Relay Oklahoma FCC Certification Renewal and Supporting Documents

Introduction

Relay Oklahoma, a program administered by the Oklahoma Telephone Association under authority of the Oklahoma Corporation Commission, has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the **FCC Public Notice DA 17-697, CG Docket No. 03-123** released on July 19, 2017. Included in the Public Notice are the minimum mandatory FCC Telecommunications Relay Service (TRS) requirements under **47 C.F.R. §64.604 and §64.606.** A copy of this Public Notice and these mandatory requirements are attached as **Appendix A**. Relay Oklahoma prepared this TRS Certification Renewal Application with the assistance of Sprint Accessibility.

The minimum mandatory TRS requirements, listed in **Appendix B,** provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606 and are contracted by the Oklahoma Telephone Association with Sprint to provide Telecommunications Relay Service effective November 14, 2016. Please note that although Sprint Accessibility provides Internet Protocol (IP) and Captioned telephone web-based services, Relay Oklahoma does not contract to provide these services in Oklahoma, nor is Relay Oklahoma responsible for oversight of IP and VRS or to other Internet or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing Telecommunications relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

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Operational Standards
A.1 Communication Assistants (CAs)
§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.

<u>CA Employment Standards</u>
Relay Oklahoma contracts with Sprint to provide the hiring, training and oversight of Communication Assistants (CAs) for Relay Oklahoma. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a 12th-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute (wpm) on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language (ASL), or experience working with individuals who are deaf, hard of hearing or have a speech disability. All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history. After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements.

A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment. Sprint TRS CA applicants are required to pass a valid and unbiased 12th grade level spelling test to be considered for employment. Sprint TRS CA applicants must pass a valid unbiased 12th grade level grammar test to be considered for employment.

Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality. If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories. This process ensures only qualified applicants are hired to work at Sprint Accessibility centers as a CA.

Sprint provides an enhanced VCO service called Captioned Telephone (CapTel) Services. Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint ensures all CapTel CAs are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. CapTel CA Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel CA Trainees spend 2-3 weeks training in a classroom setting.

- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel CAs are scheduled for one-week of transition training, while being monitored and supported by another CapTel CA or an Instructor.
- All CapTel CAs must continue to qualify for live call handling each month.
- Sprint CapTel CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel CA is evaluated on a minimum of one call each shift.
- There is also a monthly test each CapTel CA must pass in order to remain qualified to caption live calls.

§64.604 (a)(1)(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.

Relay Oklahoma, through their contract with Sprint, has shown Sprint CAs have competent skills in typing, grammar, spelling, interpretation of written ASL, and familiarity with hearing and speech disability cultures, languages, and etiquette. Sprint requires all CAs to possess clear and articulate voice communications. CAs are given five written and three hands-on performance evaluations demonstrating the ability to process calls. Sprint CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Sprint CAs must type 60 wpm prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Sprint's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint's diversified culture program incorporates training includes the characteristics and of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.
- Demonstrate a professional and courteous phone image
- Process calls using live training terminals in an efficient and knowledgeable manner
- Role-play scenarios written in varying levels of ASL

Sprint provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA
- Recommendation and/or approval from supervisor or manager
- Attend and complete STS specialized STS training program including a written evaluation.
- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories. STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training

specifically on STS Services. Sprint's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy. The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE	
Sprint Values and Goals	
Training Agenda	
▪ Objectives / Training Outline ▪ Introduction and History ▪ Video ▪ Service Description ▪ Characteristics of Customers ▪ Stereotypes	▪ Speech-Disabilities ▪ Attributes of Speech-to-Speech Relay CAs ▪ Speech-to-Speech verses Traditional Relay ▪ FCC Requirements ▪ Speech-to-Speech Variations ▪ Assessment
Work Performance Components	
▪ Basic Call Processing ▪ Call set up ▪ Customer Database ▪ Frequently Dialed Numbers ▪ Customer Requests ▪ Emergency Call Processing	▪ Confidentiality ▪ Transparency ▪ Personal Conversations ▪ Developmental Skill Practice ▪ Audio ▪ Observation
Participation	
▪ CA training ▪ Taking over calls – 15 minute ▪ CA work performance	▪ Call Focus ▪ Teamwork – support peer
Confidentiality and Transparency	
▪ Discuss call speech patterns ▪ Discuss techniques customer uses ▪ Have two CAs on one call, if necessary or customer requests.	▪ Unacceptable to: ▪ Have conversation regarding information discussed on calls ▪ Discuss customers in general

All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and speech-disabled cultures. Personnel supporting CapTel have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Services in a professional manner. CapTel Trainees are screened on several skill-sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary
- Error Recognition - CapTel Operators must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during CapTel calls; therefore it is not necessary for the Operator to interpret typewritten ASL.

CA Quality Assurance Programs

Sprint Accessibility Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers

and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in seven Relay Centers across the country. This team along with the support of the Location Managers, Supervisors, and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Accessibility does not develop training and consumer education programs for the TRS alone. Sprint Accessibility contracts with members of the deaf, hard of hearing, deaf-blind, and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604 (a)(1)(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.

Transmission of 60 WPM

Relay Oklahoma contracts with Sprint to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint conducts pre-employment testing and internal testing (quarterly) using a -minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint's CAs typed an average of 83.9 wpm, with at least 95 percent accuracy. In fact almost a third of Sprint's CAs type over 90 wpm!

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

Relay Oklahoma does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, Sprint no longer provides VRS services.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Through their contract with Sprint, Relay Oklahoma exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken over unless it is absolutely necessary to do so. Sprint CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of 10 minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA
- Call requires a specialist (STS, Spanish, etc.)
- CA Illness
- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of 10 or 15 minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
    - Sprint attempts to honor any requests for a specific gender during call transitions.
    - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(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.

As stated §64.604 (a)(1) (v), Relay Oklahoma honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All conversations relayed between voice and TTY callers are transmitted in real-time. Relay Oklahoma uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer
- CA-initiated macros (44 macros)
- Function Keys (85 separate function keys)
- System-initiated macros
- On-line help panel
- Tone of voice pre-approved descriptions (almost 100)
- Automatic Error Correction Library (615 words)
- Background descriptions (over 250)

All of these features are available in all languages including English and Spanish. CapTel is a transparent service. CapTel CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context
§64.604 (2)(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.

Confidentiality Policies and Procedures
As stated earlier, Relay Oklahoma contracts with Sprint to oversee all TRS CAs, including CapTel CAs for the State of Oklahoma. In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. Relay Oklahoma STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call. Relay Oklahoma's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment.   Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Accessibility Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Accessibility Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Relay Oklahoma CapTel CAs must comply with the same rules that TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS. Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management

staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.   Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer. A CapTel agent may have problems, complaints or stress from handling the call. The CA may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of CapTel depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any CA who breaks this policy will be disciplined, up to and including termination. Please see Appendix C for the TRS pledge of confidentiality.

STS Limited Exception of Retention of Information
At the request of a caller, Relay Oklahoma STS CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls.   No information is kept after the inbound call is released from the CA position. Please see Appendix C for the TRS Pledge of Confidentiality form.

§64.604 (2)(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.

Verbatim Relay and the Translation of ASL
Relay Oklahoma CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

STS and TRS Training: Sprint puts control of the call with the users.
- CAs accept their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

At the request of the relay user, Relay Oklahoma CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's

role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80% or better before being allowed to complete training and process Relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys. Relay Oklahoma CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Oklahoma does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

STS Facilitation of Communication

Relay Oklahoma STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Relay Oklahoma STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands each STS user may also find one technique to be most comfortable. Sprint STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible. Relay Oklahoma STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him/her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:

- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask "yes" or "no" questions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user to spell the word

To ensure STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available and observed by supervisors who are available in the STS CA work area to monitor performance. If a development area is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls

§64.604 (3) (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.

Relay Oklahoma provides 24x7 TRS for standard (voice), Text Telephone (TTY), wireless, or personal computers users to place local, intrastate, interstate, and international calls. Relay

Oklahoma also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Relay Oklahoma retain full control of the length and number of calls placed anytime through relay. Relay Oklahoma CapTel CAs are currently waived by the FCC for outbound calls because the CapTel CA is not involved in the call set up and cannot refuse the call CapTel users dial sequential calls directly therefore it is not possible for a CapTel CA to refuse sequential calls or limit length of calls. Relay Oklahoma CapTel CAs are not waived by the FCC for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to call.

§64.604 (3)(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.

The following information is applicable for the timeframe through May 31, 2017:
Relay Oklahoma, through Sprint Accessibility, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint Accessibility processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other IXC. Relay Oklahoma will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and CapTel users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Relay Oklahoma gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Relay Oklahoma works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

The following information is applicable beginning June 1, 2017:
As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering ***domestic and international calling at no charge*** with no long distance fees or long distance call billing for all TRS and CTS users through Relay Oklahoma service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Relay Oklahoma and its end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users – as is done for traditional phone users (i.e., non-relay callers).
- **Payphones:** Sprint will ***provide domestic and international calling at no charge*** for Relay Oklahoma callers using payphones.

- **International Locations:** Sprint will provide _**outbound international calling at no charge**_ for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering _**access to Directory Assistance at no charge**_ through Relay Oklahoma Service.
- **Pay Per Call Services:** Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

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

The following information is applicable for the timeframe through May 31, 2017:
If a long distance provider declines to complete a call because credit authorization is denied, Sprint Accessibility will relay the message verbatim to the relay user and follow the user's instructions.

The following information is applicable beginning June 1, 2017:
Due to the waiver described in the previous question, long distance billing is no longer applicable. Sprint is offering _**domestic and international calling at no charge**_ with no long distance fees or long distance call billing for all TRS and CTS users through Relay Oklahoma service.

§64.604 (3) (iv)Relay services shall be capable of handling pay-per-call calls.

The following information is applicable for the timeframe through May 31, 2017:
Sprint Accessibility was the first provider to process pay-per-calls, beginning in 1996. Callers to Relay Oklahoma access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Because 900 blocking information is not available with CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

The following information is applicable beginning June 1, 2017:
Due to the previously described waiver, Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Relay Oklahoma provides access to all available relay call types. Through the state's contact with Sprint, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of standard services that are provided by Relay Oklahoma:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA

- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

Except where waived by the FCC, Relay Oklahoma CapTel users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

§64.604(3)(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 Functionality
Relay Oklahoma's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line. Relay Oklahoma adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the per-minute reimbursement. With 2-Line CapTel service, a CapTel user can release or receive captions at any time during a call.

Speed Dialing Functionality
Relay Oklahoma speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel phone is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling
Relay Oklahoma provides three-way calling capability, in which the voice or STS Relay users through TRS (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. Relay users who have purchased Three-Way calling or conference calling capability from his/her LECs can use this feature when placing a call through Relay Oklahoma. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method. TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line. Relay Oklahoma provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(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.

Relay Oklahoma, through Sprint, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint's hot key sends text to the user which says "(RECORDING)." Sprint's hot keys are available in all supported languages, including English and Spanish. Relay Oklahoma has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

Relay Oklahoma does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail and recordings which redials the call so the end user is not imposed charges for additional calls. Relay Oklahoma CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Relay Oklahoma has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint Accessibility's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint Accessibility will use the touch-tone capability embedded in Sprint Accessibility's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, Relay Oklahoma CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail, and recordings which redials the call so the end user is not imposed charges for additional calls. The following information is applicable for the timeframe through May 31, 2017: If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call. The following information is applicable beginning June 1, 2017: Sprint is offering ***domestic and international calling at no charge*** with no long distance fees or long distance call billing for all TRS and CTS users through Relay Oklahoma service.
- Sprint Accessibility's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure the customer's information is kept confidential.

Like TRS users, Relay Oklahoma CapTel users can retrieve answering machine messages from an answering machine near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users including the following:

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

A.4 Handling of Emergency Calls

§64.604(a)(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.

Relay Oklahoma accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Relay Oklahoma has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 911 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

Relay Oklahoma uses the following procedures to ensure TRS users needing emergency services receive prompt assistance with their call.

1.	Relay Oklahoma CAs act upon the word "emergency". Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key (i.e., "hot key") which designates the call as an Emergency. This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Florida Relay Service. They are calling from (caller's telephone number). This is CA # 1234, one moment please."
6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON LINE NOW)" and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.

Back up Procedures

Through their contract with Sprint, Relay Oklahoma has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

- The CapTel phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone will display the typed responses from the PSAP and the caller will use their voice to communicate with the PSAP.
- The user will be connected to the proper 911 Center in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 Center.
- The 911 system renders the appropriate emergency response.

Two-Line CapTel Emergency Calling
Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials
Relay Oklahoma CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures. Supervisors or Operations Administrators are available 24/7 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations
There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center
If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency. If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint always connects the caller to the police. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls
If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance." When the voice caller does not disconnect, requests further assistance, and/or remains online for more than five seconds after the notification phrase is read the CA will attempt

to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

§64.604 (a)(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.

Relay Oklahoma offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Relay Oklahoma's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences, will be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated 10-digit telephone number without delay.

§64.604 (6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

Relay Oklahoma does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Relay Oklahoma does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards
B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Relay Oklahoma contracts with Sprint to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use. Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the

Baud rate is detected. Outbound calls are dialed out in voice mode so both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA. If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

B.2 Speed of Answer

§64.604 (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.

Relay Oklahoma contracts with Sprint, who currently has 13 TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each-15 minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

§64.604 (b) (2) (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 requirement of the Relay Oklahoma contract with Sprint is that 85% of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. Relay Oklahoma's CapTel speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within 10 seconds. Relay Oklahoma expects Sprint will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint develops a Network forecast for each upcoming scheduling week. Sprint also reviews each center's results for the previous six-

weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint ensures total network traffic is accounted for by each of the centers. By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604 (b) (ii) (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.

Relay Oklahoma considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center. Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified IXC in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

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

Through its contract with Sprint, Relay Oklahoma includes abandoned calls in its daily speed-of-answer performance calculations.

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

Sprint measures its compliance with average speed-of-answer times on a daily basis and reports this information to Relay Oklahoma on a monthly basis.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Relay Oklahoma, through its TRS contract with Sprint, ensures all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604 (b) (ii) (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.

Performance of inbound traffic on each Relay Oklahoma toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Relay Oklahoma does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (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.

The following information is applicable for the timeframe through May 31, 2017:
Relay Oklahoma TRS and CapTel users have equal access to their chosen IXC through Relay to the same extent access is provided to voice users.

TRS and CapTel users are encouraged to register their preferred Carrier-of-Choice (COC) with Customer Service. Users who have not registered their preferred COC are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their COC preferences for CapTel calls.

Voice-in users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

Relay Oklahoma relies on Sprint Accessibility to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint Accessibility's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint Accessibility provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint Accessibility routes calls to the designated carrier in as efficient a manner as possible. Sprint Accessibility includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone). Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint Accessibility provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

Sprint Accessibility encouraged all Carriers to participate in its COC program. When the requested Carrier was not a COC participant, Sprint Accessibility had established a procedure where the Carrier was notified, verbally and in writing, of its obligation to provide access to relay users and encouraged their participation.

Outlined below was the process used by CAs to process COC calls and subsequent instructions to relay callers:

- Sprint Accessibility CA answers the call
- The caller provides the toll-call information.

- The caller provides preferred Carrier information either registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase: "I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."
- The user may choose to have another Carrier handle the call. Sprint Accessibility then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint Accessibility network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint Accessibility had 260 carriers participating in the Sprint Accessibility's TRS COC program. Participation of Carriers in Oklahoma is dependent on whether carrier is authorized to provide service in Oklahoma and connectivity to the Sprint Accessibility Access Tandem.

The following information is applicable beginning June 1, 2017:
As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering **_domestic and international calling at no charge_** with no long distance fees or long distance call billing for all TRS and CTS users through Relay Oklahoma service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Relay Oklahoma and its end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users – as is done for traditional phone users (i.e., non-relay callers).
- **Payphones:** Sprint will **_provide domestic and international calling at no charge_** for Relay Oklahoma callers using payphones.
- **International Locations:** Sprint will provide **_outbound international calling at no charge_** for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering **_access to Directory Assistance at no charge_** through for Relay Oklahoma Service.
- **Pay Per Call Services:** Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

B.4 TRS Facilities
§64.604 (b)(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.

Relay Oklahoma and Sprint Accessibility Customer Service are both available 24x7 for all TRS services. Relay Oklahoma, through Sprint, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. CapTel Relay Services are also available 24x7.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Relay Oklahoma contracts with Sprint's Relay centers, which are equipped with an UPS, generator, and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available. Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Accessibility system and routes the calls to other operating call centers. Relay Oklahoma customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored..

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities.

§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

Relay Oklahoma does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

Relay Oklahoma does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology

§64.604 (b)(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.

Relay Oklahoma through Sprint, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability. In order to achieve functional equivalence, Relay Oklahoma will continue to provide Caller ID service where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Relay Oklahoma receives calling party identifying information including blocking information, from all relay users. Sprint's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

As the provider of relay services for the State of Oklahoma, Sprint offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

Wireless Access – STS (*787)

In early 2012, Sprint announced the first wireless short-code solution for STS users. Sprint wireless customers are able to dial *STS (787) to reach a STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the state are automatically connected to an STS CA. This service is available to both callers with and without a speech disability who need to place an STS call. Voice callers needing to place a call to an STS user may also use this service. When Oklahoma TRS customers travel outside of the state, callers will automatically connected to STS based on their physical location. If they are in a state where Sprint is the Relay provider, the caller is connected to the State's STS. If not, callers are automatically transferred to Sprint's interstate STS , where they will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

Sprint expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers
Sprint continues to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described, can be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay. Please see the following graphic for the written Customer Profile form, which encourages STS users to register speed dial entries.

Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):
Note: Limit 30 characters per name

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

*If you need to add more information, go to the **Additional Information** section on the page 3.*

STS with Privacy Option
Sprint offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information
Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 711 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.

Emergency Numbers
In most emergency situations, STS callers dial 911 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to 10 additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

§64.604 (b) (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.

Relay Oklahoma, through their contract with Sprint, provides true Caller ID service where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint will receive calling party identifying information including blocking information, from all TRS users.

Customer Control

With Sprint's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis. The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen. With Sprint's Caller ID, there are numerous benefits for TRS users, including:

- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen
- Phone numbers of hang-up callers
- Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

Technology

Sprint Accessibility offers True Caller ID for all local and long-distance calls to Carriers who have connectivity with Sprint. Sprint's network interfaces with all national long distance Carriers and major LECs, CLECs, and ILECs. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller and call information elements such as: the Calling Party Number, Charge Number, and Originating Line Information. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

Many Caller ID enhancements are compatible with the Relay service and can be accessed by TRS users.

Selective Call Acceptance

Selective Call Acceptance allows a user to create a list of phone numbers so the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by Relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

Selective Call Rejection

Selective Call Rejection enables the user to create a list of special phone numbers so when a call is received from that number, the call will be rejected. If this recording is reached by Relay, it will be typed or spoken to the inbound caller.

Selective Call Forward

Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

Privacy ID (Anonymous Call Rejection)

Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as: "The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected." This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voice mail. Realizing not all users will be able to hear this recording by the calling party, some companies have implemented additional enhancements.

Instant Access List (Preferred Caller List)

Users may designate a list of up to 10 numbers that can bypass the Sprint Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

Caller's Access Code

Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(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. (ii) Beginning July 1, 2008, 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, 2008 shall indicate the number of complaints received from the date of OMB approval through May 31, 2012.

Relay Oklahoma has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint ensures all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution. Relay Oklahoma works closely with their TRS provider (Sprint) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice, STS), customer contact information (when given), CA identification numbers, the call handling center and

over 45 contact categories including: complaints, inquires and unsolicited commendations. Sprint submits reports detailing the information. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint's customer contact database.

Customer Contacts Online Database (CCOD)

To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts. The CCOD will automatically notify the TRS Sprint program manager assigned to the State of Oklahoma via email of any complaint entry, ensuring they receive timely notification of concerns. The CCOD will track consumer contact information as required by the FCC. By approximately June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators. Relay Oklahoma reviews the log and then passed the complaint log to the FCC by July 1st of each year.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Relay Oklahoma callers may file intrastate complaints and commendations regarding Relay Oklahoma services through the following contacts:

Alice Berry
900 South Shackleford Road, Suite 700, Little Rock, AR 72211
www.oklahomarelay.com
alice.berry@sprint.com
TTY: 501.221.3279
Fax: 501.221.3241
Voice: 501.221.1285
VP: 501.246.8227

Bob Stafford, Executive Vice-President
3800 N. Classen Blvd, Suite 215, Oklahoma City, OK 73118
ota@brightok.net
Fax: 405.525.7707
Voice: 405.525.7700

C.3 Public Access to Information

§64.604 (3) 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.

Relay Oklahoma Outreach continues to educate the public as well as individuals who are deaf, hard of hearing, speech disabled and senior citizens in the state. Relay Oklahoma has publications in telephone directories as well as attends Health Fairs and Senior Expos to educate the public about all of the TRS services offered. Listed in the following table are some of the outreach events Relay Oklahoma has done to educate Oklahoma about 711 and all of the TRS services.

Event	City	Date	Attendace	Presentation (P), Outreach (o), Booth (B)
		November		
Okla Statewide Autism Conf	Norman	Fri, Nov 13 - Sat Nov 14	1,000	B
Prevention & Recovery Conf	Norman	Tues Nov 17 to Thurs Nov 19	300	B
Tulsa Oilers	Tulsa	Fri, Nov 20	5,608	B
Tulsa Oilers	Tulsa	Sun, Nov 22	4,870	B
Tulsa Vintage Directory - listing	Metro Tulsa	2016 Directory	30,000	O
Tulsa Oilers	Tulsa	Friday, Nov 27	4,933	B
Tulsa Oilers	Tulsa	Sun, Nov 29	5,683	B
		December		
Tulsa Oilers	Tulsa	Wed, Dec 2	3,511	B
Tulsa Oilers	Tulsa	Thurs, Dec 3	3,825	B
Tulsa Oilers	Tulsa	Thurs, Dec 10	3,621	B
Tulsa Oilers	Tulsa	Fri, Dec 11	7,327	B
Tulsa Oilers	Tulsa	Sun, Dec 13	5,226	B
Tulsa Oilers	Tulsa	Fri, Dec 18	9,160	B
Tulsa Oilers	Tulsa	Sat, Dec 19	5,163	B
		January		
Tulsa Oilers	Tulsa	Tues, Jan 5	4,312	B
Tulsa Oilers	Tulsa	Sat, Jan 9	5,872	B
Tulsa Oilers	Tulsa	Tues, Jan 26	3,687	B
OSD BB homecoming	Sulphur	Fri, Jan 29 and Sat Jan 30, 2016.	300	B
		February		
Tulsa Boat and RV show	Tulsa	Feb 1-7, 2016	10,000	B
Tulsa Oilers	Tulsa	Wed, Feb 10	5,439	B
Tulsa Oilers	Tulsa	Fri, Feb 12	10,050	B
Tulsa Oilers	Tulsa	Fri Feb 19	6,826	B
Tulsa Oilers	Tulsa	Sat Feb 20	6,211	B
Tulsa Oilers	Tulsa	Sun Feb 21	7,171	B
Tulsa Oilers	Tulsa	Tues, Feb 23	6,870	B
Choctaw Career Expo	McAlester	Wed, Feb 24, 2016.	200	B
		March		
Grand Lake Boat Show	Grove	March 11 12, 13, 2016	2,000	B
Tulsa Oilers	Tulsa	Fri, March 18, 2016	14,265	B
Tulsa Oilers	Tulsa	Sat, March 19, 2016	7,689	B
Tulsa Oilers	Tulsa	Tues, March 29, 2016	5,683	B
Tulsa Oilers	Tulsa	Wed, March 30, 2016	5,683	B
Okla Library Conference	Tulsa	March 30 to April 1, 2016	1,000	B
Regional transition Fair	Tulsa	Thurs, March 31, 2016	200	B
		April		
Okla Health & Wellness Expo	Oklahoma City	Sat, April 2, 2016	1,000	B
Tulsa Oilers	Tulsa	Sat, April 9, 2016	10,200	B
Claremore Home & Garden Show	Claremore	Fri-Sun, April 15-17, 2016	1,000	B
Broken Arrow Senior Citizens Fair	Broken Arrow	Friday, April 22, 2016.	500	B
Tulsa Home and Garden Show	Tulsa	Fri-Sun, April 22-24	2,000	B
		May		
		June		
Tulsa Pride Block Party	Tulsa	06/04/2016	10,000	B
OKRID conference	Tulsa	June 10-11, 2016	300	B
		July		
		August		
Chickasaw Nation Health Fair	Norman	Tues, Aug 2, 2016	225	B
Chickasaw Nation health Fair	Windstar	Friday, Aug 5, 2016	430	B
Choctaw Nation Health Fair	Wilburton	Wed, August 10, 2016	115	B
Choctaw Nation Health Fair	Poteau	Fri, August 12, 2016	75	B
		September		
Owasso Gathering Night	Owasso	Thurs, Sept 1	1,000	B
Parkinson Disease Assoc	Tulsa	Sat, Sept 10	300	B
Tulsa Comm College Health Fair	Tulsa Metro cmapus	Tues, Sept 13	100	B
Tulsa Comm College Health Fair	Tulsa SE Campus	Wed Spet 21	150	B
Tulsa Comm College Health Fair	Tulsa NE campus	Tues Sept 27	75	B
		October		
Senior Retirement Center	Owasso/Cville	Thur Oct 13	120	O
Senior Retirement Center	Jenks/Glenpool	Sat Oct 15	100	O
Senior Retirement Center	Broken Arrow	Thur Oct 20	100	O
Senior Retirement Center	Claremore	Fri Oct 20	100	O
		November		
City of Tulsa Health Fair	Tulsa	Wed Nov 9	1,700	B
		TOTAL	223,250	

C.4 Rates
§64.604 (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

The following information is applicable for the timeframe through May 31, 2017:
Relay Oklahoma users are not charged more for services than for those charges paid by standard "voice" telephone users. TRS users, who select Sprint Accessibility as their interstate carrier, will be rated and invoiced by Sprint Accessibility. The caller will only be billed for conversation time

By FCC jurisdiction, Sprint Accessibility has two separate Message Telephone Service (MTS) rates – one for interstate and one for intrastate. The following table exhibits the discounted rates off Sprint Accessibility's MTS rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	10%	50%

In states where Sprint is the contracted TRS provider, INTRAstate Sprint long distance rates for TRS users will be assessed at a rate of $0.03 per minute.

In states where Sprint is the contracted TRS provider, INTRAstate Sprint long distance rates for TRS users will be assessed at a rate of $0.03 per minute and INTERstate Sprint long distance rates for TRS users will be assessed at a rate of $0.07 per minute.

C.5 Jurisdictional Separation of Costs
§64.604 (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 (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 §64.605, 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.

