, speech can be converted to text and sent to both users in under a second and even when a user is talking fast, it will only fall 2 or 3 seconds behind with over 99% accuracy. Using ASR also means VTCSecure IP CTS can convert more than 200 words per minute, far the Commission's exceeding the 60 words per minute requirement. *See* 47 C.F.R. § 64.604(a)(1)(iii). VTCSecure has tested this with hard of hearing users and many very much preferred the speed of ASR over traditional IP CTS, which has been known to have as much as 7 seconds or more of delay.

Finally, ***BEGIN CONFIDENTIAL***

Today, in a scenario where one user is hard of hearing and another user is on a TTY, a double TRS call must be set up using both IPCTS and Text Relay. These double calls will no longer be necessary as calls will go directly between the two.

[4] *See, e.g.*, Using Deep Learning Technologies IBM Reaches a New Milestone in Speech Recognition, by Srini Penchikala, InfoQ (Mar. 31, 2017), available at https://www.infoq.com/news/2017/03/ibm-speech-recognition (last visited May 23, 2017).

[redacted]

[redacted] ***END CONFIDENTIAL***

C. VTCSecure Will Provide IP CTS Service at Rates Discounted by as Much as 85%

The current rate for IP CTS reimbursement is $1.90 per minute for certified IP CTS consumers. This current rate is a reflection of the need to have a human being (*i.e.*, CA) always ready to answer calls within a certain time period. The use of ASR technology allows for the potential elimination of the CA for a IP CTS calls in perfect conditions. This will result in a much lower cost to VTCSecure. VTCSecure believes a large portion of this cost reduction should be passed on to the Interstate TRS Fund. For this reason, VTCSecure is proposing the following tiered rate structure for IP CTS for each minute where a CA is not required on the call. These rates represent a savings of up to 85% off from the current IP CTS rate.

There are several reason for having a tiered system. One is to ensure the cost of having the ASR system in place can be covered. There is also a per minute rate for ASR conversion along with added platform and Internet costs. Another reason for having a tiered system is so

that as the number of ASR minutes increase over time, economies of scale allow for an even further reduction in cost. This means as more carriers support HD voice and ASR technology becomes even more accurate, the cost of these ASR minutes can be a small fraction of the current cost per minute. Lastly, our proposed tiered system will allow for profits made at the higher rate ASR tiers to be translated into an overall reduction of costs for calls that do require a CA. This rate cut could be applied industry-wide, ensuring an accelerated rate reduction for traditional IP CTS which requires a CA.[5] A demonstration of the significant price reductions that could ensue if VTCSecure is certificated is attached as Exhibit 3.

D. Verification of IP CTS Users

Today, IP CTS is a self-certification process which most people complete over the Internet without any verification that the information supplied belongs to the actual person using the service. This creates significant potential for fraudulent use of the service. VTCSecure IP CTS service has the potential to implement a new state-of-the-art user identity verification and authorization technology. VTCSecure, although not required by law to provide these services, would like to work with the Commission to implement the following capability to ensure IP CTS service is only authorized for an individual after their identity has been established and is only used by those who require the service for the functional equivalent of phone communication.

*****BEGIN CONFIDENTIAL*****

[redacted]

[redacted]

[redacted]

[5] VTCSecure would initially provide traditional IP CTS service at $1.90 per minute by using re-voicing by a trained CA until such time as the Commission notified VTCSecure in writing that it is be authorized to use ASR technology on a billable IP CTS call.

[redacted]

*****END CONFIDENTIAL*****

This VTC is something currently in development by VTCSecure. We would want to work with the Commission to test this and see if it is a viable solution which could be implemented industry-wide. VTCSecure hopes the Commission will expeditiously grant this certification Application to provide IP CTS service so that VTCSecure can introduce to the IP

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6 [redacted]

7 [redacted]

CTS market its new technology, major cost savings, and new ways of protecting the service from fraud.

II. FORM OF ITRS TO BE PROVIDED (47 C.F.R. § 64.606(a)(2)(i))

VTCSecure LLC will provide Internet Protocol Captioned Telephone Service, or IP CTS, as more fully described above.

III. MEETING NON-WAIVED MINIMUM STANDARDS (47 C..F.R. § 64.606(a)(2)(ii))

The chart below details how VTCSecure meet all of the non-waived minimum standards applicable to IP CTS.

