

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

In the Matter of)
)
)
Telecommunications Relay Service and) CG Docket No. 03-123
Speech-to-Speech Services for Individuals with)
Hearing and Speech Disabilities)
)

**Update and Verification of Internet-Based TRS Certification
Application**

CaptionCall, LLC

**Update and Verification of Internet-Based TRS Certification
Application**

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I. Introduction and Summary

Pursuant to 47 C.F.R. §§ 64.606(a)(2) and (g), and in accordance with the Commission’s orders released on July 28 and October 17, 2011, Sorenson Communications, Inc. (“Sorenson”) and CaptionCall, LLC (“CaptionCall”) submit this document, which serves as both Sorenson’s update and verification of its December 2, 2011 application for certification as a provider of Internet-based telecommunications relay service (“iTRS”),¹ and as CaptionCall’s updated application for its own certification as a provider of iTRS.²

CaptionCall, through its affiliate Sorenson, has been part of an industry-leading team providing communications services and products designed to enable deaf and hard-of-hearing individuals to communicate with the hearing world. In light of a recent corporate reorganization in which CaptionCall became a sister-company to Sorenson, rather than a Sorenson wholly-owned subsidiary,³ CaptionCall now seeks its own certification as a provider of Internet Protocol Captioned Telephone Service (“IP CTS”). Once CaptionCall receives its own certification, it will submit its own requests for compensation and be directly accountable to the Commission for

¹ This update and verification is limited to Sorenson’s compliance with mandatory minimum standards related to Internet Protocol Captioned Telephone Service (“IP CTS”). Sorenson has filed a separate update and verification of its compliance with mandatory minimum standards related to Video Relay Service.

² CaptionCall’s updated application consists of this document, the exhibits submitted herewith, and the exhibits submitted with the December 2, 2014 application. CaptionCall hereby adopts and incorporates the exhibits referenced in and accompanying the December 2014 application 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.

³ In Sorenson’s May 15, 2014 Update and Verification of Internet-Based TRS Certification Application, Sorenson noted that although CaptionCall is an affiliate rather than subsidiary following restructuring, “Sorenson will remain the certified IP CTS provider, with support from CaptionCall.” CaptionCall will continue to provide support to Sorenson as the certified IP CTS provider until the Commission acts on this, its own application.

the IP CTS services it provides in its own right, rather than through Sorenson. At that time, Sorenson itself would cease offering IP CTS, as CaptionCall would then directly provide IP CTS to eligible consumers.

Through its support of Sorenson’s IP CTS offerings, by offering consumers cutting-edge equipment and applications, and by staffing its network of 8 call centers with highly skilled communications assistants (“CAs”), CaptionCall has already 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 it submitted its 2014 application for certification, CaptionCall launched a new phone, the 67T, to replace the 57T. The phone features a simple touch interface, a high-quality speakerphone, a knob to control volume and a physical button to retrieve missed calls. In addition, on September 23, 2014, CaptionCall launched an iPad application called “CaptionCall Mobile” in four states: Texas, California, New York, and Florida, and has since expanded the service to the entire country. CaptionCall Mobile further meets the needs of the hard-of-hearing community by allowing them to make and receive captioned telephone calls on their iPad device.

Since 2011, CaptionCall has, for Sorenson, provided its award-winning IP CTS offerings, which have earned a reputation for quality, reliability, and efficiency. Indeed, with and through Sorenson, CaptionCall has established a proven record of meeting and exceeding the Commission’s minimum standards. As of November 1, 2015, CaptionCall, through Sorenson, serves *****BEGIN CONFIDENTIAL*****  *****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, CaptionCall, through Sorenson, currently provides IP CTS under a grant of interim eligibility to Sorenson.⁴ Sorenson, which formerly operated under contract with the State of Utah’s 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, May 15, 2014, and December 2, 2014. Furthermore, on April 24, 2014, the Commission granted conditional approval for the reorganized Sorenson entity—controlled by Franklin Mutual Advisers LLC and GSO Capital Partners LP (or certain investment funds managed or sub-advised by these entities)—that emerged from bankruptcy, to continue Sorenson’s provision of TRS.⁵

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

As explained in the chart that follows, CaptionCall’s service, provided through Sorenson, currently does and will continue to meet all of the non-waived minimum standards applicable to IP CTS⁶ when provided by CaptionCall directly rather than through Sorenson.