All Relay Oklahoma intrastate and interstate minutes are reported separately to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate TRS Fund administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free, and 900. In accordance with FCC rules, states only receive a 51% deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint uses a cumulative report of eligible

customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

ADA Requires TRS Services

In July 1990, the Americans with Disabilities Act (ADA) was passed by the United States Congress. Title IV of the ADA requires all states provide relay services to deaf and hard of hearing people 24x7.

The Oklahoma Telecommunications Relay Service (TRS) was established in order to comply with the Americans with Disabilities Act of 1990 (ADA). The TRS provided in Oklahoma is advertised under the name of Relay Oklahoma.

The Telecommunications for the Deaf & Hard-Of-Hearing Act (OS 673, §2417 et. Seq.) referenced herein as "the Act" was passed by the Oklahoma State Legislature in 1986 authorizing the Department of Human Services to establish a telecommunications equipment distribution program and telephone message relay service for deaf and severely hearing impaired Oklahomans. The program was funded by a surcharge of five cents per local exchange telephone access line per month. This surcharge is collected by the Local Exchange Carriers (LECs) in Oklahoma and remitted the Oklahoma Tax Commission in accordance with the requirements of the act.
In 1993, the Oklahoma Legislature created the Department of Rehabilitation Services (DRS) transferring Telecommunications for the Hearing-Impaired Act responsibilities from the Department of Human Services (DHS) to DRS. In the summer of 1993, provisions of the Americans with Disabilities Act went into effect requiring telephone companies to assume responsibilities for telephone message relay service.

In 1994, the Oklahoma State Legislature amended the Telecommunications for the Deaf and Hard-Of-Hearing Act by transferring message relay responsibilities to the telephone companies.
On September 13, 1993, an application was filed at the Oklahoma Corporation Commission regarding TRS. On October 13, 1993, the OCC approved a three-year contract with Sprint to provide the State with unrestricted telecommunications relay service. The OCC order also required each LEC to impose a monthly surcharge on each residential and business line. Per the OCC Order, the LECs are required to forward the amounts collected from this surcharge to the Oklahoma Telephone Association (OTA). The funds are then used by the OTA to fund and recover the costs of developing and providing TRS in Oklahoma. The OTA has continued to contract with Sprint for TRS services. The latest contract between Sprint and the OTA was executed November 15, 2016 and is effective through November 14, 2021.

Under OTA's agreement with Sprint, Sprint is contractually obligated to comply with all FCC regulations regarding TRS. One of these regulations requires that if a state program exceeds the mandatory minimum standards for TRS prescribed by the FCC, the state program can in no way conflict with federal law. Thus Sprint is required to ensure that the TRS it provides to the OTA for its state TRS program does not conflict with federal law. Neither the OTA nor Sprint believes that, to the extent that Relay Oklahoma exceeds the FCC's mandatory minimum standards, the services the Relay Oklahoma provides conflict with federal law.

§63-2417 Duties and responsibilities of State Department of Rehabilitation Services
The State Department of Rehabilitation Services is hereby directed to:

1. Provide for the availability, distribution and maintenance, at no cost to qualified individuals with hearing or speech disabilities, or both, telecommunications devices and ring-signaling devices compatible with telecommunications relay services for deaf or hard-of-hearing and speech-impaired individuals requirements for the Americans with Disabilities Act of 1990 and regulations promulgated thereunder; and

2. Design and implement a needs assessment test so that individuals with hearing or speech disabilities, or both, are benefited by this program. Provided, however, that no equipment and maintenance shall be provided without charge for those individuals meeting more than two hundred percent (200%) of the income guidelines for food stamps. The State Department of Rehabilitation Services shall develop a sliding scale to provide equipment and maintenance to individuals exceeding the needs test specified by this paragraph.

Added by Laws 1986, c. 183, § 2, eff. July 1, 1986. Amended by Laws 1993, c. 364, § 19, emerg. Eff. June 11, 1993; Laws 1994, c. 315 § 13, eff. July 1, 1994; Laws 1998, c. 246, § 25 eff. Nov. 1, 1998

For a copy of the Legislation establishing TRS in Oklahoma, see Appendix G.

Telecommunications Relay Fund
§64.604 (c)(5)(iii) through §64.604 (c)(iii)((M) does not pertain to State programs. However, the state of Oklahoma contracts with Sprint who contribute and collect interstate funds through RLSA. It is the State's understanding that Sprint complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. The State of Oklahoma does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

C.6 Complaints
§64.604 (6) (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 §64.605 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.

Relay Oklahoma works in conjunction with the TRS provider, Sprint, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Oklahoma customers also have the option of calling Sprint's 24x7 Customer Service (800-676-3777), the Sprint Accessibility Account Manager or the Oklahoma Telephone Association to file complaints or commendations.

Relay Oklahoma has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. Relay Oklahoma submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline. To see copies of the Complaint Log Summaries from 2013 through 2017, please refer to Appendix H.

C.7 Treatment of TRS Customer Info
(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.

Relay Oklahoma, through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format. Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint Relay center or its employees will not sell, distribute, share, or reveal customer information in any way, unless compelled to do so by lawful order.

.§64.606 State Certification
3(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; (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 (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.

In addition, the mandate below describes how funds are collected from telecommunication users in the state of Oklahoma for the purpose of funding the Relay Oklahoma.

§63-2418. Telephone access line surcharge – Telecommunications for the Hearing Impaired Revolving Fund.

    A.   There is hereby imposed a surcharge of five cents ($0.05) per local exchange telephone access line per month to pay for the equipment and maintenance program provided for in Section 2417 of this title and to provide for other needed services for the deaf, severely hard-of-hearing, severely speech-impaired and deaf-blind programs administered through the Department of Rehabilitative Services, such surcharge shall be paid by each local exchange subscriber to local telephone service in this state, unless such subscriber is otherwise exempt from taxation.

    B.   The surcharge shall be collected on the regular monthly bill by each local exchange telephone company operating in this state and shall be remitted quarterly to the Oklahoma Tax Commission no later than fifteen (15) days following the end of each quarter.

    C.   There is hereby created in the State Treasury the Telecommunications for the Deaf and Hard-of-Hearing Revolving Fund. The fund shall consist of monies imposed in subsection A of this section. All monies accruing to the fund are hereby appropriate and may be budgeted and expended by the Department of Rehabilitation Services. The fund shall be a continuing fund and not subject to fiscal year limitations and expenditures from said fund shall be made upon warrants issued by the State Treasurer against claims submitted to the Director of State Finance for the purpose of implementation of this act.

Added by Laws 1986, c. 183, § 3, eff. July 1, 1986. Amended by Laws 1987, c. 5, § 140, operative March 31, 1987; Laws 1987, c. 196, § 17, operative July 1, 1987; Laws 1994, c. 315, § 14, eff. July 1, 1994; Laws 1998, c. 246, § 26, eff. Nov. 1, 1998.

§63-2418.1. Certified local exchange telephone companies - Compliance with federal legislation - Assessment of surcharge.
Each certified local exchange telephone company shall comply with the provisions of the Americans with Disabilities Act of 1990 and regulations promulgated thereunder relating to telecommunications relay services for deaf and hard-of-hearing and speech-impaired individuals and shall assess a surcharge to each customer on a per line per month basis to recover the costs associated with such compliance and advise the Commission of any changes.

Added by Laws 1994, c. 315, § 15, eff. July 1, 1994. Amended by Laws 1998, c. 246, § 27, eff. Nov. 1, 1998.

§63-2419. Collection of revenues to cease under certain conditions.

    A.   If the revenues collected under this act exceed the costs of operating the program provided for in this act, and if such excess at any time equals the three-year average of expenditures under this act then such collections shall cease until one half of such surplus has been exhausted.

Relay Oklahoma was approved for TRS Certification Renewal by the FCC in 2013. For a copy of this letter, please see Appendix J.

§64.606(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.

Oklahoma Telephone Association awarded Sprint a new 5 year contract November 15, 2016 – November 14, 2021. Sprint Relay continues to provide, meet, and exceed all FCC requirements. For a copy of the letter notifying the FCC of substantive changes to the TRS program, please see Appendix K.

Appendix A: Public Notice

PUBLIC NOTICE

Federal Communications Commission

445 12th St., S.W.

DA 17-697

Released: July 19, 2017

CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION

CG Docket No. 03-123

Under Section 225, states wishing to operate their own telecommunications relay service (TRS) programs for the provision of intrastate and interstate TRS must have certification from the Federal Communications Commission (FCC or Commission) to do so.[1] Commission rules provide that states and covered territories may receive TRS certification in five year increments.[2] This Public Notice alerts states and territories that the certifications they now hold will expire on July 25, 2018. Under the Commission's rules, each certified state or territory may file an application for renewal of its certification one year prior to expiration, i.e., beginning July 25, 2017.[3] Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2017, to give the Commission sufficient time to review and rule on the applications prior to expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),[4] codified at Section 225 of the Communications Act of 1934, as amended (Act).[5] TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals.[6] Under the Act, the Commission must ensure that the provision of TRS is functionally

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[1] 47 U.S.C. § 225(f). TRS are "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." 47 U.S.C. § 225(a)(3). *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, para. 3 & n.18 (2004) (describing how a traditional TRS call works). Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. *See* 47 U.S.C. § 225(d)(3).

[2] 47 CFR § 64.606(c)(1). The Consumer and Governmental Affairs Bureau (CGB or Bureau), under delegated authority, issued its last round of certification grants in July 2013. *Notice of Certification of State Telecommunications Relay Services (TRS) Programs*, Public Notice, 28 FCC Rcd 9987, 9987 (CGB 2013).

[3] 47 CFR § 64.606(c)(1).

[4] Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

[5] 47 U.S.C. § 225.

[6] *Id.* § 225(a)(3).

equivalent to voice telephone services.[7] The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.[8]

All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and speech-to-speech relay (STS) service.[9] States may also offer captioned telephone relay service (CTS).[10] Each state seeking renewal of its certification must submit documentation to the Commission that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose.[11] In addition, a state must establish 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.[12] This certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The Commission's TRS rules further explain that documentation should be submitted in narrative form, and that the Commission shall provide the public with notice of and an opportunity to comment on such applications.[13]

Per the following schedule, the Bureau will release for public comment each application for renewal, after which it will review each application to determine whether the state TRS program has sufficiently documented that it 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.[14] The state must also establish that the program does not conflict with federal law.[15] In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program.[16] The Bureau will release public notices of renewal of certification for each state on a rolling basis.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	FCC ACTION	PROCESS
Beginning July 2017	CGB will issue Public Notices seeking comment on state TRS applications that have been filed.	Comments are due within 30 days of release of the Public Notices; reply comments are due within 15 days thereafter.
July 2017 - May 2018	CGB will review applications for TRS recertification for compliance with 47 CFR §§ 64.604 and 64.606.	If necessary, the Bureau will send deficiency letters requesting additional information from states to ensure compliance with TRS mandatory minimum standards and other certification requirements.
May 2018 - July 2018	CGB will issue certification renewals on a rolling basis.	

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[7] *Id.* § 225(a)(3).

[8] *See* 47 CFR § 64.604.

[9] *See* 47 CFR § 64.603.

[10] Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling, 18 FCC Rcd 16121 (2003).

[11] 47 U.S.C. § 225(f); 47 CFR § 64.606(a).

[12] 47 CFR § 64.606(b)(1)(ii).

[13] *Id.* § 64.606(a).

[14] 47 U.S.C. § 225(f)(2)(A). *See* 47 CFR § 64.604.

[15] 47 CFR § 64.606(b)(1)(iii).

[16] 47 U.S.C. § 225(f)(2)(B).

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned "TRS State Certification Application."

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission's electronic comment filing system (ECFS): http://apps.fcc.gov/ecfs/. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and CG Docket No. 03-123.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filing for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.

- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

- U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs/ (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice) or e-mail at Dana.Wilson@fcc.gov.

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Appendix B: FCC Matrix and TRS, STS, CapTel Training Outlines

Please see the following table for a point-by-point explanation of how we meet and/or exceed each of the minimum federal standards.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint offers a comprehensive training program designed to offer the best quality to all relay users. Sprint's 2-3 week program includes training on Diversified Culture, compliance with regulatory requirements, & the operation of Sprint's systems.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS, IP Relay (Partially waived for CTS, IP CTS)	Exceeds	Sprint ensures all CAs are skilled in typing, grammar, spelling, & interpretation of typewritten ASL (as applicable), familiar with hearing & speech disability culture, language, & etiquette; & have clear & articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS, IP Relay (Waived/partially waived for CTS, IP CTS)	Exceeds	Sprint's CAs type &/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	As a general rule, Sprint allows CA takeovers only when necessary. Sprint's CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation &/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's sophisticated software enables real-time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, IP Relay, CTS, IP CTS)	Meets	Sprint offers STS users the option to mute their voice so the other party to the call will hear only the CA & will not hear the STS user's voice.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has systematic & operational processes intended to prevent disclosure of call content &/or Customer Proprietary Network Info (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain info from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint bars its CAs from intentionally altering the conversations they relay, except to the extent necessary to: (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide info to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. §	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint never limits the length of a Relay call.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
64.604(a)(3)(i)			
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Except to the extent the requirements are waived, not permitted, or as the FCC determines that it is not technologically feasible to do so, Sprint services are capable of handling any type of call normally provided by telecommunications carriers.
Credit Authorization 47 C.F.R. § 64.604(a)(3)(iii)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Meets	Sprint understands it is permitted to decline a call if the user cannot pay or because a credit authorization for toll calls is denied.
Pay Per Calls 47 C.F.R. § 64.604(a)(3)(iv)	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Sprint processes pay per calling for TRS & CapTel users with blocks available via the Customer Profile.
Call Combinations 47 C.F.R. § 64.604(a)(3)(v)	TRS (Partially waived for CTS, IP CTS, IP Relay)	Meets	Sprint's Relay services support all mandatory FCC call types.
Call Release 47 C.F.R. § 64.604(a)(3)(vi)(1)	TRS (Waived for CTS, IP CTS, IP Relay)	Meets	Sprint provides TTY-TTY call set-up which allows the CA to set-up the call & drop off the line, if not needed to facilitate conversation.
Speed Dial 47 C.F.R. § 64.604(a)(3)(vi)(2)	TRS, STS, CTS, IP Relay (Waived for IP Relay)	Meets	Sprint's TRS/CTS speed dial is available with a Customer Profile. CapTel users can select 3 speed dial buttons & a phone book for contacts.
Three-Way Calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	TRS, STS, CTS, IP Relay (Waived for IP CTS)	Meets	Sprint supports LEC-based three-way calling for its customers.
Interactive Menus & Voicemail 47 C.F.R. § 64.604(a)(3)(vii)/(viii)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint electronically captures recordings & makes interactive recordings & voicemail/ answering machines available to Relay customers. Sprint supports Sprint IP Text Mail so Sprint IP users can receive voicemail messages via email, when unable to answer.
Emergency Calls for TTY-based providers 47 C.F.R. § 64.604(a)(4)	TRS, STS (N/A for CTS, IP CTS, IP Relay)	Meets	Sprint automatically & immediately connects emergency calls to an appropriate Public Safety Answering Point (PSAP) which is capable of dispatching emergency services.
STS Called Numbers 47 C.F.R. § 64.604(a)(5)	STS (N/A for TRS, CTS, IP CTS, IP Relay)	Exceeds	Sprint allows STS users to register a Customer Profile which includes Speed Dial & other enhancements.
Privacy Screens 47 C.F.R. § 64.604(a) (6)	VRS	N/A	This requirement is not applicable to the services being offered.
International Calls Non-reimbursable 47 C.F.R. § 64.604(a)(7)	VRS, IP Relay (N/A for TRS, STS CTS, or IP CTS)	N/A	This requirement is not applicable to the services being offered. Sprint IP has procedures in place to prohibit international usage.
ASCII & Baudot 47 C.F.R. § 64.604(b)(1)	TRS, STS (Waived for CTS, IP CTS) (N/A for IP Relay)	Exceeds	Sprint's TRS (TTY) platform supports all communication modes generally in use including Baudot (domestic & international), ASCII, Turbo Code, & Enhanced Turbo Code (E-Turbo).
Speed of Answer & Blockage 47 C.F.R. § 64.604(b)(2)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint Relay answers at least 85 percent of all calls on a daily basis within 10 seconds, including abandons. Sprint's systems exceed the P.01 standard.
Equal Access to Interexchange Carriers (IXCs) 47 C.F.R. §	TRS, STS, CTS (Waived for IP CTS, IP Relay)	Exceeds	Except to the extent the requirements are waived, Sprint's TRS & CTS platforms support the billing & rating of toll calls through other carriers.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
64.604(b)(3)			
TRS Facilities 47 C.F.R. § 64.604(b)(4)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides mandated services 24/7 using redundant facilities functionally.
Technology 47 C.F.R. § 64.604(b)(5)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint exceeds the minimum mandatory services & routinely upgrades its products to increase functional equivalency.
Caller ID 47 C.F.R. § 64.604(b)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides Caller ID. If not blocked by the customer, the number of the calling party is transmitted.
STS 711 Calls 47 C.F.R. § 64.604(b)(7)	TRS, STS (N/A to CTS, IP CTS, or IP Relay)	Exceeds	Sprint offers multiple solutions to meet this requirement include: Auto 711 Routing for STS users connects callers with a Customer Profile directly to STS CAs. CAs answering 711 for callers without a profile will immediately transfer the caller to a STS CA. Sprint offers a wireless short code to STS for Sprint wireless users. Sprint's 711 Interactive Voice Response (IVR) allows connectivity directly to an STS CA using the same level of prompts the IVR uses for other forms of TRS.
Consumer Complaint Logs & Procedures 47 C.F.R. § 64.604(c)(1)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint maintains 24/7 Customer Service & logs all complaints received. Sprint provides the State a summary that meets FCC standards.
Contact Persons 47 C.F.R. § 64.604(c)(2)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's point of contact for complaints is Customer Service at: Sprint Relay Customer Service PO Box 29230 Shawnee Mission, KS 66201-9230 800-676-3777 (English) 800-676-4290 (Spanish) 877-787-1989 (Speech to Speech) 877-877-3291 (Fax)
Public Access to Information 47 C.F.R. § 64.604(c)(3)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint provides innovative Outreach services through state programs. The FCC does not allow IP Relay providers to include the cost of outreach in their yearly costs. Sprint continues to publicize the availability of IP services through promo materials, on-line marketing, & public service announcements. (Sprint does not include the cost of these activities in its yearly cost submissions to the FCC).
Rates 47 C.F.R. § 64.604(c)(4)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint ensures TRS/CTS users, who rely on Sprint's Relay platforms to establish billing for toll calls, are charged no more than traditional phone users.
Cost Information & Data Submission 47 C.F.R. § 64.604(c)(5)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint contributes to the Interstate TRS Fund & submits the required cost data to the FCC & to the Fund administrator to receive reimbursement.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(M)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has provided copies of the whistleblower protections to all of its employees including instructions for reporting noncompliance to the FCC's whistleblower hotline.
Complaint Resolution 47 C.F.R. §	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint supports timely & effective complaint resolution.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
64.604(c)(6)			
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint does not offer incentives to IP CTS users directly/indirectly. Sprint prohibits incentives to hearing health professionals & does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration & Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint complies with the final FCC rule requiring the collection of each new customer's name, address, telephone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification information, except as required by law/regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint's default setting for the IP CapTel phone is to have captions on.
IP CTS Equipment Fee & Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling on Sorenson v FCC & no longer applies. Sprint fully complies with the remainders of the order to provide a warning label on all IP CTS equipment & software.
TRS calls requiring multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint complies for VCO-VCO calls between multiple captioned telephone relay service users, IP CTS/CTS users & IP CTS users; CTS/IP CTS users & TTY users; CTS/IP CTS users & VRS users.
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	Meets	Sprint's emergency calling service is in full compliance with the FCC's rules. For Sprint IP, Sprint handles & routes emergency calls to the applicable PSAP; immediately attempts to re-establish contact in the event of disconnection; automatically places 911 calls at the front of call queues; & obtains registered location info from its users. For IP CTS calls, Sprint provides captioning for emergency calls, & the customer's underlying carrier handles call routing & delivery to/from the PSAP. Sprint provides its users with methods of updating their registered locations.
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	Meets	Sprint provides IP users the ability to register Sprint as their default provider. Sprint assigns 10-digit local numbers, routes, & delivers inbound & outbound calls. Sprint updates the TRS Numbering Directory for users who select Sprint as their default IP provider, as required under the FCC. Sprint complies with all porting requirements. Sprint's promo

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
			materials include advisories for E911, processes for obtaining a number, number portability, & updating location information.

Training

Communications Assistant (CA) Training

Sprint knows a well-trained CA has the skills and tools to provide the best customer experience. The education and continued development of all CAs is an investment. Sprint's training has evolved over 26 years in the relay industry, however, Sprint's commitment to quality service has never wavered. Sprint's reputation as a TRS provider within the deaf, hard of hearing, DeafBlind, speech-disabled communities, and the general public comes from our CAs' commitment to providing quality service.

Training has been developed in coordination and cooperation with the relay user communities. CA trainees must complete a series of scenario-based assessments, culminating in an on-the-job final assessment before graduating from initial training and handling relay calls. Training does not stop after the initial push. Employees continue to receive regular ongoing training to improve their skills and knowledge. Ongoing training and Quality Assurance programs are used as incentives to encourage competition between individual CAs and call centers and encourage continued industry-leading quality.

Sprint listens to customers' feedback and takes proactive steps to implement changes to address suggestions and feedback. Sprint does not develop training and consumer education programs for the TRS in isolation. Sprint Accessibility contracts with members of the deaf, hard of hearing, and DeafBlind communities and individuals with a speech disability to jointly develop and present training for TRS. This is an important Sprint advantage. Sprint provides ongoing training to our CAs on state-specific information including the names of local organizations, cities, and other common terms specific to the State. Sprint welcomes feedback from the State and its end-users.

During initial training, CAs are trained and evaluated on how to accurately reflect the TTY user's intent and the CA's role in the Relay process. Training is provided on various levels of English/Spanish/ASL during initial training and throughout employment. In order to successfully complete initial training, the CA must demonstrate competent skills to translate calls as requested. When training is complete, a CA continues to be evaluated on translation skills through individualized monthly surveys.

Relay trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls.

Sprint incorporates various instructional methods to enhance the trainee's ability to learn:

- ◆ Lectures
- ◆ Visual graphics
- ◆ Flow charts
- ◆ Videos
- ◆ Role-play scenarios
- ◆ Simulated on-line call handling
- ◆ Observation of live-call handling

Our policies and standards manual has been developed over the past 26 years. Sprint stresses the importance of all Relay policies and procedures at the interview/selection process and continues through initial and ongoing training and is currently being utilized and available for the Sate to review. An outline of these expectations is provided in the following table. This list is not meant to be a complete source and is subject to change.

POLICY AND PROCEDURE TOPICS		
Orientation	♦ Welcome and Introductions ♦ Introduction to Each Other ♦ Sprint (or Vendor Company) ♦ Sprint Values ♦ Sprint Corp Overview ♦ History of Sprint Corporation ♦ Local Telecommunications ♦ Wireless	♦ Internet Services ♦ Product Distribution ♦ The Sprint Campus (if applicable) ♦ Telecommunications Relay Service ♦ What is Relay? ♦ Relay Agent Training ♦ Relay - Connect to Your Future Video ♦ Observation Guidelines ♦ How a Call Reaches Sprint Relay
Connecting to Relay	♦ The Role of a Relay Agent ♦ Connecting to Relay ♦ 711 ♦ Dedicated Toll-Free Numbers ♦ Equipment ♦ TTY ♦ TTY Basics ♦ TTY Etiquette ♦ Closing a Conversation ♦ Agent Responsibility ♦ Call Set Up ♦ Call Closing ♦ TTY to Voice Closing a Conversation ♦ Operator Role Closure ♦ Operator Close Protocol Guide: ♦ Disallowed Calls ♦ Glossary of Abbreviations & Terms ♦ TTY Practice Session ♦ Auto-Corrected Abbreviations ♦ Standard Abbreviations ♦ Typing Variations ♦ Internet Characters ♦ Non-Baudot Supported Characters ♦ Verbatim - Style ♦ Contraction Spelling ♦ Punctuation ♦ Agent/Operator Role ♦ SKSK ♦ Background Noises while TTY user is Typing ♦ Typing Monetary Units ♦ 711 ♦ TTY Garble During Typing ♦ XXX to Correct Typing Error ♦ Other Communication Devices ♦ Data Transmission Speed ♦ Turbo Code ♦ Turbo Code Interrupt ♦ Enhanced Turbo Dial Thru - (ETurbo) ♦ Disable Turbo Code Mode ♦ American Standard Code Information Interchange (ASCII) ♦ ASCII Interrupts	♦ Sprint IP user connects to Agent but wants Customer Service ♦ Sprint IP Two Line VCO ♦ Fed IP Relay ♦ Fed IP Relay call processing ♦ Fed IP Relay Reporting ♦ Fed IP Relay variations ♦ Sprint/Fed IP Relay International Calling ♦ Sprint/Fed IP Variations ♦ Sprint/Fed IP Fast Busy ♦ Sprint/Fed IP 2-Line VCO ♦ Sprint/Fed IP Conversation Lag Time ♦ Sprint/Fed IP Interrupts ♦ Voice Mail Greeting ♦ Cellular & Wireless Phones ♦ Video Relay Service ♦ Devices & Pagers ♦ TTY Public Payphone ♦ Sprint National Relay ♦ Sprint International ♦ Inbound international calling ♦ Sprint International Variations ♦ Non-Standard TTY ♦ Outbound International calling ♦ Transfer Menu ♦ Reseller call processing ♦ CapTel ♦ Relay-CapTel ♦ CapTel-Relay ♦ CapTel Transfers ♦ Dedicated State CapTel Transfer ♦ Alternate Languages ♦ Spanish Language Customer Service ♦ Relay Caller ID ♦ True Caller ID ♦ Per Call Block ♦ Per Line Block ♦ Permanent Call Blocking ♦ Caller ID Blocking - True Caller ID ♦ Connecting Variations ♦ Misdialed Relay Phrase ♦ Dialed 711 Instead of 911

