

September 15, 2017

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

Re: TRS Certification Application

Dear Ms. Dortch,

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

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

Sincerely,



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## Section 1 Introduction

This is an application on behalf of the Island of Saipan submitted by Micronesian Telecommunications Corporation d/b/a Pacific Telecom, Inc. (PTI) to have the Saipan Telecommunications Relay Service (Saipan Relay) be certified as a Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission (FCC). The Island of Saipan has been certified for the certification time period beginning July 26, 2013 and ending July 25, 2018.

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

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

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1006 12<sup>th</sup> Street  
Aurora, NE 68818  
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## Request for Renewal of Current State Certification

Saipan Relay provides traditional (TTY-based) TRS, Spanish language traditional TRS, and speech-to-speech relay (STS) service. In this Application for renewal of its certification, Micronesian Telecommunications Corporation (d/b/a PTI) has included documentation to the FCC that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose. This Application also demonstrates that its program makes available to TRS users informational materials on Saipan's complaint procedures sufficient for users to know the proper procedures for filing complaints. This Application is submitted in narrative form.

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

Wherefore, the Micronesian Telecommunications Corporation d/b/a Pacific Telecom, Inc. (PTI) requests that the Federal Communications Commission certify Saipan Relay provided through Hamilton Relay, Inc. ("Hamilton") in Aurora, Nebraska.

By:  \_\_\_\_\_

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**Section 2 Contract Status**

Hamilton Relay, Inc. is operating the Saipan Telecommunications Relay Service under contract with Micronesian Telecommunications Corporation d/b/a Pacific Telecom, Inc. (PTI). The term of the contract is effective October 1, 2004 through September 30, 2017 with additional one-year extensions.

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## Section 3 Operational Standards

### **§ 64.604 Mandatory minimum standards.**

#### *(a) Operational standards –*

##### *(1) Communications assistant (CA).*

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

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

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

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

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

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

Additional details about these requirements are as follows:

#### **Spelling Skills**

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

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

### **English Reading, Speaking, and Writing Skills**

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

### **Typing Proficiency**

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

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

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

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

### **Culture Training**

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

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

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

### **Proficiency Examinations**

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

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

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

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

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

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

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

*(v) CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party. The obligation of the CA to stay with the call shall terminate upon the earlier of:*

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

*(B) The completion of the minimum time period.*

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

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

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

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

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#### **Change of a STS CA**

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

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

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

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

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

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

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

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

*(2) Confidentiality and conversation content.*

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

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

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

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

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

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

*(3) Types of calls.*

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

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

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

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

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

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

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

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

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

Saipan Relay’s service provider provides long distance service to TRS users at no cost to the users.

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

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

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

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

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

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

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

### **Coin Sent Paid**

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

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

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

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

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### **Cellular/Wireless/PCS Phone Access**

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

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

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

### **Directory Assistance**

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

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

#### **Network Access**

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

#### **Access to Regionally Directed Toll-Free Numbers**

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

#### **Access to Restricted Toll Free Numbers**

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

#### **Inbound International Calls**

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

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

#### **Pay-Per-Call Services**

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

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

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

### **TTY/ASCII to Voice**

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

### **Voice Call Processing**

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

### **Voice Carryover (VCO)**

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

### **Two-Line VCO**

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

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

### **Reverse Two-Line VCO**

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

### **VCO-TTY and TTY-VCO**

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

### **VCO-VCO**

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

### **Hearing Carryover (HCO)**

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

### **Two-Line HCO**

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

### **HCO-TTY and TTY-HCO**

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

### **HCO-HCO**

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

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

### **Call Release**

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

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

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

### **Speed Dialing**

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

### **Three-Way Calling**

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

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

### **Machine Recording Capabilities**

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

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

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

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

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

### **Answering Machine and Voice Mail Retrieval**

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

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

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

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

#### **Answering Machine Retrieval (Single-Line)**

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

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

#### **Procedure for Handling TRS Emergency Calls**

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

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

#### **Back-up Emergency Procedures**

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

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

Communication Assistant can immediately dial the appropriate emergency personnel.

