Subject to Request for Confidential Treatment
Pursuant to 47 C.F.R. §§ 0.457, 0.459

HWG | HARRIS, WILTSHIRE & GRANNIS LLP

December 2, 2014

BY HAND DELIVERY AND ECFS

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

Kris Monteith
Chief, Consumer and Governmental Affairs Bureau
TRS Certification Program
Federal Communications Commission
Washington, DC 20554

Re: Update and Verification of Internet-Based TRS Certification Application, and Request for Confidential Treatment Pursuant to 47 C.F.R. §§ 0.457 and 0.459; Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Ms. Dortch and Ms. Monteith:

Pursuant to Section 64.606(g) of the Commission's rules, Sorenson Communications, Inc. ("Sorenson") hereby updates and verifies its application for certification as a provider of Internet-based telecommunications relay service (the "Annual Update").[1] An original and one

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[1] Pursuant to the *Second Report and Order* issued on July 28, 2011, Sorenson filed its original certification application on December 2, 2011, which was within 30 days after OMB published its approval in the Federal Register. *See Structure & Practices of the Video Relay Serv. Program*, Second Report & Order, 26 FCC Rcd. 10898, 10921 ¶ 59 (2011); 76 Fed. Reg. 68,328 (Nov. 4, 2011). Pursuant to 47 C.F.R. § 64.606(g), providers must certify compliance with 47 C.F.R. § 604 "on an annual basis."

In Sorenson's December 2011 application and subsequent updates, it applied for certification as both a VRS and an IP CTS provider. The present update is split into two documents: one addressing VRS and one addressing IP CTS. In the IP CTS update, Sorenson continues to apply for certification as an IP CTS provider. However, the update also seeks certification for Sorenson's affiliate, CaptionCall, LLC, to become an independent provider of IP CTS. Until the Commission grants CaptionCall an independent certification, Sorenson will continue to provide IP CTS services by subcontracting with CaptionCall. If the Commission grants CaptionCall its own independent certification, Sorenson expects that CaptionCall will

copy of Sorenson's updated Application in confidential form is attached as Exhibit A, and an original and one copy of Sorenson's updated Application in redacted form is attached as Exhibit B. Sorenson is also filing an electronic copy of the redacted version via ECFS.

Sorenson requests pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, that the Commission withhold from any future public inspection and accord confidential treatment to the highly confidential, business sensitive information contained in the Update and its exhibits, including: numbers of subscribers; details of training provided to communications assistants; call-handling capacity; internal compliance communications; contact information for Sorenson employees; data related to the number of employees involved in TRS operations; descriptions of the technology and equipment used to support Sorenson's call center functions; identities of entities with ownership interests; descriptions of Sorenson's ownership structure; names of Sorenson's executives, officers and board members; sponsorship agreements; and descriptions of Sorenson's complaint procedures (collectively, the "Confidential Information"). All of the Confidential Information has been redacted from the version of the Annual Update attached as Exhibit B and filed electronically.

The Confidential Information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"). Exemption 4 of FOIA provides that the public disclosure requirement of the statute "does not apply to matters that are ... (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential." 5 U.S.C. § 552(b)(4). Because Sorenson is providing commercial information "of a kind that would not customarily be released to the public" in accordance with the application requirements in Section 64.606 of the Commission's rules, this information is "confidential" under Exemption 4 of FOIA. *See Critical Mass Energy Project* v. *NRC,* 975 F.2d 871, 879 (D.C. Cir. 1992).

The Confidential Information related to individual employees also constitutes personally identifiable information that could, if disclosed, jeopardize the safety of the employees involved. This information merits confidential treatment under FOIA Exemptions 6 and 7(C), which protect information that "could reasonably be expected to constitute an unwarranted invasion of personal privacy" and that "would constitute a clearly unwarranted invasion of personal privacy." 5 U.S.C. § 552(b)(6), (7)(C); *see also Dep't of State v. Wash. Post Co.*, 456 U.S. 595, 601-02 (1982).

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, Sorenson hereby states as follows:

1. Identification of the Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

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begin to provide IP CTS independently and will submit its own requests for compensation directly to the fund administrator. At that time, Sorenson itself expects to cease offering IP CTS, as CaptionCall would then provide IP CTS to eligible consumers.

Sorenson seeks confidential treatment with respect to the Confidential Information—all of which has been redacted from the version of the Update attached as Exhibit B and filed electronically.

2. Description of the Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

Sorenson is updating and verifying its application for certification as a provider of Internet-based telecommunications relay service.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information described above is protected from disclosure for two reasons. First, the Confidential Information constitutes highly sensitive information about Sorenson's operations, costs, and strategic decisions, including as they relate to staffing, call center operation, redundancy and the ability to manage variable call volumes. This information constitutes highly sensitive commercial information "which would customarily be guarded from competitors." 47 C.F.R. § 0.457. Second, the Confidential Information related to individual employees constitutes personally identifiable information that could, if disclosed, jeopardize the safety of the employees identified. Disclosure of this information would result in an unwarranted privacy breach.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The Internet-based Telecommunications Relay Services market is highly competitive throughout the United States.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure of the Confidential Information would result in two kinds of harm. First, disclosure would provide Sorenson's competitors with sensitive insights related to Sorenson's operations, costs, and strategic decisions—all of which would work to Sorenson's severe competitive disadvantage. Second, disclosure of information related to specific employees would result in privacy breaches that would impact the safety of those employees directly.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

Sorenson does not make the Confidential Information publicly available.

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

Sorenson does not make the Confidential Information publicly available.

Sincerely,

Stephen W. Miller
Counsel to Sorenson Communications, Inc.

Attachments

cc: Gregory Hlibok (email)

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

In the Matter of	)	
	)	
	)	
Structure and Practices of the Video Relay Service Program	)	CG Docket No. 10-51
	)	
	)	

Update and Verification of Internet-Based TRS Certification Application

Sorenson Communications, Inc.

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December 2, 2014

TABLE OF CONTENTS

PAGE

I. INTRODUCTION AND SUMMARY 1

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

III. MEETING NON-WAIVED MINIMUM STANDARDS (47 C.F.R. § 64.606(a)(2)(ii)) 3

IV. VRS CALL CENTER LEASES (47 C.F.R. § 64.606(a)(2)(ii)(A)) 13

A. Leases for U.S. Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(2)) 13

B. Leases for Call Centers Outside of the United States (47 C.F.R. § 64.606(a)(2)(ii)(A)(3)) 14

C. List of Call Center Leases (47 C.F.R. § 64.606(a)(2)(ii)(A)(2)) 14

V. DESCRIPTION OF TECHNOLOGY AND EQUIPMENT USED TO SUPPORT VRS CALL CENTER FUNCTIONS (47 C.F.R. § 64.606(a)(2)(ii)(A)(4)) 15