POLICY AND PROCEDURE TOPICS		
	◆ Sprint IP - Internet Relay ◆ Sprint IP call processing ◆ Internet Relay variations ◆ 'GA' is optional ◆ Sprint IP Standard Svc Explanation ◆ Text Flow ◆ Interruptions without garble ◆ Conversational flow ◆ ASL Emoticons – Text Message Abbreviations ◆ IP Acronyms ◆ Sprint IP Variations	◆ 711 Spanish ◆ Request for Relay Numbers ◆ Cellular/Wireless problem reaching 711 ◆ 611/811 (LEC Service Access) ◆ 700 ◆ 900 Numbers & Call Processing ◆ Correctional Facility/Prison Calls ◆ Use of Relay through Correctional Facilities: Correctional Facility Call Processing, Relay Abuse ◆ Spanish & French Language Service ◆ International calling restrictions ◆ Info Digit list ◆ 911 Emergency Calls
Overview of System & Equipment	◆ System Overview ◆ Login/Logout ◆ Agent Profile ◆ Clicking the Mouse ◆ Dragging/Dropping ◆ Copy/Paste ◆ Drop Down Boxes ◆ Lists ◆ Radio Button ◆ Scroll Bars ◆ Sliders ◆ Tables ◆ Accessing a Program ◆ Screen Displays ◆ Call Handling Screen ◆ Title Bar ◆ Banner ◆ Conversation Area ◆ Disconnect Message Status ◆ Color Scheme ◆ Agent Text Transmission ◆ Cancel Key ◆ Information Bar ◆ Profile ◆ Help ◆ Call Type	◆ Dial Window ◆ Scratch Pad ◆ Transfer Panel ◆ Headset Panel ◆ Status Bar ◆ Record Feature ◆ Function Keys ◆ Block ◆ Ctrl-Switch ◆ Switch ◆ The Keyboard ◆ Alpha Keys ◆ Call Handling Keys ◆ Numeric Keys ◆ Cursor Movement Keys ◆ Arrow Keys ◆ Backspace ◆ Error Correction Function ◆ Single Word Edit Function ◆ Word Substitution Feature ◆ Macros Table ◆ Ctrl-Function Keys ◆ Glossary of Telephony Terms ◆ Background Noises ◆ Voice Tones/Descriptive Words ◆ Standard Abbreviations
Phone Image (Tone of Voice)	◆ Professional Phone Image ◆ How phone image is created ◆ Provide warm & friendly greeting ◆ Conversational Tone ◆ Voice Inflection ◆ Audibility & breath control ◆ Pitch ◆ Quality ◆ Operator Role ◆ Relay Role ◆ Relay Skills ◆ Conversational Flow ◆ Staying focused ◆ Listening skills ◆ Customer service skill ◆ Coping skills ◆ Phrases ◆ Background Noises ◆ Voice Tones/Descriptive Words	◆ Voice Person Speaking in Third Person ◆ Pacing the Voice Customer ◆ Brief pacing phrases ◆ Repeating information ◆ Voice Customer does not say "GA" ◆ Handling Interruptions ◆ Voice Tone ◆ How Phone Image is Created ◆ Why Conversational Tone? ◆ Transparency, Caller Control & Confidentiality ◆ Rudeness ◆ Create an Exceptional Customer Experience ◆ Announce ◆ Closing ◆ Suggested Redirect Phrases ◆ Transparency & Caller Control

POLICY AND PROCEDURE TOPICS		
TTY-Voice & Voice-TTY	◆ TTY to Voice Introduction ◆ Connecting to outbound customer ◆ Announcement ◆ Explanation of service ◆ Deaf or Hard-of-Hearing Explanation ◆ International Announcement ◆ TTY-Voice Procedures ◆ TTY-Voice Specific Person Request ◆ Variations Specific Person Request ◆ TTY-Voice Answered TTY ◆ Voice Person Not Available ◆ TTY-TTY Call Release ◆ TTY-Voice Answer TTY (TTY-TTY) ◆ TTY-TTY Specific Person Request ◆ TTY-Voice No Answer ◆ Types of Busy Signals ◆ Redialing	◆ TTY-Voice Busy Signals ◆ Regional 800 ◆ Voice-TTY ◆ Voice-TTY Introduction ◆ Connecting to the outbound customer ◆ Voice Greeting ◆ Voice call progress ◆ Announcement ◆ Voice-TTY call (Hearing Person Answer) ◆ Explanation of service ◆ Voice-TTY Procedures ◆ Voice-TTY Specific Person Request ◆ Voice-TTY Answered Voice ◆ Voice-TTY No Answer ◆ Voice-TTY Busy Signal
Branding	◆ Inbound Answer Type Branding ◆ Database Branding	◆ Branding procedures
Recordings, Answering Machines, Pagers, & Answering Machine Retrieval (AMR)	◆ Introduction ◆ Recording Feature ◆ Information Line Recording (TTY/ Voice) ◆ Touch Tone Dialing ◆ Using Touch Tones (TTY/Voice) ◆ Audio text interaction ◆ Variations for Recordings ◆ Record Feature Tips ◆ TTY-Voice Recordings ◆ TTY-Voice Recording Information ◆ TTY-Voice Answering Machine ◆ Variations: Answering Machine/ Recording/Pagers ◆ Voice Mail Retrieval	◆ AMR ◆ TTY-Voice Pager/Beeper (known) ◆ TTY-Voice Pager/Beeper (unknown) ◆ Voice-TTY Pager ◆ Voice-TTY Answering Machine ◆ Other Recording Variations ◆ Voice Mail System ◆ Privacy Manager/Call Intercept ◆ Automatic Redial System Recordings ◆ Switchboards ◆ Redialing Voicemail through Switchboard ◆ TTY-Voice Asking for Specific Person ◆ Live person On Answering Machine Redial
VCO (Voice Carry-Over)	◆ VCO Introduction ◆ VCO Announcement ◆ VCO Service Explanation ◆ VCO Equipment ◆ Non-Branded VCO ◆ Branded VCO ◆ VCO No Answer ◆ VCO Busy ◆ VCO Privacy ◆ VCO Answering Machine ◆ Voice-VCO Answered TTY ◆ Voice-VCO Answered VCO ◆ Two-Line VCO (2LVCO) Intro	◆ Reverse 2LVCO Intro ◆ Reverse 2LVCO Procedure ◆ VCO Variations ◆ VCO comes in Voice Line ◆ 2LVCO Conference Calls ◆ VCO Requests Relay to give Relay # ◆ VCO Privacy while leaving message ◆ VCO Voice Mail Retrieval ◆ 2LVCO Voice Mail Retrieval ◆ VCO Types and Voices ◆ Inbound Customer Requests VCO/HCO ◆ VCO Requests CA gives name in notes ◆ 2LVCO Procedure
Billing	◆ Introduction ◆ Local call description ◆ Paid by Inbound ◆ Toll Free Calls ◆ Calls that Cannot Be Processed ◆ Specific Person Request	◆ Inbound tells wrong # ◆ Agent dials wrong # ◆ Marine ◆ Roaming Feature ◆ Restricted Roaming ◆ Unrestricted Roaming
HCO (Hearing Carry-Over)	◆ HCO Intro ◆ HCO Announcement ◆ HCO Service Explanation ◆ People with speech disabilities "S" ◆ Non-Branded HCO	◆ Voice-HCO Answered ◆ Voice-HCO Answered TTY (1) (2) ◆ Voice-HCO recorded message answers ◆ 2LHCO Intro ◆ Two-Line HCO Procedure

POLICY AND PROCEDURE TOPICS		
	♦ Branded HCO ♦ HCO with Privacy ♦ HCO No Answer ♦ HCO Busy ♦ HCO-Voice Answering Machine	♦ Reverse Two-Line HCO ♦ HCO Variations ♦ Inbound requests VCO/HCO ♦ HCO User Requests to Speak
Customer Database	♦ Enhanced Customer Database Profile ♦ Household Profile ♦ Edit Household Profile ♦ Navigating Customer Database ♦ Household Profile Panels ♦ Frequently Dialed Numbers ♦ Preferences ♦ Restrictions ♦ Blocked ♦ Emergency Numbers ♦ STS ♦ STS Messages	♦ Customer Profile Introduction ♦ Use/Edit/New/Delete Customer Profile ♦ Verify Customer Password for Agent ♦ Verify Customer Password – CSR Only ♦ Customer Profile Panels ♦ Personal Information ♦ Notes ♦ Frequently Dialed #s ♦ Emergency #s ♦ STS ♦ STS Messages ♦ Database Profile Macros
Directory Assistance (DA)	♦ DA Intro ♦ Interstate DA ♦ Intrastate DA ♦ Automated DA ♦ DA City & State Given; Area Code Unknown ♦ DA Variations ♦ International Transfer Menu ♦ Call Processing -- Calling Intl	♦ Call Processing -- Calling from International Number ♦ Sprint International Variations ♦ Non-Standard TTY ♦ Answered Foreign Language ♦ Transfer Menu ♦ 900 # Call Processing ♦ 211/311/511 Requests
Device-to-Device Calls	♦ Device to Device Intro ♦ Function Keys & Banner Messages ♦ VCO-TTY & TTY-VCO ♦ VCO-VCO ♦ TTY-HCO & HCO-TTY	♦ VCO-HCO & HCO-VCO ♦ HCO-HCO ♦ Device to Device Variations ♦ Alternate Call Type reaches recording
Call Processing Variations	♦ CA information ♦ Area Code Only In From Number ♦ Conversational Flow ♦ Static or Poor Connection ♦ Profanity towards Agent ♦ Redialing ♦ Young Children ♦ Inbound Does Not Connect ♦ Inbound ASCII ♦ Tone Judgments ♦ Repeating Information ♦ Restricted Calls ♦ Two calling from numbers ♦ LEC Service Office ♦ 611/811 ♦ Double Letters ♦ Call Waiting Feature ♦ Conference Calls ♦ Party Line Calls ♦ Three-Way Calling ♦ Hard of hearing customer Answers TTY Line ♦ Spanish Calls to Spanish Speaking Agents ♦ Request for Alternate Language ♦ Caller Types in Alternate Language ♦ Voice Customer Hangs Up During Call ♦ Variable Time Stamp ♦ Customer Misdialed Phrase	♦ Request for Length of Call ♦ T-V Call & V Requests Supervisor Call Backs for TTYs ♦ Multiple Calls ♦ Sensitive Topics ♦ Suicide ♦ Abuse ♦ Illegal Calls ♦ Answering Machines ♦ Hangs Up Before Message Left ♦ Do Not Type Recorded Messages ♦ Answering Machine Full ♦ Change Answering Machine Message ♦ VCO Requests Leave Message 1st out dial ♦ Leaving a Message V-TTY Ans V ♦ Retrieving Messages from TTY V Answering Machine ♦ TTY Screener ♦ Request to Leave TTY Message on Answering Machine ♦ Recordings ♦ Regional 800 ♦ TTY Requests "Dial That Number" ♦ Recording with Relay Option ♦ Alternate Call Recording Reached ♦ English/Spanish ♦ Pound ♦ Touch Tone Phone

POLICY AND PROCEDURE TOPICS		
	♦ TTY Customer Hangs Up During Call ♦ Non Standard TTY Capability ♦ Relaying Internet Characters ♦ TTY User Does Not Type GA ♦ Dispatch Calls – Pizza, Taxi, etc. ♦ Customer Referral Guidelines ♦ V-T Calls answered by Fax ♦ Customer Requests ♦ Holding for Inbound prior to out dial ♦ Request for Company Information ♦ Request for M/F Agent ♦ Request Specific Agent ♦ Agent Knows Customer ♦ Request for Relay Number ♦ Customer Requests to Call Relay Service ♦ Request for Calling From Number ♦ Request Telephone Number Referral ♦ Request for Date/Time ♦ User Requests Agent to Modify Call	♦ Advertisements ♦ Do Not Type Recordings ♦ Get Live Person/Rep ♦ Conversation Being Recorded ♦ Dial Number from Recorded Announcement ♦ VCO ♦ Conference Calls ♦ Leave Relay Number ♦ Voice Mail Retrieval ♦ VCO Types & Voices ♦ Prompting ♦ Data Transmission Box ♦ Prompting VCO on Hold ♦ Requests VCO/HCO ♦ HCO ♦ Requests VCO/HCO ♦ Alternate Call Type Recording ♦ Bridge Left Open
Call Take Over Procedures	♦ FCC Rule ♦ Protocol & process flow ♦ TTY-Voice and Voice-TTY ♦ ASCII	♦ VCO ♦ VCO-VCO ♦ HCO ♦ VCO-TTY & TTY-VCO
Customer Service	♦ Functions ♦ Language Services	♦ Procedures
Transparency	♦ Non-Emergency Calls ♦ Emergency Center Evacuation	♦ Network Failure
Emergency Call Procedures	♦ Emergency Calls Intro ♦ Emergency Services ♦ FCC Requirements ♦ Emergency Call Processing ♦ Emergency Reporting ♦ TTY-Emergency	♦ TTY-Emergency TTY Call Release ♦ Internet-Emergency ♦ Instant Messenger (IM) Emergency ♦ Emergency Call Processing Variations ♦ Emergency Form ♦ Voice-Emergency
Federal Relay Service	♦ FedRelay Intro ♦ FedRelay Announcement ♦ FedRelay Service Explanation ♦ FedRelay Procedures ♦ FedRelay call types	♦ FedRelay Confidentiality Policy ♦ FedRelay Customer Information Requests ♦ FedRelay Customer Contacts ♦ FedRelay Reporting
STS (Speech-to-Speech)	♦ STS Introduction & History ♦ STS Description ♦ Disabilities ♦ Characteristics of STS users ♦ Stereotypes ♦ Clarifying Phrases ♦ Phrases to Avoid ♦ STS Phone Image ♦ STS Agent Tools ♦ Consistency ♦ Patience ♦ Ask Yes/No Questions ♦ No Personal Conversation ♦ Phrases ♦ STS Alphabet ♦ Transparency/Call Control/ Confidentiality	♦ Ways to Reduce/Streamline Notes ♦ Standard Abbreviations (STS) ♦ STS-Voice ♦ Voice-STS ♦ STS VCO-Voice ♦ Voice-STS VCO (TTY answer) ♦ Voice-STS VCO (VCO answer) ♦ STS VCO -- 2 Line VCO ♦ TTY-STS ♦ STS-TTY ♦ Non-branded HCO-STS ♦ STS-HCO ♦ STS Hold Message ♦ STS Call Takeover ♦ Confidentiality & Transparency ♦ Personal Conversations requests ♦ STS Variations
Healthy Detachment	♦ Healthy Detachment Intro ♦ Objectives	♦ Perception ♦ Ways to Reduce Stress

POLICY AND PROCEDURE TOPICS		
	◆ Survival Skills	◆ Hospitality
	◆ Relay Traps	◆ Phrases
Healthy Relay	◆ Introduction	◆ Setting up Workstation
	◆ Objectives	◆ GUAM - Get Up and Move
	◆ Ergonomics	◆ Ergonomic Relief
	◆ Stretching Exercises	◆ Slowing the Customer Down
	◆ Agent Reinforcement	◆ Overtime
	◆ Ergonomic Review	◆ Relaxation
Adult Learner	◆ Understanding the Needs of the Adult Learner	◆ Modeling
	◆ The Learning Continuum	◆ Checking For Understanding
	◆ Use of Different Modalities	◆ Guided Practice
	◆ Edgar Dale's Cone of Experience	◆ Independent Practice
	◆ Elements of Lesson Design	◆ Summary
	◆ Focus	◆ Evaluation
	◆ Objective & Purpose	◆ How to Give Effective Instruction
	◆ Input	◆ Questioning Guidelines
	◆ Trust in Management	◆ Feedback - Training & Coaching Technique
Assessing Performance	◆ The Assessment Process in Training	◆ Acceptable Time Frame
	◆ Assessment - What is involved?	◆ Acceptable Is Relative
	◆ Practice Time	◆ Ways to "Coach"
	◆ Spelling Test	◆ Feedback
	◆ Written tests	◆ Maintain Self-esteem & Motivate
	◆ Side by side evaluations	◆ Pass/Fail Guidelines
	◆ Typing	◆ Introduce Assessment Form
		◆ Form Set-Up
Introduction to Diversified Culture	◆ Introduction to Diversified Culture	◆ Why is there Deaf Culture?
	◆ Diversification	◆ What Do You Know About Deafness
	◆ Who Uses Relay	◆ Myths About Deafness
	◆ Understanding Our Customer	◆ Two Views of Deafness
	◆ Special Communication Needs	◆ Loudness Levels
	◆ Pathological vs. Cultural View of Deafness	◆ Characteristics of Deafness
		◆ The Deaf Community
Deaf Heritage	◆ History in Europe	◆ Edward Miner Gallaudet
	◆ History in North America	◆ Oral/Combined Debate
	◆ Alexander Graham Bell	◆ Timeline of Deaf History
The Deaf Community	◆ Introduction to the Deaf Community	◆ American Athletic Association of the Deaf
	◆ National Association of the Deaf	◆ National Theatre of the Deaf
	◆ Contributions to Society	◆ Assistive Devices
	◆ Mainstreamed Schools	◆ Gaining Acceptance in the Deaf Community
	◆ Sign Language Interpreters	◆ Changes in the Deaf Community
	◆ Different Communication Systems	◆ Working with a Sign Language Interpreter
	◆ Exposure to English	◆ Interpreting Standards
	◆ DEAF President Now	◆ Equal Access
	◆ Attitude Changes toward the Deaf Community	◆ Cochlear Implant Controversy
American Sign Language (ASL) Pt. 1	◆ What is ASL?	◆ Rules of ASL
	◆ History of ASL	◆ Five Parameters of ASL
	◆ ASL Recognized as Language	◆ English vs. ASL Idioms
American Sign Language (ASL) Pt. 2	◆ Evolution of ASL	◆ Translate ASL to English and Vice Versa
	◆ ASL Syntax	
TTYPhony & TTY Courtesy	◆ First Teletypewriter	◆ TTY Courtesy
	◆ Evolution & History of the TTY	◆ Development of Relay Service Market
	◆ Telecom Laws of Accessibility	
Deaf Customers	◆ Statistics from NIDCD	◆ Relaying for Deaf Customers
Hard of hearing & Late-Deafened Customers	◆ Characteristics of Deaf Customers	◆ Establishment of Hearing Loss Association of America
	◆ Assistive Devices for Deaf Customers	
	◆ Establishment of Assoc. of Late-Deafened	◆ Deaf Seniors

POLICY AND PROCEDURE TOPICS		
	Adults	♦ Military Veterans ♦ Relaying for Late-Deafened Customers
DeafBlind Customers	♦ What Does DeafBlind Mean ♦ Assistive Devices for the DeafBlind ♦ Relaying for the DeafBlind	♦ DeafBlind Pacing – Allows the CA to slow down the transmission to the Braille machine
Relaying for Speech/ Cognitively Disabled Customers	♦ Speech-Challenged Customers ♦ Assistive Devices ♦ Physically &/or Cognitively Challenged Customers	♦ Traumatic Brain Injury ♦ Stroke ♦ Communication Related Effects
Relaying for Hearing Customers	♦ Statistics	
Ethics & Confidentiality	♦ Interpreting Standards ♦ ADA & FCC regulations for the Provision of TRS ♦ Regulations pertaining to call content	♦ TRS Rules – Operator Standards ♦ Relay Center Agreement Regarding Confidential Customer Info

On-Going Quality Focus Skill Training

Continuous skill training is the cornerstone of Sprint's training program. Core relay processing skills are continually reinforced throughout employment and as a part of supplemental training programs. Sprint develops skills training programs and on-going training labs to ensure skills are maintained and remain consistent with basic relay training. Refresher training is provided on correct relay procedures including system navigation, standard procedures, professionalism, and ethics. Depending upon the complexity of the training a decision is made to determine the appropriate delivery. Our on-going skill training program includes:

- ♦ Quality Focus Skill training - monthly
- ♦ Diversified Culture Awareness training - monthly
- ♦ Customer Service Initiative – monthly
- ♦ Check for Understanding – monthly
- ♦ Grammar and Spelling Rules - bi-annual

Quality Focus Skill Training topics from 2016/2017:

Jan 2016	Dialing the correct number within 5 seconds
Feb 2016	Typing the Voice/TTY greeting verbatim, Announcement protocol including a prompt state-specific announcement/greeting used/ ID number given
Mar 2016	Call processed according to procedures, specifically following Customer Note instructions
Apr 2016	State-specific announcements/greeting/ID given, Call closing protocol, Appropriate closing and macro for call type
May 2016	Specific person request announcements, Progress of call/Customer Informed
Jun 2016	Call transfer procedure, Adapting to call procedures changes as directed by the customer.
Jul 2016	Typing greeting verbatim, Typing message verbatim, Voicing the complete message
Aug 2016	Maintaining transparency maintained, Typing messages verbatim
Sept 2016	Dialing efficiency and protocol
Oct 2016	Typing/reading voice/device answer greetings verbatim, Call closing procedure, Relay mode closing protocol, Operator mode closing protocol
Nov 2016	Changing call procedures as directed by customer, Appropriate macros use., Non-branded VCO call type setup
Dec 2016	Call type standard procedure, Modifying call procedure as directed by the customer, Transferring (711 customer request)
Jan 2017	Dialing the correct number within 5 seconds
Feb 2017	Determining familiarity with relay services, Call type appropriate service explanations, Appropriate macro use (EXPLAINING RELAY)?
Mar 2017	Following customer note and customer typed Instructions

Apr 2017	Announcement protocol including a prompt state-specific announcement/greeting used/ID number given, Call closing protocol, Appropriate closing and macro for call type.
May 2017	Specific person announcement procedure
Jun 2017	Call transfer procedure, Adapting to call procedures changes as directed by the customer, 711 transfer compliance

Ongoing Diversified Culture Awareness Training

Training continues to bring focus to serving relay customers and disability awareness. Sprint provides additional training in Diversified Culture in conjunction with each state's local deaf, hard of hearing, Deafblind, late deafened and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with trainers ensure all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness. Sprint will utilize live presentations, videos, audio recordings, role-plays, group activities, written materials, and/or discussion groups to deliver ongoing Diversified Culture training. As a part of ongoing Diversified Culture Training, each employee is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding.

Diversified Culture Awareness Training topics from 2016/2017:

Jan 2016	Diversified Culture-What's That? Diversification in Communication, Considerations, Who uses the relay service? Why is it important for us to understand our customers? Why is it important for us to recognize their special communication needs?
Feb 2016	The History of Deafness
Mar 2016	Ways to Detach
Apr 2016	Deaf Nation Expo is…
May 2016	American Sign Language is…, CODA means…
June 2016	All About CapTel, How it works
July 2016	Baseball Signs originated from Sign Language
Aug 2016	Accessibility for All, Sprint corporate responsibility
Sept 2016	Diversity-Equality-Inclusion
Oct 2016	Disability is Diversity, Stretches to do at your desk
Nov 2016	Disability Awareness
Dec 2106	Disability Advocacy
Jan 2017	View of a person's abilities
Feb 2017	Highlight: Edward Verne Roberts – American Disability Activist
Mar 2017	Disability Awareness
Apr 2017	Parkinson's Awareness Month
May 2017	Limb Loss Awareness Month

The following is an example of the monthly Quality Focus Check for Understanding from March 2017.

Check For Understanding
Quality Focus March 2017
Please return to your supervisor by March 7, 2017.
Name _____ Supervisor _____
1) What is the first thing an agent should look at when a call comes to their station?
   _____
2) If a customer requests that the agent verifies the Calling To number before dialing out the agent should type or say something like, _____
3) The IP Call number to dial is entered by the inbound, therefore you DO NOT need to verify the Calling To number before outdialing on an IP call, even if it's in the Customer Notes to do so.
           TRUE   FALSE
4) The record feature may be used on conference calls.
           TRUE   FALSE
5) If the customer has TYPE RECORDINGS as a preference or instruction the agent should not transmit _____. This instruction indicates that the customers the agent to type the _____ recording.
6) If a device user requests that you do not announce relay, the agent should:
   a) Not identify that this call is through a relay service or ask if the voice person has had a relay call before.
   b) Inform the customer they must answer the question (HOW WOULD YOU LIKE YOUR CALL ANNOUNCED Q) GA.
   c) Inform the caller they are required to announce the call.
7) What is the purpose of the customer notes?
   a) To assist the agent in processing the call how the customer prefers.
   b) To annoy the operator.
   c) To ensure the customer does not have to repeat their instructions before every call.
   d) Both A and C.
8) When using <ALT .>, agents should send it:
   a) Only once and then pause a few moments before sending it again.
   b) Twice and then pause a few moments before sending it again.
   c) As many times as they want since they are in the buffer and can be canceled when the phone is answered.

TTY/ASL Refresher	Provide examples of how to relay the statements
¨ TIME WHAT Q	
¨ GO PARTY YOU Q	

Customer Service Initiative (CSI) program: A discussion of support techniques to enhance service for customers and an avenue for sharing relay agent peer to peer suggestions toward accomplishing superior service. 2016/2017 CSI topics are provided in the following table.

Jan 2016	Use of "Deaf/hard of hearing" and/or "internet service" in announcements.
Feb 2016	Outdial time, Inappropriate use, Veterans and hearing loss
April 2016	Sprint IP go ahead, Keeping the caller informed, Facilitate communication
May 2016	Procedure for recordings, Chemotherapy and hearing loss
Jun 2016	Caller control, Keeping the caller informed, Announcements, FCC verbatim requirement, State requirement call customization request
Jul 2016	Solicitation for agent process improvement suggestions, Caller control
Aug 2016	Call closure, Equal communication access
Sep 2016	Call processing reference information, Sprint Relay customer care, Speed of service recognition
Oct 2016	Brief service explanations, Call handling tips from agents
Nov 2016	Customer commendations, States and capitals review
Dec 2016	System enhancement prioritization
Jan 2017	Customer instructions, FCC call take over rule, Transparency
Mar 2017	Transparency, Caller control
Apr 2017	Customer notes, Operator/Relay mode, Call handling tips from agents
May 2017	Stress management

The following is an example of our bi-annual Grammar and Spelling Rules from 2016/2017.

GRAMMAR MATTERS

Homonyms (also called homophones) are words that sound like one another but have different meanings. Some homonyms are spelled the same, like bark (the sound a dog makes) and bark (the outer layer of a tree trunk).

I and Me Usage

	When to Use	Example Sentence	How to Test
I	When you're referring to the subject of a sentence or clause	Julia (subject) and I (subject) always go together.	To know if you should use "I" or "me" take the other pronoun out of the sentence and see if it still makes sense.
Me	When you're referring to the object of a sentence or clause	Will you (subject) be coming with me (object) to the store?	

Examples:

I
1. Harry and I/ me went to the store.
Test: Me went to the store (Incorrect!)
Test: I went to the store. (Correct!)

2. Jake invited Brian and I/ me over for dinner.
Test: Jake invited I over for dinner. (Incorrect!)
Test: Jake invited me over for dinner. (Correct!)

Me
1. Will you take my brother and I/me to the movies?
Test: Will you take I to the movies? (Incorrect!)
Test: Will you take me to the movies? (Correct!)

2. Sam, Jennifer, and I/me went to the beach.
Test: Me went to the beach. (Incorrect!)
Test: I went to the beach. (Correct!)

There, Their, and They're Usage

pronounced the same	When to Use	How to Test
There	Naming a place, a thing, or the existence of something	If you can replace "there" with "here" you have it right!
Their	Showing possession	If you can substitute "their" with "our" you have it right!
They're	Combining the words "they" and "are"	"They" is a pronoun and "are" is the verb. If you can substitute "We are" you have it right!

