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STATE OF WASHINGTON
 DEPARTMENT OF SOCIAL AND HEALTH SERVICES
 OFFICE OF THE DEAF AND HARD OF HEARING

June 30, 2006

DOCKET FILE COPY ORIGINAL

Marlene H. Dortch
 Office of the Secretary
 Federal Communications Commission
 445 12th Street, SW, Room TW-B204
 Washington, DC 20554

RE: In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket 03-123.

Dear Ms. Dortch:

As mandated by the Federal Communications Commission (FCC), the Office of the Deaf and Hard of Hearing (ODHH) has reviewed documentation provided by HandsOn Video Relay Services, Inc., (HOVRS) that attests to HOVRS' compliance with FCC mandatory minimum performance standards for VRS. ODHH has also reviewed the log of HOVRS' consumer complaints that allege a violation of the federal minimum standards for Telecommunications Relay Services as applicable to VRS. ODHH finds the information satisfactory for purposes required by the FCC for filing under FCC Rule Section 64.604 and CG Docket 03-123. ODHH is providing you with a compliance report, consumer complaint log and summary to file with the FCC. Enclosed please find the annual complaint log for the State of Washington and a summary, which indicates the number of complaints, received by ODHH ending May 31, 2006.

Should you have any questions concerning this summary or report log, please contact me at (360) 902-8000 TTY/V or email at lichtrw@dshs.wa.gov.

Best Regards,

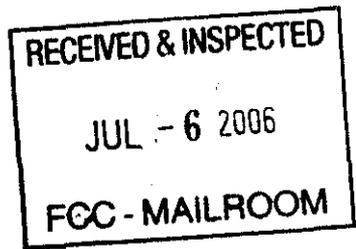
Robert Lichtenberg
 Washington State Relay Administrator

Enclosures:

- 1) HOVRS Certification to ODHH of Compliance with FCC Rule Section 64.604
- 2) Annual Log of Consumer Complaints for period of June 1, 2005 – May 31, 2006
- 3) Annual Summary Report for period of June 1, 2005 – May 31, 2006
- 4) 3.5 diskette with files in Word doc format

cc: Blake Chard, DSHS
 Eric Raff, ODHH
 Robert Shirley, WUTC
 Kristen Russell, WUTC
 Ron Obroy, HOVRS
 Pam Gregory, FCC

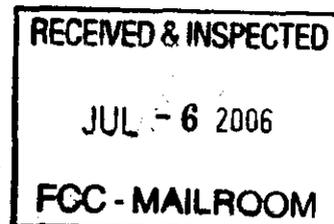
cc: [unclear] 045
 List A B C D



HOVRS Relay Service - June 1, 2005 through May 31, 2006

- 1. Total Number of Service related complaints: **36**
- 2. Total Number of Technical related complaints: **161**
- 3. Total Number of Customer Service inquiry: **22**

Before the
OFFICE OF THE DEAF AND HARD OF HEARING
Olympia, Washington



HANDS ON VIDEO RELAY SERVICES, INC. CERTIFICATION TO THE OFFICE OF DEAF AND HARD OF HEARING OF COMPLIANCE WITH FCC RULE SECTION 64.604'S REQUIREMENTS FOR PAYMENT FROM THE INTERSTATE TRS FUND

Hands On Video Relay Services, Inc. ("Hands On"), submits this certification of compliance with the requirements of FCC Rule Section 64.604 to receive reimbursement from the Interstate Telecommunications Relay Service ("TRS") Fund as a provider of Video Relay Services ("VRS") to the Office of the Deaf and Hard of Hearing ("ODHH") of the State of Washington.

I. Hands On.

Hands On is a California corporation with its headquarters at 595 Menlo Drive, Rocklin, CA 95765-3708. Hands On operates VRS call centers at the Rocklin location and in the cities of Oakland, CA., Temecula, CA, and Vancouver, WA. The ODHH is invited to tour any and all of the company's call centers.

II. Hands On's Video Relay Service.

Hands On provides VRS via a combination of Internet Protocol and the public switched network ("PSTN") to allow deaf, hard of hearing and speech impaired individuals to place and receive telephone calls in a manner functionally equivalent to telephone service provided hearing persons. A typical call operates as follows: a deaf or hard of hearing individual will access one of the Hands On Relay Centers via the Internet on his or her personal computer equipped with a video camera or via a video-phone device such as the Dlink 1000 video phone. In order for the video portion of the link to function properly the connection must be a high speed data line of 128 kBs or higher. The deaf or hard of hearing individual will be connected via two-way video link with one

of Hands On's Communications Assistants ("Video Interpreter" or "VI") who will communicate through American Sign Language (or a variant thereof) ("ASL") with the hearing user. The VI will then place a landline telephone call to the called party and then translate ASL to voice and vice versa to allow the parties to converse in a functionally equivalent manner to a telephone conversation between hearing persons.

