

Before the
Federal Communications Commission
Washington, D.C. 20554

Received & Inspected

NOV 16 2015

In the Matter of

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Structure and
Practices of the Video Relay
Service Program
Speech-to-Speech Services for Individuals
With Hearing and Speech Disabilities

CG Docket No.10-51

FCC Mail Room

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ANNUAL REPORT OF HANCOCK, JAHN, LEE AND PUCKETT, LLC

I. Introduction and Background

Pursuant to 47 C.F.R. § 64.606 (g)(2), Hancock, Jahn, Lee and Puckett, LLC d/b/a “Communication Access Ability Group” and branded “Star VRS” and “Star VRS for the DeafBlind” or “Star VRSdb” (“CAAG/Star VRS”) hereby submits its Annual Report as a provider of video relay services (“VRS”). On November 15, 2011, the Commission conditionally granted CAAG/Star VRS’ Application to be certified as a VRS provider eligible for compensation from the Interstate TRS Fund (the “Application”).¹ CAAG/Star VRS’ Application included a commitment, certified by a CAAG/Star VRS senior executive officer, that CAAG/Star VRS would submit an annual report including updated documentation and a summary of updates, or certifying that there are no changes to the information and documentation submitted with CAAG/Star VRS’ Application. This Annual Report is provided to fulfill that commitment.²

CAAG/Star VRS incorporates herein its Application, dated September 21, 2011, as well as CAAG/Star VRS’ prior Annual Reports. All information included in the Application, as supplemented by prior Annual Reports, remains true and accurate except as noted in this Annual Report.

¹ Notice of Conditional Grant of Application of Hancock, Jahn, Lee & Puckett, LLC d/b/a/ Communication Access Ability Group for Certification as a Provider of Video Relay Service Eligible for Compensation from the Interstate Telecommunications Relay Service Fund, CG Docket No. 10-51 (Nov. 15, 2011).

² Attached as **Exhibit A** is the Verification of Everett Puckett attesting to the truth and accuracy of the statements contained in the Annual Report.

CAAG/Star VRS is a privately held, small business. Since 2001, CAAG has provided primarily on-site, community-based interpreting services that have included high-quality, in-person sign language interpretation, video remote interpreting (“VRI”), interpreter training and management services, CART, advocacy and support services for the Deaf and hard of hearing, and coordination of conference and event access services. CAAG/Star VRS is actively involved in, and encourages its Communications Assistants (“CAs” “VRS Interpreters”) to participate in, ongoing professional development and mentoring programs that are open to all interpreters. CAAG/Star VRS offers workshops and training for employees and internship programs for students soon to graduate from interpreter training programs. We believe CAAG/Star VRS is one of the few interpreter agencies that offer both full and part-time employment, health, vision and dental plans, paid time off, retirement plans, and a FSA, HSA, Life, and Short Term Disability/Long Term Disability Insurance.

CAAG/Star VRS uses a unique dual or bifurcated interpreting model that provides pre-scheduled and emergency in-person/on-site community interpreter services at local sites, as well as video interpreter services like VRI and VRS. Under its dual services model, CAAG/Star VRS is able to place highly skilled, certified interpreters in the community as well as in its VRS Centers. CAAG/Star VRS’ dual service is particularly beneficial because it (1) addresses the concern frequently expressed by the Deaf Community that there is a shortage of qualified interpreters, while simultaneously (2) promoting the health and sustainability of interpreters working and continuing to work in VRS.

CAAG/Star VRS’ dual interpretive services system counters the increased risk of fatigue and physical injury that recent research and studies have linked to continuous video interpreting. Both VRS call volume and on-site community needs fluctuate. As a result, CAAG/Star VRS is able to schedule interpreters to serve either at VRS Centers or in person in the community, depending on the need. CAAG/Star VRS alternates an interpreter’s work schedule between VRI, VRS and on-site community-based interpreting. This work schedule model provides interpreters

with greater flexibility, while providing the physical breaks necessary to avoid the strain or injury that repetitive video interpreting can cause. Importantly, serving in person within the local Deaf Community is an essential component of interpreter development. This service fosters the development of relationships with those living in the local area and encourages a cultural sensitivity and appreciation for the experiences of the local Deaf Community.