Standard	Waived	VTCSecure Compliance
CA Training **47 C.F.R. § 64.604(a)(1)(i)**		VTCSecure will develop a robust IP CTS Communications Assistant (CA) training program that includes: *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL** The VTCSecure CA training encompasses instruction on: voicing and diction; English comprehension (including dialects and accents); US geographical, historical and cultural names; and call processing. In addition, VTCSecure IP CTS CAs receive instruction regarding the Hard of Hearing community etiquette.

Standard	Waived	VTCSecure Compliance
CA Skills **47 C.F.R. § 64.604(a)(1)(ii)**	Partial Waiver[8]	As part of the extensive training program described in the previous section, VTCSecure ensures that its IP CTS CAs are sufficiently trained to effectively meet the specialized and unique communication needs of deaf and hard of hearing consumers who will use our service. Each will have competent skills in typing, spelling, and grammar. CAs will also be familiar with hearing- and speech-disability cultures, languages, and etiquette; and have clear and articulate voice communication skills.
CA Typing **47 C.F.R. § 64.604(a)(l)(iii)**	Waived[9]	VTCSecure CAs will use voice recognition technology to generate text for the user. The requirement that VTCSecure give oral-to-type tests of CA speed is waived as VTCSecure CAs will be using voice recognition technology that will generate the text for the consumer.
Gender Preference **47 C.F.R. § 64.604(a)(1)(vi)**	Waived[10]	
Confidentiality Rule **47 C.F.R. § 64.604(a)(2)(i)**		VTCSecure will prohibit CAs from disclosing the content of any relayed conversation, except as authorized by 47 U.S.C. § 605. VTCSecure also prohibits CAs from keeping any record of the contents of communications handled.

[8] *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities et al.*, CG Docket No. 03-123, Declaratory Ruling, FCC 06-182, ¶ 30 n. 105 (Jan. 11, 2007) ("*2007 Waiver Order*") (waiving the requirement that CAs must be competent in interpreting American Sign Language ("ASL") "where the user does not type the outbound message, the CA generates text for the user principally using voice recognition technologies (instead of typing), and the communications assistant does not play a role in setting up a call.").

[9] *Id.* ¶ 30 n. 105 (waiving the requirement that TRS providers must give CAs oral-to-type tests "where ... the CA generates text for the user principally using voice recognition technologies (instead of typing)").

[10] *Id.* ¶ 30.

Standard	Waived	VTCSecure Compliance
Accuracy Rule **47 C.F.R. § 64.604(a)(2)(ii)**		VTCSecure will prohibit its CAs from intentionally altering the conversations they relay, except to the extent (i) the iTRS end user requests summarization or similar alterations, or (ii) as necessary to provide information to emergency responders.
Sequential calling **47 C.F.R.§ 64.604(a)(3)(i)**	Waived[11]	
Call Length **47 C.F.R. § 64.604(a)(3)(i)**		VTCSecure will prohibit its CAs from limiting the number, type, or length of calls.
Types of Calls **47 C.F.R. § 64.604(a)(3)(ii)**	Partial Conditional Exception[12]	VTCSecure provides over-the-top VoIP service with an application for smartphones, tablets, and desktops. VTC Does not charge for long distance calls.

[11] *Id.* ¶ 130 n. 105 (waiving the requirement that CAs may not refuse sequential calls "where the user does not type the outbound message, the CA generates text for the user principally using voice recognition technologies (instead of typing), and the communications assistant does not play a role in setting up a call.").

[12] 47 C.F.R. § 64.604(a)(3)(ii); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 14-125, ¶ 11 (Rel. Aug. 22, 2014) ("2014 Waiver Order") (exempting iTRS providers from the "types-of-calls requirement - to the extent that this standard requires providers to offer specific billing options traditionally offered for wireline voice services - so long as providers ... do not charge for long distance service.").