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

⁶ 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

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>CA Training</p> <p>47 C.F.R. § 64.604(a)(1)(i)</p>	<p>--</p>	<p>CaptionCall has developed a robust in-house training program in which its IP CTS 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 CaptionCall's services and equipment. Its CAs are trained for an average of ***BEGIN CONFIDENTIAL***   ***END CONFIDENTIAL***.</p>
<p>CA Skills</p> <p>47 C.F.R. § 64.604(a)(1)(ii)</p>	<p>Partial waiver⁷</p>	<p>As part of its robust training program, CaptionCall ensures that its CAs handling IP CTS calls are sufficiently skilled in typing, grammar, and spelling;⁸ that they are familiar with hearing and speech-disability cultures, and etiquette; and that they possess clear and articulate voice communications skills.</p>
<p>CA Typing</p> <p>47 C.F.R. § 64.604(a)(1)(iii)</p>	<p>--</p>	<p>CaptionCall's IP CTS CAs are all able to type more than 60 words per minute (with the use of technological aids).⁹</p>

to their meaning. In those cases, CaptionCall provides the following enumeration utilizing its understanding of the scope or substance of these requirements.

⁷ See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Declaratory Ruling, 22 FCC Rcd. 379, 392 ¶ 30 n.105 (2007) (“*IP CTS Waiver Order*”) (waiving in certain circumstances the requirement that IP CTS CAs are competent in interpreting written ASL).

⁸ CaptionCall does not separately assess CAs for competence in interpretation of “typewritten ASL.” The Commission has recognized that this requirement simply does not apply to IP CTS because “the user does not type the outbound message.” See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, 21 FCC Rcd. 9147, 9149 (2006).

⁹ See *IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement to test typing speeds of IP CTS CAs).

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	Waived ¹⁰	--
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	--	CaptionCall bars its CAs from disclosing the content of any relayed conversation, except as authorized by 47 U.S.C. § 605.
Accuracy Rule 47 C.F.R. § 64.604(a)(2)(ii)	--	CaptionCall bars its CAs from intentionally altering the conversations they relay. CaptionCall terminates IP CTS calls if the CA determines both parties of the call are in the same location or if the CA determines the user is captioning a television show..
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	Waived ¹¹	--
Call Length 47 C.F.R. § 64.604(a)(3)(i)	--	CaptionCall does not limit the length of calls.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	Conditional exemption ¹²	CaptionCall's fixed endpoint connects to the user's selected carrier. Through that carrier users can make and receive any type of call they choose. CaptionCall's <i>CaptionCall Mobile</i> service, through Sorenson, allows for any type of call. Users are not charged for long-distance calls. Long distance calls can also be placed using calling cards or credit cards.
Two-line VCO, VCO-to-TTY, and VCO-to-VCO 47 C.F.R. § 64.604(a)(3)(v)(2)	--	CaptionCall, through Sorenson, supports VCO. ¹³

¹⁰ See *IP CTS Waiver Order* ¶ 30.

¹¹ See *IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement that IP CTS CAs may not refuse sequential calls).

¹² See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 14-125 ¶¶ 11-15 (2014) (“*2014 Waiver Order*”).

¹³ The Commission has concluded that “a call between two captioned telephone relay users are essentially a form of VCO-to-VCO and, accordingly, a waiver of the VCO-to-VCO requirement is unnecessary for IP CTS and CTS providers.” *2014 Waiver Order* ¶ 49.

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>Speed Dialing</p> <p>47 C.F.R. § 64.604(a)(3)(vi)(2)</p>	<p>--</p>	<p>CaptionCall, through Sorenson, offers speed dialing capability through a user's iTRS access technology (either the CaptionCall endpoint or the CaptionCall Mobile application), such as through one-touch dialing.</p>
<p>Three-way Calling</p> <p>47 C.F.R. § 64.604(a)(3)(vi)(3)</p>	<p>--</p>	<p>CaptionCall, through 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.¹⁴ CaptionCall Mobile allows customers to participate in three-way calls that are initiated by another party to the call. CaptionCall Mobile customers cannot currently initiate a three-way call, as the application does not currently have a flash-hook feature.</p>
<p>Voice Mail</p> <p>47 C.F.R. § 64.604(a)(3)(vii) & (viii)</p>	<p>--</p>	<p>CaptionCall, through Sorenson, offers an "answering machine" mode on its fixed endpoints, which allows customers to see captions when listening to messages that are either recorded on a stand-alone answering machine or through a voice mail service provided by their local exchange carrier.</p> <p>CaptionCall Mobile provides built-in voicemail service to the customer's assigned phone number. Voice messages can be captioned when they are retrieved.</p>