CAAG/Star VRS continues to (1) meet all non-waived operational, technical, and functional mandatory minimum standards contained at 47 C.F.R. §64.604 *et. seq.* of the Commission's rules and (2) make available adequate procedures and remedies for ensuring ongoing compliance with the Commission's rules, providing informational materials to VRS users on complaint procedures, and (3) making available Whistleblower procedures for all CAAG/Star VRS staff involved in the VRS segment of its operations. All of CAAG/Star VRS' practices, policies and procedures follow the guidelines of the mandatory minimum standards.

II. VRS Centers

CAAG/Star VRS launched its VRS on January 16, 2011, with VRS Centers in Houston and Beaumont, Texas. By its Notice of Change in Video Relay Service, dated December 2, 2011, CAAG/Star VRS notified the Commission of its execution of a new lease for the Houston VRS Center space and provided a copy of the lease. Pursuant to 47 C.F.R. § 64.606 (c)(5)(iii)(N)(2)(iii), on September 17, 2012, CAAG/Star VRS provided advance notification of its intent to operate a new VRS Center located in Austin, Texas and a copy of the lease was included with CAAG's 2012 Annual Report. CAAG/Star VRS began commercial operations at the Austin VRS Center on January 9, 2013. CAAG/Star VRS' Beaumont VRS Center was relocated on February 20, 2013, and advance notification was provided on January 21, 2013. All three VRS Centers continue to support CAAG/Star VRS.

III. Update: Products and Services

Inbound video calls can access CAAG/Star VRS using the following iTRS access technology provided by CAAG/Star VRS: Star VRS software for PC (November 2015), Star

VRS Mobile application for Android (November 2015) and iOS (November 2015) utilizing internet or cellular service. Consumers can also dial 855-877-2224 from current iTRS access technology provided in the VRS industry. Inbound audio calls can access CAAG/Star VRS by dialing the number of a user registered with CAAG/Star VRS or by dialing 855-877-2224. CAAG/Star VRS continues to make improvements and adjustments to ensure that other provider iTRS access technology and updates remain interoperable with CAAG/Star VRS' iTRS access technology including full participation in the United States VRS Provider interoperability efforts.

In June 2014, CAAG/Star VRS upgraded its iTRS access technology software to include a new Video Mail system. The new Video Mail system is integrated into CAAG/Star VRS' iTRS access technology and is interoperable with current iTRS access technology provided within the VRS industry.

Beginning in March, 2015 CAAG/Star VRS began offering VRS for the DeafBlind ("VRSdb"), a form of VRS specifically suited for DeafBlind/Low Vision individuals. CAAG/Star VRS uses available iTRS access technology in the form of software that utilizes a high contrast interface that is compatible with screen/braille reader technology. CAAG/Star VRS uses a single VRS Interpreter system where one VRS Interpreter relays information from the DeafBlind/Low Vision consumer who uses Sign language through video into spoken English and relays information from the hearing consumer via English text through modified text and screen/braille reader technology. As opposed to a dual CA system, CAAG believes a single VRS Interpreter system comes closer to functional equivalency for DeafBlind/Low Vision consumers and contributes to preserving the sustainability, and reducing waste to, the TRS Fund.

IV. Continued Qualifications for Certification

VRS Interpreters³

³ 47 C.F.R. § 64.604(a)(1).

CAAG/Star VRS continues to provide what it considers to be the best interpreting services available. By only employing highly qualified VRS Interpreters, CAAG/Star VRS provides its customers with a sense of confidence in the quality of its service and CAAG/Star VRS' ability to meet a variety of call scenario needs. CAAG/Star VRS continues to hire only state or nationally certified interpreters. Additionally, applicants are required to pass an expressive and receptive skills assessment prior to employment to validate they are able to interpret telephone calls effectively and accurately.