Hands On has also developed the capability to allow hearing persons to place calls to deaf and hard of hearing persons. Hearing persons contact the call centers via a toll free number, provide contact information for the deaf or hard of hearing person to the VI, and are connected to the call party. Conversation then ensues just as with a deaf or hard of hearing person initiated call.

A. Overview of technical facilities.

Since 2000, Hands On has been developing an affordable video technology network that will enhance the lives of the deaf and hard of hearing by delivering to their desk top, in their homes or businesses, a professional ASL trained interpreter. With the use of the Internet, video compression, hardware and software, Hands On has developed a service to take its core competency, sign language interpreting to any deaf or hard of hearing person with a PC (including both windows based PCs and Apple MacIntosh) and camera or video-phone and a high speed data line. Hand On's video network incorporates redundancy in its hardware, software and Internet provider to ensure reliable and continuous service.

B. High Speed Internet.

Hands On's call centers are equipped with redundant high speed Internet lines (usually DS-3s) to facilitate multiple video calls simultaneously. These high speed Internet lines coupled with

Hands On's use of enhanced video compression, provide a design specification of 20 frames per second (FPS) or higher for video calls.

C. Database Driven Reports/Call Tracking.

To accurately track calls for billing, expansion and quality control, Hands On has developed a proprietary automated database software system. This software allows supervisory personnel to track calls in a variety of ways. They include:

1. Length of calls.
2. Number of calls at any given hour of the day, week or month.
3. Number of calls holding for more than 10 seconds, 30 seconds and so on.
4. Number of dropped calls.
5. Number of unanswered calls.
6. Answer speed.

The call tracking software is the key to effective and efficient resource allocation. Measured usage trends demonstrate system busy hours (and days) and thus allow for optimum coverage by the VIs. On a longer term basis the call tracking provides guidance on the necessity for system upgrades of incoming and outgoing lines, additional work station, or call center construction. Thus, Hands On's call tracking ability allows management to maintain quality service and facilitate service improvement.

D. Call Center.

The VRS Call Centers are designed to incorporate the latest technological advancements. Back up systems are employed to protect critical circuits. Private cubicles and recreation rooms are deployed to ensure VI retention. Each video interpreter workstation is modeled with the privacy of

the customer and the video interpreter in mind. Each workstation is configured to minimize ambient noise and to promote the privacy of the video relay call. Each workstation consists of a high-end PC computer running Windows XP Pro, capturing video at up to 30 fps. Each video camera is mounted on a flexible arm atop a height-adjustable desk with ergonomic chairs and keyboard trays to provide the ideal posture for a video interpreter. The stations utilize external LCD monitors between the sizes of 17 and 19 inches, and in some instances run a Macintosh computer in the background, sharing the same common monitor, keyboard, and mouse. Each station has battery backed up for up to 10 minutes to ensure calls are completed in the event of a power outage.

E. Video Laboratory.

Hands On has designed a Video Laboratory to test new technology prior to introduction into the Relay Center environment.

III. Hands On is a qualified VRS provider.

FCC Rule Section 64.604(c)(iii)(5)(F) sets forth eligibility criteria for receiving payments from the TRS Fund. Subsection 64.604(c)(iii)(5)(F)(1) allows reimbursement from the Interstate TRS Fund for: “TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605.” Hands On meets this requirement through its agreement with the State of Washington’s TRS program. Hands On will show below that it meets the minimum unwaived standards of FCC Rule §64.604.

A. Hands On meets all the minimum operational and technical standards set forth in §64.604.

Hand On meets all minimum standards specified in §64.604 that have not been waived for the provision of VRS service.

I. Communications Assistants (“Video Interpreters”).

Hands On’s Video Interpreters have sufficient training to meet the specialized communications needs of deaf, hard of hearing, and speech impaired individuals. Hands On is in a unique position to attract and hire the best qualified interpreters in the field because for the past 14 years Hands On, through its sister company, Hands On Sign Language Services, Inc., has been providing interpreting services for deaf and hard of hearing people living in the San Francisco Bay Area and the Sacramento Valley, and has in the past nine years expanded its presence nationwide. Hands On thus has the experience and expertise needed to attract and hire qualified interpreters to provide deaf and hard of hearing persons quality VRS.