¹⁴ 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.*

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>Speed of Answer for IP CTS</p> <p>47 C.F.R. § 64.604(b)(2)(ii)</p>	<p>--</p>	<p>As reflected in its monthly data submissions to the Fund administrator, CaptionCall's IP CTS, provided through Sorenson, routinely exceeds the speed-of-answer requirement that 85% of all calls are answered within 10 seconds measured on a daily basis.</p>
<p>Equal Access to IXC's</p> <p>47 C.F.R. § 64.604(b)(3)</p>	<p>Conditional Exemption¹⁵</p>	<p>CaptionCall's CaptionCall Mobile service, through Sorenson, does not charge for long distance service and is exempt from this requirement.</p>
<p>Redundancy</p> <p>47 C.F.R. § 64.604(b)(4)(ii)</p>	<p>--</p>	<p>CaptionCall's operations include multiple redundancy features and safeguards, including emergency generators to ensure uninterrupted power for emergency use.</p>
<p>Caller ID</p> <p>47 C.F.R. § 64.604(b)(6)</p>	<p>--</p>	<p>For IP CTS calls using CaptionCall's fixed end points, the customer's underlying carrier, not the IP CTS provider, handles all call routing and passes through data to the interconnecting carrier. Accordingly, CaptionCall is not in a position as a matter of call architecture to pass through any IP CTS call or numbering data. The CaptionCall Mobile application passes the caller's caller ID data to the interconnecting carrier.</p>
<p>Complaint Logs and Procedures</p> <p>47 C.F.R. § 64.604(c)(1), (6)</p>	<p>--</p>	<p>CaptionCall 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. CaptionCall's complaint procedures are detailed in § X below.</p>
<p>Complaint Contact Point</p> <p>47 C.F.R. § 64.604(c)(2)</p>	<p>--</p>	<p>CaptionCall's contact person for iTRS consumer information and complaints is:</p> <p style="padding-left: 40px;">Bruce Peterson Vice President of Marketing 4215 South Riverboat Road Salt Lake City, UT 84123 Voice: (801) 293-6564 Fax: (877) 567-6244 Email: bpeterson@captioncall.com</p>

¹⁵ 2014 Waiver Order ¶ 15.

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>Publicity re iTRS</p> <p>47 C.F.R. § 64.604(c)(3)</p>	<p>--</p>	<p>Although the obligation to publicize the availability of TRS is imposed on carriers rather than TRS providers, CaptionCall, through Sorenson, publicizes the availability of iTRS through print promotional materials, web-based promotional materials, sponsorship arrangements, and other means. CaptionCall, through Sorenson, does not include the cost of these activities in its yearly cost submissions.</p>
<p>Rates</p> <p>47 C.F.R. § 64.604(c)(4)</p>	<p>--</p>	<p>CaptionCall does not charge its customers anything for its iTRS.</p>
<p>Cost Information and other Data Submissions</p> <p>47 C.F.R. § 64.604(c)(5)</p>	<p>--</p>	<p>CaptionCall maintains and submits, through Sorenson, required cost data and other data to the FCC and to the Fund administrator.</p>
<p>Whistleblower Notice</p> <p>47 C.F.R. § 64.604(c)(5)(iii)(M)</p>	<p>--</p>	<p>CaptionCall has provided a complete description of the iTRS whistleblower protections to all of its employees. CaptionCall 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.</p>
<p>TRS Customer Information</p> <p>47 C.F.R. § 64.604(c)(7)</p>	<p>--</p>	<p>CaptionCall does not use its subscribers' profile data for any purpose other than to connect TRS calls.¹⁶ Neither CaptionCall nor its employees sell, distribute, share, or reveal the profile data unless compelled by law to do so.</p>