All CAAG/Star VRS interpreters continue to meet the same service level standards, receive the same training, and enjoy the same high quality working conditions and employment practices described in CAAG/Star VRS' Application. CAAG/Star VRS is committed to the professional development of its VRS Interpreters. CAAG/Star VRS demonstrates this commitment by providing on-going training, bi-annual compliance training, offering the opportunity to attend in-house programs and continuing education, as well as supporting attendance at outside conferences and workshops offered by higher education institutes and other community organizations.

24-Hour Operation and Redundancy

CAAG/Star VRS operates twenty-four hours per day, seven days a week.⁴ CAAG/Star VRS' VRS Interpreters are prohibited from relaying calls from their home.⁵ CAAG/Star VRS provides VRS only through established commercial offices and on specific computers and equipment, which are not available to its VRS Interpreters at home or in any environment other than an approved CAAG/Star VRS Centers. CAAG/Star VRS checks on a daily basis to ensure that the most recent log-in IP address for all VRS Interpreters is the IP address of CAAG/Star VRS Centers.

⁴ 47 C.F.R. § 64.604(b)(4)(i).

⁵ 47 C.F.R. § 64.604(b) (4) (iii).

CAAG/Star VRS has redundancy features that are functionally equivalent to the equipment in normal central offices, including uninterruptible power in case of emergency.⁶ CAAG/Star has secured servers and support with SureWest, a co-location vendor. Servers in the co-location have dual power supply for redundancy. The co-location has A/B/C power supply, delivering double supply with an additional power generator (diesel) on stand-by. CAAG/Star VRS has battery back-up on computers, routers and firewalls located within each VRS Center facility. The Houston and Beaumont VRS centers have back-up generators for building suites. Failover resides at the platform level. The addition of the Austin VRS Center has enhanced redundancy at the access level, providing a location that is less likely to experience severe weather, such as hurricanes. In the event of an emergency preventing operation at one VRS Center location, calls are automatically distributed to another VRS Center.

Call Transfers

In accordance with Commission rules⁷ and CAAG/Star VRS policy, interpreters answering and placing VRS calls stay with a call for a minimum of ten minutes unless the VRS Interpreter finds that he or she is not communicating effectively given the nature of the call.⁸ CAAG/Star VRS Interpreters also use their best efforts to accommodate a user's requested VRS Interpreter gender.⁹ If a call is transferred from one interpreter to another interpreter before 10 minutes, the VRS Interpreter is required to document the call information in the CAAG/Star VRS database for follow up with a CAAG/Star VRS manager.

⁶ 47 C.F.R. § 64.604(b) (4) (ii).

⁷ 47 C.F.R. § 64.604 (a)(1)(v).

⁸ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, FCC 06-81, Order ¶¶ 1 & 9 (June 16, 2006).

⁹ 47 C.F.R. § 64.604 (a)(1)(vi).

*Confidentiality and Conversation Content*¹⁰

All of CAAG/Star VRS Interpreters are bound by a strict code of professional conduct which mandates maintaining the utmost confidentiality with regard to every call. These requirements include faithfully rendering the content and spirit of the message communicated using language most readily understood by consumers and correcting errors discreetly and expeditiously.

CAAG/Star VRS interpreters also must adhere to CAAG/Star VRS' confidentiality policy which states that all call content shall remain strictly confidential and which warns that policy violations may be reported to the appropriate certifying body and may result in the revocation of the VRS Interpreter's certification. Any customer information that CAAG/Star VRS acquires is used only for the purpose of connecting VRS users with called parties, and is not sold, distributed, shared or revealed in any other way. Further, CAAG/Star VRS requires that each VRS Interpreter sign a confidentiality acknowledgment before the VRS Interpreter is permitted to begin employment in a CAAG/Star VRS Center.

CAAG/Star VRS also continues to maintain strict confidentiality of all VRS calls by limiting access to its VRS Centers.

