



Department of Public Health and Human Services

Director's Office ♦ PO Box 4210 ♦ Helena, MT 59620 ♦ (406) 444-5622 ♦ Fax: (406) 444-1970♦
www.dphhs.mt.gov

Steve Bullock, Governor

Sheila Hogan, Director

September 14, 2017

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

Re: TRS Certification Application

Dear Ms. Dortch,

Attached, please find the Montana Telecommunications Relay Service (TRS) Re-Certification Application, per written instructions from FCC Public Notice DA 17-697 released July 19, 2017.

Thank you for receiving these materials. If you have questions, please contact me.

Sincerely,

Barbara Varnum
MTAP Executive Director
111 North Last Chance Gulch
Helena, MT 59604

TABLE OF CONTENTS

Section 1 Introduction	3
Section 2 Contract Status	5
Section 3 Operational Standards	6
Section 4 Technical Standards	21
Section 5 Functional Standards	27
Section 6 Exceeding FCC Minimum Standards	39

Section 1 Introduction

This is an application on behalf of the State of Montana submitted by Montana Telecommunications Access Program to have the Montana Telecommunications Relay Service be certified as a Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission (FCC). The State of Montana has been certified for the certification time period beginning July 26, 2013 and ending July 25, 2018.

Official notices, documentation and correspondence related to this application should be directed to:

Barbara Varnum
MTAP Executive Director
111 North Last Chance Gulch
Helena, MT 59604
Telephone: 406-444-4290
Fax: 406-444-5999
E-mail: bvarnum@mt.gov

Operational questions about Montana Relay may also be directed to the following:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1006 12th Street
Aurora, NE 68818
Voice/TTY: 402-694-5101
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

Request for Renewal of Current State Certification

Montana Relay provides traditional (TTY-based) TRS, Spanish language traditional TRS, and speech-to-speech relay (STS) service. Montana Relay also offers captioned telephone relay service (CTS). In this Application for renewal of its certification, MTAP has included documentation to the FCC that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose. This Application also demonstrates that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints. This Application is submitted in narrative form.

This Application sufficiently documents that Montana Relay meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules. This Application also demonstrates that the Montana Relay program does not conflict with federal law.

Wherefore, the Montana Telecommunications Access Program requests that the Federal Communications Commission certify Montana Relay provided through Hamilton Relay, Inc. ("Hamilton") in Aurora, Nebraska.

By: 

Barbara Varnum
MTAP Executive Director
111 North Last Chance Gulch
Helena, MT 59604
Telephone: 406-444-4290
Fax: 406-444-5999
E-mail: bvarnum@mt.gov

Section 2 Contract Status

Hamilton Relay, Inc. is operating the Montana Relay Service under contract with Montana Telecommunications Access Program (MTAP). The contract term is February 28, 2016 – February 27, 2019 with an option to renew for seven, one – year periods.

Section 3 Operational Standards

§ 64.604 Mandatory minimum standards.

(a) Operational standards –

(1) Communications assistant (CA).

(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Recognizing that high quality Relay Communications Assistants ("CAs") are critical to providing consumer satisfaction, Montana Relay thoroughly trains its Relay CAs to meet the specialized communications needs of individuals who are deaf, hard of hearing or have difficulty speaking. All Montana Relay CAs possess clear and articulate voice communications. They have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with the various cultures of relay users, languages and etiquette. All Montana Relay CAs provide a typing speed of a minimum of 60 words per minute, which is verified through oral-to-type tests of CA speed.

CAs are trained to relay calls in a manner that meets and often exceeds FCC standards. The following describes how Montana Relay's service provider trains its CAs to meet operational proficiency standards stated above. Before hiring, exams are given to each applicant in the following areas to ensure that the candidate has the needed skills to become a fully trained Relay CA:

- (1) Spelling skills (must achieve at least 90% correct)
- (2) Reading skills (must be able to read clearly and distinctly)
- (3) Typing proficiency

Additional details about these requirements are as follows:

Spelling Skills

The minimum spelling skill required of Montana Relay Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. CAs must pass a spelling exam to be eligible to work as a Montana Relay CA and

score in at least the 90th percentile. The spelling skills exam is based on a 12th grade spelling level. Montana Relay performs similar testing for Spanish CAs.

English Reading, Speaking, and Writing Skills

Communication Assistants must meet all grammar proficiency requirements including reading, speaking, and writing English Communication at a minimum of a 12th grade level prior to employment. Montana Relay also tests for diction, clear and articulate voice communications and a neutral accent by requiring each prospective CA to complete a reading exam.

Typing Proficiency

Communication Assistants must type 60 words per minute (wpm) for five minutes. Montana Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm. Montana Relay's provider has an average typing speed of 79.6 wpm with 98% accuracy.

Newly hired CAs are required to meet the Montana Relay minimum typing proficiency standard on an oral-to-text exam within a three week period before they may take calls. Montana Relay also tests its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If a CA is unable to meet the 60 wpm requirement, the CA is removed from live relay calls until further training and compliance can be accomplished.

Montana Relay also uses a computer based typing program for continuing enhancement of keyboarding, spelling and grammar skills. This program is available to all CAs.

Montana Relay performs test calls to document current proficiency levels of the CAs and to make sure each is making progress over the term of their employment. Conducting typing tests during live relay calls also ensures that Relay CAs are meeting all typing requirements during actual calls.

Culture Training

All Montana Relay staff, including management, receive 20 hours of initial training devoted solely to disability issues including ASL "gloss", ASL style and grammar, tone of voice, deaf, hard of hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This training is done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs are well trained to effectively meet the specialized needs of relay users.

In addition to basic training during new hire training, Montana Relay provides an additional 12 hours of specialized/cultural training annually.

Spanish language relay CAs must complete the same training as all traditional Relay CAs and must additionally pass tests confirming proficiency in the Spanish language.

Proficiency Examinations

Montana Relay CAs begin relaying calls at the end of the three-week training period, assuming all examinations have been passed and proficiency skills have been shown. In addition to these exams and skill tests, CAs must successfully complete several relay call scenarios to demonstrate proficiency in simulated scenarios. Montana Relay's service provider can then determine that a CA is meeting and exceeding all minimum FCC proficiency requirements. Tests are kept confidential and portions of the tests are changed routinely. CAs are tested on a variety of topics monthly to ensure that they continue to meet all requirements.

CA Performance Monitoring to Ensure Each CA Continues to Meet All Requirements

Through its provider's advanced relay platform, Montana Relay has established a unique remote call monitoring system. Montana Relay uses this call monitoring system to continually monitor call performance. Such items as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated daily.

A minimum of two evaluations are completed each month; one formal call evaluation in which the call is observed from start to finish, and one informal evaluation. These monitorings are conducted by a Relay Supervisor and the Monitoring Supervisor on each CA, every month.

Additionally informal spot checking occurs throughout the month to insure that Communication Assistants are performing properly on every call. Spot checks are performed throughout the month by Relay Supervisors, the Monitoring Supervisor and the Lead CAs. A call is observed and the CA is given a score based on the information that was collected during the session. Informal Monitors are used primarily as a coaching tool to provide real time coaching.

Individuals that do not pass any portion of the Proficiency Tests are retested and/or will undergo a retraining process.

Through the call monitoring process, any CA not in compliance with quality standards is taken off duty for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

(v) 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. The obligation of the CA to stay with the call shall terminate upon the earlier of:

(A) The termination of the call by one of the parties to the call; or

(B) The completion of the minimum time period.

Montana Relay as a matter of practice does not substitute agents in the middle of calls to accommodate breaks, quitting times, etc. Montana Relay exceeds the FCC standard for substitution of CAs for all forms of TRS which requires that the CA shall stay with a relay call for a minimum of ten minutes.

Montana Relay's service provider only substitutes a CA if the following should occur:

- If a caller requests a CA of another gender. When this occurs, that gender is retained for the user throughout the relay call.
- The call requires a specialist (Spanish language, speech to speech, etc.)
- A perceived conflict of interest exists
- Another major emergency exists
- If a call goes a half hour after a scheduled lunch break or end of a shift **and** the CA requests a switch. The CA is not automatically switched out at these times.