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

### **FCC Rules for Emergency Calls**

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

### **TTY to TTY Communications Between PSAP and Caller**

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

### **If a Caller Disconnects Before Being Connected to the PSAP**

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

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

### **Emergency Numbers**

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

*(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.*

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

## Section 4 Technical Standards

### **§ 64.604 Mandatory minimum standards.**

*(b) Technical standards –*

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

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

*(2) Speed of answer.*

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

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

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

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

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

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

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

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

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

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

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

Saipan Relay has outstanding answer performance. Average answer seconds for the past year were 0.8 with 99.6% of calls answered in ten seconds or less.

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

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

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

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

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

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

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

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Saipan Relay's service provider provides long distance service to TRS users at no cost to the users.

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

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

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

*(4) TRS facilities.*

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

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

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

The facilities used by Saipan Relay's service provider have the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Saipan Relay

is operated from a combination of relay centers located in Nebraska, Louisiana, Maryland, Massachusetts and Georgia. Speech to Speech calls are processed from the Maryland and Louisiana centers.

#### **Location of TRS Switches and Relay Platforms**

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

This ensures continuous operation of Saipan Relay.

#### **Uninterruptible Power**

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

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

#### **Switching System**

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

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

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of CA control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database maintains a

preference of each caller to speed up call connections and to provide information for tailored call processing.

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

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

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

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

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

Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Saipan Relay is ideal for today's rapidly changing technologically advanced environment.

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

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

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

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

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

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

## Section 5 Functional Standards

### *§ 64.604 Mandatory minimum standards.*

#### *c) Functional standards —*

##### *(1) Consumer complaint logs.*

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

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

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

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

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

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

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

*(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:*

*(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;*

*(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and*

*(iii) The physical address to which correspondence should be sent.*

PTI submits the following individual to the FCC as a contact person for TRS consumer information and complaints about Intrastate TRS:

Tess Masga  
Micronesian Telecommunications Corporation (d/b/a PTI)  
P.O. Box 500306  
Saipan, MP 96950  
Phone: 670-682-2614  
Email: [tess.masga@vzpacifica.com](mailto:tess.masga@vzpacifica.com)

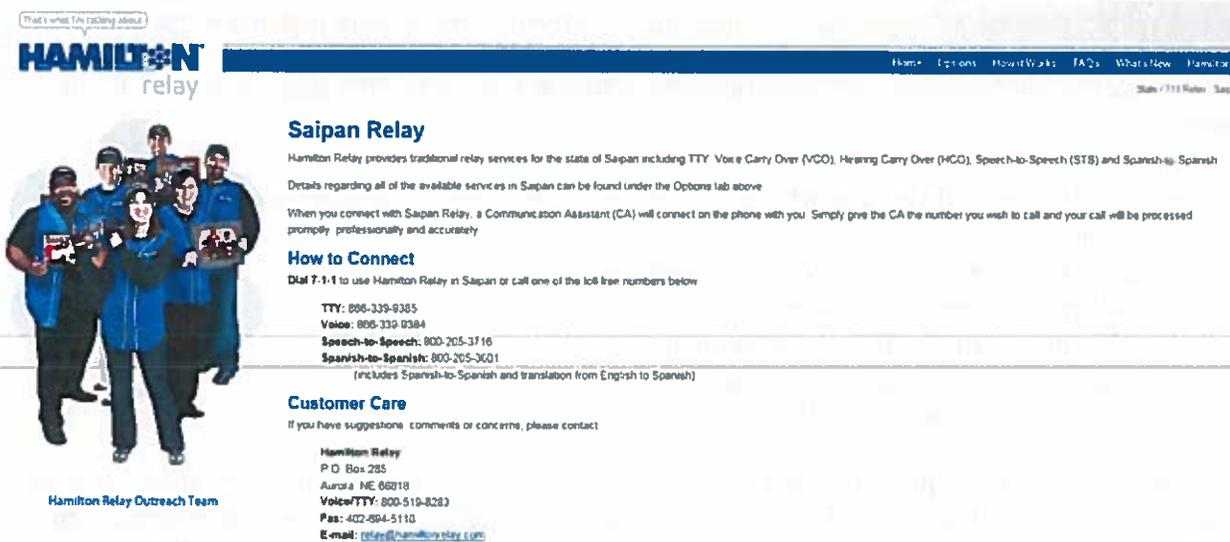
Saipan Relay's service provider has submitted the following individual to the FCC as a contact person for TRS consumer information and complaints about Hamilton's service.