Types of Calls

CAAG/Star VRS handles all non-waived call types.¹¹ CAAG/Star VRS Interpreters do not refuse any single or sequential calls or attempt to limit the length of calls utilizing relay services.¹² CAAG/Star VRS does not charge the user for any calls, including long distance calls, and, therefore, does not conduct credit checks or authorizations.¹³

CAAG/Star VRS Interpreters continue to provide answering machine and voice mail retrieval services to callers. Additionally, audio callers may leave an interpreted video mail when

¹⁰ 47 C.F.R. § 64.604(a)(2).

¹¹ 47 C.F.R. § 64.604(a)(3).

¹² 47 C.F.R. § 64.604 (a)(3)(i).

¹³ 47 C.F.R. § 64.604 (a)(3)(iii)

the call is unanswered.

Speed of Answer¹⁴

The staffing of CAAG/Star VRS' Centers has provided callers with efficient access based upon projected calling volumes to reduce the probability of a busy response. CAAG ensures that 80 percent of all calls are answered within 120 seconds, measured on a monthly basis¹⁵ Call volume and speed of answer are monitored daily by the management team to determine the need for increased staffing. Those statistics also are captured in a report generated on a monthly basis.

Public Access to Information¹⁶

CAAG/Star VRS has engaged in activities designed to advise potential users of the availability of CAAG/Star VRS through deaf conferences and events on a national and local level, partnering with affiliate state associations to educate local communities, and informing individuals through our company website, e-mail distribution, and social media. CAAG/Star VRS also distributes material with information regarding 911 calls and the importance of having a preferred provider.

End-User Information and Unauthorized Use or Disclosure of or Access to CPNI

Any customer information that CAAG/Star VRS acquires is used solely for the purpose of connecting TRS users with called parties, and is not sold, distributed, shared or revealed for any other purpose or in any other way.¹⁷ CAAG/Star VRS has in place safeguards to prevent unauthorized use and disclosure of CPNI.¹⁸ CAAG/Star VRS also takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI.¹⁹ Because CAAG/Star VRS does not make unauthorized use of, nor disclose or permit access to customers' CPNI, it has not developed a customer notification seeking permission to use, disclose, or permit

¹⁴ 47 C.F.R. § 64.604(b)(2).

¹⁵ 47 C.F.R. § 64.604(b)(2)(iii).

¹⁶ 47 C.F.R. § 64.604(c)(3).

¹⁷ 47 C.F.R. § 64.604(c)(7).

¹⁸ 47 C.F.R. § 64.5109.

¹⁹ 47 C.F.R. § 64.5110.

access to customers' CPNI.²⁰

Emergency Calling/911 Standards

The CAAG/Star VRS Platform supports all requirements for Internet-based TRS registration²¹ and automatic 911 call handling requirements using 10-digit numbering.²² CAAG/Star VRS' Platform is able to accept and handle emergency calls (as a default provider) from registered users through the Star VRS end user software application. CAAG/Star VRS utilizes the Emergency Endpoints Database provided through Dash Carrier Services, a division of Bandwidth, Inc. Upon registration, the consumer must supply CAAG/Star VRS with their physical location. CAAG/Star VRS also allows TRS users to update their registered location.²³ Once entered in the Dash system, the PSAP telephone number and location are determined and associated to the consumer.

When a 911 call is placed by a registered user, the call is immediately moved to the front of the queue and the first available VRS Interpreter will receive the call.²⁴ The VRS Interpreter then verifies the 10-digit number and call originating location. Upon validation, the outgoing 911 call generates a system query to the Dash Emergency Endpoints Database to look up the PSAP telephone number and location assigned to the registered physical address. The outgoing 911 call is routed to that pre-determined PSAP contact for further handling. If the originating address is not the consumer's registered location, a secondary 911 call is initialized that routes directly to the Emergency VRS Center of Bandwidth, Inc. for further assistance in call routing. Incoming

²⁰ 47 C.F.R. § 64.5108.

²¹ 47 C.F.R. §§ 64.605 and 64.611.

²² *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Order on Reconsideration, CG Dkt. No. 03-123, WC Dkt. No. 05-196, FCC 08-151, 23 FCC Rcd 11591 (adopted June 11, 2008); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, CG Dkt. No. 03-123, WC Dkt No. 05-196, FCC 08-275 (December 19, 2008).