Standard	Waived	VTCSecure Compliance
Two-Line VCO, VCO-to TTY, and VCO-to-VCO **47 C.F.R. § 64.604(a)(3)(v)**		VTCSecure supports Voice Carry-Over ("VCO").[13]
Speed Dialing **47 C.F.R. § 64.604(a)(3)(vi)(2)**		VTCSecure makes speed-dialing functionality available to its VRS customers by providing one-touch dialing on the iTRS access technology that it provides to users.
Voicemail **47 C.F.R. § 64.604(a)(3)(vii)(viii)**		VTCSecure will provide its users, as a TRS feature, voicemail retrieval, which allows customers to see captions when listening to their recorded messages.
Spped of Answer for IP CTS **47 C.F.R. § 64.604(b)(2)**		VTCSecure's service will meet the speed of answer CTS requirements: 85% of all calls for IP CTS are answered within ten seconds as measured on a daily basis.
Equal Access to IXC's **47 C.F.R. § 64.604(b)(3)**	Conditional Exception[14]	VTCSecure does not charge for Long Distance calls and is therefore exempt.
24/7 Operations **47 C.F.R. § 64.604(b)(4)(i)**		VTCSecure provides service 24 hours per day, 7 days per week.

[13] *See Id.* ¶ 49 (concluding that "calls between two captioned telephone relay users are essentially a form of VCO-to-VCO and, accordingly, that a waiver of the VCO to VCO requirement is unnecessary for IP CTS and CTS providers").

[14] *2014 Waiver Order*, ¶ 15 (exempting iTRS providers from the "equal access to interexchange carriers requirement" so long as providers "do not charge for long distance service."); 47 C.F.R. § 64.604(b)(3).

Standard	Waived	VTCSecure Compliance
Redundancy **47 C.F.R. § 64.604(b)(4)(ii)**		VTCSecure operates with hosted-cloud-based redundant network abilities to ensure reliable service, which includes uninterruptible power supplies for emergency use. VTCSecure provides its service out of multiple cloud locations in different areas across the country. These same locations and server farms are used to provide virtual central offices for hundreds of voice carriers around the country, making its availability and functionally equivalent to existing carriers.
Caller ID **47 C.F.R. § 64.604(b)(6)**		VTCSecure's solution will transmits/pass-through the calling party's 10-digit NANP phone number to the PSTN and on to the called party's provider.
Complaint Logs and Procedures **47 C.F.R. § 64.604(c)(1), (6)**		VTCSecure will maintain logs of all complaints it receives. The logs include the date the complaint was filed, the nature of the complaint, the date of resolution, and the nature of resolution. VTCSecure will submit annual summaries of complaint logs indicating the number of complaints received.
Complaint Contact Point **47 C.F.R. § 64.604(c)(2)**		VTCSecure's contact person for iTRS consumer information and complaints is: Becky Copeland becky.copeland@vtcsecure.com 202-888-7900 PO Box 1509 Clearwater, FL 33757
Publicity re iTRS **47 C.F.R. § 64.604(c)(3)**		VTCSecure will make an ongoing effort to educate the public concerning all forms of TRS. This is done through printed media, social media, advertising, VTCSecure's website, and in other available means of communication.
Rates **47 C.F.R. § 64.604(c)(4)**		VTCSecure does not charge its customers anything for IP CTS Service.

Standard	Waived	VTCSecure Compliance
Cost Information and other Data Submissions **47 C.F.R. § 64.604(c)(5)**		VTCSecure will provide the TRS Fund Administrator with all requisite data and information including that which is requested by the TRS Fund Administrator for each call for which compensation is sought.
Whistleblower Notice **47 C.F.R. § 64.604(c)(5)(iii)(M)**		VTCSecure complies with the Whistleblower protections requirements. VTCSecure provides an accurate and complete description of the TRS whistleblower protections (including the right to contact the FCC's Office of Inspector General or the FCC's Enforcement Bureau) to employees and contractors in writing. Internal written policies have been updated to include those whistleblower protections. Additionally, VTCSecure has posted educational signs in all its facilities that include the RedFlag Hotline number.
TRS Customer Information **47 C.F.R. § 64.604(c)(7)**		VTCSecure does not use its subscribers' profile data for any purpose other than those allowed by the Commission's rules.[15] Neither VTCSecure nor its employees sell, distribute, share, or reveal the profile data unless compelled by law to do so or unless permitted by the Commission's rules.
No Incentives to Use IP CTS **47 C.F.R. § 64.604(c)(8)**		VTCSecure will not offer or provide any direct or indirect incentives to any IP CTS consumer or entity that registers for compensable service. VTCSecure will not offer to or provide to any hearing health care professional any direct or indirect incentives to influence the consumer's decision to register for or use IP CTS. VTCSecure will not enter into prohibited joint marketing arrangements with any hearing healthcare professionals.