Hands On attracts qualified video interpreters by offering an excellent benefits package, attractive salaries, and screening candidates through a well designed interviewing process. Applicants are required to hold a current certification, RID: CSC/CI, CT; or NAD level IV/V. As a result of its existing line of business of providing ASL translation services, Hands On has a natural recruitment resource for its VIs. Currently, Hands On maintains a database of more than 600 ASL interpreters residing mostly in the State of California. Hands On draws from this base to fulfill its needs for VIs, as well as utilizing other recruitment sources.

Hands On’s VRS interpreters are able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary as required by FCC Rule Section 64.604. VRS interpreter candidates for their second interview are required to submit to a skills assessment. The applicant is asked a series of questions using a video workstation similar to the one he or she would be using if hired. This type of interview allows Hands On to accurately

judge the video relay skills of the interpreter being interviewed. Hands On prefers to hire individuals with at least three months of prior experience in video relay or video based interpreting.

Hands On believes that attracting and hiring qualified interpreters is only the beginning. It is dedicated to maintaining the highest level of service. To do so Hands On tries to keep employee turnover to a minimum. It believes this can best be achieved through on going training and focus on employee morale. Although continuing education is a requirement for certification, Hands On is dedicated to fostering a company philosophy that promotes continual improvement.

Initial training is provided all new employees during the first two weeks of employment. During orientation to the company, all benefits are explained in detail and necessary forms completed and signed. The employee's health and safety is a priority as such employees receive training in ergonomics and how to prevent injury. All interpreters are trained on call processes, policies and procedures as well as cultural diversity. Employees are allowed to learn and practice handling video relay calls in a safe training environment. Once an employee has completed the initial training he or she works closely with a more experienced employee. For the first week while handling actual relay calls, the new hire will work side by side with a trained team member before handling calls on his or her own.

On going training is provided as new software releases and hardware improvements are developed and implemented. As individuals, employees, and the company continue to strive for excellence Hands On seeks out beneficial training opportunities for its employees which include professional development and deaf culture training.

Hands On also concentrates on employee morale to retain trained interpreters. Since Video Relay Interpreters work in a call center environment, VRS call centers are accessible; designed and built with a focus on safety and ergonomics. Work stations include adjustable desks, ergonomic footrests and chairs. Employees' cubicles have clear pass through panels to facilitate communication while not on calls. Due to the physical and mental demands of interpreting, employees rotate approximately every twenty minutes, subject to the rules concerning in-call replacement of VIs, with a target occupancy level of between 45 and 50 percent. VIs are given two breaks during the course of an eight hour shift, in addition to a meal break. In addition, the platform encompasses break alerts to ensure employees receive adequate rest after 20 minutes of continuous interpreting. Break rooms provide employees a place to eat, recover and be entertained, providing high speed internet access and TV. Hot wax machines are also available so employees may protect themselves from repetitive motion injuries.

2. Confidentiality and conversation content.

Company policy stresses that Communications Assistants are prohibited from disclosing the content of any relayed conversation regardless of content, except as authorized by Section 705 of the Communications Act. No record is kept of the contents of communications handled. Likewise company policy forbids altering a relayed conversation and requires that conversations be relayed verbatim.

3. *Types of calls.*

Hands On does not limit the type or length of calls, except where the FCC has in place a waiver allowing it to do so. The requirement to provide pay-per-call service is waived for VRS. Thus, 900 and other pay per call services are not provided due to the difficulty of billing the customer. Hands on provides long distance service for no charge to VRS callers. Types of calls for which the the FCC has granted waivers are discussed below. Hands On provides Spanish language to sign language VRS service as well on a 24 hour basis.

Operator assisted calls; billing for long distance calls. Pursuant to existing waiver, VRS providers are not required to handle operator assisted calls and are not required to bill certain types of long distance calls to the end user.¹ See *VRS Waiver Order*, 17 FCC Rcd at 161. Hands On currently completes long distance calls at no charge to the VRS user. Moreover, incoming calls to be routed to deaf or hard of hearing persons over the Internet come to Hands On via an 800 number at no charge to the calling party. By the very nature of VRS, it is difficult for Hands On to know whether a call coming to it is local, even if IP address data are available.