Before a call is switched, a supervisor must approve it based on the criteria listed above and will monitor the change. The new CA then takes over the call at the same workstation (using the same gender, if gender was requested) so that the relay user's call is not interrupted (except to identify the new CA to both parties). To further minimize the disruption of the call flow, the switch does not occur until either the calling or called party has completed their part of the conversation (typed or stated GA).

Change of a STS CA

The Montana Relay service provider's 30-minute requirement prior to changing STS CAs exceeds the FCC's 20-minute requirement prior to changing STS CAs. The wait period begins after connecting to the called party. A Supervisor must approve and facilitate a STS CA change.

If a change in STS CA is necessary, another CA replaces the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. Montana's provider has the technical capability to automatically route calls to CAs of the preferred gender, if available, based on customer profile selection.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Montana Relay transmits conversations between relay and voice callers in real time.

(viii) STS providers shall offer STS users the option to have their voices muted so that the other party to the call will hear only the CA and will not hear the STS user's voice.

The Montana Relay Customer Profile contains an option titled “Open Line/Mute Transmission of STS User” which allows the STS consumer to communicate with the CA privately without the voice user hearing the conversation. This feature is also available on a per-call basis.

(2) Confidentiality and conversation content.

(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Montana Relay CAs are instructed not to disclose the content of any relayed conversation regardless of content, and to refrain from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. CAs are instructed not to intentionally alter a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs are instructed to relay all conversation verbatim unless the relay user specifically requests summarization or if the user requests interpretation of a call. Montana Relay employs various methods to ensure that all relay users' confidentiality is maintained, including the restriction of access to its call centers and the partitioning of CAs into individual cubicles to ensure relay call privacy. All Montana Relay employees must sign a confidentiality agreement committing to keep all information confidential.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Montana Relay places a great emphasis on maintaining the confidentiality of relay users. As a

result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

All information about users is treated confidentially and will not be sold, distributed, shared, or divulged by Montana Relay's service provider or any of its employees, unless divulging such information is compelled by lawful order.

(3) Types of calls.

(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Montana Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Montana Relay will continue to manage its traffic loads in a manner that will not require that customers be asked to call back later.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. Providers of TRS need not provide the same billing options (e.g., sent-paid long distance, operator-assisted, collect, and third party billing) traditionally offered for wireline voice services if they allow for long distance calls to be placed using calling cards or credit cards or do not assess charges for long distance calling. Providers of TRS need not allow for long distance calls to be placed using calling cards or credit cards if they do not assess charges for long distance calling.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

On August 24, 2016, the FCC granted temporary waivers of the following:

- "...The equal access requirement as applied to traditional TRS, STS, and CTS, provided that they do not assess separate charges on TRS users for long distance service. This temporary waiver will expire two years from the date of this Order, or on the effective date of a Commission rulemaking or other decision as to the continuing application of the equal access requirement to traditional TRS, STS, and CTS, whichever is earlier."
- "...The billing options requirement as applied to traditional TRS, STS and CTS, provided that they do not assess separate charges on users of these services for long distance calls. In other words, petitioners need not provide the same billing options (e.g., sent-paid long distance, operator-assisted, collect, and third party billing) traditionally offered for wireline voice services if they do not assess charges for long distance calling. This temporary waiver will expire two years from the date of this Order, or on the effective

date of a Commission rulemaking or other decision as to the continuing application of the billing options requirement to traditional TRS, STS, and CTS, whichever is earlier.

“We caution, however, that Sprint and Hamilton must continue to handle and complete TRS calls from inmates of correctional facilities.”

- Permissibility of Free Long Distance Calling “...Given the widespread bundling of long distance with local calling, we find no basis to conclude that, in today’s environment, offering free long distance calling to TRS users would provide an impermissible incentive for them to make long distance calls.”

Montana Relay’s service provider provides long distance service to TRS and CTS users at no cost to the users. Because relay is not involved in long distance for 2 line CTS calls, CTS users may be billed by their long distance providers for the voice portion of the call.

There are only five call types in which Montana’s service provider may require a billing method from TRS and CTS users:

1. calls from inmates at correctional facilities
2. calls placed from payphones (does not apply to CTS)
3. calls placed to and from international locations
4. calls placed to Directory Assistance
5. calls placed to pay per call services (e.g., 900 numbers)

Montana Relay’s service provider uses several methods to ensure proper billing of these types of calls which may include: collect calling and calling card payment methods. For international calls, TRS and CTS users may also be able to use interexchange carrier for direct billing (bill to ANI).

Calls that require billing to the end user are recorded and billed by the relay users' carrier of choice. On each call requiring a billing method, Montana’s service provider forwards the appropriate information digits, calling number and called number call as part of the call information so that the carrier of choice can bill the customer directly or through their normal billing mechanisms.

Montana’s service provider forwards information to the IXC at the time the relay call actually takes place. The record contains: the originating and terminating numbers and the call type (e.g. collect). Billing records are created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Call charges are based on the originating and terminating numbers. The location of the relay center does not affect billing. The IXC bills based on conversation time using their own rounding calculations. Montana Relay’s service provider does not pass on session time to the carrier so only conversation time is billed. Billing and collection is then the responsibility of the interexchange carrier who carries the call.

The format of the bill for calls is determined by the carrier as Montana Relay’s service provider does not bill any relay calls. However, the call digit information identifies the call as a TRS call and further designates the type of call (i.e. collect call). This allows the carrier to correctly identify each relay call for billing purposes.

If a long distance provider declines to complete a call because credit authorization is denied, we will relay the message verbatim to the relay user and ask if he/she wish to make another call.

Coin Sent Paid

Montana Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls, which the FCC has determined cannot be processed through relay due to a lack of existing technology.

Montana Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect call. The customer's carrier of choice will then rate and bill any long distance payphone calls. Montana Relay will continue to offer collect calling as a billing option as long as this service is available through carriers.

Once billing has been established, the call will be processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

Cellular/Wireless/PCS Phone Access

Montana Relay's service provider is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call.

Workstations have built-in DTMF generating capabilities to perform dialing or access functions for relay users. The DTMF software sends tones that activate automated voice systems and pagers. DTMF capability allows navigation of voice menus, answering machines, or other automated systems that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

There are occasions when a wireless switch sends false ANI information on wireless calls. When this occurs, the call is processed as "no bill".

Directory Assistance

Montana Relay's service provider processes directory assistance requests in the same manner as any other relay requests. When reaching the directory assistance operator, the CA identifies herself/himself and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

The relay user can pick which carrier they want to use for directory assistance. Montana Relay will continue to offer Directory Assistance as long as this service is available through carriers. In the event that Directory Assistance is not available through traditional carriers, Montana Relay's service provider has secured arrangements with a company named National Directory Assistance (NDA) to provide this service to relay users nationwide.

Network Access

Montana Relay users are able to place calls from within Montana to any point in the world and from all points outside Montana to any point within Montana. This includes access to local, intrastate (including intralata and interlata), interstate, and international call types.

Access to Regionally Directed Toll-Free Numbers

Montana Relay allows access to regionally directed toll-free numbers. Because Montana Relay passes true Caller ID information, the caller's ANI reflects a Montana number which results in the call being routed to the correct state or regional location.

Access to Restricted Toll Free Numbers

The service provided by Montana Relay allows access to restricted 800 numbers and other special prefixes. Montana Relay is providing this service today through an incumbent LEC via re-originating dial tone. Montana Relay makes sure that all of the relay users in Montana have access to all 800 numbers and other special prefixes.

Inbound International Calls

Montana Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Montana Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

(iv) Relay services other than Internet-based TRS shall be capable of handling pay-per-call calls.

Pay-Per-Call Services

Montana Relay provides relay users access to intrastate and interstate 800 and 900 pay-per-call services in which the company providing the service bills the end-user directly.

On all 900 numbers, CAs inform the relay user the dollar amount per minute associated with the call and asks them if they want to continue the call. This is the point in which callers can disconnect without being charged. Customers who do not want pay-per-calls made from their telephone line through relay can complete a customer profile and restrict (block) pay-per-call relay calls from that particular telephone line.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) one-line VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) one-line HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO. VRS providers are not required to provide text-to-voice and voice-to-text functionality. IP Relay providers are not required to provide one-line VCO and one-line HCO. IP Relay providers and VRS providers are not required to provide (1) VCO-to-TTY and VCO-to-VCO; (2) HCO-to-TTY and HCO-to-HCO. Captioned telephone service providers and IP CTS providers are not required to provide (1) text-to-voice functionality; (2) one-line HCO, two-line HCO, and HCO-to-TTY, HCO-to-HCO. IP CTS providers are not required to provide one-line VCO.