¹⁶ 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	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)</p>	<p>--</p>	<p>CaptionCall prohibits its officers, directors, employees, contractors, and agents from offering or providing to any person or entity that registers to use IP CTS any form of direct or indirect incentives, financial or otherwise, to register for or use IP CTS. CaptionCall prohibits its officers, directors, employees, contractors, and agents from offering or providing to a hearing health professional any direct or indirect incentives, financial or otherwise, that are tied to a consumer's decision to register for or use IP CTS, nor does it have joint marketing arrangements with any hearing health professionals.</p>

STANDARD	WAIVER	CAPTIONCALL’S COMPLIANCE
<p>IP CTS Registration and Certification 47 C.F.R. § 64.604(c)(9)</p>	<p>Temporary conditional waiver¹⁷</p>	<p>CaptionCall, through Sorenson, complies with the rule requiring the collection of each new customer’s name, address, telephone number, date of birth, and last four social security digits. For consumers who do not have a Social Security number or a Tribal identification card number, CaptionCall obtains physical or electronic copies of at least one of the identity confirming documents listed in the <i>2015 Waiver Order</i>.¹⁸ CaptionCall also ensures that its users who cannot provide either the last four digits or a Social Security Number or Tribal identification number are located in the United States by obtaining physical or electronic copies of at least one of the address-verifying documents listed in the <i>2015 Waiver Order</i>.¹⁹</p> <p>In addition, CaptionCall continues to collect date-of-birth and last four social security digits from each existing customer, who began receiving CaptionCall service before March 6, 2013. CaptionCall also collects a separate self-certification from the consumer before requesting compensation from the TRS fund. In addition, CaptionCall is collecting third-party professional certifications from all customers who began receiving service before March 6, 2013 and paid less than \$75 for their equipment.</p>
<p>IP CTS Registration Records and Confidentiality 47 C.F.R. § 64.604(c)(9)</p>	<p>--</p>	<p>CaptionCall maintains records of any registration and certification information for a period of at least five years after the consumer ceases to obtain service, and does not disclose such registration and certification information or the content of such registration and certification information except as required by law or regulation.</p>

¹⁷ See *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Order, DA 15-173 ¶¶ 13-14 (2015) (“*2015 Waiver Order*”).

¹⁸ *Id.* ¶13.

¹⁹ *Id.* ¶14.

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>IP CTS Equipment Label 47 C.F.R. § 64.604(c)(11)</p>	<p>--</p>	<p>CaptionCall labels the IP CTS equipment it distributes with the following label: "FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING THIS DEVICE WITH THE CAPTIONS ON." CaptionCall has distributed this label to consumers who have CaptionCall equipment without the label. For consumers of CaptionCall software, this language appears each time the consumer logs into the application.</p> <p>CaptionCall maintains, with each consumer's registration records, records describing any IP CTS equipment provided, directly or indirectly, to such consumer, and stating the amount paid for such equipment.</p> <p>Effective September 18, 2013, it has been Sorenson's policy that trainers must affix the label required by 47 C.F.R. § 64.604, which is included in the packaging with all equipment, prior to providing the equipment to consumers. Accordingly, by maintaining records of the date on which equipment was provided to the consumer, Sorenson maintains a record of whether the required label was affixed to equipment prior to its provision to the consumer. For consumers who received CaptionCall IP CTS equipment prior to September 18, 2013, CaptionCall maintains a list of all consumers to whom it mailed labels and the date on which the labels were mailed.</p>

STANDARD	WAIVER	CAPTIONCALL’S COMPLIANCE
<p>Emergency Call Handling</p> <p>47 C.F.R. § 64.605</p>	<p>--</p>	<p>CaptionCall, through Sorenson, provides emergency calling service in full compliance with the FCC’s rules. For IP CTS calls using a hard endpoint, CaptionCall provides captioning for emergency calls, and the customer’s underlying carrier handles call routing and delivery to and from the PSAP.</p> <p>From all CaptionCall Mobile customers, CaptionCall collects Registered Location information. For 911 calls placed through the CaptionCall Mobile service, CaptionCall transmits the call, as well as ANI and the caller’s Registered Location, to the PSAP, designated statewide default answering point, or Appropriate Local Emergency Authority that serves the caller's Registered Location. CaptionCall also places 911 calls in the queue ahead of other calls. Whenever possible, CaptionCall Mobile 911 calls are routed through the use of ANI and, if necessary, pseudo-ANI, and the caller’s Registered Location is available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate ALI database.</p>
<p>Speech-to-Speech Service</p>	<p>Waived²⁰</p>	<p>--</p>

²⁰ *IP CTS Waiver Order* ¶ 30.