Hands On completes calls via the most affordable method where appropriate. Hands On also handles 411 information calls for its customers at no charge to them. Therefore, deaf and hard of hearing persons receive service comparable to the switched telephone network. Requiring VRS providers such as Hands On to handle all operator assisted calls and to bill long distance calls to its deaf or hard of hearing users is problematic. Hands On does not have the billing mechanism for these calls. Nor pursuant to the FCC's existing interpretation of what are reasonable costs, does Hands On have the resources to devote to development of the billing mechanism. Completion of

¹ FCC Rule Section 64.604(a)(3) requires TRS providers to complete all types of calls.

operator assisted calls and billing for long distance calls is technically possible, but only through credit card billing, and as the FCC has acknowledged, using calling cards is not a viable alternative. *VRS Waiver Order*, 17 FCC Rcd at 161. Moreover, at present the Hands On platform is not set up to accept credit card billing. To do so would again require research and development efforts to design software modifications which would tax its already overextended engineering staff.

Equal access to interexchange carriers. Waiver of the equal access to interexchange carrier requirement has been granted for several reasons. First, since the deaf to VI portion of a VRS call is carried over the Internet, the VRS provider does not necessarily know the interexchange carrier of choice of the consumer since the consumer's identity may not in fact be known.² Second, choice of carrier is not critical in the VRS context since the deaf or hard of hearing consumer is not paying for call completion. Third, with VRS still in its infancy, requiring VRS providers to route calls over a host of different interexchange carriers would serve to unnecessarily increase the costs of providing VRS service even if it were possible to charge actual long distance costs to the deaf or hard of hearing customers. Fourth, because a VRS provider may be located in another state from the deaf or hard of hearing consumer, what may be a local call for the deaf or hard of hearing person is likely to be a toll call for the VRS provider. Thus, the Commission concluded that implementing carrier of choice for VRS is likely to lead to confusion, increased complaints and unnecessary costs, without serving any appreciable public interest objective.

900 number services. The FCC has waived the requirement for handling pay-per-call services, *see* FCC Rule Section 64.604(b)(6), due to the expected low demand for these types of calls

² There is no requirement for registration of VRS customers and any such requirement would raise privacy concerns.

and the burden this requirement would impose on startup VRS providers. *VRS Waiver Order*, 17 FCC Rcd at 164. That waiver was recently extended to IP Relay providers at the request of Sprint. Sprint sought waiver on the ground that 900 service providers require the ANI of the calling party. The ANI obviously cannot be provided in an IP Relay context for the same reason it cannot be provided for emergency call handling.

Call release. Call release is also waived for VRS. Call release would allow two VRS users to converse with one another after Hands On has set up the call. Two VRS users can now talk to one another without VRS if they have video conferencing software which is compatible with one another. For Hands On to feature this service would require research and development in a number of areas. The platform's video software would have to be modified to provide a second window so the video interpreter could sign to more than one person at a time. In addition, a means of translating incompatible video conferencing formats would have to be achieved.

Three-way calling. The requirement to offer three-way calling is currently waived as well. Three-way calling is currently possible from one VRS user to two or more hearing users through conference calling using the public switched telephone network. Three-way calling among two VRS users and one or more hearing users is not possible without additional research and development and the addition to the VRS platform of certain additional hardware. Hands On estimates the additional cost of the research and development and hardware would be approximately \$750,000. In addition to the modification to the platform video software discussed above, users would need to have available video conferencing software with multiple video windows so that two VRS users could see each other as well as the interpreter. Other platform related research and development efforts would need to be made.

Hands On has experience conducting audio conference calls set up over a conference bridge where each deaf person calls in using a separate VI. In Hands On's view that is a much more manageable situation at this point. Hands On is fully capable of offering that service.

Speed dialing. Hands On offers speed dialing through the personal phonebook feature on its platform. It therefore needs no waiver of this requirement.

VCO-to-TTY, HCO-to-TTY, VCO-to-VCO and HCO-HCO. Each of these types of calls are waived for VRS. VCO to TTY and HCO to TTY require the video interpreter to video interpret to a deaf, hard of hearing or speech impaired individual and simultaneously operate a keyboard to interpret to the TTY user. Though technically possible with certain modifications to Hands On's platform, such a call requires the VI to conduct two hand intensive interpretations. The VI cannot sign and type at the same time. Hands On questions the utility of such calls since they will be disjointed due to the time necessary to conduct separate transliterations using sign language and TTY. Moreover, the likelihood of confusion on the part of VIs is substantial. Such calls are likely to cause strain and fatigue to a VI. A better means of doing such a call -- to the extent there is any demand for them -- is for the VI to place the call to a text relay service so that the text relay operator can handle the TTY side of the call and the VI can handle the VRS side of the call. Informal discussion with the FCC staff has indicated at least some question whether such a call is a compensable relay call, however. Thus, FCC clarification of this requirement is necessary in the VRS context.