TTY/ASCII to Voice

Montana Relay is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Call Processing

Montana Relay is able to accept a call from a hearing and voice capable caller, place a call to a text based caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Carryover (VCO)

Montana Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Montana Relay.

Two-Line VCO

Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Reverse Two-Line VCO

Montana Relay's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

VCO-TTY and TTY-VCO

Montana Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

VCO-VCO

Montana Relay provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

Hearing Carryover (HCO)

Montana Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Montana Relay.

Two-Line HCO

To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

HCO-TTY and TTY-HCO

Montana Relay provides this feature allowing HCO users to contact TTY users (or vice versa) via the relay.

HCO-HCO

This service allows two HCO users to contact each other through the relay. Montana Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release

Montana Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Montana Relay gives the calling party the option to communicate independent of the relay function.

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Montana Relay provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call.

Speed Dialing

Relay users may choose up to 50 numbers they would like programmed for speed dial. When a Relay user makes a call to a number on their speed dial list, they first connect to the CA and just tell the CA, "pls call Mom". Speed dialing is available through the Montana Relay customer profile.

Three-Way Calling

Montana Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Machine Recording Capabilities

Montana Relay's recording function allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained only for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Answering Machine and Voice Mail Retrieval

Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.
2. If the user requests message retrieval, Montana Relay obtains the appropriate access codes from the user. Montana Relay does not retain access codes or any other information needed to access a voice mail system subsequent to the call. This information is considered "call" information and just like any other call information, is kept confidential.
3. After the voice processing system has been accessed, Montana Relay Communication Assistants begin to relay any messages that have been recorded or leave a message as

requested. Montana Relay makes use of its advanced recording function to capture this information as discussed previously.

Montana Relay alerts relay users to the presence of a recorded message and/or interactive menu and uses hot keys (automatic macros) to announce recordings or interactive messages.

Answering Machine Retrieval (Single-Line)

Montana Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. Montana Relay records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Procedure for Handling TRS Emergency Calls

Montana Relay's service provider uses Bandwidth, a national provider of emergency calling telephony services, for processing emergency relay calls. Montana Relay's emergency call procedures are as follows:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.
- In the event that a caller asks Relay to call 911, the CA connects with Bandwidth, which is accomplished with a stroke on the keyboard.
- This triggers an automated database dip and routes the call to the appropriate PSAP.
- The CA processes the call in the same manner as any other relay call.

Back-up Emergency Procedures

As a back-up to Bandwidth in the event that Bandwidth is unable to match the caller with the appropriate PSAP, Montana Relay's service provider has procedures in place to access its own emergency database:

- The relay software takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its internal database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of locations within the State stored in the database, which in turn is mapped to an appropriate PSAP. Once this search is complete (it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the

Communication Assistant can immediately dial the appropriate emergency personnel.

- Montana Relay's service provider passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- If the caller is using a cellular or wireless phone, the ANI is not a good indication of where the caller is actually calling from. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.
- The emergency database application described above meets the current requirements established by the FCC.

FCC Rules for Emergency Calls

In the June 2004 Order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." This process automatically and immediately transfers the caller to an appropriate Public Safety Answering Point based on NPA/NXX information, meeting FCC requirements.

TTY to TTY Communications Between PSAP and Caller

Montana Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

If a Caller Disconnects Before Being Connected to the PSAP

If a caller disconnects before being connected to the PSAP, the advanced relay technology initiates a software command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, we can send the correct ANI information to the 911 center and give the dispatcher any pertinent information collected on the call. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

While it is never our intent to be a substitute 911 center, Montana Relay's service provider will never turn away an emergency call and will take reasonable steps to get the call placed and summon necessary help. During the course of such calls, the CA continually attempts to collect as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance.

Emergency Numbers

Relay users can add local emergency numbers to their speed dialing list on their Customer Profile. This feature can save valuable time when time is of the essence. A relay user could simply type call Fire or call 911 and the CA will automatically connect the caller to an appropriate PSAP. However, Montana Relay's service provider encourages all relay users to call 911 direct.

Emergency Calls Education

Through its outreach programs and educational materials, Montana Relay educates relay users about how to use 911 services, encouraging them to call 911 direct. Montana Relay also encourages relay users to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly if there ever were an actual emergency. Outreach Coordinators routinely give presentations to 911 centers, providing training to emergency dispatchers on how to handle TTY or relay calls correctly.

(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Montana Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Montana Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA. The CA repeats the name and states the number of the person to call. The Speed Dial feature is of great benefit to STS users. Montana Relay's service provider will transfer the customer profile data in usable format to a new provider.

Section 4 Technical Standards

§ 64.604 Mandatory minimum standards.

(b) Technical standards –

(1) ASCII and Baudot. TTY-based relay service shall be capable of communicating with ASCII and Baudot format, at any speed generally in use. Other forms of TRS are not subject to this requirement.

Montana Relay's service provider is able to receive and transmit in Voice, Turbo Code, ASCII (at the correct Baud rate) or Baudot formats, and their modems can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly.

(2) Speed of answer.

(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Montana Relay's service provider answers eighty-five percent (85%) of calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.

Montana Relay's service provider begins measuring Average Answer time from the moment a Relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment accepts the call, call detail records start to capture answer time data. The information reported is taken from Call Detail Records ensuring the accuracy of the data. Each call detail record tracks the amount of time a call waits to be answered. CAs do not answer a call until they are ready to engage the call. Calls in queue or calls receiving the intercept message are not counted as answered. This "queue time" field is analyzed and reported, but not billed. Abandoned calls are included in the speed of answer calculation.

Montana Relay's service provider monitors speed of answer on a real-time basis via a monitoring system that is accessible to management and supervisors. This information is utilized to make CA staffing changes throughout the day. Average Answer time is displayed on the supervisor console. The Supervisor workstation and reader boards in the center indicate if calls are in queue waiting to be answered. The Supervisors are responsible for making sure that when that alert comes up that all available CA resources are logged in to the system and answering calls. Each of these tracking mechanisms allows Montana Relay to respond quickly by adding more CAs immediately.

Daily activity reports used for internal management purposes also track answer performance information for future scheduling. In addition, Montana Relay uses a variety of other scheduling techniques to ensure that staffing meets traffic demands. Montana's Relay provider makes use of historical data, trending, call patterns and combines that with the knowledge of current events (e.g. football games, weather, Mother's Day, etc.) to anticipate staffing needs.

Montana Relay has outstanding answer performance. Average answer seconds for the past year were 0.6 with 98% of calls answered in ten seconds or less.

Montana Relay is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Blockage is defined as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal.

The switches used are high-speed, stand-alone, non-blocking digital switching matrixes. The system is fully redundant to ensure quality and reliable performance. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure taken to prevent blocking is the use of networks that make use of SONET survivability technology. All of the networks controlled by Montana Relay's service provider- from the point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant.

Montana Relay's service provider measures, records and reports its answer performance and blockage rate information to the State and abides by the FCC rules.

The transmission circuits used meet or exceed industry interexchange performance standards for circuit loss and noise.

(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services to the same extent that such access is provided to voice users. This requirement is inapplicable to providers of TRS if they do not assess specific charges for long distance calling.

On August 24, 2016, the FCC granted temporary waivers of "...The equal access requirement as applied to traditional TRS, STS, and CTS, provided that they do not assess separate charges on TRS users for long distance service. This temporary waiver will expire two years from the date of this Order, or on the effective date of a Commission rulemaking or other decision as to the continuing application of the equal access requirement to traditional TRS, STS, and CTS, whichever is earlier."

Montana Relay's service provider provides long distance service to TRS and CTS users at no cost to the users. Because relay is not involved in long distance for 2 line CTS calls, CTS users may be billed by their long distance providers for the voice portion of the call.