STANDARD	WAIVER	CAPTIONCALL'S COMPLIANCE
<p>Impermissible Use of CPNI 47 C.F.R. §§ 64.5105, 5107, 5108, 5109, 5110</p>	<p>--</p>	<p>CaptionCall, through Sorenson, complies with the Commission's CPNI rules. CaptionCall uses or discloses CPNI only to the extent allowed by the Commission's rules, which would include providing access to CPNI to the TRS Fund administrator or the Commission for the purpose of administration and oversight of the TRS Fund, including the investigation and prevention of fraud, abuse, and misuse of TRS and seeking repayment to the TRS Fund for non-compensable minutes.</p> <p>CaptionCall does not use, disclose, or permit access to CPNI to market to a customer TRS offerings that are within a category of TRS for which CaptionCall is not currently the default provider for that customer without customer approval, unless otherwise permitted by the Commission's rules, such as for regaining former customers by marketing the same category of service from which CPNI was obtained to that former customer. CaptionCall 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.</p> <p>CaptionCall and its affiliate Sorenson do not share CPNI among themselves unless the customer (1) has selected Sorenson as its default provider for VRS and uses CaptionCall for IP CTS; or (2) has consented.</p> <p>CaptionCall and its affiliate, Sorenson, have adopted a detailed policy governing the use of CPNI in order to ensure compliance with the Commission's CPNI rules. Once the Commission grants its application for certification and CaptionCall itself becomes a certified iTRS provider, it will submit an annual certification of compliance with the Commission's CPNI rules as required by 47 C.F.R. § 5109(e).²¹</p>

²¹ CaptionCall includes for reference as Addendum 2 to this application Sorenson and CaptionCall's CPNI Certification and Statement of Operating Procedures.

IV. 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 and CaptionCall’s case:

1. Certain funds managed, advised, or sub-advised by GSO Capital Partners LP

(“GSO”) ***BEGIN CONFIDENTIAL*** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] ***END CONFIDENTIAL***

2. Certain investment funds for which Franklin Mutual Advisers LLC

(“Franklin”) acts as an investment advisor ***BEGIN CONFIDENTIAL*** [REDACTED]
[REDACTED]
[REDACTED] ***END CONFIDENTIAL***

The funds managed or sub-advised by GSO and such funds for which Franklin acts as investment advisor hold equity interests in Sorenson and CaptionCall’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 CaptionCall.

V. 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 and CaptionCall’s organizational structure is attached at Exhibit 1.

VI. 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 and CaptionCall do not have any general partners or managing members. The names of their executives, officers, and board members are included on the list attached as Exhibit 2.

VII. 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 IP CTS 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; communications assistants, and persons involved in marketing and sponsorship activities.” The requested information follows (effective November 15, 2014):

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



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

VIII. 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 CaptionCall’s list of sponsorship agreements is attached as Exhibit 3. 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.

IX. Provider Compliance With Eligibility Requirements (47 C.F.R. § 64.606(a)(2)(ii)(F))

As required by 47 C.F.R. § 64.604(a)(2)(ii)(F), CaptionCall hereby describes the measures it take to ensure it does not and will not request or collect payment from the TRS Fund for service to consumers who do not satisfy the registration and certification requirements in § 64.604(c)(9), and an explanation of how these measures provide such assurance.

CaptionCall requires all prospective subscribers to provide their name, address, telephone number, date of birth, and the last four digits of their social security numbers. In compliance with the Commission’s IP CTS registration rules, CaptionCall does not activate service for new customers who have not provided their name, address, telephone number, date of birth, and last four social security digits. In addition, before requesting compensation from the Administrator, CaptionCall removes minutes of use associated with any existing customer who has not complied with the applicable registration rules. By activating service only for customers who have provided this information, and by scrubbing ineligible minutes from its compensation

submissions, CaptionCall ensures that it does not request compensation for minutes of use associated with customers who do not comply with the Commission’s registration requirements.