VCO to VCO and HCO to HCO calls may have some of the similar problems if TTYs are used for one side of the conversation. The VI can interpret to the VRS user who is using VCO, but will likely have difficulty typing the incoming voice message from VCO TTY user. Similarly, with

HCO to HCO, the interpreter must concurrently read the signing of the VRS user and read the incoming text of the TTY user. The interpreter cannot therefore pay attention to both ends of the conversation and is likely to miss significant portions of the conversation. VCO to VCO and HCO to HCO VRS calls could be done with video conferencing software modifications similar to those discussed concerning three-way calling. If the FCC were to conclude that the reasonable costs of providing relay included research and development to meet the waived standard, these software modifications could be undertaken.

4. *Emergency calls.*

The Commission has waived for VRS and Internet Protocol traffic the requirement for immediate routing of calls to the nearest Public Safety Answering Point (“PSAP”), and the passing of the caller’s telephone number to the PSAP when a caller disconnects before being connected to emergency services. However, when such service is technically feasible for VRS and Internet Protocol, Hands On commits to implement such service. Hands On makes it clear on its web site and on its promotional materials the shortcomings and potential dangers of using VRS to place an emergency call using 911.

5. *In-call replacement of Communications Assistants.*

Hands On’s VIs stay with a call for at least 10 minutes before being replaced by another VI.

6. *Gender Preference.*

Hands On uses its best efforts to accommodate a VRS user’s requested Communications Assistant’s gender when a call is initiated and, if a transfer occurs, when the call is transferred to another Communications Assistant.

7. *ASCII and Baudot.*

The requirement of capability to communicate with ASCII and Baudot is inapplicable for VRS.

8. *Speed of answer.*

The speed of answer requirement for VRS is currently 80 percent of calls answered within 180 seconds. As of July 1, 2006, the speed of answer requirement will be 80 percent of calls answered within 150 seconds. As of January 1, 2007, the speed of answer requirement will be 80 percent of calls answered within 120 seconds. Hands On meets and has consistently met the speed of answer requirement and in fact is consistently under the answer speed requirement that will become effective January 1, 2007. However, it is Hands On's goal to provide even more rapid answer performance, consistent with available funding.

9. *Equal access to interexchange carriers.*

The equal access requirement of §64.604 is waived for VRS. Hands On provides long distance (inter-exchange) service at no charge to its users.

10. *Hands On's Operational Schedule Comports with the Rules.*

Hands On provides VRS service 24 hours a day, seven days a week. It therefore comports with the requirements of FCC Rule §64.604(b)(4). Hands On operates with redundant features to ensure reliable service equivalent to a local exchange carrier's central office. Hands On provides service in real time and maintains adequate facilities so that under projected calling volume the probability of a busy response due to network congestion will be functionally equivalent to that experienced by a voice caller over the non-TRS telephone network.

11. Voice mail and interactive menus.

Hands On's VIs alert deaf and hard of hearing callers to the presence of a recorded message and interactive menus. Other requirements relating to voice mail and interactive menus has been waived or are otherwise inapplicable to VRS. Hands On provides the functional equivalent of voice mail, video mail, for deaf persons.

12. Complaints.

Hands On maintains a log of consumer complaints including all complaints concerning its VRS service or concerning TRS service in general. The log includes the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. Summaries of logs indicating the number of complaints received for the 12-month period ending May 31 are submitted to the FCC by July 1 annually. A copy of the log has been submitted to the ODHH.

13. Contact person.

The contact person for Hands On for VRS consumer information and complaints about Hands On's service is Ronald E. Obray, 595 Menlo Drive, Rocklin, CA, telephone 800-900-9478 (voice), 800-900-9477 (TTY), email robroy@hovrs.com.

14. Public access to information.

Hands On makes an ongoing efforts to educate the public concerning all forms of TRS. This is done in billing inserts, any directories published, in advertising, on Hands On's web site, and in other available media of communication.