Have and Has Usage

	Singular	Plural	Hint
1st Person	I have	we have	"Have" and "has" are both present tense conjugations of the verb "to have", and we use "have" or "has" depending on the subject. If the subject is 3rd person singular, then you use "has". All other subject take on "have".
2nd Person	you have	you have	
3rd Person	He/ she/it has	They have	

It's and Its Usage

	When to Use	How to Test	How to Test
It's	When you're about to describe something	Replace with "it is"	If you can replace "it's" with "it is" you have it right! Otherwise do not use punctuation.
Its	When you want to indicate ownership of something	Replace with another possessive adjective ("her," "his," "their") or "the"	

Ten Common Spelling Rules

Rule	Examples	Memorize
1. 'ie' or 'ei' ❶ Write i before e, except after c ❷ Write ie after c for words with a sh sound. ❸ Write ei when the vowels sounds like an e as in 'weigh'	❶achieve, believe, friend receive, receipt, perceive ❷ancient, efficient, sufficient, conscience ❸neighbor, vein, reign, rein, deign	Exceptions: Words like counterfeit, either, neither, height, leisure, forfeit, foreign, science, species, seize, weird
2. 's' or 'es' ❶ Add es if a word ends in ch, sh, ss, x or z ❷ Add es for most words ending in o	❶arch > arches, clash > clashes, class > classes, box > boxes, quiz > quizzes ❷tomato > tomatoes, hero > heroes, go > goes, do > does, echo > echoes	Exceptions: Words like altos, duos, pianos, radios, solos sopranos, studios, videos, typos
3. 'y' to 'i' or not ❶ For words ending in y preceded by a vowel, retain the y when adding s or a suffix. ❷ For words ending in y, retain the y when adding ing. ❸ For words ending in y, preceded by a consonant, change the y to i before any other suffix	❶ convey > conveys, employ > employer ❷ try > trying, justify > justifying, certify > certifying, study > studying ❸ try > tried, justify > justifies, certify > certifiable, mystify > mystified, laboratory > laboratories	Exceptions: Words like dryness, shyness
4. drop the final 'e' ❶ DROP the e when the suffix starts with a vowel. ❷ DROP the e when the word ends in dge. ❸ DROP the final e when adding -ing	❶save > savable, use > usable ❷judge > judgment ❸save >saving, manage > managing, trace > tracing, emerge > emerging	Exceptions: DO NOT DROP the e if the word ends in ce or ge (e.g. manage > manageable, trace > traceable)
5. 't' or 'tt' when adding -ing, -ed and some suffixes to verbs ❶ DOUBLE the t for verbs of one syllable with a single vowel, or a short vowel sound. ❷ DOUBLE the t for verbs of more than one syllable when the stress is on the last syllable.	❶rot > rotting, rotted, rotten fit > fitting, fitted knot > knotting, knotted ❷abet > abetting, abetting allot > allotting, allotted commit > committing, committed emit > emitting, emitted forget > forgetting, forgotten (but forgetful)	Exceptions: DO NOT DOUBLE the t for verbs of one syllable with a double vowel or a long vowel sound (e.g. treat > treating, treated; greet > greeting, greeted)
6. 'r' or 'rr' when adding -ing, -ed and some suffixes to verbs ❶DOUBLE the r for verbs of one syllable when the final r is preceded by a single vowel. ❷DOUBLE the r for words of more than one syllable when the stress does not fall on the first syllable.	❶star > starring, starred, starry tar > tarring, tarred war > warring, warred (but warfare) scar > scarring, scarred stir > stirring, stirred ❷concur > concurring, concurred, concurrence occur > occurring, occurred, occurrence defer > deferring, deferred, (but deference) deter > deterring, deterring, deterrent infer > inferring, inferred, (but inference) prefer > preferred, preferring, (but preference) refer > referred, referring, referral	Exceptions: DO NOT DOUBLE the r for verbs of one syllable when the final r is preceded by a double vowel (e.g. fear >fearing, feared) DO NOT DOUBLE the r for words of more than one syllable, when the stress falls on the first syllable (e.g. prosper > prospered, prospering)
7. 'l' or 'll' when adding -ing, -ed and some suffixes to verbs DOUBLE the l when it is preceded by a single vowel.	cancel > cancelling, cancelled, cancellation fulfil > fulfilling, fulfilled, fulfilment level > levelling, levelled travel > travelling, travelled, traveller /traveler	Exceptions: DO NOT DOUBLE the l when it is preceded by a double vowel (e.g. conceal > concealing, concealed)

Staff Training
Our entire Accessibility team exists for our customers. Training on all aspects of ASL, deaf culture, the needs of hearing, speech and dual sensory impaired users, ethics and confidentiality is vital to our success. These topics and others help us to be able to meet and exceed customer expectations and requirements.

All Sprint employees are required to take ethics and confidentiality training. The Sprint Code of Conduct is applicable to Sprint employees and its controlled subsidiaries, the Sprint Board of Directors and anyone we authorize to act on Sprint's behalf. The Code establishes the basic foundation of Sprint's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders, and the communities in which we do business. The Sprint Code of Conduct outlines our ethical and legal responsibilities as employees, as well as our interactions with customers, competitors and suppliers. One of our most valuable assets is our reputation for honesty and fairness, and our commitment to uphold this responsibility. The Code is

a go-to resource when questions of legal or ethical appropriateness arise. We are bound by the Code and the specific operational policies of Sprint. Annual Code certification is required. Sprint also maintains an Ethics Helpline, a 24-hour resource for employees and other stakeholders to confidentially and safely seek advice or report any suspected violation of the Code of Conduct, such as fraud, sexual harassment, discrimination, or any illegal conduct in the workplace.

Sprint staff members are also required set annual corporate training and development goals. Individual performance is measured and tied to compensation. Ongoing Staff Development is also key to overall staff performance. Sprint's Accessibility Customer Solutions (ACS) group hosts an interactive meeting called the Sprint Accessibility Café. This monthly meeting is an opportunity for the Accessibility Team to share market and industry product updates. Presenters from outside the group and subject matter experts from the Relay industry also provide updates.

Appendix C: TRS Pledge of Confidentiality

Sprint's reputation as an ethical company is the key to enabling us to be the preferred communications company – a place that delivers the best experiences for employees, end users, and state customers. Throughout initial and on-going training, CAs receive information and guidelines on professional conduct with an emphasis on ethics and confidentiality, based on Sprint's "Relay Center Code of Ethical Conduct" and "Principles of Business Conduct." CAs are presented with possible situations involving ethical issues and are taught how to apply the conduct guidelines to each situation.

All Relay center personnel are required to sign and abide by a pledge of confidentiality that promises not to disclose the identity of any caller or any information learned during the course of relaying calls. In conjunction with signing Sprint's confidentiality agreement, as a part of training, CAs role-play various scenarios which teach the correct way to ask for assistance from a supervisor without divulging call-specifics. Examples of confidentiality breaches are reviewed and discussed with the CAs.

Sprint strictly enforces confidentiality policies in the center, which includes the following:

- ◆ Prospective employees are screened during the interview process on issues regarding ethics and confidentiality.
- ◆ On day one of training, employees must sign a Pledge of Confidentiality Agreement Form.
- ◆ During initial training, employees are presented with examples of potential breaches of confidentiality.
- ◆ Stress can be a factor in maintaining confidentiality. CAs receive three hours of training on healthy detachment.
- ◆ After graduation from initial training, employees are reviewed yearly on the Pledge of Confidentiality and are required to re-sign promises not to disclose the identity of any caller or any information learned during the course of relaying calls.
- ◆ Breach of confidentiality may result in termination of employment.
- ◆ All Sprint Accessibility Centers have security key access.
- ◆ Visitors are not allowed in work areas.

Sprint Code of Conduct

The Sprint Code of Conduct describes the ethical and legal responsibilities of employees of Sprint and anyone we authorize to act on Sprint's behalf. Sprint and all TRS employees (including Communication Service for the Deaf [CSD] staff) are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an investigation may be subject to corrective action up to and including termination. This

information is contained within Sprint's Code of Conduct all employees are required to complete annually.

There is a TRS whistleblower protection notification posted at Sprint TRS call centers in accordance with FCC rules. CSD also obtains a signed acknowledgement of the receipt of the Whistleblower Policy from all employees upon hire, and annually thereafter.

Training on Ethics
Sprint Relay employees receive training on the appropriate protocol to protect relay users' privacy and how to prevent the unintentional disclosure of relay communications. When trainees observe calls and ask questions once back in the training room, trainers lead a discussion on the appropriate method to seek clarifications without divulging confidential information. CAs may also role-play various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Examples of ethical issues and challenging circumstances are reviewed and discussed with CAs. During initial training, CAs are required to pass a series of written and skills-demonstration tests, which include their understanding of the Relay Center Code of Ethics and how to apply the Code to hypothetical situations. Trainees who do not pass these tests are not utilized as CAs.

Sprint's high-performance culture focuses on accountability, first and foremost, along with open communication and innovation. Within these traits, integrity and ethics are critical success factors. Amidst unprecedented change and technological advancement, acting with integrity is not just the right thing to do; it is the unwavering foundation for Sprint.

Confidentiality
Sprint believes measures to ensure confidentiality are crucial to the success of TRS operations and has implemented procedural and environmental measures to safeguard customer and call information. Sprint has policies in place to protect users' confidentiality. These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

Sprint employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs are taught using various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through our CAs' participation in an interactive training program focusing on scenarios that they are likely to encounter when relaying calls.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without elaboration. Maintain a	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
professional and friendly image with customers.	with relay customers.
It is appropriate to discuss with a member of management technical or procedural components of a call. For example, to say you had problems placing a calling card call from a pay phone.	It is not appropriate to discuss call content or conversations with others, ever.
It is appropriate to call for a Supervisor to look at your screen for assistance with the call.	It is not appropriate to request assistance from the agent sitting next to you.

All relay center personnel are required to sign and abide by the Sprint Relay policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. The relay center Code of Ethics requires the following:

♦ Keep all TRS call-related information strictly confidential.
♦ Keep no records of customer information or content of any TRS call.
♦ Refrain from editing or omitting anything from the content of the conversation or the spirit of the speaker.
♦ Refrain from adding or injecting into the content of the conversation or the spirit of the speaker.
♦ Assure maximum customer control.
♦ Strive to further skills and knowledge through training, workshops, and reading literature available in the field.

In accordance with the FCC, all information utilized for call set up, including customer database and preferred call type information remains confidential and cannot be used for anything but the call. Once the inbound party disconnects, all information pertaining to that call disappears from the CA's terminal. The required confidentiality and security of the customer preference data is covered during training of all employees and reinforced throughout employment. Sprint takes the following steps to ensure Customer Profile information remains secure:

♦ Sprint does not modify a customer's record based on experience.
♦ All Customer Profile database entries contain time and date stamps and note the identification number of the CA who processed the request.
♦ Relay users register a username and password/PIN. Sprint also asks customers to register a security question and answer only known to them in case the username and password is lost or forgotten.
♦ Sprint's Customer Profile information is encrypted and protected from outside access by firewalls.

CTI Confidentiality Form

Consumers need to be confident that their personal and professional calls are kept in the strictest confidence. It is crucial that all employees understand and abide by this Confidentiality Policy.

All information obtained during a CapTel call is to be kept strictly confidential. The only person(s) to whom information obtained during a call may be divulged is a member of the administrative team (i.e. supervisors, trainers, HR representatives, the Floor Operations Coordinator, or the Call Center Director). Only specific, pertinent information relating to Training, Call difficulty, Technical difficulties, Emergencies or Customer service issues may be disclosed to the appropriate personnel, and this must be done in private.

Under no circumstance are identifiers to be used while discussing a call (terminology that would identify personal information about a caller including, but not limited to, gender, name, address, and business information). The standard, objective way off referring to callers is to identify the person using the captioned telephone as the "client," while the other party or parties are referred to as the "doc(s)." Furthermore, any person not employed by CapTel, Inc. or its parent company shall not be allowed on or near the call floor.

Nor shall information regarding CapTel clients be discussed or posted in any public forum.

Employees agree to abide by the following:

- I shall only discuss the content of a CapTel call (production, training, timing, or otherwise) with a member of the administrative team under the guidelines provided above. I will not discuss the content of a CapTel call with other persons (CAs, friends, family members, etc.).
- I shall disclose only appropriate information regarding a training/timing call to a member of the administrative team according to the guidelines documented above.
- I shall not divulge specific information related to the work or calls I have heretofore processed, upon termination of my employment at CapTel or at any time thereafter.
- I shall not disclose information which could be used to identify specifics about a particular consumer to anyone except a member of the administrative team according to the guidelines documented above.
- I shall not act upon any information received via a CapTel call.
- I shall not listen to, get involved in, or position myself to observe a CapTel call being processed by another employee.
- I shall not disclose information which could be used to identify specifics about any employee including, but not limited to, name, CA number, and schedule, except as is necessary to appropriate individuals and/or institutions or services.
- I shall not divulge my personal CA number in conjunction with my name except as required by a member of the administrative team.
- I shall not disclose the technical aspects of my position to anyone not employed by CapTel/Ultratec.
- I shall not bring visitors, including children, onto the call floor.
- I shall remain off of the call floor if I am not scheduled to be at work.

_____
Employee Name (please print)

_____
Employee Signature and Date

Sprint Confidentiality Form

IN CONSIDERATION of: (1) my employment with Sprint or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation, (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

1. **ALL TELECOMMUNICATIONS RELAY SERVICE (TRS) CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL.** I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.
2. **NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TRS CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES.** I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.
3. **NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER**. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.
4. **NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER**. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.
5. **TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.**
6. **I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.**
7. **ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.**

I have read and understand the Sprint Relay Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action

_____

that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

_____
EMPLOYEE SIGNATURE AND DATE

_____
MANAGER/SUPERVISOR SIGNATURE AND DATE

Sprint Federal Confidentiality Form

The Federal Relay provides a transparent link of telecommunication between typed/signed/voice (disabled) and voiced (non-disabled) messages. As part of the relay services organization all employees and subcontractors are bound to the following rules and regulations:

- All Federal Relay call related information is to be strictly confidential.
- Nothing is to be edited or omitted from the content of the conversation or the spirit of the Federal Relay user.
- Nothing is to be added or interjected into the content of the conversation or the spirit of the Federal Relay user.
- To assure maximum user control, the employee will be flexible in adapting to the caller's needs.
- Employees and subcontractors will strive to further competency in skill and knowledge through continued training, workshops and reading of current literature in the field.

~ Employee and Subcontractor Role ~

1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as $5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than $1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(I)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than $5,000.00.
8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.
9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of

Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).

10) This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

I have read and fully understand the Federal Relay Code of Ethical Behavior. I agree that failure to do so will lead to disciplinary action that may include termination. I agree to process calls in the manner required by the Federal Government as detailed in the Federal Relay contract. I agree to abide by this Code of Ethics even after my employment with Sprint and/or subcontractor ends.

_____
Employee/Subcontractor Signature   Date

_____
Supervisor Signature   Date

_____
Company Name (Print or Type)

Service Type *(check one)*
_____ Captioned Telephone/CapTel
_____ Relay Conference Captioning/RCC
_____ Telecommunications Relay Service/TRS and/or Internet Relay (a.k.a. Federal IP Relay)

Note: All of Sprint's Employees and subcontractors working on this contract will be acquainted with the applicable portions of FIRMR, the Privacy Act of 1974, and the Freedom of Information Act, and implementing regulations and policies. The employees and subcontractors will also be given copies of the following criminal and civil disclosure and inspection penalties, in full text, IRC 7213, IRC 7213A, and IRC 7431.

Appendix D: Disaster Recovery Plan

Sprint offers emergency options and uninterruptible power that exceeds the State's minimum requirements by offering an end-to-end approach that is unmatched in the relay industry. Sprint has emergency operations and uninterruptible power systems (UPS) supporting relay call centers, the TRS switches (located at wireline switch sites). Sprint knows a large-scale loss of commercial power is one of the most critical factors impacting access to communication. We have proven programs to keep that from impacting relay services. Both TRS and CapTel offer uninterruptible power supplies and generators to ensure relay users will continue to have access to the service in the event of power outages.

Call Center Power Solutions

Sprint provides a cost effective solution with a UPS using a combination of standard battery backup and an auxiliary generator to provide uninterrupted power for an unlimited duration for key components.

- The switch peripherals
- Switch room environment, including:
- Air conditioning, if required to maintain service
- Fire suppression systems
- Emergency lights and system alarms
- CA consoles/ terminals
- CA work site emergency lights
- Call Detail Recording (CDR)

Sprint ensures the UPS system capacity is sufficient to operate the call center during busy season and busy hour load. Sprint has installed power-generating equipment capable of operating call centers for extended periods. In the event of a power outage, the UPS and back-up power generator ensure seamless power transition until normal power is restored. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. Backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. Generators can stay in service for longer periods of time as long as fuel is supplied. As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental controls until commercial power is restored.

Emergency Procedures Training

All Sprint Relay employees are trained on emergency procedures to minimize or prevent disruption to relay users. Sprint instructs its staff on the procedures to be followed in the event of an emergency or service impacting issue. Sprint provides annual training to ensure familiarity with systems and processes. Ad-hoc training is conducted for new procedures or team members.

Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with Federal Emergency Management Agency (FEMA), the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster.

- Tabletop Exercises: In a round-table setting, members of the response team meet to discuss responsibilities and describe how to react as a team in an emergency.

- Walk-Through Drills: Both the response team and management perform their emergency functions within the emergency response location.
- Functional Drills: Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. Often, these functions are tested separately to help identify improvement areas and to eliminate confusion.
- Full-scale Exercises: Exercises simulated to be as close as possible to a real-life disaster. They may involve a combination of response teams, management, field operations, and outside agencies.
- After Action Reviews (AARs): Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity: Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Business Continuity

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, FEMA, Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301, and several Military Specifications (Mil-Spec) standards. Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Relay network has a Business Continuity (BC) plan to deal with all types of natural and man-made problems which may prevent calls from reaching the relay center or impact the operation of the TRS platform. The plan identifies how Sprint minimizes impact to relay users and restores relay services. Sprint brings more value when it comes to maintaining operations during natural and man-made events. Sprint's BC methodology and implementation standards are consistent with industry-wide best practices and trusted by experts in the field. The Sprint dedicated BC Teams (BCTs) participate in government-provided and private sector training, and maintain certifications from:

- DRII
- International Association of Emergency Managers (IAEM)
- DHS
- Business Continuity Institute (BCI)

Sprint understands the BC challenges faced by government organizations and has designed state relay services accordingly. Sprint has experience in serving more than 160 federal entities and more than 150 military bases worldwide including the Department of Defense (DOD), State/Local Governments, Law Enforcement, and DHS.

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, Telecommunications Service Priority (TSP) and Critical Life Circuits are re-established.

All departments within Sprint, including the Sprint Relay program, follow these well-established

programs to ensure top-notch support for our customers.

Call Center Evacuation Events

Sprint has plans in place to deal with call center events such as fires. Each call center has a designated Safety Marshal and clear chain of command. As a first step, the situation is identified and the threat is assessed. If evacuation is necessary, the local authorities (e.g., 911) are immediately alerted along with the Call Center Service Assurance Center (CCSA) and the Traffic Management Control Center (TMCC). Call center management and Sprint Corporate Security are also alerted.

Traffic will be re-routed immediately to other call centers not impacted and work with those call centers to increase staffing, as needed. Once the issue is resolved, all CAs return to the center and the incident is fully documented.

Proactive Measures

Over the past 26 years, Sprint Relay users have rarely experienced any type of inability to place calls. Sprint's backup capabilities are unmatched in the TRS industry with 6 call centers (including the location at Sprint headquarters in Overland Park, KS) capable of handling TRS calls and multiple switch locations supporting the TRS platform.

Sprint's switches and call centers are staffed with spare positions and platform components to deal with all types of technical issues. The TRS platform offers automated alarming to notify personnel of issues.

Redundancy is built into our infrastructure to deliver outstanding performance for all of our TRS customers. These attributes will ensure functional equivalency for state relay service callers during disasters. The benefits of our leading-edge platform and flexible configuration include:

- ◆ Switches, call controllers, and databases are housed in geographically-dispersed locations that conform to "critical" grade physical security requirements. Sprint's switches and peripherals are located at switch sites in telecom bunkers.
- ◆ Redundant connections between switch sites, 800 network, and call centers
- ◆ If the problem is within Sprint's TRS center, maintenance can usually be performed from Sprint's centralized center, the CCSA.
- ◆ Sprint retains hardware spares at each center to allow for the most common type of repair required without the ordering of additional equipment (except for complete loss of a building).
- ◆ Centralized routing and reporting systems enables Sprint to treat the entire call center complex as a single virtual call center rather than standalone call centers
- ◆ All TRS positions are capable of handling calls for any State customer.
- ◆ All training seats are configured and immediately ready to take production traffic.
- ◆ Sprint has pre-established plans for all types of outages.
- ◆ Sprint automatic routes calls away from a center undergoing a service recovery event. For example, if a fire drill forces CAs to evacuate, the call router automatically sends calls to other relay centers.

Sprint has historically been the best at dealing with natural and man-made disasters that have caused outages. With each incident Sprint has managed to be prepared, respond and ensure ongoing service delivery. Sprint's processes as detailed here take into consideration every aspect

of an outage and/or natural disaster that includes a higher call volume likelihood due to the natural disaster. Some examples of disasters that affected Sprint facilities in the past are:

- Wind burst that blew off a portion of the roof of our Syracuse, NY call center
- Farmer cuts Fiber Optic cable servicing Lubbock, TX when burying a cow
- Hurricanes that impacted call centers in Miami and Jacksonville
- Tornado warnings impacting upper Midwest call centers. One evening, 37 Tornadoes were within range of our call center. Our center had to be evacuated. Sprint continued to provide service without interruption.

These list just a few of the natural and man-made disasters we faced, and with each one we were able to maintain our service levels with the processes we have in place. Our employees are the best at ensuring we maintain these service levels.

TRS Data Center Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

TRS Winter Preparedness Plan

Sprint has processes in place if a known weather event is encountered. These known contingency plans are designed to mitigate our customers' degradation of service and are maintained by the TMCC. Each service has back-up locations to ensure redundancy.

Known Event

- Four days prior - TMCC and Ron Peay (Operations Manager) will make a determination as to the severity and number of centers which might be affected.
- Three days prior - TMCC and Ron will verify previous day's potential impact and begin calling to non-effected centers to post overtime (OT). All centers will be advised to put a list together of employees who will work overnight and weekends. TMCC will notify John Moore (Manager - Customer Relations) and CCSA of our "game plan"
- Two days prior - TMCC will meet with Ron to update impacts and plan. All non-impacted centers will be called to update OT requirements and overnight requests.
- One day prior - TMCC will meet with Ron to update impacts and plan.
- Day of Event - TMCC will invoke emergency call routing as required. TMCC will be the point of contact for all notifications. Affected centers will update TMCC every four hours. TMCC will update Ron who will update Business Continuity Manager through executive level. Management is also responsible for notifying the Business Continuity Team.

Unknown Event

The Activation Criteria Plan will be used when either weather or other events cause potential significant (excess of 25 percent) increase in call volumes or one or more TRS call centers is off-line for more than two hours, using the following procedure:

- Automated alarming and/or TRS call center notifies TMCC
- TMCC contact CCSA
- CCSA sends notification to a pre-established distribution list

♦ CCSA establishes a conference call to work on resolving the issue with impacted groups

After fix agencies are unable to re-establish center operations – the Business Continuity Plan (BCP) is invoked and Management will notify the Business Continuity Management Team.

CapTel-*Specific Disaster Recovery Information*
CapTel, Inc. (CTI) and Sprint have worked together to develop a complete plan for dealing with all types of natural and man-made problems including but not limited to terrorism and phone line cut accidents. Performance at the CapTel call center is monitored continuously by CTI technicians 24/7.   Sprint will be notified by the CapTel Service Center Manager immediately upon determination of any type of natural or man-made problem that causes disruption either:

CapTel has established contingency plans in the event of a complete and extended loss of a CapTel call center. The plan includes a number of steps based on the estimated duration of the outage and takes advantage of the relative short travel time between the Wisconsin CapTel call centers. The first phase is organized to initiate the recovery process within hours and can be fully completed within days. This involves expanding service into available space in the operating call center locations and other CapTel facilities

♦ All training seats are configured and immediately ready to take production traffic.
♦ Additional production seats are established in unused and available space within the existing facilities.
♦ Regular shuttle services are established to transport qualified CapTel CAs and staff from the outage area to and from the expanded facilities.

The recovery plan includes a second phase for extended outages. To support this longer duration, CapTel has identified additional disaster recovery locations with appropriate facilities in the metropolitan area of each of the call centers.

The addition of the Orlando, FL and Sprint's TRS/CapTel call centers has alleviated many of the inclement weather challenges presented by the winter season. However, if inclement weather affects the CapTel staffs' ability to arrive to work, in most cases, with minor adjustments, CTI can still meet the call volume demand with enough staff coverage in a wide range of snow fall amounts. However, if necessary, Sprint and CTI will institute proven tactics, as necessary, to motivate, encourage, and enable CapTel CAs to be present or to pick up additional hours so CTI can meet its service level requirements during inclement weather

Customer Notification Procedures
Sprint will inform the state contract manager of any major interruptions to the TRS/CapTel service that exceeds five minutes in duration or isolates part of the state. To provide the contract manager with the most complete and timely information on problems affecting relay service, Sprint's trouble reporting procedure for TRS and CapTel includes multiple levels of response:

♦ Immediate notification of events that last 5 minutes or isolate part of the State
♦ Notification when the issue is resolved and/or status updates (every 24 hours)
♦ Comprehensive final report within 3 days

Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals the problem has been corrected and full relay service has been restored. The state contract manger (or designate) will receive this notification from your Sprint Customer Relationship Manager (CRM).   He/she and/or a member of the management team will provide the final report and follow up on steps

Sprint will take to ensure we can minimize the likelihood of this event occurring again.

Final reports include a comprehensive look at the event, including the following:

- ◆ How the problem occurred
- ◆ When the problem occurred
- ◆ The number of impacted customers (if known)
- ◆ What was required to correct the problem
- ◆ Time and date the relay service resumed full operation
- ◆ Avoidance plan for future (if applicable)

Temporary Delay Message

If approved by the state, Sprint can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack or natural disaster that significantly increased the number of calls to the relay center, Sprint can add a temporary recording that alerts voice and TTY users, such as: "THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER."

Telecommunications Service Priority (TSP)

All of Sprint's circuits supporting TRS and CapTel services have qualified for priority restoration under the TSP program. Sprint's participation in the TSP Program strengthens our robust reliability. If a national or regional emergency causes service to be disrupted and the call center cannot receive or place calls, Sprint's participation in the TSP program means Local Exchange Carriers (LECs) would be required to restore service as rapidly as possible consistent with the priority status assigned. Sprint's reliable network and TSP participation ensures Sprint's disaster recovery ability is unmatched by any Relay provider in the world.

Appendix E: Oklahoma TRS Information in Telephone Directories

Central Oklahoma Telephone Co. & COTC Connections Customers

Main Office • 223 Broadway, Davenport, OK

DIRECTORY ASSISTANCE

Local Directory Service..Dial 411 or dial 1 + 411
Long Distance Directory Assistance ....Dial 1 + Area Code of desired location + 555+1212

REPAIR SERVICE & BUSINESS OFFICE

Agra & Tryon 918-375-2241
Boley & Castle...918-667-3411
Davenport, Kendrick & Sparks..918-377-2241
    Toll Free...800-252-8854
Stroud...918-987-1414
via e-mail...info@cotc.net

For information about our company and services, visit www.cotc.net
Stroud customers can visit www.connectstroud.com

Payments may be made in person at our business office at 223 Broadway in Davenport or at the Central Cellular Store at 905 Manvel in Chandler. Payments may be mailed to Central Oklahoma Telephone Company, 223 Broadway, Box 789, Davenport, Oklahoma 74026. For your protection, please include your telephone number on your check or money order. A deposit slot is located near the door of the Davenport business office to receive payment when the office is closed.