A. Description of Technology and Equipment (47 C.F.R. § 64.606(a)(2)(ii)(A)(4)) 15

B. Technology and Equipment in U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(6)) 16

C. Technology and Equipment in Non-U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(7)) 17

D. ACD Lease or License Agreement (47 C.F.R. § 64.606(a)(2)(ii)(A)(8)) 18

VI. ENTITIES WITH OWNERSHIP / CONTROL INTEREST (47 C.F.R. § 64.606(a)(2)(ii)(B)) 18

VII. DESCRIPTION OF ORGANIZATIONAL STRUCTURE (47 C.F.R. § 64.606(a)(2)(ii)(B)) 19

VIII. NAMES OF EXECUTIVES, OFFICERS, MEMBERS OF BOARD (47 C.F.R. § 64.606(a)(2)(ii)(B)) 19

IX. NUMBER OF TRS EMPLOYEES (47 C.F.R. § 64.606(a)(2)(ii)(C)) 19

X. LIST OF SPONSORSHIP AGREEMENTS (47 C.F.R. § 64.606(a)(2)(ii)(E)) 20

XI. DESCRIPTION OF COMPLAINT PROCEDURES (47 C.F.R. § 64.606(a)(2)(iii)) 21

XII. STATEMENT REGARDING ANNUAL COMPLIANCE REPORTS (47 C.F.R. § 64.606(a)(2)(iv)) 22

XIII. CERTIFICATION 23

LIST OF EXHIBITS 24

ADDENDUM 1: COMPLIANCE PLAN

ADDENDUM 2: CPNI CERTIFICATION AND STATEMENT OF OPERATING PROCEDURES

I. Introduction and Summary

Pursuant to 47 C.F.R. § 64.606(g), and in accordance with the Commission's rules, the Commission's Notice of Grant of Conditional Certification released on April 24, 2014,[1] and its orders released on July 28 and October 17, 2011, Sorenson Communications, Inc. ("Sorenson") submits this update and verification of its December 2, 2011 application for certification as a provider of Internet-based telecommunications relay service ("iTRS").[2]

Sorenson is the industry-leading provider of communications services and products designed to enable deaf and hard-of-hearing individuals to communicate with the hearing world. By offering consumers cutting-edge equipment and applications, and by staffing its network of 106 Video Relay Service ("VRS") call centers with highly skilled communications assistants

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[1] *Grant of Conditional Certification for Sorenson Commc'ns, Inc., as Reorganized Pursuant to Chapter 11, to Provide Internet-Based Telecommunications Relay Servs. Pending Comm'n Action on Sorenson's Application for Certification*, Public Notice, 29 FCC Rcd. 4111 (2014).

[2] Sorenson's updated application consists of this document; the exhibits submitted with the December 2011 application, the December 2012 update, the December 2013 update, the February 2014 update; the May 2014 update; and the exhibits submitted herewith. Sorenson hereby adopts and incorporates the exhibits accompanying the 2011 application, the 2012 update, the 2013 update, the February 2014 update, and the May 2014 update to the extent they are not replaced by the updated exhibits submitted today unless otherwise noted. Due to their sensitive nature, the exhibits have been redacted from the public version of the application.

In Sorenson's December 2011 application and subsequent updates, it applied for certification as both a VRS and an IP CTS provider. The present update is split into two documents: one addressing VRS and one addressing IP CTS. In the IP CTS update, Sorenson continues to apply for certification as an IP CTS provider. However, the update also seeks certification for Sorenson's affiliate, CaptionCall, LLC, to become an independent provider of IP CTS. Until the Commission grants CaptionCall an independent certification, Sorenson will continue to provide IP CTS services by subcontracting with CaptionCall. If the Commission grants CaptionCall its own independent certification, Sorenson expects that CaptionCall will begin to provide IP CTS independently and will submit its own requests for compensation directly to the fund administrator. At that time, Sorenson itself expects to cease offering IP CTS, as CaptionCall would then provide IP CTS to eligible consumers.

("CAs")[3], Sorenson has demonstrated its commitment to working closely with the deaf and hard-of-hearing community to ensure that communications services continue to meet their needs. Since 2003, Sorenson has provided its award-winning iTRS offerings, which have earned a reputation for quality, reliability, and efficiency. Indeed, Sorenson has established a proven record of meeting and exceeding the Commission's minimum standards, and it continues to set the pace among iTRS providers with respect to robust internal compliance systems and efforts to combat fraud. By virtually any measure, Sorenson has proven itself to be the industry leader in terms of service quality, equipment innovations, efficiency, ease of use, fraud prevention, and consumer responsiveness.

Sorenson began providing VRS in 2003. Sorenson began providing IP Relay services in 2005 and IP CTS in 2011. Sorenson discontinued IP Relay service in 2013 and is no longer applying for certification as an IP Relay service provider. Sorenson's affiliate, CaptionCall, currently supports Sorenson in its provision of IP CTS. As of November 18, 2014, Sorenson serves *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****

II. Forms of iTRS to Be Provided (47 C.F.R. § 64.606(a)(2)(i))

Pursuant to the Commission's July 28, 2011 Order, Sorenson currently provides VRS, and its affiliate, CaptionCall, supports Sorenson in its provision of IP CTS, under a grant of interim eligibility.[4] Sorenson, which formerly operated under contract with the State of Utah's

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[3] For VRS, Sorenson's "CAs" are known as Video Interpreters or "VIs". Sorenson will utilize CA throughout this document, however, because that is the term referenced in the Commission's rules.

[4] *See Structure and Practices of the Video Relay Service Program*, Second Report and Order, 26 FCC Rcd. 10,898, 10,922, ¶ 59 (2011) ("*2011 Waiver Order*") (granting interim eligibility

FCC certified TRS program, timely filed its Certification Application on December 2, 2011, and updated that application on December 3, 2012, December 3, 2013, February 28, 2014, and May 15, 2014. This filing also serves as an update to the 2011 application.

III. Meeting Non-Waived Minimum Standards (47 C.F.R. § 64.606(a)(2)(ii))

As explained in the chart that follows, Sorenson's services meet all of the non-waived minimum standards applicable to VRS.[5]

STANDARD	WAIVED	SORENSON'S COMPLIANCE
CA Training 47 C.F.R. § 64.604(a)(1)(i)	--	Sorenson has developed a robust in-house training program in which its CAs are instructed in depth on meeting the needs of deaf and hard-of-hearing consumers, complying with the regulatory standards applicable to CAs, and the operational and technological aspects of Sorenson's services and equipment. Its CAs are trained for an average of *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****.

for "any iTRS provider currently eligible to receive compensation directly from the TRS Fund via a means other than Commission certification," to expire "(1) 35 days after this application deadline, in the event no application is timely filed; (2) 35 days after Commission dismissal or denial of the application for certification in the event of Commission dismissal or denial; or (3) upon Commission grant of the application for certification in the event of Commission grant").

[5] With respect to some of the non-waived minimum standards, the Commission's requirements are ambiguous and the Commission has not provided additional guidance as to their meaning. In those cases, Sorenson provides the following enumeration utilizing its understanding of the scope or substance of these requirements.

STANDARD	WAIVED	SORENSON'S COMPLIANCE
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	--	As part of its robust training program, Sorenson ensures that its CAs handling VRS calls are sufficiently skilled in ASL;[6] that they are familiar with hearing and speech-disability cultures, languages and etiquette; and that they possess clear and articulate voice communications skills.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	--	Through its applicant screening and in-house training systems, Sorenson ensures that all of its VRS CAs are "qualified interpreters" — that is, that they are able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.
Ten Minute Rule 47 C.F.R. § 64.604(a)(1)(v)[7]	--	Sorenson's procedures provide that CAs must stay with any given call for a minimum of ten minutes once the CA reaches the called party, unless (a) the VRS end user terminates the call earlier or requests another CA, or (b) either the VRS user or CA finds that they are not communicating effectively given the nature of the call.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	--	As part of its operating procedures, Sorenson makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation and in the event of a transfer to another CA.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	--	Sorenson bars its CAs from disclosing the content of any relayed conversation, except as authorized by 47 U.S.C. § 605.

[6] The minimum standards involving typing and spelling do not apply to VRS. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5159 ¶ 42 (2000).

[7] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Order, 21 FCC Rcd. 6733, 6736 ¶ 9 (2006) ("If the party using sign language or the VRS CA find that they are not communicating effectively given the nature of the call, the VRS provider may have another CA handle the call without violating the 10-minute in-call replacement rule.").