[15] *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with hearing & Speech Disabilities*, CC Docket No. 98-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 00-56, ¶¶ 77, 82-83 (2000) (defining "profile data" and limitations on its use).

Standard	Waived	VTCSecure Compliance
IP CTS Registration and Certification **47 C.F.R. § 64.604(c)(9) and August 1, 2014 Public Notice**[16]		Section 64.606(a)(2)(ii)(F) of the Commission's rules requires an IP CTS applicant to provide "a description of the measures taken by such applicants or providers to ensure that they do not and will not request or collect payment from the TRS Fund for service to consumers who do not satisfy the registration and certification requirements in §64.604(c)(9), and an explanation of how these measures provide such assurance." Before billing the TRS Fund for service, VTCSecure will require all consumers requesting service to first provide their full name, date of birth, last four digits of the consumer's social security number, address, and telephone number. All VTCSecure consumers requesting service from VTCSecure will be requesting such service after August 28, 2014. Prior to requesting compensation from the TRS fund for the consumer, VTCSecure will obtain a written certification from the consumer through its online signup portal. The written certification shall state the following. **(A)** The consumer has a hearing loss that necessitates use of captioned telephone service; **(B)** The consumer understands that the captioning on captioned telephone service is provided by a live communications assistant who listens to the other party on the line and provides the text on the captioned phone; **(C)** The consumer understands that the cost of captioning each Internet protocol captioned telephone call is funded through a federal program; and **(D)** The consumer will not permit, to the best of the consumer's ability, persons who have not

[16] *Consumer and Governmental Affairs Bureau Reaffirms Application of Internet Protocol Captioned Telephone Service (IP CTS) Rule on User Registration and Certification*, CG Docket Nos. 13-24 & 03-123, Public Notice, DA 14-1127 (Rel. Aug. 1, 2014).

Standard	Waived	VTCSecure Compliance
		registered to use Internet protocol captioned telephone service to make captioned telephone calls on the consumer's registered IP captioned telephone service or device. The written certification will be made on a separate form from any other agreement or form and will include a separate consumer acknowledgement specific to the certification. The form will include a section that informs the consumer that such certification shall be made under penalty of perjury and will require the user to electronically sign the agreement in a manner that follows the Electronic Signatures in Global and National Commerce ACT 15 U.S.C 7001 *et seq.* Through these legal requirements, as well as periodic reviews consumer reviews and data analysis, VTCSecure will ensure that it will not request compensation for minutes attributable to customers that do not meet the Commission's requirements. VTCSecure will also maintain records of all registration and certification information for a period of at least five years after the consumer ceases to obtain service from VTCSecure. VTCSecure will also maintain the confidentiality of such registrations and certification information and will not disclose this information or the content of this information, except as required by law or regulation.

Standard	Waived	VTCSecure Compliance
IP CTS Registration Records and Confidentiality **47 C.F.R. § 64.604(c)(9)(x)**		VTCSecure will maintain records of registration and certification information for a period of at least 5 years after the consumer ceases to obtain service from VTCSecure. VTCSecure maintains the confidentiality of any registration and certification information obtained, and does not disclose such registration and certification information or the content of such registration and certification information except as required by law or regulation.
IP CTS Settings **47 C.F.R. § 64.604(c)(10)**		The IP CTS equipment distributed by VTCSecure includes a button, icon, or comparable feature that is easily operable and requires only one step to turn on captions.
IP CTS Equipment Label **47 C.F.R. § 64.604(c)(ll)(iii)**		For VTCSecure software, the notification appears when the customer logs in. A picture of this label will be provided to the Commission.
Emergency Call Handling **47 C.F.R. § 64.605**		VTCSecure provides emergency calling service in full compliance with the FCC's rules. 911 calls for its users are handled and routed to the applicable Public Safety Access Point. VTCSecure automatically prioritizes 911 calls at the top of the queue. If there is an unintended disconnection, steps are taken to try to reestablish contact. VTCSecure ensures that information obtained as a result of emergency calls is limited to that needed to facilitate 911 services, is made available only to emergency personnel and call handlers, and is used for the sole purpose of ascertaining a user's location in an emergency situation or for other emergency/law enforcement purposes.
Speech-to-speech Service	Waived[17]	

[17] *2007 Waiver Order*, ¶ 30 n. 97.