Office hours in Davenport are:
Monday through Friday 8:00 am to 5:00 pm
After hours, leave a message. In case of service trouble, leave a message stating your name and telephone number and a serviceman will be contacted.

Office hours in Chandler are:
Monday through Friday 8:30 am- Noon; 1:00 pm - 5:00 pm

EXTENDED AREA SERVICE

This is service to the next exchange and is not a toll call.
You must dial 918 + the 7 digit phone number. (Do not dial 1.)

Agra .... Kendrick
Boley..Castle
Davenport .... Kendrick
Davenport ....Sparks
Tryon ....Agra

RELAY OKLAHOMA TDD RELAY SERVICE

For communication between TDD users and hearing persons. Answered 24 hours a day, 7 days a week. If you have a TDD and need to talk to someone who does not have one, OR if you do not have a TDD and need to talk to someone who does, please call these numbers for assistance in relaying a message:

TTY/TDD/Voice/Computer 711
Sprint's Customer Service Center .... 800-676-3777 (TTY/TDD/Voice)

COTC BUSINESS OFFICE

Service representatives in our business office can help with orders for service and equipment, billing matters, rates and inquiries or complaints.

ALTERNATIVE OPERATOR SERVICES

If operator assisted calls are made from outside the Central Oklahoma Telephone Company area, or if a privately owned paystation is used, these may or may not be telephone company operator assisted calls. Customers should register questions or complaints with the Alternate Operator Services (AOS) firm, the hotel, hospital, payphone owner or owner of the business where the phone is located, and with the PUC or the Federal Communications Commission.

CONTENTS

> This directory contains important information, beginning on page 3, about your rights and responsibilities as a telephone customer.

TDD/TTY RELAY SERVICE FOR THE DEAF

To communicate by telephone between hearing persons and TDD/TTY users, you may call these numbers. For 24 hour service call:

Voice ....711 or 1-800-522-8506

TDD/TTY...711 or 1-800-722-0353

Customer Service Center (TDD/TTY).........................1-800-676-3777

Customer Service Center (Voice) 1-800-676-3777

SPECIAL SERVICES

Relay Information for the Hearing & Speech Impaired

Missouri Relay Service

Relay Missouri Service & how it works
Missourians with hearing / speech impairments using a telecommunications device for the deaf (TDD) will be able to communicate with people using standard telephone equipment. Missourians without hearing / speech impairments using standard telephone equipment can call a TDD user. Relay Missouri will utilize specially trained agents located at the Relay Missouri Center to relay conversations between parties.

Relay Missouri Service Center
This center will operate and handle calls 24 hours a day, 7 days a week. The center relay assistants can instruct you in making long distance calls.

How to use Relay Missouri, Missouri Message-Relay Service
If you have a TTY and need to talk to someone who does not have one, OR if you do not have a TTY and need to talk to someone who does, please call these numbers for assistance in relaying a message:

Relay-Missouri	800-RELAY-MO
TTY Users Only	800-735-2966
Voice Callers Only	800-735-2466
Dial from anywhere to connect with a relay service	711

Upon reaching the center, provide the relay agent with the area code and telephone number you wish to call. If making a long distance call, advise the relay agent of the type of call you are making (direct dial, credit card, collect, person to person, etc.) and how you wish to pay (if using calling card, credit card or third number billing, you will need to provide your name and the necessary billing numbers).

In the past, when you needed to talk to an operator, you dialed 0 (zero) for assistance. Now, you may have to dial 00 (zero, zero) to reach the appropriate operator.

Oklahoma Relay Service

TDD Message Relay Service for the Deaf
To communicate by telephone between hearing persons and TDD users you may call these numbers.

For 24-hour service call	
Oklahoma City Local	232-0591
Within 405 Area Code	1-800-522-8506
Tulsa Local	663-4071
Within 918 / 539 Area Code	1-800-722-0353
Or Call	711

BURIED CABLE

To Locate Buried Cable in Kansas Call • 1-800-DIG SAFE (344-7233)

Kansas House Bill No. 2041 requires anyone who engages in any type of excavation to provide advance notice of at least two full working days, excluding weekends and holidays, to Kansas One-Call.

Kansas One-Call was developed to provide excavators and the general public with the ability to inform multiple owners of underground facilities of intended excavation with just one phone call.

Craw-Kan will locate and mark our underground facility at no charge to the excavator. Location markings are only estimates and after the markings have been made, excavators are required to maintain a minimum of two feet between a marked and unexposed utility underground facility and the cutting edge or point of any power-operated excavating or earth-moving equipment.

If damage of any kind is discovered or any suspicion of damage exists, it is the excavator's responsibility to immediately notify the facility owner directly.

To Locate Buried Cable in Missouri Call • 1-800-344-7483

To Locate Buried Cable in Oklahoma Call • 1-800-522-6543 Or Call 811

KanOkla Networks

Important Information Regarding Kansas Relay Center

Kansas Relay Center
Powered by Hamilton Relay

What is the Kansas Relay Center (KRC)?
KRC is a public service which guarantees all citizens access to prompt, professional and accurate communication through the telephone. Consumers of these specialized services, specifically individuals who are deaf, deaf-blind, hard of hearing or have difficulty speaking, can communicate on the telephone via TTY/TDD, Voice Carry Over (VCO), Hearing Carry Over (HCO), Speech-to-Speech (STS), Spanish-to-Spanish and Captioned Telephone in order to connect with family, friends or businesses with ease.

How does the Kansas Relay Center (KRC) work?
Simply dial 711 or the appropriate toll-free number provided to connect with KRC. A qualified Communication Assistant (CA) will ask for the area code and number of the person you wish to call and begin the relay call. Generally, the CA will voice the typed message from the text telephone (TDD/TTY) user to you. The CA relays your voiced message by typing it to the TDD/TTY user.

Specialized Services:
KRC offers specialized services for individuals who have difficulty speaking and for Spanish speaking residents. Specially trained CAs are on hand to assist in these types of calls by dialing the associated number provided. Since KRC offers a variety of services please refer to the website listed or call KRC Customer Care for more detailed instruction on how a particular call is processed.

Captioned Telephone (CTS):
CTS is also available and ideal for individuals with hearing loss who are able to speak for themselves. A captioned telephone works like any other telephone with an essential difference: it allows users to listen to their phone conversations while reading word-for-word captions of what's said to them.

Access to Services:
Both 711 and the 800 numbers are toll-free calls and provide access to the same relay services. If you are experiencing trouble dialing 711 to reach KRC, please call KRC Customer Care.

All services are available 24 hours a day, seven days a week. Consumers may place relay calls to English and Spanish speaking persons within Kansas, across the United States and even internationally. By law, each conversation is handled with strict confidentiality. There is no charge to access KRC, although standard long distance charges apply.

To place a call using Kansas Relay Center, dial 711 or one of the toll-free numbers below:

TTY/Voice: 1-800-766-3777
Spanish: 1-866-305-1343
Speech-to-Speech: 1-866-305-1344

Customer Care Information:
1-866-735-2957 V/TTY
P.O. Box 285
Aurora, NE 68818

Email: KSRelay@HamiltonRelay.com
Web: www.KansasRelay.com

Captioned Telephone

Customer Service: 1-888-269-7477
To call a Captioned Telephone user, dial:
711 or 1-877-243-2823

Special points of interest:

Equipment Distribution Program
The Kansas Telecommunications Access Program offers amplified phones, TTYs, Voice Carry Over (VCO) phones, Captioned Telephones and other equipment to eligible individuals in Kansas who are deaf, deaf-blind, or who have difficulty with speech, mobility and cognitive capabilities. For more information you can visit www.atk.ku.edu/ks-tap or call 1-800-526-3648.

Emergency Calls
Please note that 711 is only to be used to reach Kansas Relay Center. In an EMERGENCY you should continue to use 911. For emergencies, call 911 or your local emergency service TTY number directly, without using relay. The Americans with Disabilities Act (ADA) requires that 911 centers have a TTY and be prepared to handle emergency calls placed in this manner. Kansas Relay Center will make every effort to assist you in an emergency. However, it is important to understand that relay centers are **not** 911 centers and do not assume responsibility for emergency calls.

As a telephone customer, you have access to the Oklahoma Relay System. This service provides a communications link between hearing or speech impaired residents who use a typewriter-like text telephone (TDD), or personal computer, and those who use standard voice telephones.

How does it work?
People who are deaf or hard of hearing and those with speech impairments can dial 711 or 1-800-522-8506 (TDD only) or 711 or 1-800-722-0353 (Voice only) and be connected to a Communications Assistant. The assistant then relays the conversation from a computer screen and verbally "relays" the message to the hearing party. The conversation continues until both parties terminate the call. All relayed calls are kept strictly confidential, and content of the call is deleted when the call terminates.

The Relay System works both ways
Anyone may call hearing or speech impaired individuals by simply dialing the same number.

When is the Relay System available and how much does it cost?
The Relay System is available 24 hours a day, seven days a week, including holidays. Local calls are free and long distance calls are billed if dialed directly. There is no limit on the number or length of calls.

TDD/TTY Numbers

711 or 1-800-722-0353 ....(TDD only)
711 or 1-800-522-8506 ....(Voice only)
1-800-325-0778 .... Social Security Information

Questions?
If you would like a referral, or more information about the Relay System, please dial 711 or 1-800-522-8506 (TDD only) or 711 or 1-800-722-0353 (Voice only).

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Pottawatomie Telephone

Procedure For Petitioning The Commission To Examine The Reasonableness Of Proposed Local Exchange Rate Change

Under Oklahoma law enacted during 1986 (17 O.S.#137), this telephone company can raise your local exchange rate up to $2.00 per month every year without the review and approval of the Oklahoma Corporation Commission.

At least sixty (60) days before the effective date of such proposed rate change each subscriber will be notified by the telephone company. Such an increase can be suspended if fifteen percent (15%) of the subscribers petition the Oklahoma Corporation Commission to examine and determine the reasonableness of the proposed local exchange rates.

Every petition shall contain:
(1) The name, address and telephone number of the telephone subscriber.
(2) The signature of the telephone subscriber in whose name the telephone service is listed.
(3) The reason the subscriber opposed the proposed increase. (Optional)

Only the subscriber in whose name the telephone service is listed shall be counted as a petitioner.
Petitions should be mailed to:
   Director, Public Utility Division, Oklahoma Corporation Commission
   Jim Thorpe Building, P.O. Box 52000, Oklahoma City, OK 73152-2000

State Government Offices

Capitol - General Information Operator	1-405-521-2011
Governor's Office	1-405-521-2342
State Senate	1-405-524-0126
House of Representatives	1-405-521-2711
Insurance Commission	1-405-521-2828
Oklahoma Corporation Commission	
Public Utilities Complaints	1-800-522-8154
Attorney General	
Consumer Protection	1-405-521-2029
State Health Department	
Vital Records	1-405-271-4040
Tourism & Recreation Information	1-800-652-6552
Lodge & Cabin Reservations	1-800-654-8240
HIV/AIDS Hotline	1-800-523-2347

Message Relay Service

Under the Telecommunications for the Hearing Impaired Program, the Department of Human Services provides for a statewide message relay service. Although the distribution portion of this program provides TDDs to eligible hearing or speech impaired individuals, there is still a limitation in that both parties in the telephone conversation must have a TDD. The message relay service was designated to alleviate this limitation. A special telephone operator equipped with a TDD reads the message of the TDD user and relays it verbally to the third party. Conversely, the operator listens to the spoken reply from the third party and types the reply to the TDD user. This allows TDD users to contact relatives, doctors, friends, emergency services, etc. without depending on a neighbor, family member or co-worker. This service is available 24 hours a day, seven days a week. For those living outside the local dialing area of the message relay service, an 800 (toll free) number is provided at no cost to the customer. The service can also be used by hearing people who wish to contact the TDD user. The message relay phone numbers are:

405 Area Code	1-800-522-8506
918 Area Code	1-800-722-0353

For more detailed information of services provided for the hearing impaired

1-800-833-8973
Call
Or 1-866-309-1717 School for the Deaf

580-622-4900 Telecom Dept.

Recording Or Monitoring Telephone Calls

Anyone who records or monitors a telephone conversation is required to make this known to all parties in the conversation. The party doing the monitoring or recording must ask the other persons' permission to record or monitor the conversation.

When using the public utility telephone network:

A. All parties in the conversation must consent to the conversation being recorded or monitored; and

B. The monitoring or recording must be signaled by either:

 1. a "beep tone" audible to all parties and repeated at regular intervals during the conversation; or

 2. clearly and permanently marking the telephones being used that the conversation may be recorded without notice.

Telecommunications Device For The Deaf (TDD/TTY) Dial: 711

This service relays calls between a person using a TTY or other assistive devices and any other telephone user within the state. The service also allows a person without a TTY to call a TTY user. Specially trained personnel are available 24-hours-a-day, 7 days a week, to relay the call. There is no extra charge for this service.

Texas Customers - Dial 711 or:
If you have a TTY 1-800-RELAY-TX
....(1-800-735-2989)
If you do not have a TTY 1-800-RELAY-VV
....(1-800-735-2988)

Oklahoma Customers - Dial 711 or:
If you have a TTY 1-800-722-0353
If you do not have a TTY 1-800-522-8506

Oklahoma and Texas may also dial 711, both hearing and deaf, hard-of-hearing, deaf-blind or speech-impaired users can initiate a Relay Call.

The Specialized Telecommunications Assistance Program (STAP) provides financial assistance to help Texas residents with disabilities purchase basic specialized equipment or services needed to access the telephone network. For more information, contact the Texas Commission for the Deaf and Hard of Hearing at 512-407-3250 (Voice) or 512-407-3251 (TTY) or www.tcdhh.state.tx.us. This program is open to all individuals who are residents of Texas and have a disability.

Telephone Receiver Off The Hook

At times you may not wish to receive incoming calls. Please do not leave the receiver off the hook as this unnecessarily congests the switching equipment. In some cases, we may have to disconnect your line to avoid overloading the equipment. When this occurs, your telephone will not work until it is reconnected in our switching office.

We suggest if your telephone is equipped with a jack, simply unplug it.

Attachments To Telephone Equipment

Attachments connected to the telephone company's lines must be in compliance with company tariffs and Federal Communications Commission regulations.

Telephone Safety

The telephone is one of the safest appliances in your home or office. There are, however, a few situations where a telephone user needs to be cautious.

Use Of The Telephone Near Water

The telephone should not be used while you are in the bathtub, shower or pool. Immersion of the telephone or handset in water could cause electrical shock.

Use Of The Telephone During An Electrical Storm

You should avoid using a telephone during an electrical storm in your immediate area; calls of an urgent nature should be brief. There is a remote risk of a dangerous electrical shock from lightning when using the telephone during a nearby electrical storm.

Use Of The Telephone To Report A Gas Leak

If you think you have found a gas leak, you should not use a telephone in the vicinity of the leak until the leak is repaired. The telephone contains electrical contacts that could generate a tiny spark when you lift the handset and dial. While unlikely, it may be possible for this spark to trigger an explosion if the gas concentration is high enough.

Use Of A Vandalized Coin Telephone

Do not use a coin telephone that has been vandalized. The handset could have exposed wires that could cause an electrical shock. If possible, contact telephone repair service to report the damaged instrument.

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Dobson Telephone Company, Inc.

Emergency Calls

	Ambulance	Fire	Police	Non-Emergency
Camargo	911	911	328-5558	
Cheyenne	911	911	911	497-2417
Erick	911	911	911	526-3385
Leedey	911	911	328-5558	
Reydon	911	911	911	497-2417
Roger Mills	911	911	911	497-2417
Sweetwater	911	911	911	928-2121
Taloga	911	911	328-5558	
Vici	911	911	328-5558	

State Highway Patrol **580-323-2424**

State Government Offices

Governor's Office 1-405-521-2342
State Senate 1-405-524-0126
House of Representatives 1-405-521-2711
Insurance Commissioner 1-800-522-0071
Attorney General..1-405-521-2029
Oklahoma Corporation Commission 1-800-522-8154
State Health Department...1-405-271-5600
Tourism and Recreation..1-800-652-6552
Before You Dig – Call OKIE......................................811 or 1-800-522-6543
Federal Bureau of Investigation, Oklahoma City...................1-405-290-7770
U.S. Secret Service, Oklahoma City.....................................1-405-272-0630
Oklahoma Poison Control Center 1-800-222-1222
Oklahoma Bureau of Narcotics, and Dangerous Drug Control..1-800-522-8031
Missing Persons Nationwide, Inc...1-800-843-5678
Child Abuse Hot Line 1-800-522-3511

Hazardous Materials

Dewey County Local Emergency Planning Committee (LEPC)...........328-5558

TDD Message Relay for the Deaf

To communicate by telephone between hearing persons and TDD users, you may call these numbers:

For 24-hour service within Oklahoma, call ....711 or 1-800-722-0353
Voice..1-800-522-8506
Customer Service..1-800-676-3777
Corporation Commission Consumer Services Division (TDD)...1-405-521-3513

Community Services... 211

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Dobson Telephone Company, Inc.

Emergency Calls

	Emergency	Non-Emergency
Oklahoma, Cleveland, Lincoln and Pottawatomie Counties	911	
McLoud Fire Department	911	
McLoud Police Department	911	964-3325

County Sheriffs

	Emergency	Non-Emergency
Cleveland County/Norman	911	321-8600
Lincoln County/Chandler	911	405-258-1191
Oklahoma County/Oklahoma City	911	713-1000
Pottawatomie County/Shawnee	911	598-9305

Safety Center-Jail 273-0043

State Highway Patrol **425-2043**

State Government Offices

Governor's Office 1-405-521-2342
State Senate 1-405-524-0126
House of Representatives 1-405-524-0126
Insurance Commissioner 1-405-521-2711
Attorney General 1-405-521-2991
Oklahoma Corporation Commission 1-405-521-2029
Oklahoma Corporation Commission 1-800-522-8154
State Health Department 1-405-271-5600
Tourism and Recreation 1-800-652-6552
Before You Dig – Call OKIE .... 811 or 1-800-522-6543
Federal Bureau of Investigation, Oklahoma City 1-405-290-7770
U.S. Secret Service, Oklahoma City 1-405-272-0630
Oklahoma Poison Control Center 1-405-271-5454
Oklahoma Bureau of Narcotics, and Dangerous Drug Control 1-405-521-2885
Missing Persons Nationwide, Inc 1-800-843-5678
Child Abuse Hot Line 1-800-522-3511

TDD Message Relay for the Deaf

To communicate by telephone between hearing persons and TDD users, you may call these numbers:

For 24-hour service within Oklahoma, call 711
Voice 1-800-522-8506
Customer Service 1-800-676-3777
Corporation Commission Consumer Services Division (TDD) 1-405-521-3513

Community Services 211

Dobso –
McLoud Directory

Hearing and Speech Impaired

Chickasaw
Telephone Company

Welcome To Relay Oklahoma
For The Hearing & Speech Impaired

If you live or work in Oklahoma, you can take advantage of the state's new relay communications service, offered by Sprint. Known as Relay Oklahoma, the service will be provided 24 hours every day, with no restrictions on the length or number of calls placed.

To Access Relay Oklahoma,
Callers Can Dial Either Toll-Free Number:

(The center can be reached from anywhere in the state using either number.)
1 800 722 0353 (TTY/Voice)
1 800 522 8506 (TTY/Voice) or dial 711

What You Need To Know

Relay Oklahoma is Strictly Confidential

All calls will be kept private, and no records or conversations will be maintained. Relay customers agents will not share information regarding the contents of any relay call, unless they are required to do so by state or federal law.

What To Do In An Emergency

In case of emergency, please call the TTY-equipped 9-1-1 center or emergency services center in your Oklahoma community. You will need to verify the phone number for emergency TTY calls in your area. Remember: Calls placed directly and immediately to the local TTY emergency number can save valuable time in urgent situations.

Your Communications Options

If you ask, Relay Oklahoma offers you different ways for your calls to be handled. Here are your options:

Ask the relay agent to type and speak exactly what is said.

(Result: The agent will reproduce the exact conversation.)

Ask the agent not to announce your call.

(Result: The agent will not initially ask the calling party if he or she has ever received a relay call, and will not explain the service.)

Ask the agent to use voice or hearing carry-over.

(Result: This provides direct communication when callers who are deaf, hard-of-hearing, or speech disabled use their own voice or hearing.)

Using Directory Assistance

Please refer to your local directory for the directory assistance number.

Relay Oklahoma Billing Procedures

- There are no fees or charges for using the relay service within your local calling area.

- Long distance calls made through Relay Oklahoma will be billed at a reduced rate. This discount is given to compensate for the additional time needed to place a call through the relay service. Rates are available.

- Direct dial, collect calls, third-party calls, credit card and calling cards are welcome through the relay service. Simply identify your billing method.

State-To-State/International Calling

Relay Oklahoma lets you place calls to and receive calls from anywhere in the continental United States. In addition, Relay Oklahoma enables you to make international calls to anywhere in the world.

Computer Call Processing

You may access Relay Oklahoma with your computer by dialing either 1-800-722-0353 or 1-800-522-8506. Set your communications software to the following protocol at speeds ranging from 300 to 2400:

a. 8 bit b. No Parity c. 1 Stop Bit d. Full Duplex

When calling at a rate of 300 or below, follow the above settings using Half Duplex. (Note: It may be helpful to set your "time out" to 100 seconds.)

If you need more information on Relay Oklahoma, please feel free to call our Customer Service Center:

1-800-676-3777 (TTY/Voice)
Relay Oklahoma c/o Sprint
P.O. Box 7910
Shawnee Mission, KS 66207

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DIRECT DISTANCE DIALING

With Direct Distance Dialing (DDD), you can dial your own station-to-station long distance calls. To make this possible the nation has been divided into geographic areas with each area having its own three-figure "Area Code." If you do not know the code for the area you wish to call, **CALL THE OPERATOR BY DIALING 0** and she will give you the correct Area Code.

FROM ALL TELEPHONES (EXCEPT PAY TELEPHONES)

DIAL by first getting the correct local number and the area code of the city you wish to call. Follow the example as shown:

DIAL	AREA CODE	TELEPHONE NUMBER
1	580	679-3345

TYPES OF LONG DISTANCE CALLS

0-plus-calls (Dial 0 +)

0 plus dialing means that you may dial direct person to person, collect or calling card calls. To do this, you must dial 0, plus area code plus the number. At this point, you will hear a tone and you can enter your calling card number at this time for station to station calls or wait for the operator to come on the line to advise her if the call is person to person or collect.

LOCAL SERVICE OPTIONS

CALLING NUMBER IDENTIFICATION .... Delivers calling party telephone number and name.

CALLING NUMBER DELIVERY BLOCKING .... Allows you to block the delivery of your telephone number to an identification device.

CALL WAITING .... You can accept incoming calls while talking on the telephone.

DISTINCTIVE RINGING .... If call is from someone on your VIP list, you will receive a special ring when they call.

CALL WAITING .... With call waiting, a special call waiting tone will sound with incoming call.

CALL FORWARDING .... You can be transfer calls to another number.

CALL FORWARDING REMOTE .... Activate or cancel call forwarding without being at home

SELECTIVE CALL FORWARDING .... You can transfer calls on a VIP list to another number.

SELECTIVE CALL REJECTION .... Any calling number on your VIP list will be routed to an announcement and rejected.

THREE WAY CALLING .... You can turn a regular conversation into a conference call by adding a third party.

AUTOMATIC RECALL .... You can recall the last number called automatically.

AUTOMATIC CALL BACK .... Automatically redial the last number you called.

SPEED CALLING .... Store numbers and place calls by dialing one or two digits.

VOICE MAIL .... Takes messages while you are on the phone and answers your phone when you are away.

Telecommunication Relay Services Dial 711

If you have a TDD/TTY and need to talk to someone who does not have one, or if you do not have a TDD/TTY and need to talk to someone who does, please call these numbers for assistance in relaying a message:

TDD/TTY .... 711 or 1-899-722-0353

Voice .... 711 or 1-800-522-8506

Customer Service Center (Voice and TDD/TTY) 1-800-733-4327

When using Relay Oklahoma from a coin telephone, local calls will be free of charge; you can change toll or long distance calls to your calling card and they will cost no more than the same call using coins.

STATEMENT OF 900 BILLING ERROR RIGHTS

Customers calling 900 telephone numbers should be aware that telephone companies charge you for these calls. You can obtain blocking of access to services offered on the 900 service access code where it is technically feasible, at no charge within 60 days after you subscribe to the new number and it becomes effective. Other requests for blocking and requests for unblocking will be subject to a reasonable one time fee.

Under the FCC Rules, your telephone service cannot be disconnected or interrupted as a result of your failure to pay pay-per-call or similar service charges. However, it is important that you notify Southwest Oklahoma Telephone Company in writing, of any billing error, so that we or our long distance company can respond. It is important that we receive the proper Information to process your billing error notice. Please contact Southwest Oklahoma Telephone Company at (580) 679-3345 for the correct billing error notice procedures.

You have the right to withhold payment, and any action to collect any disputed amount for billed for pay-per-call services not offered in compliance with Federal laws and regulations. Any undisputed amounts are payable upon receipt, and failure to pay the amount determined not to have been the result of a billing error may subject you to a collection action. Your access to 900 services may be involuntarily blocked for failure to play any legitimate pay-per-call charges.

Should you have any questions pertaining to foregoing statement please call the Southwest Oklahoma Telephone Company office at (580) 679-3345.

YOU MAY WANT TO KEEP THIS STATEMENT FOR FUTURE REFERENCE

REPAIR SERVICE

Southwest Oklahoma Telephone Company is responsible for maintenance and repair of telephone into your home. If you need repairs, it is important to determine if the problem is in your telephone our inside wiring, or our telephone lines.

To make a customer requested service call and determine the problem is caused by your telephone inside wiring and not by our facilities, you will be billed for the cost of the service call. This is even if someone else calls to report the trouble. To protect you from unnecessary service call charges, an available Maintenance Contract covers the cost of our trip to your home or business to inside wiring and jacks. The contract also covers the cost of the trip even if we determine that problems are in your telephone set and not our facilities.

If you do not have a Maintenance Contract, **Unplug every phone** and test each one, one-at-a-time by plugging into each wall jack, checking for a dial tone. The telephone set that causes the line to go out is the broke one. Leave the broken telephone unplugged and contact the company you purchased or leased it from for repair.

If you have just one phone, unplug it and borrow someone else's. If the borrowed phone works, then problem is in your telephone set.

If all phones appear to be In good working order, take one to the **NETWORK INTERFACE Box** on the outside of your home and plug it in. The Network Interface, usually near your electric meter, houses a place to connect your telephone wires to the outside telephone lines. It provides a test jack to help locate trouble in the telephone line. If you are having the same trouble at the Network Interface with the good phone, then the trouble is in Southwest Oklahoma Telephone lines and you call us for repairs.