CaptionCall requires all prospective customers to submit a self-certification that complies with the requirements of 47 C.F.R. § 64.604(c)(9)(iii). In compliance with the Commission’s certification rules, CaptionCall does not activate service for customers who have not submitted a self-certification that complies with the requirements of 47 C.F.R. § 64.604(c)(9)(iii). In addition, before requesting compensation from the Administrator, CaptionCall removes minutes of use associated with any existing customer who has not complied with the applicable self-certification rules. By activating service only for customers who have provided the required self-certification, and by scrubbing ineligible minutes from its compensation submissions, CaptionCall ensures that it does not request compensation for minutes of use associated with customers who do not comply with the Commission’s self-certification requirements.

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

CaptionCall directs users and employees to report complaints through the email address support@captioncall.com. CaptionCall applies the following process to complaints it receives related to its services.

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

█ [REDACTED]

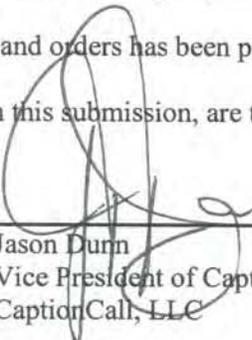
END CONFIDENTIAL

XI. 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), CaptionCall states that it will file annual compliance reports demonstrating continued compliance with the Commission’s rules governing Telecommunications Relay Service.

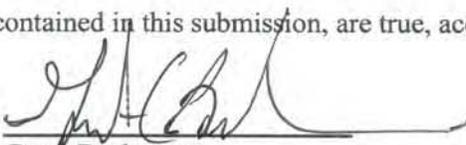
XII. Certification

I declare under penalty of perjury that I am Jason Dunn, 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.



Jason Dunn
Vice President of CaptionCall Centers
CaptionCall, LLC

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, IT, and Compliance
Sorenson Communications, Inc.

Date: December 2, 2015

List of Exhibits

- Exhibit 1 Organizational Structure
- Exhibit 2 Directors and Officers List
- Exhibit 3 Sponsorship List

Addendum 1

Sorenson and CaptionCall Regulatory Compliance Plan

Sorenson Regulatory Compliance Plan

As a provider of Telecommunications Relay Services (“TRS”), Sorenson Communications, Inc. and CaptionCall, LLC (collectively “Sorenson”) are 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 Compliance Manager (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 Compliance Manager is a full-time, dedicated compliance employee who reports to the Compliance Officer and meets every other month with the Compliance Committee. The Compliance Manager 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 inside and 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 every other month 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 Manager 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 Compliance Manager 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 compliance committee meetings, members of the Committee receive updated training from the Compliance Manager 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 Compliance Manager a list of new employees. The list includes each new employee's start date, the employee's department, and the employee's supervisor. The Compliance Manager maintains that information in order to track the completion of new-hire compliance training. The Compliance Manager 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 Compliance Manager.

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 Compliance Manager 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 annual 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 Compliance Manager monitors all reports made through the Compliance Hotline and the compliance email inbox. The Compliance Manager 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 Fund Administrator, (2) Sorenson’s routine review of compliance with customer registration, certification, and verification requirements; and (3) Sorenson’s standard review 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 Fund 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 Compliance Manager works with the Sales and Outreach department to obtain reports on the customer registration, certification, and verification for all TRS services. Each month, the Compliance Manager 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 Compliance Manager 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 Compliance Manager conducts periodic reviews of all departments with responsibility for providing TRS services, including: Sales and Outreach; Marketing; Information Systems; Operations; Finance; and Human Resources.

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 and outside counsel. 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 and CaptionCall CPNI Certification and Statement of Operating Procedures

Annual 47 C.F.R. § 64.5109 CPNI Certification

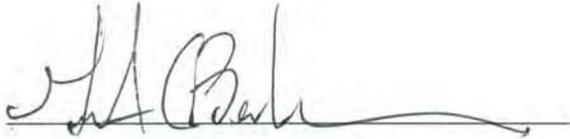
Sorenson Communications, Inc.
2015 CPNI Compliance Certificate and Statement

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. Neither Sorenson, nor its affiliate CaptionCall, has taken any actions against data brokers in the past year. Nor has Sorenson or CaptionCall received any customer complaints during the period covered by this certification.

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, 2015.

A handwritten signature in black ink, appearing to read 'Grant Beckmann', written over a horizontal line.

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

Sorenson Communications, Inc.
2015 CPNI Compliance Statement of Operating Procedures

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.¹ 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;

¹ This Policy also applies to Sorenson’s affiliate, CaptionCall, LLC.

- 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.