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Accuracy Rule 47 C.F.R. § 64.604(a)(2)(ii)	--	Sorenson bars its CAs from intentionally altering the conversations they relay, except to the extent (i) the iTRS end user requests summarization or similar alterations, or (ii) necessary to provide information to emergency responders as allowed by rule.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	--	Sorenson bars its CAs from refusing single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	--	Sorenson does not limit the length of calls.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	Conditional exemption[8]	Sorenson's VRS is capable of handling any type of call normally provided by telecommunications carriers except as exempted by the Commission. Because Sorenson does not assess charges for long-distance calling, Sorenson is not required to and does not provide billing options such as sent-paid long distance and operator-assisted, collect, and third party billing. For the same reason, Sorenson does not and need not permit users to place calls using calling cards or credit cards.
One-Line VCO, Two-Line VCO 47 C.F.R. § 64.604(a)(3)(v)(2)	Partial waiver[9]	Sorenson supports two-line VCO for all VRS users. Sorenson supports one-line VCO by providing at least one form of iTRS access technology that supports this functionality.
HCO, two-line HCO 47 C.F.R. § 64.604(a)(3)(v)(3)	Partial waiver[10]	Sorenson supports two-line HCO for all VRS users. As required by the rules, Sorenson provides at least one form of iTRS access technology that supports one-line HCO.

[8] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities Waivers of ITRS Mandatory Minimum Standards*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 14-125 ¶¶ 11-15 (2014) ("*2014 Waiver Order*").

[9] *2014 Waiver Order* ¶¶ 34-35 (waiving requirement that VRS providers support one-line VCO and one-line HCO on VRS access technology distributed by another provider).

[10] *Id.*

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Speed Dialing 47 C.F.R. § 64.604(a)(3)(vi)(2)	--	Sorenson makes speed-dialing functionality available to its VRS customers by providing one-touch dialing on the iTRS access technology that it provides to users.
Three-way Calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	--	Sorenson meets the three-way-calling requirement by ensuring that its Communications Assistants handle a three-way call arranged by the hearing party just as they would handle any other call.[11] Over and beyond the requirement, Sorenson also permits deaf users to place three-way-calls to multiple hearing parties.
Recorded Messages and Interactive Menus 47 C.F.R. § 64.604(a)(3)(vii)	--	Sorenson's Communications Assistants alert a VRS user to the presence of a recorded message and interactive menu[12] and process such calls just as they would process any other call. Sorenson does not impose charges for calls to recorded messages.

[11] The Commission has stated that TRS providers satisfy the three-way calling requirement if they "ensure that the TRS facility or CA facilitates or handles a three-way call, as the CA would handle any TRS call, where and to the extent the three-way call has been arranged by any one of the parties to the call, *e.g.*, using a party's LEC-provided custom calling service (CCS), by bridging two telephone lines via customer terminal equipment, or by some other means." *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 20 FCC Rcd 3689, 3691 ¶ 8 (2005). The Commission has further clarified "that TRS providers are not required to be able to arrange, initiate, or set up a three-way call (but they may do so)... so long as the provider is able to handle or facilitate a three-way call, in some manner, whether initiated by one of the parties to the call or set up by the provider." *Id.*

[12] The requirement that the VI use a "hot key" to "send text from the CA to the consumer's TTY" plainly does not apply to VRS, which does not use TTYs or send text. *See* 47 C.F.R. § 64.604(a)(3)(vii). Similarly, the requirement that TRS providers "electronically capture" recorded messages so that they can type the whole message without requiring the user to hang up and call back multiple times also plainly does not apply to VRS. Sorenson Communications Assistants relay recorded messages in real time without requiring users to hang up and call back and therefore do not need to record electronic messages. *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5179 ¶ 92 (2000) (noting that the recording requirement was imposed because without it, users were "unable to make calls that encounter interactive menus or other recorded messages or must frequently place a succession of calls to leave a message with, or access the information provided by, such systems").

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Answering Machine Retrieval 47 C.F.R. § 64.604(a)(3)(viii)		Sorenson permits users to place VRS calls to retrieve voice messages left in their voice mailbox and permits Communications Assistants to interpret messages left on a user's voice answering machine.
Privacy Screen 47 C.F.R. § 64.604(a)(6)	--	Sorenson's call management system does not allow CAs to use privacy screens. Sorenson's VRS CAs are required to disconnect a VRS call if either the calling or called party employs a privacy screen or similar feature for more than five minutes or is otherwise unresponsive for more than five minutes, except in the case of a 911 call or in circumstances where the calling or called party has legitimately been placed on hold. Sorenson's VRS CAs disconnect calls in these circumstances only after announcing the upcoming disconnection.
International Calls 47 C.F.R. § 64.604(a)(7)	--	Sorenson does not seek compensation for VRS calls that originate from an international IP address, with the exception of calls made by a U.S. resident who has pre-registered with Sorenson prior to leaving the country, as required under the FCC's rules.
Speed of Answer for VRS 47 C.F.R. § 64.604(b)(2)(iii)	--	As reflected in its monthly data submissions to the Fund administrator, Sorenson's VRS complies with the current speed-of-answer requirement that 80% of all calls are answered within 120 seconds measured on a monthly basis.[13]
Equal Access to IXCs 47 C.F.R. § 64.604(b)(3)	Conditional exemption[14]	Sorenson does not charge for long distance service and is therefore exempt from this requirement.

[13] *Sorenson Communications, Inc. v. FCC*, 765 F.3d 37, 52 (D.C. Cir. 2014).

[14] *2014 Waiver Order* ¶ 15.

STANDARD	WAIVED	SORENSON'S COMPLIANCE
24/7 Operations 47 C.F.R. § 64.604(b)(4)(i)	--	Sorenson VRS is available 24 hours per day, 7 days per week. Sorenson's equipment has the technical capacity to handle up to *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL***** Sorenson also has the ability to scale these capacities upwards to meet growing demand.
Redundancy 47 C.F.R. § 64.604(b)(4)(ii)	--	Sorenson's operations include multiple redundancy features and safeguards, including emergency generators to ensure uninterruptable power for emergency use.
At-Home Interpreting 47 C.F.R. § 64.604(b)(4)(iii)	--	Sorenson does not permit or enable its VRS CAs to relay calls from their homes (or from any location other than a Sorenson call center).
Caller ID 47 C.F.R. § 64.604(b)(6)	--	On all VRS calls that originate with a Sorenson iTRS customer, Sorenson passes through the number of the iTRS facility, 711, or the calling party's number—except where the calling party has requested to block caller ID.
Complaint Logs and Procedures 47 C.F.R. § 64.604(c)(1), (6)	--	Sorenson maintains logs of all complaints it receives that allege violations of the federal TRS mandatory minimum standards. The logs include the date the complaint was filed, the nature of the complaint, the date of resolution, and the nature of resolution. Sorenson annually submits to the FCC a summary of its complaint logs. Sorenson's complaint procedures are detailed in § XI below.
Complaint Contact Point 47 C.F.R. § 64.604(c)(2)	--	Sorenson's contact person for iTRS consumer information and complaints is: Michael D. Maddix Director of Government and Regulatory Affairs 4192 South Riverboat Road Salt Lake City, UT 84123 Voice: (801) 287-9461 Fax: (801) 287-9401 Email: mmaddix@sorenson.com

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Publicity re iTRS 47 C.F.R. § 64.604(c)(3)	--	Although the FCC has initiated a pilot program to perform TRS outreach and no longer allows VRS providers to include the cost of outreach in their yearly cost submissions, Sorenson publicizes the availability of iTRS through print promotional materials, web-based promotional materials, sponsorship arrangements, and other means. Sorenson does not include the cost of these activities in its yearly cost submissions.
Rates 47 C.F.R. § 64.604(c)(4)	--	Sorenson does not charge its customers anything for its iTRS.
Cost Information and other Data Submissions 47 C.F.R. § 64.604(c)(5)	--	Sorenson maintains and submits required cost data and other data to the FCC and to the Fund administrator.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(iii)(M)	--	Sorenson has provided a complete description of the iTRS whistleblower protections to all of its employees. Sorenson includes instructions for reporting noncompliance as part of its TRS Compliance Manual and TRS Compliance Training, which is on the home page of the company HR Intranet site. This includes the URL and phone number for the FCC's whistleblower hotline.
VRS Service Name 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(ii)	--	Sorenson's primary VRS services (known as "SVRS") and its Spanish-language sub-brand (known as "RAPIDO.SVRS.TV") clearly identify Sorenson as the provider of the service.
URL Routing 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(ii)	--	All of Sorenson's VRS signaling traffic is routed through IP addresses to which Sorenson's URL (svrs.tv) resolves.
Contracting 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(iii)	--	Sorenson does not contract with or otherwise authorize any third party to provide interpretation services or call center functions for VRS.