Standard	Waived	VTCSecure Compliance
Impermissible Use of CPNI **47 C.F.R. §§ 64.5105, 5107, 5108, 5109, 5110**		VTCSecure has adopted a detailed policy governing the use of Customer Proprietary Network Information ("CPNI") in order to ensure compliance with the Commission's CPNI rules. VTCSecure does not use, disclose, or permit access to CPNI for the purpose of marketing to a customer TRS offerings in a category for which VTCSecure is not the customer's default provider without customer approval, unless otherwise permitted by the Commission's rules. VTCSecure does not identify or track CPNI of customers that call competing TRS providers and does not use, disclose, or permit access to CPNI related to a customer call to a competing TRS provider. VTCSecure will retain records of any approval obtained for use of CPNI (and any associated notification to the customer of the customer's right to deny or restrict use of, disclosure of, and access to that customers' CPNI) pending the period that approval/disapproval is in effect and for 1 year thereafter. VTCSecure provides notification to customers of the customer's right to deny or restrict use of, disclosure of, and access to CPNI containing the disclosures specified in 47 C.F.R. § 64.5108(c). VTCSecure may use or disclose CPNI to the extent allowed or prescribed by the Commission's rules, including the investigation of fraud, waste, and abuse; the submission of minutes to the TRS Fund Administrator; the provision, installation, and maintenance of relay services; and the marketing of adjunct-to-basic services. VTCSecure has internal procedures and training to ensure that CPNI is only used as permitted by the Commission's rules. VTCSecure takes all reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. VTCSecure customers receive an email when their password, address, email address, or first or last name is changed. VTCSecure will provide notification and maintain a record of any breach of its customers' CPNI as required by 47 C.F.R. § 64.5111. Once the Commission grants VTCSecure' application for certification and VTCSecure becomes a certified iTRS provider, VTCSecure

Standard	Waived	VTCSecure Compliance
		will submit an annual certification of compliance with the Commission's CPNI rules as required by 47 C.F.R. § 64.5109.

IV. ENTITIES WITH OWNERSHIP/ CONTROL INTEREST (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to list all "individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant."

This information is provided in **Exhibit 1** to this Application.

V. DESCRIPTION OF ORGANIZATIONAL STRUCTURE (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to describe their organizational structure.

This information is provided in **Exhibit 1** to this Application.

VI. NAMES OF EXECUTIVES, OFFICERS, MEMBERS OF BOARD (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to provide "the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company)."

This information is provided in **Exhibit 1** to this Application.

VII. NUMBER OF TRS EMPLOYEES (47 C.F.R. § 64.606(a)(2)(ii)(C))

Section 64.606(a)(2)(ii)(C) of the Commission's rules requires IP CTS applicants to provide "a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; ... communications assistants, and persons involved in marketing and sponsorship activities.

This information is provided in **Exhibit 2** to this Application.

VIII. MAINTAINING COPIES OF EMPLOYMENT AGREEMENTS, EMPLOYEE LIST (47 C.F.R. § 64.606(a)(2)(ii)(D))

Section 64.606(a)(2)(ii)(D) of the Commission's rules provides that "copies of employment agreements for all of the provider's employees directly involved in TRS operations, executives, and communications assistants, and a list of names of employees directly involved in TRS operations, need not be submitted with the application, but must be retained by the applicant for five years from the date of the application, and submitted to the Commission upon request."

In accordance with this rule, VTCSecure will maintain copies of the required employment agreements and employee list for five years from the date of this Application and will submit such to the Commission upon request.

IX. LIST OF SPONSORSHIP AGREEMENTS (47 C.F.R. § 64.606(a)(2)(ii)(E))

Section 64.606(a)(2)(ii)(E) of the Commission's rules requires applicants to provide "a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements."