There are only five call types in which Montana's service provider may require a billing method from TRS and CTS users:

1. calls from inmates at correctional facilities
2. calls placed from payphones (does not apply to CTS)
3. calls placed to and from international locations
4. calls placed to Directory Assistance
5. calls placed to pay per call services (e.g., 900 numbers)

Montana Relay's service provider uses several methods to ensure proper billing of these types of calls which may include: collect calling and calling card payment methods. For international calls, TRS and CTS users may also be able to use interexchange carrier for direct billing (bill to ANI).

(4) TRS facilities.

(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Montana Relay provides telecommunications relay service 24 hours a day, 7 days a week.—

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The facilities used by Montana Relay's service provider have the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Montana Relay is operated from a combination of relay centers located in Nebraska, Louisiana, Maryland, Massachusetts and Georgia. Speech to Speech calls are processed from the Maryland and Louisiana centers.

Location of TRS Switches and Relay Platforms

- Relay switches and platforms are located in the Louisiana and the Nebraska relay centers. Workstation equipment, database information, and CAs are located in all relay centers.
- All incoming calls are primarily controlled by an Automatic Call Distributor (ACD) and switch equipment located in Nebraska via redundant T-1 circuits.
- For redundancy purposes, all centers can also operate off the ACD and switch equipment located in Louisiana, via redundant T-1 circuits.
- All incoming relay calls enter our relay network. Calls are then connected to workstations in any TRS facility. This all happens instantaneously with no call delays. Calls made to the terminating party exit through the call network as well.

This ensures continuous operation of Montana Relay.

Uninterruptible Power

All relay centers operated by Montana's Relay provider make use of an uninterruptible power supply (UPS) which supports all relay technology and operations during a loss of power through the combination of battery and generator back-up. This allows Montana Relay's service provider to continue uninterrupted relay service during short or long-term power outages.

The power system supports the switch system and its peripherals, switch room environmental (air conditioning/heating, fire suppression system, emergency lights & system alarms), CA consoles/terminals, CA work-site and lighting and Call Detail Record recording at each center. Employees are given procedures to follow in the event of emergency.

Switching System

Montana Relay's service provider's switch is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The switch supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The switch adapts to standard network and line interfaces, including T1, E1, J1, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records. The ISOS is a fully operational basic switch and has great flexibility.

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of CA control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database maintains a preference of each caller to speed up call connections and to provide information for tailored call processing.

The host controller is housed in a redundant server environment and will automatically failover to prevent dropped calls in the event of technical failure. In addition, redundant and geographically dispersed host controllers and switches facilitate failover in the event of a disaster recovery situation. An inventory of spare critical components is maintained for the switching system onsite to ensure that required levels of service are met.

The relay switch is a high-speed, stand-alone, non-blocking digital switching matrix. The system is fully redundant to insure quality, reliable performance. The system utilizes a standard T1 interface that enables it to be linked to other digital switches. All cards and power supplies within the system are redundant which provides the flexibility to switch from one side of the switch to the other to perform updates or to troubleshoot without interrupting call processing. The system is set up to automatically access the secondary operating system on the switch with no human intervention. The system auto-detects any problems and moves to the secondary system immediately if necessary.

If one switching system cannot be returned to service by transferring control to redundant equipment, the calls are rerouted to another switching system. The switching systems are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online. Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to insure the required levels of service are always met.

This flexible system architecture connects every workstation to both switching locations so that the workstation can utilize either system in the event that one becomes unreachable. This also provides uninterrupted service during maintenance windows. Network redundancy is delivered with two separate high speed routes provided by two different carrier groups connecting all centers.

(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Montana

Relay is ideal for today's rapidly changing technologically advanced environment.

The relay platform used by Montana Relay's service provider makes use of SS7 signaling.

(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Through the use of SS7 signaling, the relay platforms deliver Caller ID in the same manner that these services are delivered in the public switched network (i.e. Montana Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

(7) STS 711 Calls. An STS provider shall, at a minimum, employ the same means of enabling an STS user to connect to a CA when dialing 711 that the provider uses for all other forms of TRS. When a CA directly answers an incoming 711 call, the CA shall transfer the STS user to an STS CA without requiring the STS user to take any additional steps. When an interactive voice response (IVR) system answers an incoming 711 call, the IVR system shall allow for an STS user to connect directly to an STS CA using the same level of prompts as the IVR system uses for all other forms of TRS.

Montana Relay's service provider is in compliance with this rule as their technology automatically routes a STS user to an STS CA when dialing 711. This is available via the customer profile.

When STS users reach a TRS CA after dialing 711, the TRS CA connects the consumer directly to a STS CA without requiring the user to do anything further. Montana Relay's service provider does not make use of an IVR to answer incoming calls.

Section 5 Functional Standards

§ 64.604 Mandatory minimum standards.

c) Functional standards —

(1) Consumer complaint logs.

(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

Montana Relay's service provider tracks all TRS complaints and all other customer service activity. Consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service are maintained in a log which is retained for the State until the FCC grants the next application for certification.

Every contact made with the Customer Care Department is documented in a Customer Relations Management (CRM) tool. This includes contacts via the toll-free Customer Care number, the customer inquiry form or on-line feedback form, in writing or in person. All information is kept on file and available to the State and FCC. Each database record includes:

- The name and/or address of the customer (if given)
- The date and time received
- The Communication Assistant identification number
- The record identification number
- If a complaint, the nature of the complaint
- The specific relief or satisfaction sought
- The result of the investigation
- The resolution of the complaint
- The date of the resolution
- The Customer Care representative responsible for handling the complaint

Montana's complaint log summary contains complaints in violation of FCC Mandatory Minimum Standards. It also includes external complaints.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

The Montana Relay TRS Administrator has submitted copies of its complaint logs to the FCC each year as required.

(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 State of Montana has submitted the following individual to the FCC as a contact person for TRS consumer information and complaints about Intrastate TRS:

Montana Telecommunications Access Program
P.O. Box 4210
Helena, Montana 59604-4210
Voice: 406-444-4290
Toll Free: 800-833-8503
Fax: 406-444-5999
Contacts:
Barbara Varnum, MTAP Director
Email: bvarnum@mt.gov

Montana Relay Service Customer Care
P.O. Box 285
Aurora, NE 68818
Voice/TTY: 800-833-8503
Fax: 402-694-5110
Email: relay@mt.gov

Montana Relay's service provider has submitted the following individual to the FCC as a contact person for TRS consumer information and complaints about Hamilton's service.

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1006 12th Street
Aurora, NE 68818
Voice/TTY 402-694-5101
Fax: 402-694-5037

E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Community Outreach, Public Relations and Educational Programs

Montana Relay's outreach programs specifically target hearing audiences i.e. voice users, businesses and professionals, trade shows, civic organizations, government entities, public schools and university students. The outreach programs also target individuals who are deaf, hard of hearing, late deafened, deaf-blind, or who have difficulty speaking as well as their family and friends. Montana Relay utilizes venues such as presentations, exhibits, demonstrations, etc. with special emphasis aimed at the business community and the hearing sector at large.

Outreach programs include demonstration of equipment and distribution of informational materials describing how to use TRS and CapTel services. Montana Relay presents relay information to organizations and groups, meets with businesses, educational institutions, veterans, equipment distribution programs, 911 and law enforcement centers, and other public and private entities to describe relay and how it works, and meets with individuals or groups to demonstrate equipment and answer questions. Montana Relay works with the elderly and people who have difficulty speaking to promote use of relay and also uses public relations campaigns to expose relay to a broader audience of people throughout the State.

Outreach and Marketing Materials

In addition to presentations, meetings and exhibits, Montana Relay's service provider utilizes flyers, Facebook and videos to promote Montana Relay. Montana Relay utilizes informational materials such as brochures, promotional materials, newsletters, display materials, bill inserts and directory pages, and websites.

Complaint Resolution procedures and FCC complaint processes are described on Montana Relay websites and brochures (screenshot of website is shown below).