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State of Washington
 Department of Social & Health Services
 Office of the Deaf & Hard of Hearing
 Hands On Video Relay Service (HOVRS)
 Annual Log Summary of Consumer Complaints
 CG Docket 03-123
 June 30, 2006

Annual Log Summary of Consumer Complaints
 Attachment #1

WASHINGTON



RELAY SERVICE

Acronym Log

VI: Video Interpreter
 CCR: Customer Care Representative
 CCM: Customer Care Manager
 CCS: Call Center Supervisor

| Date of Complaint | Customer Comments | Date of Resolution | Explanation of Resolution |
|-------------------|--|--------------------|---|
| 06/30/05 | I'm not able to get to the link to download VideoSign Software. Help me out here. | 06/30/05 | Customer Care emailed customer direct link to download. |
| 06/30/05 | Customer needed help setting up his router to work with webcam and VP. | 06/30/05 | Customer Care assisted customer with port forwarding. Customer called back to test and video connection was successful. |
| 06/30/05 | Customer wanted to know why his Video was not clear. | 06/30/05 | Recommended that he check his upload and download speeds and if it is slow, to contact his ISP for a better upload speed. |
| 07/01/05 | Customer reports Dlink picture sometimes choppy. | 07/01/05 | Customer Care worked with customer to adjust speed settings. Customer called back and reports some improvement. Customer was satisfied. |
| 07/11/05 | Chatted with customer, no video. Will attempt to remotely access customer's computer. Suspected firewall preventing call backs. | 07/11/05 | Customer Care recommended customer upgrade RAM to 256, customer only had 128, much too slow for video. |
| 07/11/05 | Caller couldn't see VI and VI couldn't see caller. Made recommendations for the customer's router settings. Customer will set up DMZ for his computer. | 07/11/05 | Customer called back and tested. Video connection was successful. |
| 07/11/05 | Agent number 330 was very pushy and intimidating. I was not comfortable with her and I had to hang up so I could get another interpreter. Please give her a refresher course on this. | 08/10/05 | Supervisor talked with VI 330. She was open to the feedback and stated she would watch for this behavior in the future. She could not remember a specific incident, but processed the feedback. |
| 07/11/05 | Customer complaint-VI #460. Sunday afternoon around 4pm to 5pm. Customer got interpreter #460 and wasn't comfortable with interpreter, noted that interpreter controlled call. Asked for a VI switch and interpreter responded "no one is available". Caller hung up and then called back only to get #460 again. Caller was frustrated that there wasn't anyone else available. | 07/22/05 | Call Center supervisor has spoken to vi about situation and reviewed policies and procedures for switching VI's. Supervisor reminded VI that caller is in control of the call. |
| 07/13/05 | VS-high. choppy video, will lower speed. | 07/13/05 | Suggested lower speed setting. Customer did not call back for test. |
| 07/14/05 | Customer had windows firewall on. Recommended he turn it off and place a test call. | 07/14/05 | Caller called back, assisted customer with router and firewall settings. Successful video connection. |

**Annual Log Summary of Consumer Complaints
Attachment #1**

State of Washington
Department of Social & Health Services
Office of the Deaf & Hard of Hearing
Hands On Video Relay Service (HOVRS)
Annual Log Summary of Consumer Complaints
CG Docket 03-123
June 30, 2006



Acronym Log

VI: Video Interpreter
CCR: Customer Care Representative
CCM: Customer Care Manager
CCS: Call Center Supervisor