*****BEGIN CONFIDENTIAL*****

[redacted]

[redacted]

*****END CONFIDENTIAL*****

X. PROVIDER COMPLIANCE WITH ELIGIBILITY REQUIREMENTS (47 C.F.R. § 64.606(a)(2)(ii)(F))

Section 64.606(a)(2)(ii)(F) of the Commission's rules requires an IP CTS applicant to provide "a description of the measures taken by such applicants or providers to ensure that they do not and will not request or collect payment from the TRS Fund for service to consumers who do not satisfy the registration and certification requirements in §64.604(c)(9), and an explanation of how these measures provide such assurance."

Before billing TRS Fund for service, VTCSecure will require all consumers requesting service to first provide their full name, date of birth, last four digits of the consumer's social security number, address, and telephone number.

All VTCSecure consumers requesting service from VTCSecure will become VTCSecure customers after August 28, 2014. Prior to requesting compensation from the TRS Fund for the consumer, VTCSecure will obtain a written certification from the consumer through its online signup portal. The written certification shall state the following:

(A) The consumer has a hearing loss that necessitates use of captioned telephone service;

(B) The consumer understands that the captioning on captioned telephone service is provided by a live communications assistant who listens to the other party on the line and provides the text on the captioned phone;

(C) The consumer understands that the cost of captioning each Internet protocol captioned telephone call is funded through a federal program; and

(D) The consumer will not permit, to the best of the consumer's ability, persons who have not registered to use Internet protocol captioned telephone service to make captioned telephone calls on the consumer's registered IP captioned telephone service or device.

The written certification will be made on a separate form from any other agreement or form and will include a separate consumer acknowledgement specific to the certification. The form will include a section that informs the consumer that such certification shall be made under penalty of perjury and

require the user to electronically signed the agreement in a manner that follows the Electronic Signatures in Global and National Commerce Act, 15 U.S.C § 7001 *et seq.*

Through these legal requirements, as well as periodic reviews consumer reviews and data analysis, VTCSecure will ensure that it will not request compensation for minutes attributable to customers that do not meet the Commission's requirements.

VTCSecure will also maintain records of all registration and certification information for a period of at least five years after the consumer ceases to obtain service from the provider. VTCSecure will also maintain the confidentiality of such registrations and certification information and will not disclose this information or the content of this information except as required by law or regulation.

XI. DESCRIPTION OF COMPLAINT PROCEDURES (47 C.F.R. § 64.606(a)(2)(iii))

Section 64.606(a)(2)(iii) of the Commission's rules requires applicants to provide a description of their "complaint procedures."

*****BEGIN CONFIDENTIAL*****

[redacted]

*****END CONFIDENTIAL*****

XII. STATEMENT REGARDING ANNUAL COMPLIANCE REPORTS (47 C.F.R. § 64.606(a)(2)(iv))

Section 64.606(a)(2)(iv) of the Commission's rules requires applicants to provide "a statement that the provider will file annual compliance reports demonstrative continued compliance with these rules."

Pursuant to Section 64.606(a)(2)(iv) of the Commission's rules, VTCSecure states that it will file annual compliance reports demonstrating continued compliance with the Commission's rules governing Telecommunications Relay Service and containing the information required by Section 64.606(g) of the Commission's rules.

XIII. CERTIFICATION (47 C.F.R. § 64.606(a)(2)(v))

I declare under penalty of perjury that I am Peter Hayes, President and CEO, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

Peter Hayes
President & Chief Executive
Officer VTCSecure, LLC

Date: May 26, 2017

EXHIBIT 1

VTC Secure Corporate Stakeholders, Structure, and Officers and Organizational Structure

VTCSecure Corporate Stakeholders, Structure, and Officers and Organizational Structure

VTCSecure LLC is a limited liability company.

*****BEGIN CONFIDENTIAL*****

[redacted]

*****END CONFIDENTIAL*****

EXHIBIT 2

Number of VTCSecure LLC Employees

Number of VTCSecure LLC Employees

BEGIN CONFIDENTIAL

[redacted]

END CONFIDENTIAL

EXHIBIT 3

VTCSecure Pricing Demonstration

VTCSecure Pricing Demonstration

The following is VTCSecure's initial proposed rate structure for IP CTS minutes using only ASR:

******BEGIN CONFIDENTIAL*****

[redacted]	[redacted]	[redacted]	[redacted]	
			[redacted]	[redacted]
[redacted]		[redacted]		
[redacted]				
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
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[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
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*****END CONFIDENTIAL*****