Customer Care

If you have suggestions, comments or concerns, please contact:

Montana Relay
P.O. Box 285
Aurora, NE 68818
Voice/TTY: 800-833-8503
Fax: 402-694-5110
Email: relay@mt.gov

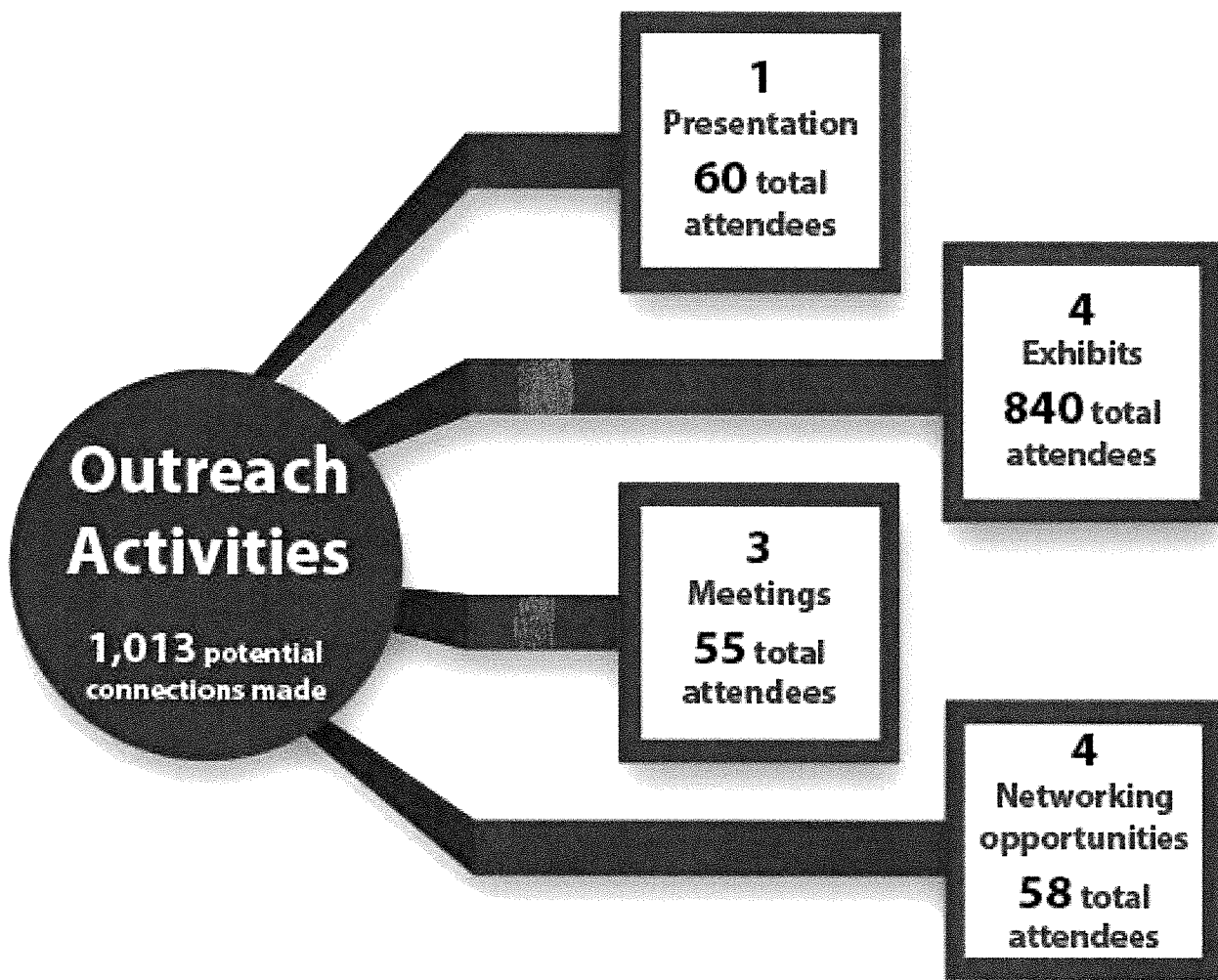
If your expressed concern is not resolved to your satisfaction, contact your State Relay Administrator.

Barbara Varnum, Executive Director
Montana Telecommunications
Access Program
P.O. Box 4210
Helena, Montana 59604
Voice: 406-444-4290
E-mail: bvarnum@mt.gov

Should your concern go unresolved, you may file a complaint with the FCC's Consumer Information Bureau.

Voice: 888-CALL-FCC
TTY: 888-TELL-FCC
<http://www.fcc.gov/cgb/complaints.html>

Below is a summary of the outreach activities Montana Relay has accomplished in the past year.



(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

On August 24, 2016, the FCC granted temporary waivers of "...Permissibility of Free Long Distance Calling "...Given the widespread bundling of long distance with local calling, we find no basis to conclude that, in today's environment, offering free long distance calling to TRS users would provide an impermissible incentive for them to make long distance calls."

Montana Relay's service provider provides long distance service to TRS and CTS users at no cost to the users. Because relay is not involved in long distance for 2 line CTS calls, CTS users may be billed by their long distance providers for the voice portion of the call.

There are only five call types in which Montana's service provider may require a billing method from TRS and CTS users:

1. calls from inmates at correctional facilities
2. calls placed from payphones (does not apply to CTS)
3. calls placed to and from international locations
4. calls placed to Directory Assistance
5. calls placed to pay per call services (e.g., 900 numbers)

Montana Relay's service provider uses several methods to ensure proper billing of these types of calls which may include: collect calling and calling card payment methods. For international calls, TRS and CTS users may also be able to use interexchange carrier for direct billing (bill to ANI).

(5) Jurisdictional separation of costs —

(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

Montana Relay's service provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated from the Montana Relay Fund.

(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be

recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

Please refer to §64.606 Section (d) at the end of this document for a description of Montana's funding mechanism.

(6) Complaints —

(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.606 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

MTAP will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

*(2) A shorter period as prescribed by the regulations of such state;
or*

(B) The Commission determines that such state program is no longer qualified for certification under §64.606.

MTAP understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

MTAP understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal complaints —

(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet email, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints.

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or

defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

MTAP will assist as necessary in this process.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

- (1) The name and address of the complainant,*
- (2) The name and address of the defendant against whom the complaint is made,*
- (3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and*
- (4) The relief sought.*

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service.

(1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the

defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

MTAP will assist as necessary in this process.

Supplemental Information:

Intrastate Montana Relay complaints are processed in the following manner for MTAP by its TRS service provider:

Montana Relay Customer Care activities, including inquiries, comments, compliments and complaints, are handled by personnel trained on Deaf Culture and the needs of individuals who have difficulty speaking or hearing. Montana Relay's Customer Care Department is available to relay users 24 hours a day, 365 days a year via a toll-free telephone number which is accessible from anywhere in the U.S. Any caller to the relay center having a complaint is able to reach a supervisor or customer care representative while still on line during a relay call. Customers may

also contact Montana Relay via e-mail, through the Montana Relay web-site, in person or in writing.

Montana Relay's service provider's Customer Care Department, in communication with their Vice President of Relay (who reviews all complaint information), has ultimate responsibility for all inquiries, comments, compliments and complaints. The Customer Care department shares customer care activities with the Relay Center Manager who has the ability to take whatever action is needed to resolve situations which may arise.

In the event of a customer care contact regarding the Montana Relay, trained staff follow an established procedure, which varies depending on the gravity of the situation.

- Feedback involving CAs is directed to the CA's Supervisor and the Relay Center Manager. Positive feedback is shared with the CA. Constructive feedback is shared with the CAs and the appropriate coaching, re-training and counseling steps are taken by the primary Supervisor to resolve the situation. Detailed call records show each key command (not actual text) the CA makes. Montana Relay's service provider has the ability to investigate CA complaints and will take disciplinary action when needed.
- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff and are addressed promptly. Procedural issues are discussed at internal quality meetings and appropriate action is initiated.

All complaints are reviewed by the Customer Care Manager to ensure that complaints have been resolved to the customer's satisfaction. The Customer Care Team resolves most customer care complaints. If further action is needed, the complaint is escalated to Montana Relay's service provider's Vice President of Relay Service, and then to MTAP when needed. Montana Relay's Customer Care Department strives to respond to all customer inquiries within 24 hours and to resolve all complaints within 72 hours; however, all complaints are to be resolved within 10 calendar days depending on the complexity of the problem. Contact information for customer inquiries is described in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by Montana Relay's service provider or with any action taken, Montana Relay's monthly report to MTAP will so state. The user then has the opportunity and is given written notice of that opportunity to have the complaint and action reviewed by MTAP for such action as it may deem appropriate in accordance with its rules and regulation. MTAP will act on such complaint no later than 180 days from the filing of the complaint.