IT IS THE RESPONSIBILITY OF THE SUBSCRIBER TO REPORT TROUBLE ON HIS TELEPHONE

Southwest Oklahoma Telephone

Kansas/Oklahoma Relay Center

Kansas Relay Center (Cont'd)

Captioned Telephone

Customer Service: 1-888-269-7477
To call a Captioned Telephone user, dial:
711 or 1-877-243-2823

Special Points of Interest:

Equipment Distribution Program

The Kansas Telecommunication Access Program offers amplified phones, TTY's, Voice Carry Over (VCO) phones, Captioned Telephones and other equipment to eligible individuals in Kansas who are deaf, deaf-blind, or who have difficulty with speech, mobility and cognitive capabilities. For more information you can visit www.atk.ku.edu/ks-tap or call 1-800-526-3648.

Emergency Calls

Please note that 7-1-1 is only to be used to reach Kansas Relay Center. In an EMERGENCY you should continue to use 9-1-1.
For emergencies, call 9-1-1 or your local emergency service TTY number directly, without using relay. The Americans with Disabilities Act (ADA) requires that 911 centers have a TTY and be prepared to handle emergency calls placed in this manner. Kansas Relay Center will make every effort to assist you in an emergency. However, it is important to understand that relay centers are not 911 centers and do not assume responsibility for emergency calls.

RELAY OKLAHOMA FOR TDD/TTY

Relay Oklahoma provides a full telephone interpreting service between people who can hear and those who are deaf, hard-of-hearing, or speech-disabled. This service was mandated by the FCC on October 1, 2001 for all 50 states. It is available 24 hours a day, 365 days a year. Services are offered in English, Spanish, and English-Spanish or Spanish-English. There are no restrictions, and confidentiality for relay users is assured.

Relay Oklahoma is toll free* and is simply accessed by dialing 711.

*Long Distance charges may apply if the call would be long distance without Relay Oklahoma assistance.

Yes, the old access numbers are still available: 1-800-722-0353

TDD/TTY

Or 1-800-522-8506 Voice

Customer Service Center: 1-800-676-3777

Get more information at:
www.oklahomarelay.com

Persons with hearing or speaking difficulties may obtain information about specialized equipment and services by contacting:

Oklahoma Dept. of Rehabilitation Services
3535 NW 58th, Suite 500
Oklahoma City, OK 73112

Voice/TTY/TDD: 1-800-845-8476

Oklahoma Corporation Commission
Consumer Services Division

Telecommunication Devices for the Deaf
1-405-521-3513.

It is important that you do not use 711 in an emergency situation. For EMERGENCIES please continue to use 911. The Americans with Disabilities Act (ADA) requires that 911 Centers have a TTY and be prepared to handle calls placed in this manner.

TOTAH COMMUNICATIONS, INC.

Since 1954

1-888-580-2208

March 2016

Soaring to New Heights

TRS Information on Telephone Company Websites

OKLATEL
COMMUNICATIONS INC.

telephone   internet   long distance   customer   about   cc

Providing dependable telecommunication service.

Key Word...   Submit Que   *Quality Communication Se*

Home   Telephone   Additional Information

telephone

- Local Calling Areas
- Business Service
- Residential Service
- Directory Assistance
- Lifeline Service
- Additional Information
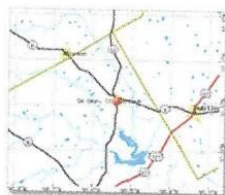
Check Your Coverage
See the services available in
your area.

Technical Support #:
1-800-869-1989
Technical Support Hrs.
Mon - Fri 8 a.m. - 5 p.m.
E-mail:
oklatel@oklatel.net

Need Help? Click Here

Additional Informa

Oklatel continually strives to provide its
customers quality phone service that offe
enhanced features and competitive high
broadband. To accomplish this, enhancin
Oklatel's network with fiber optics is a st
step goal aggressively being met, even t
extent of expanding some services into
neighboring areas.

Give us a call for all your telecommunica
needs -- 918-656-3233.

Additional Information

- Oklahoma Government Offices
- Oklahoma Corporation Commission

✳ Customer Telephone Access

To communicate by telephone between hearing persons and TDD users, you may call these 24-hour service numbers:

Oklahoma City (Local) 525-8628
405 Area Code 1-800-522-8506
Tulsa (Local) 252-3022
918 Area Code 1-800-722-0353

Persons with hearing or speaking difficulties may obtain information about specialized equipment and service by contacting:

Oklahoma Department of Rehabilitation Services
2401 NW 23rd St., Suite 65
Oklahoma City, OK 73107

Oklahoma Corporation Consumer Services Division Telecommunication Device for the Deaf -- 405-521-3513

Telephone Safety

Your telephone is one of the safest appliances in your office or home, but a telephone user should be cautious in a few situations.

- Putting the telephone in water could cause a shock. Do not use the telephone while you are in the swimming pool, bathtu shower.
- Oklatel Communications uses protective measures to limit electrical surges from entering your home, but absolute protec lightning is impossible.
- Avoid using the telephone during electrical storms in your immediate area. Make urgent calls brief!
- Report immediately if a gas leak is suspected, but use a telephone away from the area in question. A tiny spark could be the telephone's electrical contacts when dialing. It is possible the spark could ignite heavy concentrations of gas.

Glossary of Terms

\#   A   B   C   D   F   I   L   M   N   O   P   R   S

➕ 9-1-1 Fee

➕ 9-1-1 Equalization Fee

OKLATEL

Services   Customer   About   Legal

TRS Information

Customer Bill Page Message

OKLATEL PO Box 390600
COMMUNICATIONS INC. Dustin, OK 74839

ACCOUNT NO:
TELEPHONE:

Page: 3 of 6

* Bureau of Indian Affairs General Assistance
* Tribally-Administered Temporary Assistance for Needy Families (TTANF)
* Head Start Programs (under income qualifying eligibility provision only)
* National School Lunch Program's Free Lunch Program

Oklatel Communications, Inc. offers Enhanced Lifeline Service at a reduced rate. Lifeline customers can also subscribe to optional services at the same rate offered to other customers.

Lifeline service is a non-transferable benefit, and a Lifeline subscriber is prohibited from transferring the Lifeline service to another, including another person eligible for Lifeline service. Lifeline service is limited to one discount per household.

What Universal Services Are Available to All Customers?

Unversal Services available to all customers of Oklatel Communications Inc. include:
* Voice grade access to the public switched network or its functional equivalent
* Minutes of use for local service provided at no additional charge to the customer
* Access to emergency services (911)
* Toll limitation for qualifying low-income consumers.

How Do Telephone Customers and Applicants for Telephone Service Apply for Enhanced Lifeline and Expanded Link-Up Program?

Customers may request self-enrollment forms from the business office.

How to Apply for Telephone Service?

If you do not have telephone service and wish to obtain telephone service, and you are in the Oklatel Communications, Inc., serving areas or if you have telephone service and you move, and you qualify for the Expanded Link-Up Program and are in the Oklatel Communications, Inc., serving areas please call our business office number, 918-656-3233, and we will be glad to assist you.

OKLAHOMA RELAY SERVICE FOR TDD MESSAGE RELAY SERVICES

Oklahoma Relay provides a full telephone interpreting service between people who can hear and those who are deaf, hard-of-hearing, deaf-blind, or speech-disabled. Communications Assistants (CA's) have computers that enable them to hear the voice users as well as read the signals from the TTY users. These services are available 24 hours a day, 365 days a year. There are no restrictions, and confidentiality for relay users and CA's is assured by the Federal Communications Commission (FCC) Ruling.

OKLATEL
COMMUNICATIONS INC.

PO Box 390600
Dustin, OK 74839

ACCOUNT NO:
TELEPHONE:

Page: 4 of 6

Oklahoma Relay Numbers:
711........................TTY/ASCII/Voice/VCO
1-800-722-0353...TTY/HCO
1-800-522-5065...ASCII to Voice
1-800-522-8506...Voice to TTY/VCO/HCO/STS
1-800-676-3777...Customer Service (TTY/Voice/ASCII/VCO/HCO)

Persons with hearing or speaking difficulties may obtain information about specialized equipment and services by contacting:

Oklahoma Department of Rehabilitation Services
2401 NW 23rd St., Suite 65
Oklahoma City, OK 73107
TDD Equipped...1-800-833-8973

Oklahoma Corporation Commission
Consumer Services Division
Telecommunication Device for the Deaf...1-405-521-3513

TRS Information

Published Newsletter to Customers

Inside this edition

OFFICIAL NOTICE OF ANNUAL MEETING
OF MEMBERS OF
PIONEER TELEPHONE COOPERATIVE, INC.

The Annual Meeting of members of Pioneer Telephone Cooperative, Inc. Kingfisher, Oklahoma, will be held in the Kingfisher County Exhibit Building on the grounds of the Kingfisher County Free Fair Association, located just West of Thirteenth Street and South Bowman Avenue, situated on a tract of land described as the N/2 of the NE/4 of Section 21, Township 16 North, Range 7 W.I.M., Kingfisher County, Oklahoma, at 1:00 p.m., on Tuesday, May 2, 2017, to take action on the following matters:

I. Certified copies of the Minutes of the District Meetings of Members in which Trustees have been elected.

II. Report of Officers, Trustees and Committees.

III. All other business which may come before the meeting or any adjournment thereof.

PIONEER TELEPHONE COOPERATIVE, INC.

BY _____
It's President

ATTEST:

_____
It's Secretary

(SEAL)

If anyone needs an interpreter present because of hearing impairment, please notify us five (5) days in advance.

Equal Opportunity Employer M/F

Appendix F: Oklahoma Brochures, Ads, and Website Screenshot

What is CapTel® Service?

- The service is similar to captioned television.
- Dial the person you're calling directly.
- Captions are provided live for every phone call. They are displayed on your CapTel phone's built-in screen for you to read while listening to the caller with your residual hearing and responding back to them with your own voice.
- CapTel Service is provided free of charge* through Oklahoma Relay.

  * CapTel users are responsible for their own long distance charges

The CapTel phone is available through OK-TEDP. OK-TEDP information on the back.

How does CapTel work?

1. The CapTel user dials and speaks directly to the other party on the telephone.
2. The other party speaks directly to the CapTel user.
3. The CapTel operator transcribes the other party's spoken message into text (captions) using voice-recognition technology.
4. The CapTel user listens to the other party on the telephone while reading captions of the conversation on a display screen.

Need Equipment?

The Oklahoma Telecommunications Equipment Program (OK-TEDP) provides free telephone equipment to eligible Oklahomans who:

- are deaf, hard-of-hearing, or deaf-blind.
- have a speech disability.
- have a visual, mobility, or cognitive impairment that prevents them from using a standard telephone.

Who can apply?

Anyone can apply who meets the following four criteria:

- Oklahoma resident
- Personal telecommunication service
- Income eligibility
- Disability certified by a qualified professional

Even if you do not meet income eligibility, a shared cost option is available.

How do I apply?

To receive an application, contact OK-TEDP:

- Service to the Deaf and Hard of Hearing Oklahoma School for the Deaf
  1100 East Oklahoma Street
  Sulphur, OK 73086-3108
- 888-309-1717 (Voice/TTY)
- 405-294-3977 or 405-294-3968 (Videophone)
- www.osd.k12.ok.us/edp (Website)

Nathan Burleson, Relay Manager
900 South Shackleford Road
Suite 300
Little Rock, AR 72211
Voice: 501-221-1285
TTY: 501-221-3279
Fax: 501-221-3241
Videophone: 501-246-8227
Email: nathan.burleson@sprint.com
Website: oklahomarelay.com/captel

Oklahoma Relay is provided by Sprint.
CapTel is a registered trademark of Ultratec, Inc.

A-PMOK-0002

Do you struggle with understanding others on the phone?

We've got a solution for you!

Captioned Telephone

oklahomarelay.com

"What? Can you repeat that, please?"

Do you...
- have difficulty hearing on the phone?
- misunderstand conversations due to background noises?

If you answered YES, we've got the solution for you. Oklahoma Relay Captioned Telephone Services allow you to LISTEN, and READ captions of what the other person says.

CapTel benefits:
- Built-in answering machine with captions
- Bright and easy-to-read display.
- Captions appear on all calls, incoming and outgoing.* * see CapTel Comparative Chart for more information
- Just unplug your old phone and plug in the CapTel phone. There are no additional line charges associated with use of the CapTel phone.
- Font size and colors can be changed to meet your personal preferences.

CapTel 2400i

CapTel 840/840i

CapTel Comparative Chart

Lines on display screen

CapTel 840	Up to 15 lines of text depending on font size
CapTel 840i	Up to 15 lines of text depending on font size
CapTel 2400i	Up to 10 lines of text depending on font size

Phone services supported

CapTel 840	Analog phone line or DSL with filter
CapTel 840i	Analog, DSL, VoIP, FIOS, Digital cable phone
CapTel 2400i	Analog, DSL, VoIP, FIOS, Digital cable phone

2-line CapTel

CapTel 840	Yes
CapTel 840i	2-line capabilities
CapTel 2400i	2-line capabilities

Requires high-speed internet connection

CapTel 840	No
CapTel 840i	Yes
CapTel 2400i	Yes

Ability to save text of conversation

CapTel 840	Yes - Up to 480 lines of text
CapTel 840i	Yes - Up to 500 lines of text
CapTel 2400i	Yes - Up to 360,000 characters

Captions provided

CapTel 840	Over analog phone line
CapTel 840i	Over internet connection
CapTel 2400i	Over internet connection

CapTel lets you communicate with confidence

- Oklahoma Relay Captioned Telephone Service allows anyone who uses hearing aids or who finds it difficult to hear independently to use the phone.
- 24-hour-a-day free service. CapTel users are responsible for their own long distance charges. However, there is no charge for using Oklahoma Relay Captioned Telephone Service.
- Spanish Captioning is available for Spanish-to-Spanish calls.
  - Hours are 7 am to 11 pm CST

CapTel 840/840i

CapTel 2400i

Sprint WebCapTel
sprintcaptel.com

WebCapTel benefits:
- No special equipment is required.
- Any kind of telephone and computer with internet access.
- Font size and colors can be changed to meet your personal preferences.
- The WebCapTel user listens to the voice user on his telephone while reading captions of the conversation on his computer monitor.
- To access this FREE* service, simply go to the Sprint WebCapTel registration page at www.sprintcaptel.com to enter the required information.

Federal Relay CapTel
federalcaptel.com

Are you a federal employee?

You may be qualified for the Sprint Federal CapTel Service.

- If you are a Federal employee, Federal CapTel is accessible domestically from work, home, or while traveling in the continental USA.
- No domestic toll (long distance) charge for calls made anywhere in the United States.
- Depending on your federal status, several options are available to order a CapTel phone:
  - www.federalrelay.us/captel
  - www.captel.com/federal

* Registration and certification required to use this service. Visit sprintcaptel.com/foc to learn more.

Outreach Services

The Oklahoma Relay Program Manager or Outreach Specialist is available to:

- provide outreach to the deaf, hard-of-hearing, deaf-blind and speech-disabled communities, as well as civic groups and other organizations within Oklahoma.
- make presentations and distribute relay information in educational settings and at trade shows throughout Oklahoma.
- conduct educational workshops and training sessions with deaf, hard-of-hearing, deaf-blind, speech-disabled and hearing communities in Oklahoma.
- answer any questions, provide usage tips, and resolve relay-related issues.

To receive information or schedule a presentation, contact:

- 501-221-1285 (Voice)
- 501-221-3279 (TTY)
- 501-246-8227 (Videophone)
- 501-221-3241 (Fax)
- oklahomarelay.com/contact (Website)

Please, Don't Hang Up

- The goal of the **Please Don't Hang Up** campaign is to decrease the frequency of hang ups by businesses who are unfamiliar with Oklahoma Relay. The campaign includes:
  - public service announcements
  - articles in business publications
- If you have experienced a hang-up, please go to www.oklahomarelay.com/donthangup to report the business and the Customer Relations Manager will provide the business with information about Oklahoma Relay.
- **Many people have found that changing the way their relay calls are announced reduces hang ups:**
  - Instead of saying, "This is Oklahoma Relay...", ask the relay operator to begin, "This is a customer of your business calling through Oklahoma Relay," or, "This is (your name) calling through Oklahoma Relay."

Emergency

- In an emergency, dial 911 directly to ensure immediate attention and identification of a relay user's location.
- NOTE: 711 is **NOT** an emergency number.

Directory Assistance

- Oklahoma Relay will relay Directory Assistance (DA) calls between relay users and the Local Exchange Carrier (LEC) DA operator.
- Once the relay user makes the request, the relay operator will contact the appropriate LEC DA operator. After obtaining the number, the relay user may choose to place the call through Oklahoma Relay or dial it directly TTY to TTY.

TTY Public Payphones

- Dial 711.
- All local calls from TTY payphones are free of charge.
- Toll calls can be billed through calling cards and prepaid cards.

Customer Profile

- The Oklahoma Relay Customer Profile allows relay users who access relay through a toll-free number to submit their user preferences such as, frequently dialed numbers, emergency numbers, preferred carrier of choice, customer notes, and many other preferences.
- The relay user will have the flexibility of updating their user preferences as needed. Profile information is confidential and secure.
- For more information, visit www.oklahomarelay.com/profile

Telecommunication Equipment Distribution Program (TEDP)

- The Oklahoma TEDP provides TTYs and other adaptive equipment to Oklahomans with hearing loss and speech disabilities who require special equipment to access the telephone system from their local and/or long distance telecommunication carriers.
- For more information, visit www.oklahomarelay.com/edp

More Information

- Customer Service: 800-676-3777 (TTY/Voice/ASCII)
- Servicio al Cliente: 800-676-4290 (TTY/Voz/ASCII)
- STS Customer Service: 877-787-1989 (Speech-disabled only)
- CapTel Customer Service: 888-269-7477 (Voice/CapTel/TTY)
- CapTel Servicio al Cliente: 866-670-9134 (Voz/CapTel/TTY)
- Website: www.oklahomarelay.com

CapTel is a registered trademark of Ultratec, Inc. A-FMOK-0003 rev 01/2017

Connecting people to people...
One call at a time!

www.oklahomarelay.com

What is Oklahoma Relay?

- Free service that provides full telephone accessibility to people who are deaf, hearing, hard-of-hearing, deaf-blind, late-deafened, or have a speech disability.
- Allows text-telephone (TTY) or captioned telephone (CapTel) users to communicate with standard telephone users through specially trained relay operators.
- Calls can be made to anywhere in the world, 24 hours a day, 365 days a year with no restrictions on the number, length, or type of calls.
- All calls are strictly confidential and no records of any conversation are maintained.
- The relay service is administrated by the Oklahoma State Office of the Deaf and Hard of Hearing and provided by Sprint.

How does the Relay work?

1. Relay User types her conversation to the Relay Operator.
2. Relay Operator then read alouds TTY User's typed message to Standard Telephone User.
3. After TTY User types "GA", it is Standard Telephone User's turn to respond.
4. Relay Operator relays Standard Telephone User's spoken words by typing them back to TTY User.

VOICE
Standard Phone
711 or 800-522-8506

- Standard telephone users can easily initiate calls to persons who are deaf, hard-of-hearing, deaf-blind, and/or speech-disabled.
- The relay operator types the standard telephone user's spoken words to the TTY user.
- How to dial:
  - Dial 711 or 800-522-8506
  - The relay operator announces, "Oklahoma Relay Operator (#). May I have the number you wish to call, please?"
- Give the relay operator the area code and phone number.
- The relay operator will process the call.

TTY
Teletypewriter
711 or 800-722-0353

- TTY stands for a teletypewriter device.
- A person who is deaf, hard-of-hearing, or deaf-blind uses a TTY to type his/her conversation to a relay operator, who then reads aloud the typed conversation to a standard telephone user.
- The relay operator relays the standard telephone user's spoken words by typing them back to the TTY user.

HCO
Hearing Carry-Over
711 or 800-722-0353

- Speech-disabled users with hearing listen to the person they are calling.
- The HCO user types his/her conversation for the relay operator to read aloud to the standard telephone user.
- Additional HCO service is available:
  - HCO to TTY: The HCO user listens while the relay operator reads aloud the TTY user's typed message. The HCO user types his/her conversation directly to the TTY user.

VCO
Voice Carry-Over
711 or 866-826-6552

- A deaf/hard-of-hearing person uses his/her voice to speak directly to a standard telephone user.
- A relay operator types what the standard telephone user says to the VCO user to their TTY for the VCO user to read.
- Ideal for late-deafened adults who are unable to hear over the phone.
- Additional VCO services are available:
  - VCO to TTY: The relay operator types what the VCO user says to the TTY user. Whatever the TTY user types goes directly to the VCO user's text display.
  - VCO to VCO: The relay operator types what is said on both ends of the call.

STS
Speech-to-Speech
711 or 877-722-3515

- A person with a speech disability can use his/her voice or voice synthesizer over the phone.
- Speech-to-Speech (STS) calls can be made:
  - by anyone/to anyone with a speech disability.
  - by people/to people who use a TTY.
- Specially trained relay operators serve as the speech disabled user's voice. They listen and repeat the speech-disabled user's dialogue to the called party.
- Oklahoma Relay's unparalleled equipment and exceptional STS relay operator training ensures that speech-disabled users will be heard and understood.

CAPTEL®
Captioned Telephone
711 or 877-243-2823

- Simultaneously hear the other party's voice and also read captions of everything they say.
- Provided free of charge* through Oklahoma Relay.
- Ideal for late-deafened adults who have difficulty understanding spoken words over the phone.
- Built-in answering machine with captions.
- Free phone eligibility information is available on the website at: weitbrecht.com/captel-oklahoma.html
- * CapTel users are responsible for their own long distance charges.

CapTel 2400i

OTHERS
Internet (IP) Relay   www.sprintip.com

- Sprint IP Relay is a service that allows callers with hearing loss to place relay calls over the Internet via their computer or laptop. There is no need for traditional TTY equipment.
- Sprint IP Relay is a free service that combines traditional relay service with the ease of the Internet and there are no long-distance charges.

Spanish Relay Service   800-662-4955

- TTY user can type in Spanish and his/her conversation will be relayed in Spanish to a voice caller.

International Calls   605-224-1837

- Oklahoma Relay allows you to place and receive calls to and from anywhere in the world in English or Spanish.

TeleBraille   711 or 800-722-0353

- Deaf-blind relay users often use special TTYs equipped with TeleBraille or large visual displays and prefer slower typing speeds at a rate of 15 words per minute to read messages.
- Users can also request increased or decreased rates of text in increments of 5 words per minute.

Trouble HEARING on the Phone?

www.oklahomarelay.com

hi grandma   my concert recital is next Friday night   would you and grandpa be able to come? great it starts at 7pm at the theater downtown

Captioned Telephone service from Oklahoma CapTel offers the ability for anyone with hearing loss to communicate on the telephone independently.

LISTEN, READ and **RESPOND** to your callers with ease on the CapTel® phone!

FEATURES:

- Built-in answering machine with captions
- Speakerphone capability
- Large touch-screen display with easy-to-read captions
- One-touch button to reach customer service

FOR MORE INFORMATION ABOUT THE SERVICE OR TO GET A CAPTEL PHONE, CONTACT:

- Oklahoma Relay/CapTel Customer Service
- 888.269.7477 (TTY/Voice)
- 866.670.9134 (Espanol)
- 608.204.6167 (Fax)
- captel@captel.com (Email)

Learn About Relay Oklahoma

| LEARN ABOUT OKLAHOMA RELAY | LIST OF RELAY SERVICES | CAPTIONED TELEPHONE | FOR CALLERS WITH A SPEECH DISABILITY | PLEASE DON'T HANG UP | EQUIPMENT DISTRIBUTION | OUTREACH PROGRAM | PARA PERSONAS QUE HABLAN ESPAÑOL | HELP CONTACT |

What is Relay Service?

What is 711?

List of Relay Numbers

What is 711?

711 is a number that is used in the United States to reach the Telecommunications Relay Service (TRS). This number enables telephone conversations between people with speech or hearing loss and people without speech or hearing loss. All states now have 711.

All you have to do is dial 711.

Everyone Can Use 711!

Follow these simple steps:

1. Dial 711 (or the Oklahoma Relay toll-free number appropriate for you specific call. - click here)
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3. Give the Operator the phone number of the person you are calling.
4. The operator will connect you with the person you are calling and will assist you with communication.

It really is that easy! NOTE: If the phone from which you are calling does not accept 711, just call 1-800-722-0353 for the same great results.

Remember, calls can be made to anywhere in the world, 24 hours a day, 365 days a year. All calls are strictly confidential and no records of any conversation are maintained. Long distance calls are billed at a discounted rate.

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Appendix G: Legislation Establishing TRS in Oklahoma

§63-2417. Duties and responsibilities of State Department of Rehabilitation Services.
      The State Department of Rehabilitation Services is hereby directed to:
      1. Provide for the availability, distribution and maintenance, at no cost to qualified individuals with hearing or speech disabilities, or both, telecommunication devices and ring-signaling devices compatible with the telecommunications relay services for deaf or hard-of-hearing and speech-impaired individuals requirements of the Americans with Disabilities Act of 1990 and regulations promulgated thereunder; and
      2. Design and implement a needs assessment test so that individuals with hearing or speech disabilities, or both, are benefited by this program. Provided, however, that no equipment and maintenance shall be provided without charge for those individuals meeting more than two hundred percent (200%) of the income guidelines for food stamps. The State Department of Rehabilitation Services shall develop a sliding scale to provide equipment and maintenance to individuals exceeding the needs test specified by this paragraph.
Added by Laws 1986, c. 183, § 2, eff. July 1, 1986. Amended by Laws 1993, c. 364, § 19, emerg. eff. June 11, 1993; Laws 1994, c. 315, § 13, eff. July 1, 1994; Laws 1998, c. 246, § 25, eff. Nov. 1, 1998.

§63-2418. Telephone access line surcharge - Telecommunications for the Hearing Impaired Revolving Fund.
      A. There is hereby imposed a surcharge of five cents ($0.05) per local exchange telephone access line per month to pay for the equipment and maintenance program provided for in Section 2417 of this title and to provide for other needed services for the deaf, severely hard-of-hearing, severely speech-impaired and deaf-blind programs administered through the Department of Rehabilitation Services, such surcharge to be paid by each local exchange subscriber to local telephone service in this state, unless such subscriber is otherwise exempt from taxation.
      B. The surcharge shall be collected on the regular monthly bill by each local exchange telephone company operating in this state and shall be remitted quarterly to the Oklahoma Tax Commission no later than fifteen (15) days following the end of each quarter.
      C. There is hereby created in the State Treasury the Telecommunications for the Deaf and Hard-of-Hearing Revolving Fund. The fund shall consist of monies imposed in subsection A of this section. All monies accruing to the fund are hereby appropriated and may be budgeted and expended by the Department of Rehabilitation Services. The fund shall be a continuing fund not subject to fiscal year limitations and expenditures from said fund shall be made upon warrants issued by the State Treasurer against claims submitted to the Director of State Finance for the purpose of implementation of this act.
Added by Laws 1986, c. 183, § 3, eff. July 1, 1986. Amended by Laws 1987, c. 5, § 140, operative March 31, 1987; Laws 1987, c. 196, § 17, operative July 1, 1987; Laws 1994, c. 315, § 14, eff. July 1, 1994; Laws 1998, c. 246, § 26, eff. Nov. 1, 1998.