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

*(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier*

*providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

Saipan Relay utilizes a website to provide information (screenshot shown below).



The screenshot shows the Hamilton Relay website. At the top left, there is a logo for Hamilton Relay with the tagline "That's what I'm talking about!". To the right of the logo is a navigation menu with links for Home, Options, How to Use, FAQs, What's New, and Hamilton. Below the navigation menu is a section titled "Saipan Relay". This section includes a photograph of the Hamilton Relay Outreach Team, which consists of several people in blue shirts. The text in the "Saipan Relay" section describes the services provided, including TTY, Voice Carry Over (VCO), Hearing Carry Over (HCO), Speech-to-Speech (STS), and Spanish-to-Spanish. It also provides contact information for the Saipan Relay, including a list of phone numbers for TTY, Voice, Speech-to-Speech, and Spanish-to-Spanish. Below this is a "Customer Care" section with contact information for suggestions, comments, or concerns.

**Hamilton Relay**  
P.O. Box 285  
Aurora, NE 68818  
Voice/TTY: 800-519-8283  
Fax: 402-694-5110  
E-mail: [relay@hamiltonrelay.com](mailto:relay@hamiltonrelay.com)

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

## Customer Care

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

**Hamilton Relay**  
P.O. Box 285  
Aurora, NE 68818  
Voice/TTY: 800-519-8283  
Fax: 402-694-5110  
E-mail: [relay@hamiltonrelay.com](mailto:relay@hamiltonrelay.com)

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

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

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

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

Saipan Relay's service provider provides long distance service to TRS users at no cost to the users.

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

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

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

*(5) Jurisdictional separation of costs —*

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

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

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

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

*(6) Complaints —*

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

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

The Micronesian Telecommunications Corporation d/b/a Pacific Telecom, Inc. (PTI) will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

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

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

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

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

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

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

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

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

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

*(A) Informal complaints —*

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

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

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

*(B) Review and disposition of informal complaints.*

*(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this*

*subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.*

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

PTI will assist as necessary in this process.

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

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*(1) The name and address of the complainant,*

*(2) The name and address of the defendant against whom the complaint is made,*

*(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and*

*(4) The relief sought.*

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

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

*(F) Service.*

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

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

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

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

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

PTI will assist as necessary in this process.

**Supplemental Information:**

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

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

Saipan Relay's service provider's Customer Care Department, in communication with their Vice President of Relay (who reviews all complaint information), has ultimate responsibility for all

inquiries, comments, compliments and complaints. The Customer Care department shares customer care activities with the Relay Center Manager who has the ability to take whatever action is needed to resolve situations which may arise.

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

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

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

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

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

*(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such*

*information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

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

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

## Section 6 Exceeding FCC Minimum Standards

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

#### *(a) Documentation —*

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

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

#### *(b)*

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

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

PTI understands.

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

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

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

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

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

#### **CA Training and Procedures**

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

#### **Typing 60 Words Per Minute**

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

#### **Turbo Code**

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

#### **Enhanced Turbo Code**

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

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

#### **Spanish to Spanish Relay and Spanish to English Translation**

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

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

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

(c)

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

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

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*(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.*

PTI undersants.

(e)

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

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

*(f) Notification of substantive change.*

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

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

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