MTAP will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the State of Montana. MTAP will cooperate in the investigation or resolution of any and all complaints concerning Montana Relay with the Federal Communication's Commission.

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Upon termination of the contract, Montana Relay's service provider will transfer the customer profile database to a new Relay Provider. They will transfer this data in a usable format at least 60 days in advance of their last day of service.

The data gathered from providing relay service is not used for any purpose other than connecting the relay user to their called party. Montana Relay's service provider has not, and will never make any relay information available for sale or distribution. They will not sell, distribute, share or reveal in any way the information referenced above, unless compelled to do so by lawful order.

Section 6 Exceeding FCC Minimum Standards

§ 64.606 Internet-based TRS provider and TRS program certification.

(a) Documentation —

(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

The State of Montana is currently certified to provide intrastate TRS through July 26, 2018. This application is submitted to re-certify the State of Montana for an additional five years.

(b)

(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

MTAP understands.

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

MTAP regulates the provision of TRS in the State of Montana and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies. The contract entered into between MTAP and Hamilton Relay, Inc. provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which MTAP could terminate the agreement with Hamilton. Consumers have the opportunity to file complaints or petitions concerning Montana Relay. Complaint Resolution procedures and MTAP complaint processes are described on Montana Relay websites and brochures.

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes [that its program in no way conflicts with federal law].

As demonstrated in the following section, where the Montana Relay program exceeds the mandatory minimum standards contained in §64.604, Montana Relay establishes that its program in no way conflicts with federal law.

Montana Relay exceeds mandatory minimum standards contained in §64.604 in terms of the following items:

CA Training and Procedures

Montana Relay not only meets, but also exceeds FCC Communication Assistant standards in the areas of hiring and training practices, typing speed to accuracy and in-call replacement of CAs.

Typing 60 Words Per Minute

Communication Assistants must type 60 words per minute (wpm) for five minutes. Montana Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm.

Turbo Code

Montana Relay exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. Montana Relay provides Turbo Code; a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. Turbo Code is faster than Baudot (similar to “real-time”) and does not have the limitation of ASCII. Turbo Code also allows for “interrupt” capability while one party is still typing. Montana Relay users are able to automatically connect “Turbo Code” on every relay call type.

Enhanced Turbo Code

Enhanced Turbo Code brings the relay experience much closer to being functionally equivalent with traditional voice calls. Relay users who’s TTYs include E-Turbo (the TTY must be E-Turbo capable) merely push a “relay” button, then dial the number of the person they are calling directly.

E-Turbo equipped TTYs store user specific data (the user has total control over this data), and handles the details of connecting to the relay service; automatically transmitting caller preferences, such as long distance carrier of choice, VCO preference, CA gender preference etc. Each time a relay call is placed, these details are automatically passed on from the E-Turbo TTY to the Relay Service. Because this exchange is done automatically “behind the scenes,” the need for the TTY caller to “set up” the call with the CA is eliminated.

Spanish to Spanish Relay and Spanish to English Translation

In addition to Interstate Spanish to Spanish, Montana Relay provides Intrastate Spanish to Spanish, and Spanish to English translation services. Montana Relay processes the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, Montana Relay requires Spanish CAs pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls.

Relay users who always want to have their calls answered by a Spanish speaking CA can select “Spanish” as an option on their Customer Profile. This option allows Spanish speaking relay users to dial 711 and have their calls automatically answered by a Spanish speaking CA.

Captioned Telephone Service (CapTel)

Montana Relay provides Captioned Telephone service 24 hours a day, 7 days a week, 365 days a year in a manner that is functionally equivalent to traditional voice calls. Captioned Telephone users place a call in the same way as dialing a traditional phone. As they dial, the CapTel phone automatically connects to a captioning service. When the other party answers, the CapTel phone user hears everything that is said, just like a traditional telephone call.

Montana Relay provides Captioned Telephone call processing from a combination of call centers located in Nebraska, Louisiana, Maryland, Georgia, Kansas, Massachusetts, Wisconsin (Madison and Milwaukee), Florida (Orlando and Tampa), and Texas.

FCC CapTel Regulations and Waivers

The FCC issued a separate Ruling specifically for CapTel on August 1, 2003: Declaratory Ruling CC Docket No. 98-67, FCC 03-190. In this Ruling the FCC:

- Found that Captioned Telephone VCO Service (CapTel Service is a form of this) is a type of TRS.
- Clarified that certain TRS mandatory minimum standards do not apply to Captioned Telephone VCO Service.
- Waived other TRS mandatory minimum standards for captioned telephone VCO service

On July 14, 2005 the FCC clarified that Two-Line Captioned Telephone Service is a type of telecommunications relay service eligible for compensation from the Interstate TRS Fund.

The Declaratory Ruling referenced above serves as the primary source in meeting the existing minimum standards, including waivers of certain TRS requirements for CapTel Relay Services. The FCC issued an order on August 14, 2006 (CG Docket No. 03-123, DA 06-1627) making these temporary waivers permanent.

Captioned Telephone waivers include:

1. Speech to Speech (STS) and Hearing Carryover (HCO)
2. 711 Dialing Access
3. Communication Assistants waivers:
 - TRS mandatory minimum standard requiring CAs to be competent in interpretation of typewritten ASL as applied to captioned telephone CAs
 - CA oral-to-type test requirement and permit the use of an oral-to-text test instead for CapTel CAs

- Requirement that CAs not refuse single or sequential calls as applied to CapTel CAs handling outbound captioned telephone calls
 - Gender preference
 - 60 wpm mandatory typing speed for CAs
4. Interrupt Functionality
 5. Call Release
 6. ASCII and Baudot Format

Montana's Captioned Telephone Service meets or exceeds all FCC minimum standards.

711 via Captioned Telephone

Montana's Captioned Telephone provider has a procedure for voice to Captioned Telephone that allows voice consumers to call a Captioned Telephone user by dialing 711 rather than the Captioned Telephone 800 number. Voice users can use this on a per-call basis or as an option on the Customer Profile.

Spanish Captioned Telephone

Intrastate and Interstate Spanish Language Captioned Telephone Services are available to Montana Captioned Telephone users from 7:00 a.m. to 11:00 p.m. Central Time. To use Spanish Captioned Telephone, the user may either call the Spanish Captioned Telephone toll-free number or select the Spanish option under the menu settings. Once selected, calls automatically route to a Spanish captioning CA. Voice users dial the Spanish toll-free access number to call a Spanish CTS user and have the call captioned in the Spanish language.

True Caller ID via Captioned Telephone

Captioned Telephone users in Montana are provided with True Caller ID which passes along the 10-digit number of the person calling, consistent with FCC requirements. The actual identity of the Calling Party is presented to the Called Party's Caller ID box (True Caller ID). However, if the Calling Party blocks their Caller ID, the Called Party does not receive any Caller ID information, functionally equivalent to a normal telephone call. Caller ID information of the Called Party is shown on the CapTel display screen.

Three-way Calling via Captioned Telephone

FCC compliant Three-way calling is available to Captioned Telephone users in Montana. A standard telephone user initiates a three-way call to a CTS user in the following manner:

The party with three-way calling feature on his/her phone line would hook flash to put the other person on hold, and would then dial the national CapTel voice number and give the CA the Captioned Telephone user's telephone number or dial the Captioned Telephone user direct if a 2-Line Captioned Telephone user. All three parties would then be joined and the Captioned Telephone user would receive captions on the call.

With 2-Line Captioned Telephone, the Captioned Telephone user initiates a three-way call in the same manner that a standard phone user would. The first line works exactly as a regular phone line (able to add another caller) and the second line supports the captions.

Call-Waiting via Captioned Telephone

Call-waiting is supported by 2-line Captioned Telephone. When the Captioned Telephone user hears (or reads in the captions) the “beep” telling him/her a second call is coming in, the party simply presses the FLASH button on their CapTel phone. The Captioned Telephone user’s second caller will be on-line, and the Captioned Telephone user will receive captions of the conversation. The Captioned Telephone user will still receive captions of their first conversation, if/when they return to the first caller by pressing the FLASH button again.