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Written Contracts 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(v)	--	For VRS, all of Sorenson's contracts with third parties are in writing. Copies of all such contracts are available to the Commission and the iTRS Fund administrator upon request.
Call Center Reports 47 C.F.R. § 64.604(c)(5)(iii)(N)(2)	--	Sorenson files the required call center reports with the FCC and the Fund administrator.
CA Compensation 47 C.F.R. § 64.604(c)(5)(iii)(N)(3)	--	Sorenson does not compensate, provide preferential work schedules, or otherwise benefit its VRS CAs based on the number of VRS minutes or calls that the CA handles, either individually or as a group.
Remote Training Calls 47 C.F.R. § 64.604(c)(5)(iii)(N)(4)	--	Sorenson acknowledges that it is not entitled to compensation for VRS calls to remote training sessions or comparable activities when it (or its affiliates or related parties) has been involved in any manner with the session or activity. Sorenson removes any such minutes from its data submissions before submitting them to the TRS Fund administrator when seeking compensation.
TRS Customer Information 47 C.F.R. § 64.604(c)(7)	--	Sorenson does not use its subscribers' profile data for any purpose other than those allowed by the rules.[15] Neither Sorenson nor its employees sell, distribute, share, or reveal the profile data unless compelled by law to do so or unless permitted by the Commission's rules.
VRS Non-Discrimination 47 C.F.R. § 64.604(c)(12)	--	To the best of its knowledge, Sorenson does not engage in any practices that qualify as "unjust or unreasonable discrimination" with regard to its provision of VRS service.

[15] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5173-76 ¶¶ 77-84 (2000) (defining "profile data" and limitations on its use).

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Emergency Call Handling 47 C.F.R. § 64.605	--	Sorenson provides emergency calling service in full compliance with the FCC's rules. In the case of VRS, it provides E911 service to its customers; handles and routes emergency calls to the applicable PSAP; immediately attempts to reestablish contact in the event of disconnection; automatically places 911 calls at the front of call queues; and obtains Registered Location information from its customers. Sorenson also delivers the following to the PSAP: Sorenson's role as iTRS provider, the ANI, the caller's Registered Location, and the CA's identification number.
Default Provider Registration 47 C.F.R. § 64.611(a)-(c)	--	Sorenson provides VRS users with the capability to register with Sorenson as their default provider. Sorenson routes and delivers all such users' inbound and outbound calls unless the user chooses to place a call with, or receives a call from, an alternate provider (dial-around). Sorenson updates the TRS Numbering Directory for users that select Sorenson as their default provider as required under the FCC's rules.
Ten-Digit Numbering 47 C.F.R. § 64.611(a)(1), (d)	--	For each user that registers with Sorenson as his or her default provider, Sorenson either (a) facilitates the user's valid porting request from another provider, or (b) assigns the user a geographically appropriate ten-digit number (or, when such numbers are not available in the user's rate center, a geographically approximate ten-digit number). Sorenson does not assign or issue proxy numbers to TRS users. For access to ten-digit numbers to assign to its subscribers, Sorenson contracts with *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****.
Toll-Free Numbering 47 C.F.R. § 64.611(e)(1)	--	Sorenson no longer assigns toll-free numbers to its VRS users, and either terminated former numbers or transitioned ownership to the registered user who maintains the number with a toll free service provider.

STANDARD	WAIVED	SORENSON'S COMPLIANCE
CPE 47 C.F.R. § 64.611(f)	--	The CPE that Sorenson provides to VRS users delivers routing information only to the user's default provider, except to the extent necessary to complete dial-around calls.
User Notification re Ten-Digit Numbering and Toll-Free Numbering 47 C.F.R. § 64.611(g)	--	Sorenson's website and promotional materials related to numbering or E911 service include an advisory addressing (a) the process for obtaining a ten-digit number, (b) number portability, and (c) the process for updating Registered Location information. Sorenson has also prepared and posted an advisory explaining the process by which an iTRS user can acquire a toll-free number; transfer control of a toll-free number to the user; and/or request that a toll-free number be linked to the user's ten-digit number in the TRS Numbering Directory.
Speech-to-Speech Service	Waived[16]	--
Interoperability 47 C.F.R. § 64.621	--	Sorenson's users are able to place and receive calls through any of the VRS providers' services, and Sorenson can receive calls from, and make calls to, any VRS user, to the extent it is technically possible. Sorenson does not take steps that restrict a user's unfettered access to another provider's service. Sorenson's VRS access technologies and video communication service platforms plans to be interoperable with the VRS Access Technology Reference Platform and the Neutral Video Communication Service Platform, including for point-to-point calls, once those platforms are developed.

[16] *2011 Waiver Order* ¶ 20 (VRS).

STANDARD	WAIVED	SORENSON'S COMPLIANCE
Verification and Processing of Orders for Change of Default TRS Providers. 47 C.F.R. § 64.631, 64.632		It is Sorenson's policy not to initiate or implement default-provider changes unless and until it has obtained the iTRS user's written or electronically signed authorization in a form that meets the requirements of 47 C.F.R. § 64.632. If a user wishes to change its default provider for separate iTRS services, it is Sorenson's policy to obtain separate authorizations for each service as required by 47 C.F.R. § 64.631(b). It is Sorenson's policy to implement an iTRS user's default-provider change order within 60 days of obtaining the signed letter of agency. It is Sorenson's policy to follow the requirements of 47 C.F.R. § 64.631(f) in the event that it acquires, through a sale or transfer, either part or all of another iTRS provider's iTRS user base without obtaining each user's individual consent.
Maintenance of Service After Porting Request 47 C.F.R. § 64.631(e)	--	When a Sorenson user has submitted a request to change the user's default provider, Sorenson does not reduce the level or quality of service provided to that user or reduce the functionality of any VRS access technology provided by Sorenson to the user until the transition is complete.
Impermissible Use of CPNI 47 C.F.R. §§ 64.5105, 5107, 5108, 5109, 5110	--	Sorenson has adopted a detailed policy governing the use of CPNI in order to ensure compliance with the Commission's CPNI rules. As required by 47 C.F.R. § 5109(e), Sorenson is attaching its annual CPNI compliance certification, which includes a statement explaining how Sorenson's operating procedures ensure that it is in compliance with the CPNI rules.

IV. VRS Call Center Leases

A. Leases for U.S. Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(2))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(2), copies of the leases for a representative sampling of Sorenson's U.S. VRS call centers were attached as Exhibits 2-6 to Sorenson's December 2, 2011 Certification Application. The sample includes the Sorenson call

centers located in Sacramento, CA; Tucson, AZ; Kansas City, KS; Tampa, FL; and Portland, ME. Sorenson filed updated leases for these call centers with its December 2013 application update, and hereby incorporates these leases by reference and certifies they have not changed since Sorenson's December 2013 application update.