| Date of Complaint | Customer Comments | Date of Resolution | Explanation of Resolution |
|--------------------------|---|---------------------------|--|
| 07/14/05 | Customer had question about router set up. | 07/14/05 | Customer is knowledgeable with set up, so gave him a few pointers for setting up. Also informed him about no-ip.com |
| 07/15/05 | Customer needed help setting up d-link. | 07/15/05 | Customer Care instructed customer how to set up and suggested making a test call to an interpreter. Customer care did not get test call back from customer. |
| 07/15/05 | I failed using all video compatible to connect using VRS via netmeeting, videSIGN and hovrs.tv. Previously the dlink was used with sprint and its out of service. Sprint is not available to work with this household. So I replaced with Hands On DLink. Now it cannot be connected because of existing phone number and cannot be bypassed. | 07/21/05 | Customer Care worked with customer assisting him to set up the D-link VP and walked him through steps for connection. Apparently the modem wasn't getting the signal, but we called the provider and got it working. VP tested fine afterwards. |
| 07/15/05 | Netmeeting, no video. Customer's router DMZ is on, and has Video Phone. Turned DMZ off and port forwarded the VP, so webcam will work. | 07/22/05 | Customer Care tested with customer and was successful in making calls. |
| 07/15/05 | I pushed default button. Lost all data. we cannot use VP. | 07/15/05 | CC emailed customer that we will be here to assist him when he's ready. Customer contact us back and helped him set up DMZ for his VP. |
| 07/15/05 | Customers notice picture quality is not good. Recommended running the speed test and then adjusting speed settings as necessary. | 07/15/05 | Customer ran speed test and got 142 for upload and 1254 for download. Recommended to customer to increase upload for best picture quality by calling their high speed internet provider. Helped customer adjust speed setting on VP for time being. Customer reports some improvement. |
| 07/20/05 | Customer has FPS problem, shows low FPS and wants to know what to do. | 07/22/05 | Ran Speed test and shows low upload speed. Suggested to customer that they contact their ISP provider for a solution to increase their upload |
| 07/21/05 | VS-high. Suggested to set to VS-med. | 07/21/05 | Customer called back and informed customer care of improved picture quality. |
| 07/21/05 | Automatic face tracking is causing picture to pan and zoom out. | 07/21/05 | Assisted customer with turning off face tracking. |
| 07/22/05 | Customer needed help with set up for D-link | 07/22/05 | Customer Care assisted with Set up and configuration. Tested with Customer Care, the picture was good. |

**Annual Log Summary of Consumer Complaints
Attachment #1**

State of Washington
Department of Social & Health Services
Office of the Deaf & Hard of Hearing
Hands On Video Relay Service (HOVRS)
Annual Log Summary of Consumer Complaints
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June 30, 2006



Acronym Log

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| Date of Complaint | Customer Comments | Date of Resolution | Explanation of Resolution |
|-------------------|---|--------------------|--|
| 07/22/05 | Tried to connect with customer, but no contact. Typed with customer on chat box. Customer reports very poor picture quality. | 08/01/05 | Customer care had customer run speed test. Test indicated that upload was minimal. Customer care explained to customer that they will need to increase bandwidth to allow quality connection. Customer understood and will call ISP. |
| 07/22/05 | Very dark and he has to push contrast button to get serviceable views. | 07/22/05 | Explained Dlink auto adjust feature. Customer care helped customer to turn it on. |
| 07/25/05 | Caller reports that his picture is in black and white. CCR confirmed this, and the VP was given by hovrs. Will contact installer to see if there is a solution. | 07/29/05 | Installer was at customer's home and exchanged VP. |
| 07/25/05 | Installer had some feedback about some installations in customer's homes. | 07/25/05 | Customer Care discussed router issues with video phones and what routers have some problems. Advised customer on some recommendations. |
| 07/26/05 | Customer said that VI sees customer as blurry. | 07/26/05 | Recommended to customer to use VideoSign at medium speed to improve the video quality. Customer was using Netmeeting. |
| 07/26/05 | Hi Customer service staff I m writing this about VI #383. She wore too bright green shirt for me I asked her to change her shirt to dark color like black or navy I said like "smock" to wear (easy to change) but she replied back & not use smock. I thought Vi expects to wear dark color shirt or spare smock for any VI. I am requesting you to set up dark color smock for VI After switching VI, VI #399 wore dark color shirt Perfect also she politely asked me if that color was all right. | 07/29/05 | Call Center Manager acknowledged and reported to supervisor to follow up with VI #383 about proper clothing color. Supervisor gave proper coaching to VI. |
| 07/27/05 | Security Warning notice - This downloading sequence can ruin my computer program. Can you suggest what ways to download your software program or what? I don't have a webcam yet and what are the best item use for this program of vp programs? Thanks. | 07/28/05 | Customer Care emailed customer direct link to download Video sign. Explained VP, how it works. |
| 07/27/05 | Webcam is not working with computer. | 07/27/05 | Customer Care advised customer to turn off Window's firewall. Customer called back and tested, works. |

**Annual Log Summary of Consumer Complaints
Attachment #1**

State of Washington
Department of Social & Health Services
Office of the Deaf & Hard of Hearing
Hands On Video Relay Service (HOVRS)
Annual Log Summary of Consumer Complaints
CG Docket 03-123
June 30, 2006