Speed Dialing via Captioned Telephone

Speed Dialing, which is built into the CapTel phone’s Dialing Directory, allows users to quickly dial frequently called phone numbers and is available to all Montana Captioned Telephone users. To speed dial a number that the Captioned Telephone user has saved in the CapTel memory, the user simply presses the button next to the “Memory Dial/Redial” arrow. A list of saved numbers along with the last number dialed is then displayed. The user then presses the button next to the number they wish to dial again and CapTel dials the number automatically.

No charges are assessed to Captioned Telephone users for these local exchange non-basic services beyond what the user pays their LEC for these services.

Using Automated (Touchtone) Systems via Captioned Telephone

Captioned Telephone users have access to audiotext, interactive voice response units and answering machines including message retrieval services and can easily receive and/or leave messages on answering machines or voice mail systems with automated menus. The Captioned Telephone user can press the CapTel number buttons at any time during a call to make selections. The captioning service continuously transcribes what is heard regardless of what the Captioned Telephone user is saying or which buttons they press.

Leaving Messages on Answering Machines via Captioned Telephone

The Captioned Telephone user may begin leaving their message as soon as they see “BEEP” on the display screen or hear the recorded greeting end the same way they would with a regular phone.

Retrieving Voice Mail Messages via Captioned Telephone

To retrieve their voice mail, the Captioned Telephone user simply calls into their voice mail/answering machine system as a remote caller, and follows the voice mail/answering machine prompts to retrieve the messages.

Captioning External Answering Machine Messages via Captioned Telephone

Captioned Telephone users can receive captions of voice messages left on an answering machine that is near the CapTel phone. Users press the menu button on the CapTel phone until the “Caption External Answering Machine Messages” is displayed. Users place the CapTel phone handset mouth piece next to the answering machine speaker, and then play the answering machine message aloud, following the instructions on their CapTel screen. When finished, hanging up the CapTel handset, causes the “Caption External answering Machine Messages” feature to go off automatically.

Captioned Telephone Answer Performance

Montana's Captioned Telephone service provider answers 85% of calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in queue or on hold.

Adequate staffing is provided to ensure CTS users are provided with an average answer speed of 85% of all calls answered within 10 seconds on a daily basis (including during times of increases or spikes in call volume) including abandons. Montana's Captioned Telephone service provider communicates with its subcontractor, CTI, frequently to project future demand so that standards can be met. Additionally, as an experienced Captioned Telephone provider that processes a majority of their state Captioned Telephone traffic, they are in a position to further ensure that staffing needs are met to consistently reach a high answer performance.

Along with adequate staffing, Montana's Captioned Telephone service provider and CTI provide adequate trunking capacity, CA workstations, and equipment capacity to meet the current FCC Standard of 85% of all calls answered within 10 seconds on a daily basis. Additionally they track the number of CapTel phones distributed to users. Combining this with an average length of each call allows them to predict the number of Captioning Assistants that are needed.

Captioned Telephone Blockage

Montana ensures compliance with the P.01 customary TRS industry standard for blockage. Montana's Captioned Telephone provider commits to ensuring that no more than one call in 100 will receive a busy signal when calling the Captioning Center at the busiest hour.

Captioned Telephone End User Billing

On August 24, 2016, the FCC granted temporary waivers of "...The billing options requirement as applied to traditional TRS, STS and CTS, provided that they do not assess separate charges on users of these services for long distance calls. In other words, petitioners need not provide the same billing options (e.g., sent-paid long distance, operator-assisted, collect, and third party billing) traditionally offered for wireline voice services if they do not assess charges for long distance calling. This temporary waiver will expire two years from the date of this Order, or on the effective date of a Commission rulemaking or other decision as to the continuing application of the billing options requirement to traditional TRS, STS, and CTS, whichever is earlier."

Montana's Captioned Telephone service provider offers long distance service to Captioned Telephone users at no cost to the users. Because relay is not involved in long distance for 2 line Captioned Telephone calls Captioned Telephone users may be billed by their long distance providers for the voice portion of the call.

There are only four call types in which a billing method from Captioned Telephone users may be required:

1. calls from inmates at correctional facilities
2. calls placed to and from international locations
3. calls placed to Directory Assistance
4. calls placed to pay per call services (e.g., 900 numbers)

Montana's Captioned Telephone service provider will use several methods to ensure proper billing of these types of calls which may include: collect calling and calling card payment methods. For international calls, Captioned Telephone users may also be able to use interexchange carrier for direct billing (bill to ANI).

Captioned Telephone N11 Dialing Access

Montana's Captioned Telephone service provider makes three-digit dialing available to Captioned Telephone users in Montana. A Captioned Telephone user dials the N11 code on their CapTel phone. Based on the Captioned Telephone user's incoming ANI, the CapTel platform automatically matches the ANI to the correct N11 10-digit telephone number and places the call for the Captioned Telephone user.

Captioned Telephone Regionally Restricted Numbers

Montana's Captioned Telephone service provider ensures that Captioned Telephone users in the State of Montana will have access to regionally restricted 800/888/877 numbers and pay for service numbers including business offices of local telephone companies that have special prefixes to the extent possible using 10-digit translation.

Dialing 911 in an Emergency – Two-Line Captioned Telephone

When calling 911 using 2-Line Captioned Telephone, one line is routed directly to the appropriate 911 center which receives the caller's ANI information directly from the network in the same way as a non-CTS call. The second line is routed through the captioning center. This allows the user to receive captions on one line and hear the conversation on the other line.

Dialing 911 in an Emergency – Single Line Captioned Telephone

When calling 911, the single line Captioned Telephone user's call is automatically routed to the appropriate 911 center because the call was placed from the user's home line. Single Line Captioned Telephone 911 calls are **not** routed through the captioning service. This means:

- There are no delays in accessing emergency personnel, as calls are directly connected to a 911 call center.
- Emergency 911 Services will know the ANI of the caller and be able to locate the individual and send appropriate help, based on the location from which the Captioned Telephone call is placed.
- Emergency 911 calls are **not** captioned in the same manner that regular CTS calls are.
 - The CTS user speaks directly into the handset as with any other CTS call.
 - The 911 dispatcher is able to hear everything the CTS user says but the CTS user will not be able to hear the dispatcher.
 - The dispatcher can type instructions on a TTY, which will appear on the CapTel display screen.

Captioned Telephone Training

All Captioned Telephone CAs are required to have the requisite experience, expertise, skills, knowledge and education; and are adequately trained to accurately caption in a professional manner the words spoken by the hearing party without intervening in the communication between the parties. Montana's Captioned Telephone service provider and CTI have a detailed CA training plan in place to ensure that all standards as applied by the FCC to the provision of

Captioned Telephone are met by each Captioned Telephone CA. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and employment terminated.

Captioned Telephone Ongoing Training

Captioned Telephone CAs receive ongoing training throughout their employment. This includes:

- Monitoring on each shift. If they are found to need additional training or re-training, they are taken off line and given the necessary training.
- Training on new features and capabilities of CTI's CapTel service platform including any new or improved voice recognition systems used.
- Monthly testing through the administration of Timing Scripts in a test environment.

In addition, CAs are periodically monitored while processing live calls. All scores of each CA are maintained in a database. No other information regarding conversations is kept at any time.

Captioned Telephone Quality Assurance

One way that quality is measured is through the CA testing program which requires a proficiency level for CapTel CAs of 130 WPM speed of transcription with a 2% or less Error Rate and 98% accuracy requirement in a testing environment.

Change of Captioned Telephone CA

Montana's Captioned Telephone service provider ensures compliance with the FCC rule which requires that the CA shall stay with a relay call for a minimum of ten minutes.