²³ 47 C.F.R. § 64.605(b)(4)(ii).

²⁴ *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order on Reconsideration, CG Dkt. No. 03-123, WC Dkt. No. 05-196, FCC 08-78 (adopted March 11, 2008).

calls from non-registered users are handled in the same manner as a registered user calling from a location that is not the location assigned to the 10-digit number in Dash. In the event of disconnection of either party, the VRS Interpreter immediately reestablishes contact with that party to resume call handling.

In order to ensure that 911 callers have the ability to communicate with first responders when they arrive, CAAG/Star VRS Interpreters stay on the call to assist. Upon the arrival of first responders, CAAG/Star VRS terminates the connection to the PSAP, but remains with the caller, performing non-billable video interpreting for as long as necessary to ensure the caller's safety. This is done as a community service only. The associated interpreting time is not reflected in the compensable minutes reported by CAAG/Star VRS to the Fund Administrator.

CAAG/Star VRS informs subscribers of the process for placing emergency VRS 911 calls through promotional materials, CAAG/Star VRS' website <http://www.starvrs.net>, and through information communicated in the registration process.

Discrimination and Preferences

CAAG/Star VRS does not directly or indirectly, by any means or devise, engage in any unjust or unreasonable discrimination related to its VRS, nor does it give undue or unreasonable preferences or advantages, or subject any person, class of persons, or locality to unreasonable prejudice or disadvantage.²⁵

Unauthorized and Unnecessary Use of VRS and Related CAAG/Star VRS Compliance Plans

CAAG/Star VRS neither engages in, nor encourages, any practice that would cause or encourage false or unverified claims for TRS Fund compensation, unauthorized use of VRS, the making of VRS calls that would not otherwise be made, or the use of VRS by unauthorized persons.²⁶

²⁵ 47 C.F.R. § 64.604(c)(12).

²⁶ 47 C.F.R. § 64.604(c)(13).

CAAG/Star VRS hereby submits for Commission review its Compliance Plan which includes CAAG/Star VRS' policies, procedures and practices for complying with the requirements of section 64.604 (c) (13).²⁷ CAAG/Star VRS' Compliance Plan identifies the officer or managerial employees responsible for ensuring compliance with section 64.604 (c) (13); describes compliance training CAAG/Star VRS provides; identifies telephone numbers, website addresses, and other mechanisms available to employees for reporting abuse, describes internal audit and verification processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator, and describes all policies and practices CAAG/Star VRS is following to prevent waste, fraud, and abuse of the TRS Fund.

Data Collection and Reporting

CAAG/Star VRS is current on its submission to the fund administrator of all data necessary to determine TRS fund payments and to meet speed of answer compliance requirements. Processes have been implemented to ensure that the accuracy and completeness of all data submitted can be attested to based on the first-hand knowledge of a CAAG/Star VRS senior executive.

Notification of Substantive Changes

CAAG/Star VRS confirms its intent to notify the Commission of substantive changes in its VRS services, program or features within 60 days of when such changes occur.

Procedures for Ensuring Compliance

In order to ensure compliance with all of the FCC's rules governing VRS providers, CAAG/Star VRS continues to train all new employees regarding applicable standards and requirements and when rule changes are adopted. CAAG/Star VRS monitors new Commission decisions, actions, policies and rule changes so that training of new and existing employees

²⁷ 47 C.F.R. § 64.606(g)(3). CAAG's Compliance Plan documentation is included as **Confidential Exhibit B**.

incorporates current standards and requirements.²⁸

Complaint Procedures

CAAG/Star VRS continues to be committed to providing the highest quality customer service for all its service offerings. CAAG/Star VRS users can contact customer service by videophone at 855-807-2224, e-mail at vrscare@caag4.com, or a transfer from a CAAG/Star VRS Center to customer service. Voice callers can also reach customer service by dialing 832-413-4622. CAAG/Star VRS continues to track and document complaints in its database and commits to submit complaint summaries annually to the Commission as required.

