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STATE OF FLORIDA



OFFICE OF
INDUSTRY DEVELOPMENT &
MARKET ANALYSIS
CAYCE HINTON
DIRECTOR
(850) 413-7160

Public Service Commission

June 19, 2018

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

Re: CG Docket No. 03-123 – FCC TRS Recertification Application – Florida

Dear Ms. Wilson:

Pursuant to the Federal Communications Commission's (FCC) April 26, 2018 correspondence requesting additional compliance information, Florida Relay hereby supplements its previously filed TRS recertification application. The specific rule requirements applicable to Florida conveyed by the FCC, and Florida Relay's confirmation of compliance are presented below.

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.

Florida Relay confirms that consistent with the new requirement of 64.604(a)(1)(v), Sprint CAs answering or placing an 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.

Florida Relay confirms that language promoting an understanding of Florida Relay, such as the surcharge on local telephone bills, is labeled in a manner that is respectful and does not offend the public.

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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.

Please see Attachment A.

You may contact me at 850-413-6924 or cjwillia@psc.state.fl.us with any questions regarding this supplemental filing.

Thank you for your assistance.

Sincerely,

/s/

Curtis J. Williams
Public Utility Analyst
Florida Relay Point of Contact

CJW/jb
Enclosure

cc: Sherita Kennedy
Office of Executive Director (Baez)
Office of Deputy Executive Director (Futrell)
Office of General Counsel (Page)
Office of IDM (Hinton, Fogleman)

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EXECUTIVE DIRECTOR
BRAULIO L. BAEZ
(850) 413-6463

Public Service Commission

June 18, 2018

Ms. Dana Wilson
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

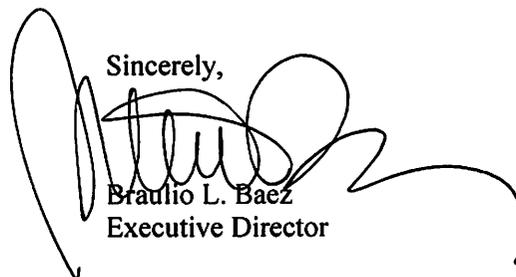
Re: Supplemental Information for Florida Relay FCC Recertification

Dear Ms. Wilson:

This is in response to your correspondence requesting supplemental information on the Florida Relay Federal Communications Commission Recertification. In your inquiry to the Florida Public Service Commission you stated that pursuant to federal order released June 10, 2013, Customer Proprietary Network Information (CPNI) rules are now mandatory minimum standards for state relay programs. You also referenced regulations found at 47 C.F.R. Part 64 requiring the Florida Public Service Commission to certify that it complies with the requirements of the CPNI rules.

Accordingly, I hereby certify that I am the Executive Director for the Florida Public Service Commission and that I have knowledge that Sprint Communications Company, L.P. (Sprint), has established operating procedures that are adequate to ensure compliance with FCC Telecommunications Relay Service (TRS) CPNI rules pursuant to 47 C.F.R. 64.5101 and 64.5111.

I am aware that Sprint has filed their TRS CPNI certification that included the details of their procedures ensuring compliance with the requirements set forth in Sections 64.5101 and 64.5111 of the FCC's rules. To my knowledge, there has been no instance in the past year where Sprint, or its agents or subcontractors, used, disclosed, or permitted access to CPNI without compliance with the procedures specified in the Federal Communications Commission's Customer Proprietary Network Information rules for TRS.

Sincerely,

Braulio L. Baez
Executive Director

cc: Sherita Kennedy
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