B. Leases for Call Centers Outside of the United States (47 C.F.R. § 64.606(a)(2)(ii)(A)(3))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(3), copies of the leases for all of Sorenson's VRS call centers located outside of the United States were attached as Exhibits 7-14 to Sorenson's December 2, 2011 Certification Application. Sorenson's non-U.S. call centers at that time were located in the following cities (all in Canada): Victoria, BC; Vancouver, BC; Calgary, AB; Edmonton, AB; Winnipeg, MB; Ottawa, ON; Toronto, ON; and Halifax, NS. Sorenson filed updated leases for its call centers in Vancouver, Winnipeg, Ottawa, and Halifax in its December 2013 application update. Sorenson hereby incorporates the leases filed with its December 2011 application and December 2013 updated application by reference to the extent they are not replaced by lease amendments for Toronto, Victoria, and Winnipeg, submitted as Exhibits 5-7 with this updated application. In addition, in 2014 Sorenson opened a new VRS call center, also in Canada, in Langley, BC, and submits a copy of this lease as Exhibit 8 to this updated application.

C. List of Call Center Leases (47 C.F.R. § 64.606(a)(2)(ii)(A)(2))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(2), a list of all of Sorenson's VRS call centers including the information required by 47 C.F.R. § 64.604(c)(5)(iii)(N)(2) is attached as Exhibit 1.

V. Description of Technology and Equipment Used to Support VRS Call Center Functions (47 C.F.R. § 64.606(a)(2)(ii)(A)(4))

A. Description of Technology and Equipment (47 C.F.R. § 64.606(a)(2)(ii)(A)(4))

Sorenson's VRS call center functions utilize the following technology and equipment:

- CAs' Desktop Computers and Monitors. A desktop computer and a monitor are installed at every CA's work station to allow the CA to manage and service VRS calls.

- CAs' Desktop Televisions. A television is installed at every CA's work station and connected to the CA's videophone to allow the CA to see the VRS user on the call.

- CAs' Videophones. A Sorenson videophone is installed at every CA's work station to allow the CA to communicate with the VRS user over a video link.

- CAs' Telephone Handsets. A telephone handset is installed at every CA's work station to allow the CA to speak with the hearing party.

- Custom Call Management Client. Sorenson employs a call management software system that the company developed in-house to manage call flow and routing. It is installed on every CA's desktop computer.

- Automatic Call Distribution ("ACD") Servers. Sorenson's ACD servers manage inbound call queues and route VRS calls within and among Sorenson's VRS call centers. (In the documentation attached to Sorenson's December 2, 2011 Certification Application at Exhibit 16, these servers are referred to as "session border controllers.")

- Billing Servers. Sorenson's billing servers house the billing databases that store all VRS call data, including time stamps and the identity of the CA and call center that handled the call.

- Storage Area Networks ("SAN"). Sorenson's SAN is highly redundant storage hardware housed in collocation facilities used to warehouse billing, registration, and call data.

- Uninterruptible Power Supply ("UPS"). Sorenson's UPS utilizes battery resources that are engaged to keep production infrastructure online in the event of a power outage or surge.

- Switches. These are network components used to connect servers to each other, to disk resources, and to network resources.

- Routers. These are network components used to manage transmission control protocol / Internet protocol ("TCP/IP") traffic, including internal data traffic and traffic bound to or from the Internet.

- Firewall. Sorenson's firewall is a combined hardware and software network component that prevents unauthorized network access to Sorenson infrastructure.

- Load Balancer. Sorenson's load balancer assesses servers' current load levels and directs incoming and outgoing network communications to the server with the lowest current load, thereby ensuring the fastest response time.

- Call Managers. Sorenson's call managers are pieces of telephony equipment that allow the CA to manage inbound and outbound telephone conversations with the hearing party.

B. Technology and Equipment in U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(6))

Section 64.606(a)(2)(ii)(A)(6) of the Commission's rules requires providers operating more than five VRS call centers within the United States to provide a copy of each proof of purchase, lease, or license agreement for technology and equipment used to support call center functions in a representative sampling of five call centers within the United States. Section 64.606(a)(2)(ii)(A)(4) of the Commission's rules requires providers to include a statement indicating whether such technology and equipment is owned, leased, or licensed.

The call center sample Sorenson has selected mirrors the sample it selected for purposes of providing call center leases, as reflected in Section IV.A. above. The technology and equipment documentation for these call centers was attached to Sorenson's December 2, 2011 Certification Application at Exhibit 16, and was supplemented and revised in the February 2014 Update and Exhibit 4 thereto. In addition to the 2014 Exhibit 4, Sorenson revised its application to note ***** BEGIN CONFIDENTIAL ***** [redacted]

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

Sorenson hereby incorporates those Exhibits (subject to the aforementioned revision) by reference. In addition, Sorenson submits as Exhibit 9 to this updated application further updates to its technology and equipment documentation.

C. Technology and Equipment in Non-U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(7))

Section 64.606(a)(2)(ii)(A)(7) of the Commission's rules requires providers to submit a copy of each proof of purchase, lease, or license agreement for technology and equipment used to support call center functions in each VRS call center located outside of the United States. Section 64.606(a)(2)(ii)(A)(4) of the Commission's rules requires providers to include a statement indicating whether such technology and equipment is owned, leased, or licensed.

As noted above in Section IV.B above, all of Sorenson's non-U.S. VRS call centers are located in Canada. The technology and equipment documentation for these call centers is included in Exhibit 16 to the December 2011 Certification Application, as explained in Section V.B above. Sorenson supplemented this Exhibit 16 with Exhibit 4 to the February 2014 Update. In addition, Sorenson submits as Exhibit 9 to this updated application further updates to its technology and equipment documentation. With the exception of software licenses (included in the records contained in Exhibit 16), Sorenson owns all of the technology and equipment used to support its call center functions.

D. ACD Lease or License Agreement (47 C.F.R. § 64.606(a)(2)(ii)(A)(8))

Sorenson has developed its own custom-built ACD system. Accordingly, there is no ACD lease or license agreement to submit.

VI. Entities With Ownership / Control Interests (47 C.F.R. § 64.606(a)(2)(ii)(B))

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

1. Certain funds managed, advised, or sub-advised by GSO Capital Partners LP and its affiliates (collectively, "GSO") *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****

2. Certain investment funds for which Franklin Mutual Advisers LLC ("Franklin") acts as an investment advisor *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****

The funds managed, advised, or sub-advised by GSO and such funds for which Franklin acts as investment advisor hold equity interests in Sorenson's ultimate parent, Sorenson Holdings, LLC, which was formed upon the conversion of Sorenson Holdings, Inc. to a limited liability company upon the effective date of the plan of reorganization of Sorenson and its affiliates and holds a 100% indirect interest in Sorenson.

VII. Description of Organizational Structure (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to describe their organizational structure. A copy of a diagram presenting Sorenson's organizational structure was originally attached as Exhibit 17 to Sorenson's December 2, 2011 Certification Application. Sorenson includes as Exhibit 2 to this Update a revised ownership structure diagram. As shown in Exhibit 2, Sorenson's affiliate, CaptionCall became a subsidiary of Sorenson Holdings, LLC, rather than of Sorenson. Sorenson will remain the certified IP CTS provider, with support from CaptionCall, until the Commission acts on CaptionCall's separate application.

VIII. Names of Executives, Officers, Members of Board (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to provide "the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company)." Sorenson does not have any general partners or managing members. The names of its executives, officers, and board members are included on the list attached as Exhibit 3 to this Update.