§63-2418.1. Certified local exchange telephone companies - Compliance with federal legislation - Assessment of surcharge.

Each certified local exchange telephone company shall comply with the provisions of the Americans with Disabilities Act of 1990 and regulations promulgated thereunder relating to telecommunications relay services for deaf and hard-of-hearing and speech-impaired individuals and shall assess a surcharge to each customer on a per line per month basis to recover the costs associated with such compliance and advise the Commission of any changes.
Added by Laws 1994, c. 315, § 15, eff. July 1, 1994. Amended by Laws 1998, c. 246, § 27, eff. Nov. 1, 1998.

§63-2419. Collection of revenues to cease under certain conditions.
If the revenues collected under this act exceed the costs of operating the program provided for in this act, and if such excess at any time equals the three-year average of expenditures under this act then such collections shall cease until one half of such surplus has been exhausted.

APPLICATION OF THE OKLAHOMA LOCAL EXCHANGE CARRIERS FOR APPROVAL TO RECOVER COSTS INCURRED IN PROVIDING INTRASTATE TELECOMMUNICATIONS RELATED SERVICES.	) CAUSE PUD NO.930001568))))) ORDER NO. 377145

Hearing: October 13, 1993, before the Commission En Banc

Appearances: (See Official Record.)

By the Commission:

The Corporation Commission of the State of Oklahoma being regularly in session and the undersigned Commissioners being present and participating, this Cause comes on for consideration of the application of the Oklahoma Local Exchange Carriers ("LECs") for approval to recover costs incurred in providing intrastate Telecommunication Relay Services ("TRS").

Summary of Proceeding

The LECs' application was filed on September 13, 1993. The application was specially set before the Commission en banc, and after proper notice came on for hearing on the above mentioned date.

At the time of hearing Staff counsel announced that the parties to the Cause had entered into a Stipulation for purposes of resolving the issue raised by the LECs' application, and that the parties request that the Commission approve said Stipulation as its disposition of this Cause.

The Stipulation was sponsored and explained by witness Kendall W. Parrish, Telecommunications Coordinator, Public Utility Division of the Oklahoma Corporation Commission. Mr. Parrish recommended that the Stipulation, as signed by the parties to the Stipulation, be approved by order of the Commission.

Findings of Fact and Conclusions of Law

Upon full and fair consideration of the record in this Cause and being well and fully advised in the premises, the Corporation Commission makes the following findings and conclusions:

Proper notice was given in this Cause by publication as ordered by the Commission.

The Commission has jurisdiction of this Cause by virtue of the provisions of Article IX, § 18 of the Oklahoma Constitution; 17 O.S., § 131 et seq; and the Commission's General Rules and Regulations Governing the Operations of Telephone Companies and Telecommunications in Oklahoma.

The Commission finds that the Stipulation attached hereto and made a part hereof, is a fair, reasonable and equitable disposition of this application.

The Commission further finds that Title IV of the Americans With Disabilities Act of 1990 ("ADA") mandates that by July 26, 1993, all common carriers in Oklahoma shall provide TRS, but that currently the LECs in Oklahoma are not in full compliance with the new ADA requirements or Federal Communications Commission ("FCC") regulations.

The Commission further finds that the LECs have solicited bids from known vendors of TRS service; that four vendors responded with proposals; and that based on those bids, an agreement for the provision of TRS has been reached between the Oklahoma Telephone Association ("OTA") as designee of the LECs and the lowest bidder, U.S. Telecom d/b/a Sprint Services, a subsidiary of Sprint Corporation ("Sprint").

The Commission further finds that pursuant to that contract Sprint will provide, as the OTA's designee, a statewide TRS in conjunction with its nationwide TRS, through which hearing-impaired and speech-impaired persons are provided with access to the telecommunications network in the United States that is functionally equivalent to that provided to other telecommunications customers.

The Commission further finds that the components of Sprint's TRS will meet or exceed the minimum operational and technical requirements of the FCC's regulations, Part 64.604 for TRS; and that as designee of the OTA, through Sprint's provision of TRS in Oklahoma all LECs will thereby achieve compliance with the ADA.

The Commission further finds that at the time Sprint's TRS service is implemented in Oklahoma, the DRS will terminate the service it now provides under the Oklahoma Telecommunications for the Hearing Impaired Act; except that Department of Rehabilitative Services ("DRS") will continue to provide equipment and maintenance to qualified individuals in accordance with the pertinent provisions of the Act, funded by the current five cents surcharge imposed by the Act.

The Commission further finds that access to Sprint's Oklahoma Relay Center will be through the two existing toll-free numbers currently available to users of the DRS program; the DRS will transfer the availability of those numbers to Sprint, thereby making a transition from the DRS program to Sprint's telecommunications relay service transparent to users of the service.

The Commission further finds that Sprint will bill the OTA each month for its services and the OTA will allocate the charge to each individual LEC based on access lines; each LEC will be responsible for its share of the charges and will remit payment to the OTA which will in turn forward payment to Sprint.

The Commission further finds that the Interexchange Carriers providing toll service in Oklahoma should not be assessed any amount of Sprint's monthly charge unless so ordered by the Commission in the future, but will be subject to the monthly per access line fee, or its equivalent, to the extent they subscribe to the LECs' services. Sprint will process all local calls, and all intrastate long-distance and interstate long-distance calls regardless of which long-distance carrier serves the user; long-distance callers will be allowed to choose long-distance carriers from those who respond to Sprint's carrier of choice plan.

"A" should be approved and each LEC authorized to recover its allocated portion of Sprint's charge to provide TRS by assessing its customers a statewide uniform monthly per access line fee in accordance with the provisions of said tariffs.

The Commission further finds that approval of the Stipulation is in the public interest and will represent a balancing of the needs and interest of the public, the common carriers providing telecommunications services in Oklahoma, the users of the service and the parties to the Stipulation.
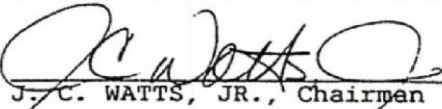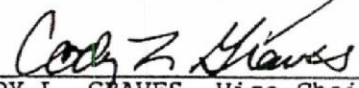
ORDER

IT IS THEREFORE THE ORDER OF THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA that the Stipulation attached hereto and made a part hereof be and the same is hereby approved and adopted by the Commission as its disposition of this Cause.

IT IS FURTHER ORDERED that each Applicant is hereby authorized to recover its allocated portion of the charge of the TRS provider, by assessing its customers the statewide uniform monthly per access line fee in accordance with the provision of the tariff approved herein and attached to the Stipulation and made a part thereof as Attachment "A".

IT IS FURTHER ORDERED that Applicants shall file original tariff schedules, which substantially comply with the provisions of Attachment "A" to the Stipulation, for approval by the Public Utility Division to become effective on and after the date of approval.

CORPORATION COMMISSION OF OKLAHOMA

J. C. WATTS, JR., Chairman

CODY L. GRAVES, Vice Chairman

DISSENT (Dissenting Opinion Attached)
BOB ANTHONY, Commissioner

DONE AND PERFORMED THIS 13TH DAY OF OCTOBER ,1993.
BY ORDER OF THE COMMISSION:

CHARLOTTE W. FLANAGAN, Secretary

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF THE OKLAHOMA	)	
LOCAL EXCHANGE CARRIERS FOR	)	
APPROVAL TO RECOVER COSTS	)	CAUSE PUD NO. 930001568
INCURRED IN PROVIDING	)	
INTRASTATE TELECOMMUNICATIONS	)	
RELAY SERVICES.	)	

DISSENT OF COMMISSIONER ANTHONY

I must respectfully dissent from the opinion of the majority filed herein. I am reluctant to grant a unilateral $1.5 million rate increase which affects all Oklahoma telephone customers without carefully considering the fairness of existing rates.

Let no one misinterpret my dissent as a vote against this program. I have long been a supporter of advanced telecommunications access for the hearing and speech impaired, and upgrading this program in Oklahoma should occur immediately.

But I oppose automatic pass-through of these program costs outside the normal rate review process which is designed to protect Oklahoma ratepayers.

Bob Anthony

Bob Anthony

Commissioner

APPENDIX B

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF OKLAHOMA

APPLICATION OF THE OKLAHOMA LOCAL)
EXCHANGE CARRIERS FOR APPROVAL TO)
RECOVER COSTS INCURRED IN PROVIDING) CAUSE PUD NO. 930 001568
INTRASTATE TELECOMMUNICATIONS   )
RELAY SERVICES.   )

APPLICATION

Come now the Applicants in the above-styled and numbered Cause
and for their application to recover the costs incurred in
providing intrastate telecommunications relay services allege and
state as follows:

1. Parties. Applicants consist of virtually all Local
Exchange Carriers ("LECs") providing local exchange telephone
service and other telecommunications services throughout the State
of Oklahoma. Attached hereto and made a party hereof as Appendix
"A" is a list of the names and addresses of each of the Applicants
in this Cause.

2. Allegations of Fact. Title IV of the Americans With
Disabilities Act of 1990 ("ADA"), § 225 of the Communications Act
of 1934, as amended, 47 U.S.C. § 225; and §§ 64.601-64.608 of the
Code of Federal Regulations, 47 C.F.R. §§ 64.601-64.608; require
that each common carrier that provides telephone voice transmission
services shall, no later than July 26, 1993, provide
telecommunications relay service ("TRS") individually, through
designees, through a competitively selected vendor, or in concert
with the other carriers throughout the area in which it offers
service. The intent of Section 225 of the Communications Act
("Section 225") is to further the Communication Act's goal of
universal service by providing to individuals with hearing or
speech disabilities telephone services that are functionally
equivalent to those provided to individuals without hearing or
speech disabilities.

From 1986 until the present, a TRS type service has been
provided in Oklahoma by the Department of Human Services ("DHS")
and the subsequently created Oklahoma Department of Rehabilitation

Services ("DRS"), pursuant to authority and obligation established under the Telecommunications For The Hearing-Impaired Act passed by the Oklahoma Legislature and made effective July 1, 1986.

Since the time Section 225 was passed in 1990, each Oklahoma LEC has relied on the DRS' program as a method to fulfill its individual obligation to provide TRS under Section 225. Each LEC assumed that by virtue of the DRS program it would be in compliance with Section 225 on the July 26, 1993, deadline date.

However, only a few weeks before July 26, 1993, the LECs were made aware that the DRS program did not meet Federal Communications Commission ("FCC") requirements. Therefore, none of the LECs were in compliance with Section 225, nor could they achieve compliance by July 26, 1993.

In August each LEC was notified by the FCC's enforcement division that the LEC must explain why it is not in compliance with Section 225 and the steps being taken to achieve compliance. The FCC's letter noted that failure to comply with Section 225 subjects a common carrier to substantial forfeitures of up to $100,000 for each violation or each day of continuing violation, up to a total of $1,000,000 for a continuing violation.

Since that notification by the FCC, industry meetings have been conducted and bids have been solicited and received from vendors interested in providing TRS in Oklahoma. The bids are being analyzed at the present time. Applicants believe that contracting with a vendor to provide TRS in Oklahoma is the quickest and most cost effective way to achieve compliance with the requirements of Section 225. The FCC has been notified by the LECs of these steps that have been taken toward compliance.

It is the intent of the LECs to select a single entity to serve as billing agent for the vendor. That entity will receive the monthly bill from the vendor and will allocate the costs of the service to each telecommunications company in the state obligated under Section 225 to provide TRS. Each company's bill will be calculated pursuant to an equation to be developed by the billing

agent for purposes of determining the ratios for allocating the monthly costs of TRS to each telecommunications company using the vendor's service.

It is estimated by the LECs that the cost to provide TRS in Oklahoma by a vendor selected through the bidding process will equate to less than eight cents per month per telephone access line. The LECs propose to recover by approved tariff each LEC's allocated portion of the vendor's cost by assessing customers a monthly per access line fee.

3. __Legal Authority__. The Corporation Commission has jurisdiction of this matter pursuant to the provisions of Article IX, § 18 of the Oklahoma Constitution; 17 O. S. § 131 et seq; and the Commission's General Rules and Regulations Governing the Operations of Telephone Companies and Telecommunications in Oklahoma.

4. __Relief Sought__. Applicants seek an order of the Commission allowing the LECs to file tariffs to recover monthly each LEC's allocated portion of the monthly bill submitted to the billing agent by the TRS vendor. The tariff will provide for recovery by allowing each LEC to assess its customers a monthly per access line fee.

WHEREFORE, premises considered, Applicants pray that after notice given as determined appropriate by the Commission, that this matter be set for hearing, and that an order be issued as quickly as possible granting the application as requested, thereby allowing each local exchange carrier to recover its allocated portion of the vendor's costs of providing the telecommunications relay services mandated by Title IV of the Americans With Disabilities Act of 1990.

Respectfully submitted,

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Oklahoma City, Oklahoma 73116

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Southwestern Bell Telephone Company
800 North Harvey, Room 310
Oklahoma City, Oklahoma 73102

J. A. Garza, Jr., Esq.
GTE Southwest Incorporated
P. O. Box 152013
500 E. Carpentar Freeway
Irving, Texas 75015-2013

Attorneys for Applicants

APPLICANT LOCAL EXCHANGE CARRIERS

Alltel Oklahoma, Inc.
Oklahoma Alltel, Inc.
P. O. Box 2177
Little Rock, AR 72203
(501) 661-8000

Atlas Telephone Company
P. O. Box 77
Big Cabin, OK 74332
(918)783-5111

Beggs Telephone Company
5th & Choctaw
Beggs, OK 74421
(918)267-3636

Bixby Telephone Company, Inc.
P.O. Box 98
Bixby, OK 74008
(918)366-8201

Canadian Valley Tele. Co.
Access Road 69 Highway
Crowder, OK 74430
(918)334-3700

Carnegie Telephone Company
1st & Colorado
Carnegie, OK 73015
(405)654-1002

Central Oklahoma Tele. Company
223 Broadway
Davenport, OK 74026
(918)377-2241

Cherokee Telephone Company
Service Road & McKinley
Calera, OK 74730
(405)434-5375

Chickasaw Telephone Company
124 W. Vinita
P. O. Box 460
Sulphur, OK 73086-0460
(405) 622-2111

Chouteau Telephone Company
P.O. Box 909
Chouteau, OK 74337
(918)476-8311

Cimarron Telephone Company
101 Cimarron Street
Mannford, OK 74044
(918)865-3311

Cross Telephone Company
704 3rd Avenue
Warner, OK 74469
(918)463-2921

Grand Telephone Company
P. O. Box 308
Jay, OK 74346
(918) 253-4323l

GTE Southwest, Inc.
500 E. Carpenter Freeway
Irving, TX 75015-2013
(214) 717-2811

Hinton Telephone Company
200 W. Main
Hinton, OK 73047-1040
(405)542-3262

Kanokla Telephone Association
100 KanOkla Avenue
P.O. Box 111
Caldwell, KS 67022
(316)845-3682

Lavaca Telephone Company
P. O. Box 130
Lavaca, AR 72941
(501)674-2211

McLoud Telephone Company
13439 N. Broadway Ext., Suite 200
Oklahoma City, OK 73114
(405)749-0500

Medicine Park Telephone Co.
P.O. Box 171
Medicine Park, OK 73357
(405)529-2700

Mid America Telephone, Inc.
P. O. Box 7
Stonewall, OK 74871
(405)265-4212

Oklahoma Communications Systems, Inc.
301 S. Westfield Road
P.O. Box 5901
Madison, WI 53705
(608)845-4000

Oklahoma Telephone and Telegraph
P. O. Box 3906000
Dustin, OK 74839
(918)656-3233

Oklahoma Western Telephone Co.
P.O. Box 399
Clayton, OK 74536
(918)569-4111

Panhandle Telephone Coop., Inc.
602 S. Main
Guymon, OK 73942
(405)338-2556

Pine Telephone Company
P. O. Box 548
Broken Bow, OK 74728
(405) 584-3355

Pioneer Telephone Cooperative, Inc.
P. O. Box 339
Kingfisher, OK 73750
(405)375-6674

Pottawatomie Telephone Company
P.O. Box 66
Earlsboro, OK 74840
(405)997-5201

Salina-Spavinaw Telephone Company
4200 East Kelly Drive, Suite 410
Tulsa, OK 74135
(918)496-8166

Santa Rosa Telephone Cooperative, Inc.
1401 Main Street
Vernon, TX 76384
(817)886-2217

Shidler Telephone Company
120 Broadway
Shidler, OK 74652
(405)793-2212

South Central Telephone Association, Inc.
P.O. Box 170
Medicine Lodge, KS 67104
(316)886-5629

Southwest Oklahoma Tele. Co.
Duke, OK 73532
(405)679-3345

Southwestern Bell Telephone Co.
One Bell Central
800 N. Harvey
Oklahoma City, OK 73102

Terral Telephone Company
220 W. Wilshire, Suite F-1
Oklahoma City, OK 73116
(405)842-1764

Totah Telephone Company, Inc.
P.O. Box 196
Ochelata, OK 74051
(918)535-2208

Valliant Telephone Company
100 E. Wilson
Valliant, OK 74764
(405)933-4400

Wyandotte Telephone Company
dba Oklahoma Communication Systems - Wyandotte
P. O. Box 220
Choctaw, OK 73020-0220
(405)390-8181

APPLICATION OF THE OKLAHOMA)
LOCAL EXCHANGE CARRIERS FOR)
APPROVAL TO RECOVER COSTS)   CAUSE PUD NO. 930001568
INCURRED IN PROVIDING)
INTRASTATE TELECOMMUNICATIONS)
RELAY SERVICES.)

STIPULATION

This Stipulation and Settlement Agreement ("Stipulation") is made this 13th day of October, 1993, by and between the undersigned Oklahoma Local Exchange Carriers ("LECs" or "Applicants") the Oklahoma Department of Rehabilitation Services ("DRS") and the Staff of the Public Utility Division ("Staff") of the Oklahoma Corporation Commission ("Commission").

WHEREAS, Applicants filed the above styled and numbered application on September 13, 1993, and the parties to this Stipulation are all parties to this Cause.

WHEREAS, Applicants consist of virtually all LECs providing local exchange telephone service and other telecommunications services throughout the State of Oklahoma.

WHEREAS, the Telecommunications for the Hearing-Impaired Act ("the Act"), effective July 1, 1986, directed the Department of Human Services ("DHS") and the subsequently created DRS to design and implement a program ("the DRS program") whereby third party intervention shall connect the deaf, severely hearing-impaired, severely speech-impaired or deaf-blind persons with persons of normal hearing by way of intercommunication devices and the telephone system.

WHEREAS, the Act imposed a surcharge to be paid by each local exchange subscriber to telephone service of five cents ($0.05) per local exchange telephone access line per month, except as exempted, to fund the DRS program.

WHEREAS, the DRS program is currently in operation and the five cents surcharge is currently being collected by the LECs and remitted to the Oklahoma Tax Commission in accordance with the requirements of the Act.

WHEREAS, Title IV of the Americans With Disabilities Act of

1990 ("ADA") §225 of the Communications Act of 1934, as amended, 47 U.S.C. §225 ("Section 225"), and §§ 64.601-64.608 of the Code of Federal Regulations, 47 C.F.R. §§ 64.601-64.608; requires that each common carrier that provides telephone voice transmission services shall, no later than July 26, 1993, provide telecommunications relay service ("TRS") individually, through designees, through a competitively selected vendor, or in concert with the other carriers throughout the area in which it offers service; the intent of Section 225 being to further the Communications Act's goal of universal service by providing to individuals with hearing or speech disabilities telephone services that are functionally equivalent to those provided to individuals without hearing or speech disabilities.

WHEREAS, since the time Section 225 was passed in 1990, each Oklahoma LEC has relied on the DRS program as a method to fulfill its individual obligation to provide TRS under Section 225, and each LEC believed that by virtue of the DRS program it would be in compliance with Section 225 on the July 26, 1993, deadline date.

WHEREAS, in fact, only a few weeks before July 26, 1993, the LECs were made aware that the DRS program did not meet Federal Communications Commission ("FCC") requirements, nor could it be modified in time to meet FCC requirements; and that therefore none of the LECs were in compliance with Section 225, nor could they achieve compliance by July 26, 1993.

WHEREAS, in August, 1993, each LEC was notified by the FCC's enforcement division that each respective LEC must explain why it is not in compliance with Section 225 and the steps being taken to achieve compliance, and that failure to comply with Section 225 subjects a common carrier to substantial forfeitures of up to $100,000 for each violation or each day of continuing violation, up to a total of $1,000,000 for a continuing violation.

WHEREAS, as a result of that FCC notification, industry meetings were conducted and Applicants determined that the quickest

and most cost effective way to achieve compliance with the requirements of Section 225 would be to contract with an experienced vendor, whose telecommunications relay service is ADA and FCC compliant, to provide TRS in Oklahoma; that the Oklahoma Telephone Association ("OTA") solicited bids from known vendors of TRS service; that four vendors responded with proposals; and that based on those competitive bids a contract has been entered into between the OTA and the lowest bidder, US Telecom, d/b/a Sprint Services, a subsidiary of Sprint Corporation ("Sprint") pursuant to which Sprint will provide, as the OTA's designee, a statewide TRS in conjunction with its nationwide TRS, through which hearing-impaired and speech-impaired persons are provided with access to the telecommunications network in the United States that is functionally equivalent to that provided to other telecommunications customers; that the service will be implemented no later than November 15, 1993; that the components of Sprint's TRS will meet or exceed the minimum operational and technical requirements of the FCC's regulations, Part 64.604 for TRS; and that as designee of the OTA, through Sprint's provision of TRS in Oklahoma all LECs will thereby achieve compliance with Section 225.

WHEREAS, Applicants seek an order of the Commission allowing the LECs to file tariffs to recover monthly by a per access line fee, each LEC's allocated portion of the monthly bill submitted to the OTA by Sprint for providing TRS.

NOW, THEREFORE, the LECs, DRS and Staff agree and stipulate as follows:

1. Title IV of the Americans With Disabilities Act of 1990 mandates that by July 26, 1993, all common carriers in Oklahoma shall provide TRS throughout the area in which each offers service.

2. Currently the LECs in Oklahoma are not in full compliance with the new ADA requirements.

3. To achieve compliance and avoid substantial fines being levied by the FCC against each LEC, the OTA, as designee for the

Oklahoma LECs, has entered into a contract with Sprint pursuant to which Sprint will provide TRS in Oklahoma.

4. Through Sprint's provision of TRS in Oklahoma as the designee of the OTA, the Oklahoma LECs will thereby achieve compliance with Section 225 and the FCC rules.

5. Access to Sprint's Oklahoma Relay Center will be through the two existing toll free numbers currently available to users of the DRS program; the DRS will transfer the availability of those numbers to Sprint, thereby making the transition from the DRS program to Sprint's telecommunications relay service transparent to users of the service.

6. At the time Sprint's TRS service is implemented in Oklahoma, the DRS will terminate the service it now provides under the Telecommunications For The Hearing Impaired Act; except that DRS will continue to provide equipment and maintenance to qualified individuals in accordance with pertinent provisions of the Act, funded by the current five cents surcharge imposed by the Act.

7. Sprint will process all local calls, and all intrastate long-distance and interstate long-distance calls regardless of which long-distance carrier serves the user; long-distance callers will be allowed to choose long-distance carriers from those who respond to Sprint's carrier of choice plan.

8. Sprint will bill the OTA each month for its service and the OTA will allocate the charge to each individual LEC based on access lines; each LEC will remit payment to the OTA which will in turn forward payment to Sprint.

9. Each LEC will recover its allocated portion of Sprint's charge to provide TRS by assessing its customers a monthly per access line fee in accordance with the provisions of the tariff attached hereto and made a part hereof as Attachment "A".

10. Under the tariff, for purposes of calculating the initial monthly per access line fee, the annual assessment amount shall be calculated utilizing Sprint's per minute of use contract price, an

assumption of 25,000 calls per month of an average duration of 7 minutes per call, and the aggregate number of LEC access lines: in any event the monthly per access line fee for the first year shall not exceed eight cents and any over or under recovered balance in any year shall be carried forward to the following contract year in accordance with the tariff.
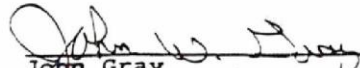
11. The Interexchange Carriers providing toll service in Oklahoma shall not be assessed any amount of Sprint's monthly charge but will be subject to the monthly per access line fee, or its equivalent, to the extent they subscribe to the LECs' services.

12. The parties agree to actively pursue, in cooperation with any other interested party, legislation that will amend the Telecommunications For The Hearing-Impaired Act to whatever extent necessary to reconcile any duplication of obligations resulting from the state directive and the federal mandate; and will address the proper method of funding TRS and funding the equipment and maintenance service provided to qualifying individuals by the DRS.
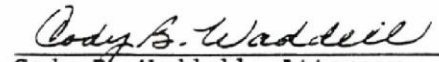
13. The service provided by the DRS and the future TRS to be provided by Sprint is a praiseworthy and deserving service for deaf, severely hearing-impaired, severely speech-impaired or deaf-blind persons; granting the LECs' application and approval of this Stipulation will be in the public interest and will represent a balancing of the needs and interests of the public, the users of the service and the parties to this Stipulation.
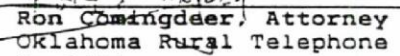
14. In the event this Stipulation is not accepted in its entirety without condition or modification by the Commission, it shall be null and void and no party shall be bound by any of its provisions.
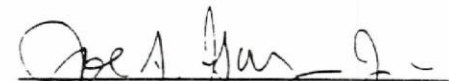
WHEREFORE, the undersigned LECs, DRS and Commission Staff respectively submit this Stipulation to the Oklahoma Corporation Commission and request its approval.
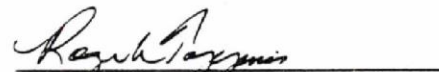
John Gray
Assistant General Counsel -
Public Utilities
Oklahoma Corporation Commission

A. C. Adams, Director of
Rehabilitative Services
Oklahoma Department of
Rehabilitative Services

Cody B. Waddell, Attorney
Alltel Oklahoma, Inc.
Oklahoma Alltel, Inc.
Oklahoma Communication
Systems, Inc.
Chickasaw Telephone Company
Pine Telephone Company
Mid America Telephone, Inc.
Wyandotte Telephone Company

Ron Comingdeer, Attorney
Oklahoma Rural Telephone
Coalition

J. A. Garza, Jr., Attorney
GTE Southwest Incorporated

Roger K. Toppins, Attorney
Southwestern Bell Telephone
Company

Appendix H: Complaint Logs from 2013-2017

Complaint Log 2012-2013

Complaint Tracking for OK (06/01/2012-05/31/2013). Total Customer Contacts: 5

Tally	Date of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	10/01/12	Customer reported seeing Login failure on the screen of the CapTel.	10/01/12	Customer Service Rep apologized for the customer's experience and noted there was a brief 10-minute technical difficulty that affected their call. Customer Service Rep suggested the customer try their call again and confirmed that the customer was able to make captioned calls successfully without seeing an error message.
2	10/01/12	Customer reported seeing Account Login Failure please call support Code E2 on their CapTel display screen.	10/01/12	Customer Service Rep apologized for the customer's experience and noted there was a brief 10 minute technical difficulty that affected their call. Customer Service Rep suggested the customer try their call again and confirmed that the customer was able to make captioned calls successfully without seeing an error message.
3	11/07/12	Customer complained of inaccurate captions.	11/07/12	CSR apologized for incidence and thanked customer for bringing their experience to our attention. CSR sent a letter and suggested if the customer documents the date time and CA# of any future calls this will allow us to take specific action with the CA captioning the call for further coaching and monitoring for optimal performance. Change to complaint category #07 authorized by Customer Relationship Manager on 11/14/14 as a result of a systemic coding error identified.
4	03/05/13	Customer stated that after the completion of the call, the Communication Assistant did not acknowledged the customer's closing comment. Customer reiterated the comments and once again the Communication Assistant did not responded. Customer thought that perhaps the Communication Assistant disconnected on the customer. Apologized for the inconvenience this may have caused. No follow up requested.	03/05/13	We did not have agent ID currently assigned at this time. Unable to conduct a follow up with the agent.
5	04/18/13	Customer requested a redial to leave a VCO message. The customer did not receive any indication that the phone was ringing, only (one moment please). The customer attempted to get Communication Assistant's attention and asked what was going on. Customer did not receive a response so they hung up and placed call with another Communication Assistant.	04/20/13	Apologized to customer and informed them this will be forwarded to the operators supervisor for review. No follow up required. Followed up with the Communication Assistant and reviewed proper procedure. The Communication Assistant will perform in a more professional manner in the future.