The situations in which a CA may change during a call include:

- More than 10 minutes past scheduled break or lunch time
- More than 10 minutes past the end of a shift
- CA is observed having extreme difficulty processing the call
- Call has been in progress more than 30 minutes with difficult call content or speed, or 60 minutes or more of an average call

The change of CA is handled through a supervisor who approves the change, finds an available CA to exchange, and issues the Call Take Over. Just prior to the change in CA a message is sent to the Captioned Telephone user indicating there will be a change in CA. After the change, a new message is sent with the new CA number indicating they have taken over the call. This way the client can choose to stop the standard phone user from talking for a moment until the new CA is fully in place. The change attempts to take place while the client is speaking so that the least amount of information to caption is lost.

Captioned Telephone CAs adhere to the following minimum standards:

- The Captioned Telephone CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible without intervening in the communications. The CA is permitted to provide background noise identification;
- The Captioned Telephone CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential;

- The Captioned Telephone CA shall be required to meet the FCC standards for TRS minimum transcription speed;
- The Captioned Telephone CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call;
- CapTel personnel will have the requisite experience, expertise, skills, education, knowledge and training to perform Captioned Telephone Services in a professional manner.

Captioned Telephone Confidentiality Agreement

All Captioned Telephone CAs adhere to strict policies of confidentiality which comply with all FCC confidentiality requirements. Captioned Telephone CAs do not discuss the contents of captioned calls, any caller identifying factors, calling points, or other information about captioned calls other than what is necessary to train other CAs. Captioned Telephone CAs are also prohibited from intentionally altering a relayed conversation.

The only information collected is personal information necessary to provide and bill for the Captioned Telephone Service being rendered. Information obtained during a Captioned Telephone call may be shared with a member of the CapTel management staff who has asked for specific information which may be needed to clarify technical, policy, emergency, or customer service issues. Information about call content is discussed in a private area only.

The Captioned Telephone Service is isolated to assure confidentiality standards are upheld. Additionally, equipment and structural accommodations made to the CA workspace ensure the confidentiality of Captioned Telephone User's calls, preventing the Captioned Telephone Users on one call from overhearing a CA processing another call.

All employees of Montana's Captioned Telephone service provider must sign a confidentiality agreement committing to keep all information confidential.

All information about users is treated confidentially and will not be sold, distributed, shared, or divulged by Montana's Captioned Telephone service provider or any of its employees, unless divulging such information is compelled by lawful order.

CapTel Redundancy/Switching System

Processing Captioned Telephone calls from twelve geographically dispersed locations provides a high level of redundancy and assurance to Montana Captioned Telephone users.

The CapTel Service Relay Center is equipped with redundant systems for power; utilizing a combination of battery backup, commercial UPS supply, and/or auxiliary generator to supply uninterruptible power to the CapTel Center for a minimum of 8 hours. Redundant systems for power include ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Montana's Captioned Telephone service provider and its subcontractor, CTI, have developed a complete plan for dealing with natural and man-made problems including but not limited to terrorism and phone line cut accidents. The plan, described in detail below, details the level of

escalation, which will be employed to deal with the problem and restore service. The plan is designed to ensure that no aspect of relay service is impaired.

CapTel Switching System

The CapTel switching system includes a redundant Central Processing Unit (CPU) on “hot stand-by” to ensure that no calls are dropped due to processor failure. The switching system also includes:

- A full Maintenance and Administrative Terminal with keyboard, screen and printer capabilities
- On-line monitoring
- Real time programming capabilities which will not take the system off-line
- The ability to perform preventative maintenance without taking the system off-line

An inventory of spare critical components is maintained on site to ensure the required levels of service are met.

STS User Training Line

Montana Relay Speech-to-Speech (STS) User Training Line is a resource for individuals, family, friends, medical professionals, businesses and organizations to familiarize themselves with the proper etiquette and standard procedures of using STS. Individuals who are residents of Montana and/or intend to use the STS Service with a Montana resident are eligible to utilize the training line.

On the STS User Training Line, representatives are prepared to:

- Describe how STS calls are placed and what happens on a typical STS call
- Explain call handling instructions including; dictated messages, privacy options, and "first thoughts" (information shared with the CA before dialing)
- Explain strategies used to help clarify speech patterns
- Review and establish Customer Profile options
- Place practice calls

The STS User Training Line is available 24/7 and can be reached by contacting the Customer Care Department. However, the User Training Line is not a function of our Customer Care Department.

Visually Assisted Speech to Speech

The purpose of Montana Relay Visually Assisted Speech To Speech (VA-STS) is to provide the STS CA with visual communication cues including lip reading, spelling in the air, facial expressions and other physical movements that may facilitate comprehension of what the person with difficulty speaking is saying.

VA-STS capability supports a STS user that is connected to the Relay Provider via a regular STS telephone audio call through the Public Switched Telephone Network (PSTN). The STS user needs to have a telephone connection, as well as compatible video equipment, and an internet

connection with enough band width to enable a clear video connection between the STS CA and the STS user.

The STS user is able to indicate automatic requests for a video connection via their STS Customer Profile. If a STS customer has a completed Customer Profile form associated with their telephone number, the CA will receive this information when connected to the STS user during the initial telephone call.

A STS user who has the required equipment will first call Montana Relay Service using their telephone and connect with a STS CA via the Toll Free STS access number. Once this connection has been established, the STS CA will place a secondary call, either by using the STS user's Skype software account, connecting the CAs video equipment with the STS user's video equipment using a high speed internet connection. This will allow the STS CA to not only hear the STS user's voice, but to watch facial expressions and mannerisms that may help them to understand the STS user in a clearer manner. A STS user will not be able to initiate an inbound call via video. The CA then places the outbound relay call via the relay workstation.

All standard STS call procedures remain the same for VA-STS calls.

Remote Conference Captioning (RCC)

Montana Relay offers Remote Conference Captioning (RCC), with real time captioning, to enable text users to participate in conference calling. This service is available in both English and Spanish. Please note that RCC is not subject to TRS standards but it is verbatim, confidential and secure.

RCC is provided in conjunction with Caption First (CFI), an industry leader in this area of service. CFI has been providing real-time captioning and CART services since 1989.

RCC services include Communication Access Real-time Translation (CART) service delivered over the Internet for use by Relay users.

CFI captioners are certified with at least one of the following certifications and many hold multiple certifications. Details on certification qualifications can be found at

<http://ncraonline.org/certification/Certification/>.

- RPR-Registered Professional Reporter
- CRR-Certified Realtime Reporter
- CCP-Certified CART Provider
- CBC-Certified Broadcast Captioner

Relay users may request RCC services by completing an RCC Scheduling Request Form on the Montana Relay website or by calling RCC Customer Service. Montana Relay users are guaranteed access to RCC Services if scheduled 24 hours in advance. RCC Services are also available with a two hour notice for emergency situations. Finished Transcripts are available if the State has added this add-on feature added to their contract.

In order to use Remote Conference Captioning, a consumer needs the following:

- Accessibility to a conference bridge, which allows the captioner to listen to the audio portion of the call.
- A computer, tablet or smartphone with access to the Internet. There is no software to download, just a link to follow to view the captions.

Here's how RCC works:

- The writer accesses the audio either through a conference call bridge or other method.
- The writer then listens and produces real-time streaming text that is sent over the Internet.
- The text is viewed by the consumer on a computer or mobile device with an Internet connection by clicking on a link that is provided.
- The text shows up just seconds after someone has spoken.
- At any time the RCC user can scroll up to review text.
- By clicking the "Transcript" button on the webpage, the RCC user opens another browser page containing the raw (unedited) transcript which may be copied or printed.

(c)

(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

The State of Montana is currently certified to provide intrastate TRS. The State of Montana is requesting certification beginning July 26, 2018, continuing for a five-year period.

(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.

The Montana Telecommunications Access Program is funded by a monthly fee of a \$0.10 per line charged on all communication access lines including telephone, cell phone, pre-paid cell phone, and Voice over Internet Protocol (VoIP) lines. All money collected from this fee is placed into a State Special Revenue fund to cover the costs of the program. No federal funds are used and no State General Funds are used for this program.

(e)

(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

The Montana Relay program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

(f) Notification of substantive change.

(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet Federal minimum standards after implementing the substantive change.

Montana Relay understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application MTAP intends that the operation of the Montana Relay will continue to be in compliance with the FCC rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the FCC that would cause or could cause Montana Relay to be out of compliance, MTAP agrees to take such action as may be reasonably required to bring the Montana Relay into compliance.