IX. Number of TRS Employees (47 C.F.R. § 64.606(a)(2)(ii)(C))

Section 64.606(a)(2)(ii)(C) of the Commission's rules requires applicants to provide "a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers, communications assistants, and persons involved in marketing and sponsorship activities." The requested information for Sorenson's VRS operations follows (effective November 15, 2014):

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

[redacted]

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

X. List of Sponsorship Agreements (47 C.F.R. § 64.606(a)(2)(ii)(E))

Section 64.606(a)(2)(ii)(E) of the Commission's rules requires applicants to provide "a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements." A copy of Sorenson's list of sponsorship agreements since its December 2013 updated application is attached as Exhibit 4. For each sponsorship agreement on the list, there is a written document, ranging from a one page email for simple sponsorships to documents a few pages long for more extensive sponsorships, specifying the amount of the contribution and the terms under which the contribution will be made.

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17 *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****

XI. Description of Complaint Procedures (47 C.F.R. § 64.606(a)(2)(iii))

Sorenson directs users and employees to report complaints through the email address vrscomments@sorenson.com. Sorenson applies the following process to complaints it receives related to its services.

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

[redacted]

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

XII. Statement Regarding Annual Compliance Reports (47 C.F.R. § 64.606(a)(2)(iv))

Pursuant to 47 C.F.R. § 64.606(a)(2)(iv), Sorenson states that it will file annual compliance reports demonstrating continued compliance with the Commission's rules governing Telecommunications Relay Service.

XIII. Certification

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

Grant Beckmann
Vice President of Engineering and Compliance Officer
Sorenson Communications, Inc.

Date: December 2, 2014

List of Exhibits

Exhibit 1	Call Center List
Exhibit 2	Organizational Structure
Exhibit 3	Directors and Officers List
Exhibit 4	Sponsorship List
Exhibit 5	Updated Toronto Call Center Lease
Exhibit 6	Updated Victoria Call Center Lease
Exhibit 7	Updated Winnipeg Call Center Lease
Exhibit 8	Langley Call Center Lease
Exhibit 9	Supplemental Call Center Technology and Equipment

Addendum 1

Sorenson Regulatory Compliance Plan

Sorenson Regulatory Compliance Plan

As a provider of Telecommunications Relay Services ("TRS"), Sorenson Communications, Inc. ("Sorenson") is committed to full and complete compliance with the rules and regulations of the Federal Communications Commission ("FCC"). This Regulatory Compliance Plan describes Sorenson's policies, procedures, and practices for complying with the Communications Act (47 U.S.C. § 151 *et seq.*), FCC rules (47 C.F.R. § 64.601 *et seq.*), and the FCC's *Report and Order and Further Notice of Proposed Rulemaking*, dated June 10, 2013 (¶ 134).

Compliance Office and Staff

Sorenson's compliance program is led by a Compliance Officer and a Senior Compliance Analyst (together, the "Compliance Office"). The Compliance Officer chairs Sorenson's Compliance Committee and is the senior officer responsible for implementing and overseeing Sorenson's compliance with FCC rules. Sorenson's Senior Compliance Analyst is a full-time, dedicated compliance analyst who reports to the Compliance Officer and meets monthly with the Compliance Committee. The Senior Compliance Analyst has direct responsibility for the development, production, and maintenance of the compliance tools, reports, plans, tasks and activities for the management of the Sorenson regulatory compliance system. The Compliance Office:

- Develops and maintains compliance policies, procedures, training materials, and compliance records;
- Performs compliance analysis and leads the development, production, and maintenance of reporting methods to detect and monitor any significant compliance deviations;
- Works with department executives to ensure knowledge of and compliance with company policies and procedures;
- Prepares regular compliance reports detailing observance of company policies and regulatory requirements;
- Investigates and reports compliance matters to Sorenson management; and
- Monitors corrective and preventive actions relating to non-compliance issues and findings.

The Compliance Office has the authority to monitor ongoing Company activities as they relate to FCC Rules, and has unlimited access to all Company files, records, and information needed to fulfill its compliance responsibilities. This includes the right to interview Company employees in connection with potential instances of non-compliance. The Compliance Office has access to sufficient internal and external resources, including outside counsel, to execute its compliance duties.

Sorenson's Compliance Committee is composed of department executives from across the company, including Engineering, Information Systems, Operations, Sales and Outreach, Marketing, and Finance. The Committee meets monthly to review any FCC-related issues, including regulatory changes and any compliance related policies or procedures. At each meeting, the Committee: (1) reviews the status of customer registration, certification, and

verification for TRS services; (2) receives updates from department executives on the status of compliance with terms of FCC orders; (3) reviews any outstanding items from the previous Committee meeting; and (4) makes assignments on compliance action items for the next meeting. Sorenson's Compliance Analyst documents and maintains records of the Committee meetings.

Compliance Manual

Sorenson's Compliance Office has developed and adopted a TRS Compliance Manual ("Compliance Manual"). The Compliance Manual is distributed to all Sorenson personnel who perform, supervise, oversee, or manage any activities that relate to Sorenson's responsibilities under Section 225 of the Communications Act and the TRS rules ("Covered Personnel"). An electronic copy of the Compliance Manual is posted on Sorenson's internal intranet site in the compliance section. All Sorenson employees have access to the Compliance Manual on the intranet site. The Compliance Office has responsibility for revising and updating the Compliance Manual, in consultation with outside counsel, to maintain compliance with all FCC rules and regulations.

Compliance Training

Working with the necessary company departments, Sorenson's Compliance Office has developed and implemented training on Sorenson's Compliance Manual and the department-specific policies and procedures for compliance with FCC Rules. The Senior Compliance Analyst reviews and approves all training materials, tracks all completed and outstanding training, and coordinates training updates to address any changes to FCC Rules or Sorenson's policies and procedures.

Officer Training:

Sorenson's senior executives and officers have been trained on the Compliance Manual and the department-specific policies and procedures for compliance with FCC Rules. At the committee's monthly meetings, members of the Committee receive updated training from the Senior Compliance Analyst on any new FCC Rules and any new Sorenson policies or procedures.

Employee Training:

To conduct employee training, the Compliance Office meets with each department's executive individually to review the FCC Rules applicable to the department. The departments customize the Compliance Office's base compliance training presentation to emphasize the department-specific policies and procedures that apply to their staff. The Compliance Office reviews and approves all customized department training materials before training is provided. Sorenson's department executives conduct the majority of employee training through live group sessions, with the remaining portion being conducted online through a learning management system. Training takes place annually or as TRS Rules are changed. Upon completion of the training, employees sign an electronic acknowledgment indicating receipt of the Compliance Manual and

completion of compliance training. The acknowledgements are tracked and maintained centrally by the Compliance Office.

New Hire Training:

All newly hired employees receive compliance training within 30 days of their start date. For every hiring period, Sorenson's Human Resources Manager provides the Senior Compliance Analyst a list of new employees. The list includes each new employee's start date, the employee's department, and the employee's supervisor. The Senior Compliance Analyst maintains that information in order to track the completion of new-hire compliance training. The Senior Compliance Analyst informs each new employee's supervisor of the requirement to train the new employee on both (1) Sorenson's Compliance Manual, and (2) the department-specific policies and procedures for compliance with FCC Rules. All compliance training materials are reviewed, approved, and maintained by the Senior Compliance Analyst.

Contractor Training:

The Compliance Office trains any contractor who perform, supervise, oversee, or manage any activities that relate to Sorenson's responsibilities under, and compliance with, Section 225 of the Act and the TRS Rules. The training covers Sorenson's Compliance Manual as well as the specific Sorenson policies and procedures that are applicable to the contractor's compliance with FCC Rules.

Training Updates:

The Senior Compliance Analyst coordinates training of employees when a rule change impacts Sorenson's TRS services. The Compliance Office identifies the affected departments and works with the departments to modify or create a procedure to address the rule change. The Compliance Office reviews and approves all new policies and procedures. The Compliance Office ensures that the departments impacted by the new policy or procedure train their staff accordingly. The Compliance Office reviews the training materials.