Complaint Log 2013-2014

Complaint Tracking for OK (06/01/2013-05/31/2014). Total Customer Contacts: 9

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/29/13	Communication Assistant was instructed to call "time and temperature" and the call was disconnected, caller feels it was on purpose and not a technical problem. Supervisor apologized for the inconvenience. No follow up requested.	06/29/13	Communication Assistant was coached by a supervisor on this issue. Communication Assistant does not recall processing this type of call. Communication Assistant was coached on disconnecting callers and recording procedure.
2	08/02/13	Customer complained that the Communication Assistant was not listening at the end of an answering machine retrieval. When the customer had asked the Communication Assistant to make another call the Communication Assistant did not respond. Supervisor apologized for the inconvenience.	08/02/13	Communication Assistant did request supervisor assistance while waiting for the caller to respond and may have inadvertently switched to the wrong line and was unable to hear the callers response. Communication Assistant was coached on correct procedure.
3	08/02/13	Customer asked to redial a number, got no response from the Communication Assistant, and finally hung up. Communication Assistant did not redial or respond back to the customer. Supervisor apologized for the inconvenience. No follow up request.	08/02/13	Communication Assistant identification provided by the customer is currently not assigned; unable to conduct a follow up.
4	10/04/13	After relaying a message during an answering machine retrieval, the customer had informed the Communication Assistant that the message was too garbled for it to be repeated, and the Communication Assistant just disconnected. Supervisor apologized for the inconvenience. No follow up requested.	10/08/13	Supervisor met with Communication Assistant. Communication Assistant does not remember the call and strongly believes that she did not hang up on customer.
5	01/31/14	Customer declared that the Communication Assistant's typing was very bad and was unable to read. Supervisor apologized for the inconvenience. No follow up requested.	01/31/14	Communication Assistant was coached to be mindful of typing and to make corrections as necessary.
6	03/27/14	The VCO customer, from previous experience, recognized that the correct phrase for the start of an answering machine retrieval was not used that the Communication Assistant typed their own phrasing. The customer did say this to the Communication Assistant and the Communication Assistant did not respond. The customer did then hang up and called back to the Relay to speak to a supervisor. Supervisor taking the complaint apologized for the inconvenience. No follow up requested.	03/27/14	Communication Assistant stated that at the time he couldn't remember the macro for the answering machine phrase. Rather taking the time to check out the macro, the Communication Assistant decided to type out the phrase. Communication Assistant was coached the importance of ensuring the typed phrase is consistent with the macro.
7	04/08/14	After dialing the requested number the phone rang over 10 times and the VCO customer was asking the Communication Assistant if they were there and the Communication Assistant never responded. Supervisor apologized for the inconvenience. No follow up requested.	04/08/14	Our logs indicates that this Communication Assistant did not work at the time of the alleged incident. Unable to conduct a follow up on this matter.
8	04/23/14	Communication Assistant repeatedly asked if the caller got a message typed via answering machine retrieval and the Communication Assistant did not respond to caller's "Thank you" - when Communication Assistant would not reply or disconnect, customer requested supervisor and says Communication Assistant did not comply with request. The caller called back to request a supervisor to file complaint. Supervisor apologized for the inconvenience. No follow up requested.	04/23/14	Communication Assistant typed to caller several times to confirm the message was received and was unable to hear any response. Communication Assistant was coached to make sure to be in "live mode" when finished relaying a recorded message.
9	05/27/14	Customer complained that the Communication Assistant did not close the call, would like Communication Assistant to be notified, they never said caller's party hung up, and did not say goodbye. Caller was uncertain if she had been hung-up-on by Relay. Supervisor apologized for the inconvenience. No follow up requested.	05/27/14	Communication Assistant was following close-of-call procedure and in doing so accidentally disconnected the inbound caller. Coached the Communication Assistant when the mistake is realized to alert a supervisor for documentation.

Complaint Log 2014-2015

Complaint Tracking for OK (06/01/2014-05/31/2015). Total Customer Contacts: 11

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/14/14	Voice Carry Over caller stated when they connected to relay and gave the Communication Assistant the number to dial, the call was processed normally. When the call ended, the inbound Voice Carry Over caller instructed the Communication Assistant to disconnect the outbound line the Communication Assistant refused and would not disconnect the outbound line. Supervisor apologized for the inconvenience. No follow-up requested.	06/14/14	At the close of the call the inbound customer instructed the Communication Assistant to disconnect and the Communication Assistant accidentally disconnected the inbound line instead of the outbound line. Communication Assistant was coached to be careful not to disconnect the inbound line.
2	07/11/14	Customer's assistant shared feedback on the accuracy of captions on the CapTel 840 in 1-Line mode on occasion.	07/16/14	Customer Service Representative thanked the customer's assistant for the feedback and provided information on how captions are produced. Customer Service Representative explained how corrections will appear in the captions so that the customer knows what to look for. Customer Service Representative followed up with the customer who reported that captions have been better after understanding how they are made and learning to ask callers to speak clearly. Customer Service Representative further advised customer to contact CapTel Customer service with future concerns about the accuracy of her captions. Customer Service Representative incidentally identified in technical detail available this customer has some incidence of data connection difficulties that could be impacting the captions of what the customer is receiving as the gaps in the connection would mean some words would not be sent to the CapTel while the data disruption occurred on their phone line. Customer Service Representative sent the customer a letter describing our technical findings and tips on what might reduce such incidence. Change to complaint category #07 authorized by Customer Relationship Manager on 11/14/14 as a result of a systemic coding error identified.
3	09/30/14	Caller was not sure if complete message was left on the answering machine, caller asked the Communication Assistant for clarification only received a "Go Ahead" and when asked if the Communication Assistant was still on the line the caller did not get any further response. Supervisor apologized for the inconvenience. No follow-up requested.	09/30/14	Supervisor met with the Communication Assistant and explained to be careful and to verify the connection and status of the call to ensure no further instructions are being missed by the caller.

Complaint Tracking for OK (06/01/2014-05/31/2015). Total Customer Contacts: 11

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
4	10/07/14	The customer reports that the Communication Assistant had successfully dialed an 800 number call and the customer then asked the Communication Assistant to dial another call, but the Communication Assistant did not respond. The Communication Assistant said the outbound caller was going to hang-up because there was no response from the Voice Carry Over user. The in-charge responding apologized for the confusion and advised the customer that the report will be sent to the call center.	10/07/14	No Communication Assistant assigned to this ID number. Unable to further investigate.
5	10/17/14	A Voice Carry Over customer called with a concern that towards the end of the call the customer was no longer receiving any responses from the Communication Assistant. Assistant Supervisor documenting the concern apologized to the customer for the inconvenience.	10/17/14	Supervisor was present during this call and observed the call had dropped.
6	10/17/14	The Voice Carry Over customer had requested messages from the answering machine be relayed. The Communication Assistant had instructed the Voice Carry Over customer to place the messages which was done but then the customer states there was no longer any response from the Communication Assistant. Supervisor documenting the concern apologized for the inconvenience. No follow-up was requested.	10/17/14	A supervisor spoke with the Communication Assistant who explained he had made a mistake during the retrieval process which included not communicating with the customer. The supervisor reviewed the retrieval process with the Communication Assistant.
7	10/28/14	The Voice Carry Over customer had made a request for the messages on the answering machine be relayed. After a delay the Voice Carry Over customer had requested to speak to a Supervisor but got no response from the Communication Assistant. Assistant Supervisor documenting the concern apologized for the inconvenience and offered a different Communication Assistant to complete the request. No follow-up requested.	10/28/14	Communication Assistant was looking-up the wrong procedure which caused the delay and requested Supervisor assistance to complete the call. It is possible that while the Communication Assistant was retrieving the messages, the Voice Carry Over customer was making the request for a Supervisor and the Communication Assistant was not able to hear them. Supervisor met with the Communication Assistant and coached the Communication Assistant whenever a request is made to speak with a Supervisor we will comply and always keep the caller informed of all the call steps.

Complaint Tracking for OK (06/01/2014-05/31/2015). Total Customer Contacts: 11

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
8	02/05/15	Customer states that on ending the call the Communication Assistant never gave her the "Go Ahead." Customer said, "Bye" and the Communication Assistant didn't response. Then she was sent the message, "Do you have any other calls?" She said, "no but I was waiting for you to say good bye." She was then sent the message, "Due to no response this call is being disconnected." She thought this seemed very abrupt and rude and that the Communication Assistant didn't seem to be paying attention to her call ending. RCS response: Apologized for the problem and assured that the complaint would be sent in as stated.	02/05/15	Supervisor coached the Communication Assistant to always pay attention to what is going on with the call and correctly follow closing procedures.
9	02/24/15	The Communication Assistant did not keep the caller informed while processing an answering machine retrieval. The customer reported that it took a long time before the Communication Assistant started to type the messages and then did not respond to any of the customer's question. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow-up requested.	02/24/15	Supervisor coached the Communication Assistant to always keep the caller informed and, if necessary, to request supervisor assistance.
10	05/28/15	The customer called in wanting to do Answering Machine Retrieval. The Communication Assistant first asked the customer for their mailbox number and customer had to tell the Communication Assistant what kind of machine she had. When the Communication Assistant did successfully send the right macro, the Communication Assistant began typing the message right away, causing the message to be incomplete. After five minutes of this, the customer got frustrated and hung-up and then dialed in and ask for a supervisor. Customer wanted the Communication Assistant to be instructed as to proper procedure. Supervisor apologized for the inconvenience and assure this will be forwarded to the Communication Assistant's direct supervisor. No follow-up requested.	05/28/15	Supervisor apologized for the inconvenience and assured that this will be forwarded to the Communication Assistant's direct supervisor. Customer asked that the Communication Assistant be trained on the right procedure for getting answering machine messages. The supervisor assured this will be done and information on this was provided to the Communication Assistant along with training protocol. Case closed.
11	05/29/15	A Voice Carry Over user states when the number was dialed an answering machine was reached, the Voice Carry Over user told the Communication Assistant they wished to leave a message. The only response the Voice Carry Over user got from the Communication Assistant was that they were disconnecting by typing "SKSK" Assistant Supervisor documenting the concern apologized for the inconvenience. No follow-up requested.	05/29/15	Communication Assistant was coached on proper answering machine procedures.

Complaint Log 2015-2016

Complaint Tracking for OK (06/01/2015 - 05/31/2016). Total Customer Contacts: 5

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/04/15	A Voice Carry Over customer gave the Communication Assistant a number to dial and an answering machine was reached but the answering machine message was not relayed. The Voice Carry Over customer then requested a re-dial for a message to be left and there was no response from the Communication Assistant. Assistant Supervisor apologized for the inconvenience. No follow-up requested.	06/04/15	Communication Assistant was coached on proper answering machine procedures.
2	06/04/15	A Voice Carry Over customer reported that upon re-dialing to leave a message the Communication Assistant had asked for the number to dial and then when the number was dialed for the second time, the Communication Assistant never informed the caller on when it was time to leave a message. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow-up requested.	06/04/15	Communication Assistant was coached on proper answering machine procedures.
3	09/29/15	A Voice Carry Over customer instructed the Communication Assistant to redial to an answering machine after about 5 rings there was no more communication from the Communication Assistant. VCO customer asked "are you there?" several times with no response. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow-up requested.	09/29/15	Supervisor met and coached the Communication Assistant on all answering machine procedures and the importance of keeping the customer informed of all call steps at the time of occurrence.
4	12/21/15	A Voice Carry Over customer report that she may have been disconnected by the Communication Assistant but had also mentioned that the same thing had happened earlier with a different Communication Assistant so it is possibly a technical issue or an issue with the caller's equipment. No follow-up requested.	12/21/15	Supervisor met with the Communication Assistant to review call disconnect procedures.
5	04/13/16	A Voice Carry Over customer stated the Communication Assistant was not able to process the answering machine retrieval procedure correctly. The Communication Assistant instructed the caller to set-up the answering machine but the caller did not receive anything from the Communication Assistant. Assistant Supervisor apologized for the inconvenience. No follow-up requested.	04/13/16	Supervisor coached the Communication Assistant on proper answering machine retrieval procedure.

Complaint Log 2016-2017

Complaint Tracking for OK (06/01/2016-05/31/2017). Total Customer Contacts: 7

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/08/16	A Voice Carry Over (VCO) user stated they are very frustrated with the garbling issues that occur during each call. Customer had tried to contact the Relay Customer Service but were unable to communicate due to the garbling issues. Assistant Supervisor documenting the concern apologized for the inconvenience. Customer would like to communicate with relay via the postal service.	06/08/16	A trouble ticket was submitted for the technicians to investigate the issue. Follow up letter sent via postal service as per request. While the technical response details are unavailable the garbling reported on this date may have been due to a resolved equipment or phone line issue. Research confirms that no additional concerns have been received from this customer.
2	06/15/16	A Voice Carry Over (VCO) user said they had connected to this Communications Assistant and had requested for the Communications Assistant to dial a number for the time and temperature and did not get any response from the Communications Assistant. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow up requested.	06/15/16	Supervisor met with the Communications Assistant, the Communications Assistant does remember relaying the information requested and was waiting for a response from the caller when there was no further response the Communications Assistant followed the procedure to disconnect the call.
3	07/15/16	Answer Machine Retrieval was done incorrectly. Communications Assistant never responded or typed messages to caller. Supervisor apologized for the problem. No contact wanted.	07/15/16	Supervisor coached the Communications Assistant on the proper answering machine retrieval procedure.
4	07/27/16	Customer's father reported the customer seeing inappropriate captions on a call to the CapTel phone that were out of context.	08/04/16	Customer Service Representative apologized for the incident. Customer Service Representative noted that we can take very specific action provided the date time phone number called and/or Communications Assistant #. The father and later the daughter chose not to share specifics including what was captioned thus no follow up could take place. Customer Service Representative encouraged the father and customer to document call detail and report it right away on any future calls.
5	11/02/16	A Voice Carry Over (VCO) customer had requested for an answering machine retrieval. The Communications Assistant that processed the request only relayed a portion of the message. The VCO user had asked the Supervisor to review and the Supervisor confirmed what was relayed was correct. The customer had called back into relay and had asked for another Supervisor to listen to the message, at this the Supervisor was able to hear the completed message. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow up requested.	11/02/16	The Supervisor met with the Communications Assistant and coached them on the proper procedures for voice mail retrievals. No follow up requested.
6	11/02/16	A Voice Carry Over (VCO) user says the Communications Assistant did not respond after relaying the messages on the answering machine retrieval. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow up requested.	11/02/16	Supervisor coached the Communications Assistant and reviewed the answering machine retrieval procedure.
7	01/12/17	A Voice Carry Over (VCO) user stated the Communications Assistant did not keep them informed of the call steps. Assistant Supervisor documenting the concern apologized for the inconvenience. No follow up requested.	01/12/17	Supervisor coached the Communications Assistant to always keep the caller informed of the call steps.

Date Generated: Fri, Jun. 2nd, 2017 @ 09:41:53 AM CT

Appendix I: Phone Bill with Surcharge Rate

For All Billing Inquiries, call 1-888-580-2208
Account Number: 000000██████
Account Name: ████ & KRISTINE MCLAUGHLIN
Due Date: 10TH OF MNTH

Page 3

█ TOTAH
COMMUNICATIONS, INC.

Current Account Charges

Non-Payment of charges noted with an asterisk (*) may result in disconnection of your local telephone service.

Account No 000000█ █████
BRIAN █████ MCLAUGHLIN

Other Charges & Credits

Description	Qty	Amount	Total
███████			

Subtotal Other Charges & Credits ████████

The Account charges shown above are being billed on behalf of TOTAH COMMUNICATIONS, INC 1-888-580-2208

Current Telephone Service

Non-Payment of charges noted with an asterisk (*) may result in disconnection of your local telephone service.

Telephone No 918-535-2826
BRIAN █████ MCLAUGHLIN

Monthly Charges

Service	Qty	Amount	Total
Charges for 09/01/17-09/30/17 - 1 MONTH			
* RES-LOCAL ACCESS LINE-CITY	1	12.20	12.20
* SIGHT/HEARING IMP RES	1	0.05	0.05
* TRS SURCHARGE	1	0.03	0.03
* RES- E911 FEE	1	0.61	0.61
* RES-INTERSTATE TOLL ACCESS	1	6.50	6.50
RES-ACCESS RESTRUCTURE CHARGE	1	3.00	3.00
████████			
████████			
* NETWORK INTERFACE DEVICE	1	0.00	0.00
████████			
OCC MONTHLY ASSESSMENT FEE	1	0.12	0.12
* RES-WACR ADJUSTMENT	1	5.81	5.81
Subtotal Monthly Charges			**$35.12**

The company you have chosen for your interLATA calls (long distance calls outside your local calling area) ████████

The company you have chosen for your intraLATA calls (long distance calls inside your local calling area) is █████

Taxes, Surcharges & Fees	Total
FEDERAL TAX	0.95
STATE TAX	1.62
CITY TAX	1.08
COUNTY TAX	0.37
FRANCHISE TAX	0.63
FED UNIV SVC CHARGE	1.62
OKLA UNIV SERVICE CHARGE	0.48
Subtotal Taxes, Surcharges & Fees	**$6.75**

The Telephone charges shown above are being billed on behalf of TOTAH COMMUNICATIONS, INC 1-888-580-2208

Current ██████████

Internet ID ██████
BRIAN █████ MCLAUGHLIN

Monthly Charges

Service	Qty	Amount	Total
Charges for 09/01/17-09/30/17 - 1 MONTH			
████████	1		████
████ MAINTENANCE	1		
F██████ SERVICE	1	4████	
Subtotal Monthly Charges			████

The Internet charges shown above are being billed on behalf of TOTELCSI 1-888-580-2208

PUBLIC NOTICE

Federal Communications Commission ion

445 12th Street, S.W.   News Media Information 202-418-0500 Internet: http://www.fcc.gov

Washington, D.C. 20554   TTY: 1-888-835-5322

DA 13-1530
Released: July 8, 2013

NOTICE OF CERTIFICATION OF
STATE TELECOMMUNICATIONS RELAY SERVICES (TRS) PROGRAMS

CG DOCKET NO. 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Governmental Affairs Bureau (Bureau) hereby grants certification to the state telecommunication relay services (TRS) programs listed below,[1] pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 225(f)(2), and section 64.606(b) of the Commission's rules.[2] On the basis of the state applications received, the Bureau has determined that:

(1) The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;[3]

(2) The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs;[4] and

(3) The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.[5]

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of ongoing compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states, as needed, to ensure compliance with such rule changes.

This certification, as conditioned herein, shall remain in effect for a five (5) year period, beginning July 26, 2013, and ending July 25, 2018, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2017, the states may apply for renewal of their TRS program

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[1]   For purposes of this proceeding, the term "state" refers to states, U.S. territories, and the District of Columbia, where applicable.

[2]   47 C.F.R. § 64.606(b).

[3]   47 U.S.C. § 225(f)(2)(A); 47 C.F.R. § 64.604.

4 47 U.S.C. § 225(f)(2)(B).

5 47 C.F.R. § 64.606(d).

certification by filing documentation in accordance with the Commission's rules, pursuant to 47 C.F.R. §§ 64.606(a) and (b).

STATES APPROVED FOR CERTIFICATION

File No: TRS-46-12
Alabama Public Service Commission
State of Alabama

File No: TRS-19-12
Department of Commerce
State of Alaska

File No: TRS-47-12
Arkansas Deaf and Hearing Impaired
State of Arkansas

File No: TRS-02-12
Commission for the Deaf and Hard of Hearing
State of Arizona

File No: TRS-32-12
California Public Utilities Commission
State of California

File No: TRS-23-12
Colorado Public Utilities Commission
State of Colorado

File No: TRS-48-12
Connecticut Department of Public Utility
State of Connecticut

File No: TRS-35-12
Delaware Public Service Commission
State of Delaware

File No: TRS-49-12
Public Service Commission
District of Columbia

File No: TRS-50-12
Florida Public Service Commission
State of Florida

File No: TRS-51-12
Georgia Public Service Commission
State of Georgia

File No: TRS-22-12
Hawaii Public Utilities Commission
State of Hawaii

File No: TRS-43-12
Idaho Public Service Commission
State of Idaho

File No: TRS-10-12
Illinois Commerce Commission
State of Illinois

File No: TRS-08-12
Indiana Telephone Relay Access Corporation
State of Indiana

File No: TRS-03-12
Iowa Utilities Board
State of Iowa

File No: TRS-07-12
Kansas Relay Services, Inc.
State of Kansas

File No: TRS-52-12
Kentucky Public Service Commission
Commonwealth of Kentucky

File No: TRS-13-12
Louisiana Relay Administration Board
State of Louisiana

File No: TRS-53-12
Maine Public Utilities Commission
State of Maine

File No: TRS-33-12
Telecommunications Access of Maryland

File No: TRS-34-12
Department of Telecommunications and

Energy

State of Maryland

Commonwealth of Massachusetts

File No: TRS-54-12
Michigan Public Service Commission
State of Michigan

File No: TRS-39-12
Minnesota Department of Commerce
State of Minnesota

File No: TRS-55-12
Mississippi Public Service Commission
State of Mississippi

File No: TRS-15-12
Missouri Public Service Commission
State of Missouri

File No: TRS-56-12
Telecommunications Access Program
State of Montana

File No: TRS-40-12
Nebraska Public Service Commission
State of Nebraska

File No: TRS-25-12
Relay Nevada
State of Nevada

File No: TRS-42-12
New Hampshire Public Service Commission
State of New Hampshire

File No: TRS-45-12
New Jersey Board of Utilities
State of New Jersey

File No: TRS-14-12
Commission for the Deaf and Hard of Hearing
State of New Mexico

File No: TRS-16-12
New York State Department of Public Service
State of New York

File No: TRS-30-12
Department of Health and Human Service
State of North Carolina

File No: TRS-12-12
Information Technology Department
State of North Dakota

File No: TRS-37-12
Public Utilities Commission of Ohio
State of Ohio

File No: TRS-57-12
Oklahoma Telephone Association
State of Oklahoma

File No: TRS-36-12
Oregon Public Utilities Commission
State of Oregon

File No: TRS-58-12
Pennsylvania Bureau of Consumer Services
Commonwealth of Pennsylvania

File No: TRS-28-12
Telecommunications Regulatory Board
Puerto Rico

File No: TRS-59-12
Division of Public Utilities and Carriers

State of Rhode Island

File No: TRS-62-12
Micronesian   Telecommunications
Corporation
Saipan

File No: TRS-11-12
South Carolina Office of Regulatory Staff
State of South Carolina

File No: TRS-60-12
Department of Human Services
State of South Dakota

File No: TRS-20-12

File No: TRS-17-12

Tennessee Regulatory Authority	Texas Public Utility Commission
State of Tennessee	State of Texas
File No: TRS-61-12	**File No: TRS-09-12**
Virgin Islands Public Service Commission	Public Service Commission
U.S. Virgin Islands	State of Utah
File No: TRS-44-12	**File No: TRS-04-12**
Vermont Department of Public Service	Department for the Deaf and Hard of Hearing
State of Vermont	Commonwealth of Virginia
File No: TRS-27-12	**File No: TRS-06-12**
Office of the Deaf and Hard of Hearing	Public Service Commission of West Virginia
State of Washington	State of West Virginia
File No: TRS-01-12	**File No: TRS-18-12**
Wisconsin Department of Administration	Division of Vocational Rehabilitation
State of Wisconsin	State of Wyoming

The full text of this *Public Notice* and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Room CY-A257, Washington, DC 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their website: www.bcpiweb.com or call (202) 488-5300. Filings may also be viewed on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs// (insert docket No. **03-123** in the proceeding number fill-in block, and the state identification number, (*e.g.*, TRS-46-12) assigned for that specific state application in the bureau identification number fill-in block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* can also be downloaded in Word and Portable Document Format (PDF) at http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs.

For further information regarding this *Public Notice*, contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disabilities Rights Office, (202) 418-2247 (voice), or e-mail Dana.Wilson@fcc.gov.

- FCC -

Appendix K: Letter notifying the FCC of substantive changes to TRS program

November 14, 2016

Mr. Thomas Chandler
Chief, Disability Rights Office
Federal Communications Commission
9300 East Hampton
Capitol Heights MD 20743

Dear Mr. Chandler:

Pursuant to 64.605(f), this is to inform you of substantive changes in the Oklahoma Telecommunications Relay Service (TRS) program. Among the changes are the following:

1. A new agreement for the provision of telephone relay service in Oklahoma has been executed with Sprint Communications Company, L.P. for the period of November 15, 2016 through November 14, 2021.

2. New rates, pursuant to the new contract for TRS service and for CapTel services.

3. Outreach - Sprint will provide a dedicated outreach budget to increase awareness and familiarity of Relay Oklahoma among the users of the service as well as other citizens and businesses. During the term of this Agreement, Sprint will provide a $60,000 annual outreach budget dedicated to Relay Oklahoma in addition to providing the services of an Account Manager to serve the outreach needs for the State. This is an increase of $10,000 annually from the previous contract.

The OTA certifies that the Oklahoma TRS program continues to meet federal minimum standards.

Sincerely,

Robert Stafford
Executive Vice President

CC: Marlene H. Dortch
        Office of the Secretary
        Federal Communications Commission
        445 12th Street, SW, Room TW-B204
        Washington, D.C. 20554