Contact Persons

Kate Johnson, Senior Manager of Video Interpreting Services, is the designated contact person to provide consumer information and receive consumer complaints for CAAG/Star VRS. Ms. Johnson may be contacted at 1445 N. Loop West, Suite 910, Houston, Texas 77008, 713.807.1176 (voice and TTY telephone number), 713.807.1238 (fax), kate.johnson@caag4.com (e-mail). Correspondence should be sent to the following physical address: 1445 N. Loop West, Suite 910 Houston, Texas 77008.

V. Conclusion

Having been committed to providing sign language interpreting services to the deaf and hard of hearing community for 14 years, CAAG/Star VRS is honored to be able to provide outstanding VRS services as well. CAAG/Star VRS will continue to comply with all TRS rules and will continue to provide its consumers with a quality VRS service.

²⁸ See also *Unauthorized and Unnecessary Use of VRS and Related Compliance Plan*, above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jeremy M. Jack', with a long horizontal flourish extending to the right.

Jeremy M. Jack
Vice President, Star VRS

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(916) 225-4944 – Cell
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Date: November 14, 2014

EXHIBIT A

VERIFICATION OF EVERETT PUCKETT

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of §
Structure and § CG Docket No.10-51
Practices of the Video Relay §
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ANNUAL REPORT OF HANCOCK, JAHN, LEE & PUCKETT, LLC

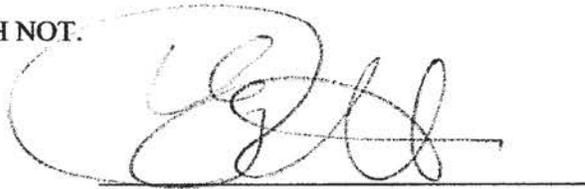
VERIFICATION OF EVERETT PUCKETT

STATE OF TEXAS §
§
COUNTY OF HARRIS §

Before me, the undersigned notary public for the State of Texas, personally appeared the affiant Everett Puckett, who is known to me and who, and after being duly sworn to tell the truth stated:

“In accordance with 47 C.F.R. §64.606(g)(2) of the Commission’s rules, I swear under penalty of perjury that I am Everett Puckett, a Senior Executive Officer of the reporting entity Hancock, Jahn, Lee & Puckett, LLC d/b/a “Communication Access Ability Group” and branded “Star VRS” and “Star VRS for the DeafBlind” or “Star VRSdb” (“CAAG/Star VRS”), 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.”

FURTHER AFFIANT SAYETH NOT.

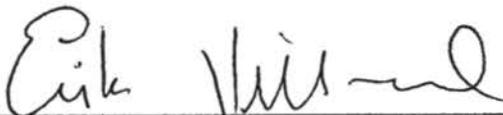


Everett Puckett
CAAG/Star VRS
Managing Partner, CEO
1445 North Loop West, Suite 910
Houston, TX 77008
713-807-1176

Sworn and subscribed before me this 5 day of November, 2015.

My Commission Expires:




Notary Public in and for the State of Texas

Request for Confidential Treatment: Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, CAAG/Star VRS respectfully requests confidential treatment of the non-public, non-redacted version of this letter and its attachment. The confidential version contains proprietary information not intended for public consumption. CAAG/Star VRS would not make this information public under any circumstance. Release of the confidential version of this letter to the public could cause CAAG/Star VRS irreparable and inestimable harm. CAAG/Star VRS requests that the confidential version of this letter be withheld from public inspection. Should disclosure of the confidential version of this letter be requested, CAAG/Star VRS requests that it be informed of such request so that CAAG/Star VRS may take appropriate action to safeguard its interests.

Pursuant to the Commission's Second Protective Order in the above-referenced matter, one copy of the confidential version of this annual report and two copies of the redacted public version are enclosed. Two copies of the confidential version are being mailed to Gregory Hlibok, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554 and cc via email to Gregory Hlibok and Karen Peltz Strauss.

EXHIBIT B

COMPLIANCE PLAN

(CONFIDENTIAL)

[REDACTED]