Compliance Reporting Mechanisms

Sorenson has established several mechanisms for employees to report fraud, waste, or abuse. Each of these is described in the Compliance Manual, and explained to employees as part of their compliance training.

To report any compliance concern, employees may contact their supervisor or the executive officer of their department who are instructed to contact the Compliance Office. Alternatively, employees may contact a "Compliance Hotline" anonymously through a toll-free number. Employees may also email the Compliance Office directly via a dedicated email address. The Senior Compliance Analyst monitors all reports made through the Compliance Hotline and the compliance email inbox. The Senior Compliance Analyst is responsible for responding to concerns, including elevating them to the Compliance Officer and/or the Compliance Committee as may be appropriate.

The Compliance Manual informs employees that they have the right to report compliance concerns to the FCC's Office of Inspector General, and provides the website address and hotline phone number to make such reports.

Sorenson does not tolerate retaliatory conduct. Employees are informed in the Compliance Manual and in their training that Sorenson will never take action against employees for reasonably reporting information related to potential compliance violations.

Monitoring and Auditing Compliance with FCC Rules

Sorenson's Compliance Office regularly monitors and audits company departments regarding compliance with FCC rules and will make any necessary changes to the Compliance Plan in response to these evaluations. The following describes (1) Sorenson's monthly review and audit of minutes for submission to the TRS Administrator, (2) Sorenson's routine review of compliance with customer registration, certification, and verification requirements; and (3) Sorenson's standard audit process for compliance checks on all departments.

(1) Monthly Review of Minutes:

Each month, Sorenson conducts a monthly, multi-department review of the detailed call records prior to submission to the TRS Administrator. As part of this monthly review process, members of Sorenson's Quality Assurance staff and database administration team review and analyze the FCC's and TRS Fund Administrations guidelines used to prepare the report of compensable minutes. The engineering team then meets with the executives of the Finance, Engineering, Information Technology (IT), and Sales and Outreach departments, as well as the Compliance Office to review the draft submission. The IT and Engineering departments maintain detailed operating procedures that document the monthly submission preparation and review process.

(2) Compliance with Customer Registration, Certification, Verification Requirements:

The Senior Compliance Analyst works with the Sales and Outreach department to obtain reports on the customer registration, certification, and verification for all TRS services. Each month, the Senior Compliance Analyst prepares a "Registration, Certification, and Verification Process Review" report for the Compliance Committee. The report identifies the total installed accounts and the percentage of those accounts that have completed registration, self-certification, verification, professional verification (if applicable), and other relevant metrics. The Senior Compliance Analyst works with the Sales and Outreach department to ensure (i) compliance with the TRS registration, certification, and verification requirements for each TRS service, and (ii) that only properly registered, certified, and verified customers' minutes are billed to the TRS Administrator.

(3) Routine Compliance Office Audits

The Compliance Office coordinates an internal audit process for conducting compliance reviews in order to help minimize risk to the organization and strengthen internal controls. The internal audit process: (1) identifies risks within each department that relate to compliance with FCC rules; (2) ensures that each department has department-specific procedures in place to comply with relevant FCC rules; (3) regularly reviews each department to ensure that procedures and processes are being followed; (4) provides feedback and remedial action items following the reviews; and (5) monitors and enforces completion of action items.

The Senior Compliance Analyst conducts periodic audits of all departments with responsibility for providing TRS services, including: Sales and Outreach; Marketing; Information Systems; Operations; Finance; and Human Resources. The audits utilize the following protocol:

Planning:

The Senior Compliance Analyst has responsibility for carrying out internal audits under Sorenson's audit plan. The Senior Compliance Analyst conducts a preliminary risk assessment, gathers the relevant department's executives input on the preliminary risk assessment, and prepares an audit scope based on the results of the risk assessment process.

Once the audit plan is finalized, the Senior Compliance Analyst collects any relevant documentation and information necessary for the audit.

Fieldwork:

The Senior Compliance Analyst is responsible for conducting the audit fieldwork and has access to both internal and external resources, including outside counsel, to complete the audit. A typical audit includes a review of the department's policies and procedures, performance of tests against those procedures, and verification that the department is conducting its own testing for compliance with the relevant TRS requirements.

Findings and Reporting:

The Senior Compliance Analyst communicates preliminary findings immediately to the affected department executives. The department executives are required to provide responses to the audit findings and recommendations for remediation. The Senior Compliance Analyst has authority to consult outside counsel regarding any preliminary audit findings and potential instances of non-compliance with FCC rules and regulations. Audit results are maintained by the Compliance Office and discussed as needed during the Committee's monthly compliance meeting.

Remedial Measures:

Following the completion of the audit, the Senior Compliance Analyst performs a follow-up review to verify that the agreed upon actions have been implemented and completed.

Compliance Policies, Procedures, and Practices

Sorenson's senior management has communicated a strong message to all employees that Sorenson is committed to 100% compliance with all FCC rules and regulations. To effectuate that commitment, Sorenson has developed and implemented its Compliance Manual as well as a comprehensive and robust set of policies and procedures to prevent fraud, waste, and abuse of the TRS Fund.

The Compliance Manual describes Sorenson's commitment to compliance and its expectation that all employees will do their part. It describes permitted and prohibited activities in the following areas: working with customers; providing TRS services; determining qualifying calls; providing equivalent and innovative services; and reporting and record keeping.

Sorenson's policies and operating procedures detail the specific requirements that each department must follow to comply with FCC rules for TRS providers. All policies are maintained on Sorenson's internal intranet site, and employees have access to the policies and procedures applicable to their department. All policies implemented to ensure compliance with TRS Rules were reviewed and approved by the Compliance Office. The TRS policies cover a variety of topics with detailed operating procedures implementing the policies. The following are examples of these topics: Customer Data Access and Use, Whistleblower, CPNI, User Registration, Verification and Certification, No Direct and Indirect Inducements.

The Compliance Office, in coordination with outside counsel, monitors developments in FCC rules and evaluates whether those developments require a modification to Sorenson's policies and procedures. If a change is required, the Compliance Office identifies the affected departments and works with them to modify or create a policy or procedure to address the rule change. The Compliance Office reviews and approves all new policies and procedures, and works with outside counsel as needed to ensure that the new policy or procedure appropriately addresses FCC rules.

Enforcement of Compliance Plan

If Sorenson determines that one or more of its employees have engaged in conduct that violates FCC Rules, the Compliance Office – in consultation with outside counsel – will take appropriate disciplinary measures up to and including suspension, termination, and referral to the appropriate governmental authorities.

If Sorenson determines that minutes have been billed improperly to the TRS Fund, it will advise the TRS Administrator at its earliest opportunity through the submission of a revised or corrected billing submission.

Addendum 2

Sorenson CPNI Certification and Statement of Operating Procedures

Annual 47 C.F.R. § 64.5109 CPNI Certification
Sorenson Communications, Inc.
2014 CPNI Compliance Certificate and Statement

I, Grant Beckmann, certify that I am an officer of Sorenson Communications, Inc. and I have personal knowledge that, effective October 30, 2014, the company has established a CPNI policy that is adequate to ensure compliance with the Commission's iTRS CPNI rules (*see* 47 C.F.R. § 64.5105 *et seq.*).

Attached to this certification is an accompanying statement explaining how the company's policy ensures compliance with the requirements of section 64.5105 *et seq.* of the Commission's rules. As explained more fully in the accompanying statement, Sorenson has not taken any actions against data brokers in the past year. Nor has Sorenson received any customer complaints during the period covered by this certification (beginning October 30, 2014).

The company represents and warrants that the certification is consistent with 47 C.F.R.§ 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Executed on December 2, 2014.

Grant Beckmann
Vice President of Engineering and Compliance Officer
Sorenson Communications, Inc.

Sorenson Communications, Inc.
2014 CPNI Compliance Statement of Operating Procedures
(From 10/30/2014 through Present)

General Duty, Training, and Discipline

Sorenson Communications, Inc. (the "Company" or "Sorenson") has adopted and made available to all relevant employees a Customer Proprietary Network Information Standard ("CPNI Policy") that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the CPNI Policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

Use of CPNI Without Customer Approval (47 C.F.R. § 64.5105)

Absent express consent from the customer, it is Sorenson's policy to use CPNI only for certain specific purposes which are permitted by the FCC's CPNI rules. These purposes include:

- Win-back marketing campaigns for former customers, which are limited to the same category of service to which the customer formerly subscribed (*i.e.*, IP CTS or VRS);
- Marketing extended services like speed dialing, call waiting, caller ID, and call forwarding, voice or video mail, voice or video storage and retrieval services (together known as adjunct-to-basic services);
- Providing customer training, education, and entertainment tied to the service to which the customer has selected Sorenson as its default provider;
- Providing, upgrading, or adding Customer Premises Equipment (CPE) or iTRS access technology;

In addition, Sorenson may use CPNI without customer consent to maintain and monitor the quality of services to customers, including as follows:

- Providing inside wiring installation, maintenance, and repair services;
- Monitoring call processing, speed of answer, routing and failure rates;
- Tracking call quality, including video quality, audio quality, bandwidth, packet loss, and other technical call characteristics;

It is also Sorenson's policy to use, disclose, or permit access to CPNI to the extent necessary for emergency-call handling, including as follows:

- Accepting and handling 911/E911 calls;
- Accessing, either directly or through a third party, a commercially available database that will allow Sorenson to determine an appropriate Public Safety Answering Point (PSAP) designated statewide default answering point;
- Relaying 911/E911 calls to the appropriate local emergency authority that corresponds to the caller's location;

- Facilitating the dispatch and response of emergency service or law enforcement personnel to the caller's location, in the event that the 911/E911 call is disconnected or the caller becomes incapacitated.

Sorenson does not identify or track CPNI of customers that call competing TRS providers and does not use, disclose, or permit access to CPNI related to a customer call to a competing TRS provider. With all calls, Sorenson does use CPNI in order to track call quality but in doing so does not track whether a call was made to a competing provider.

Sorenson and its affiliate CaptionCall have both adopted policies not to share CPNI with each other for the purposes of marketing.

Customer Approval for Use of CPNI (47 C.F.R. § 64.5107)

To access, use, or disclose CPNI for any purpose other than one of the pre-approved no-consent uses of CPNI, it is the Company's policy to obtain the customer's affirmative, express consent to allow the requested CPNI usage, disclosure, or access. Before soliciting such consent, it is the Company's policy to notify the customer that he or she may deny or restrict use of, disclosure of, and access to that CPNI. Sorenson maintains records of this notification during the time period that the approval is in effect and for at least one year thereafter. The notification informs the customer:

• that the customer has a right to deny the Companies the right to use, disclose or permit access to the customer's CPNI, and the Companies have a duty, under federal law, to honor the customer's right and to protect the confidentiality of CPNI;

• of the types of information that constitute CPNI and who will use, receive, or have access to the CPNI;

• of the purposes for which CPNI will be used;

• of his or her right to deny or withdraw consent to use, disclose, or permit access to access to CPNI at any time;

• of the precise steps the customer must take in order to grant or deny use, disclosure, or access to CPNI, and that customer denial of approval will not affect the TRS provider's provision of any services to the customer; and

• that any approval or denial of approval for the use of CPNI outside of the service for which the Company is the default provider for the customer is valid until the customer affirmatively revokes or limits such approval or denial.

If any portion of a notification is translated into any other language (including American Sign Language), then Sorenson's policy requires that all portions of the notification must be translated into that language

Notice to Customers for Use of CPNI (47 C.F.R. § 64.5108)

Prior to any solicitation for customer approval to use, disclose, or permit access to CPNI, Sorenson notifies its customers individually of their right to deny or restrict the use or disclosure of, or access to, that customer's CPNI. Sorenson maintains records of a customer's response for a minimum of one year after the consent is no longer in effect.

Sorenson's policy states that the customer notification must inform the customers of what type of information constitutes CPNI, who would use, receive, or have access to CPNI and how the CPNI will be used, their right to deny Sorenson the right to use, disclose, or permit access to its customers' CPNI at any time, and the steps a customer must take in order to grant or deny permission to use, disclose, or access CPNI. Sorenson informs its customers that their decision regarding CPNI will not affect their Sorenson service.

Safeguards for Use of CPNI (47 C.F.R. § 64.5109)

Sorenson's CPNI policy limits CPNI access to those employees who have a need to know. Unauthorized employees are prohibited from attempting to obtain access to CPNI.

For the use of CPNI for any purpose that requires customer consent, Sorenson's policy requires the specific authorization of the Compliance Officer. In addition, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval to use CPNI. Before accessing, using, or disclosing CPNI for any purpose that requires customer consent, Sorenson's policy requires employees to obtain the customer's affirmative, express, consent.

Sorenson maintains a record, for a period of at least three years (beginning from the date on which the regulation became effective), of (1) any sales and marketing campaigns that use its customer's CPNI, and (2) where CPNI was disclosed or provided to a third party, or a third party was permitted access to CPNI.

Safeguards on the Disclosure of CPNI (47 C.F.R. § 64.5110)

Sorenson protects against attempts to gain unauthorized access to CPNI and authenticates a customer prior to disclosing CPNI. For telephone, TRS, and point-to-point access to CPNI, customers are authenticated without the use of readily available biographical information, or account information, prior to allowing the customer telephonic, TRS, or point-to-point access to CPNI related to his or her TRS account. Alternatively, a customer may obtain telephonic, TRS, or point-to-point access to CPNI related to his or her accounts through a password. To establish a customer's identity without reference to readily available biographical information or account information, Sorenson may call the customer at the telephone number of record, have the customer present a government issued ID over the video phone, or have the customer recite a randomly generated PIN that the Company sends via text to the customer's number of record.

Customers may also access their CPNI online and establish a password for future access only after being authenticated without using readily available biographical information or account information. After initial authentication, customers may only access CPNI online only by providing their pre-established password. Customers that have lost or forgotten their passwords

may retrieve their passwords by their previously provided answer to a secret question, which will not involve the use of readily available biographical information or account information. If a customer cannot provide the correct password or the correct response to the shared secret question, the customer must be re-authenticated and must establish a new password.

It is Sorenson's policy to notify customers whenever a password, answer to shared secret question, online account, or address of record is created or changed. (The policy does not, however, require such a notification when the customer initiates service, including the selection of a password at service initiation.) This notification may be through voicemail, text message, or video mail to the existing telephone number of record, by mail to the existing physical address of record, or by e-mail to the existing e-mail address of record, and shall not reveal the changed information or be sent to the new account information.

Notification of CPNI Network Information Security Breaches (47 C.F.R. § 64.5111)

The Company requires that any possible unauthorized disclosure of CPNI must immediately be reported to the Company's Compliance Officer. Upon notification, the Compliance Officer conducts an inquiry to determine whether a breach of CPNI has taken place. If the Compliance Officer determines there has been a breach, he or she shall notify law enforcement, the FCC's Disability Rights Office, and customers of any breach as provided by 47 C.F.R. § 64.5111. The Compliance Officer maintains records of any breaches discovered, notifications made to law enforcement, and notifications made to customers. These records include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. These records are retained for 2 years.