Acronym Log

VI: Video Interpreter
CCR: Customer Care Representative
CCM: Customer Care Manager
CCS: Call Center Supervisor

| Date of Complaint | Customer Comments | Date of Resolution | Explanation of Resolution |
|-------------------|--|--------------------|--|
| 07/27/05 | Interpreter can see me pretty good whereas your picture of interpreter is superior. A couple days, it seems to get worse. I am not sure why this is happening. One suggests that I should download videosign. I am tempted but I want to make sure that I can use videosign to communicate one to one with their various videophone. | 07/28/05 | Customer Care emailed customer differences between netmeeting and video sign. Explained the points of VideoSign and how it can be used. |
| 07/27/05 | Customer reported bad video picture. Suggested that he adjust speed settings on the VP. | 07/27/05 | Adjusted and called back, and reported improvement. |
| 07/28/05 | Customer had MAC and vp-100. wanted to know how he can set up both without any conflicts. | 07/28/05 | Customer Care explained to customer how to port forward and turn off dmz. Customer Called back to test and both works great. |
| 07/28/05 | Customer inquired about bad video. Suggested that she adjust her receiving speed for better picture. | 07/28/05 | Customer adjusted and called back, and reported improvement. |
| 07/29/05 | Customer had question on how to set up his router and how to set up DMZ. | 07/29/05 | Customer Care worked with customer how to set up the DMZ on his D-link Router. After, we tested and the picture was clear. |
| 08/01/05 | Customer asked : Do we offer Spanish interpreters? | 08/01/05 | Customer Care explained that we do not offer Spanish interpreters at this time. |
| 08/01/05 | I try to download the software so I can use it to dial hovrs, but it will not down load and also can not use hovrs to call you guys. I have dsl and my internet is with msn and it is a 1.5 high speed. I need to know what I need to sign up and get this program. Thank you | 08/02/05 | Customer Care emailed customer direct link to download VS. Explained he needs to use IE to download. |
| 08/01/05 | Customer wanted to know where reset button was on router. | 08/01/05 | Explained to customer where it is. Informed customer he may need to input all settings again if he chooses to reset the router. Advised customer that we can help with settings if he wishes to have assistance. |
| 08/01/05 | Customer wanted info on how to set up di-624 router. | 08/01/05 | Instructed caller and gave step by step instructions how to set up router. |

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| 08/01/05 | Customer called using netmeeting. Picture was poor, suggested to caller to call hovrs interpreter via Video Sign and then transfer to CC. | 08/01/05 | Helped customer set up router settings. Also noticed that the customer had low upload speed. Made recommendation to have ISP increase upload. |
| 08/01/05 | Customer called to test speed. | 08/01/05 | All looked good and reported to customer. Explained to customer differences between upload and download speed. |
| 08/01/05 | Video smooth but grainy. Will increase send speed (she sees me very clearly) | 08/01/05 | Caller adjusted and is much better. Also explained to customer about difference in upload and download speeds. |
| 08/01/05 | Complaint on interpreter #197, customer complains that interpreter showed struggling in voicing for customer. Call was at 424pm for 4.3 minutes. | 08/16/05 | Supervisor spoke with VI. VI reports poor quality resolution on the screen. |
| 08/03/05 | Customer need help setting up Dlink vp and router. | 08/05/05 | Customer Care helped customer set up dlink, walking through each step to make sure it is connected correctly. |
| 08/03/05 | Just wanted you to know I've tried to place a call but can't establish a connection or I get a black screen. | 08/03/05 | Customer Care contacted customer and by that time the customer had already gotten help. Customer reported that picture is good and no problems with connections now. |
| 08/03/05 | Customer reported that VI didn't follow instructions--do not announce. Customer recently made changes to profile, so wanted to make sure the changes were working. | 08/03/05 | Concluded that interpreter wasn't paying attention to the profile set forth by the customer. |
| 08/05/05 | I recently received a new webcam at work and just finished download the videosign software. I am not able to download the software. Is it a firewall issue that is preventing me from using the software to make a phone call? If so, how can I get this resolved with the Dept of Justice server to allow me to make a phone calls? | 08/08/05 | CC emailed customer telling him to make sure the h.323 protocol in the outbound rule in the firewall settings is on. Also gave him a direct link for download. Informed him to contact us back if he is still having problems. |
| 08/08/05 | I would like to set up my "i2eye" video phone. I need help. I have SBC 2wire for my DSL and I have a Linksys router and I am using a television and not a computer monitor. | 08/08/05 | Assisted with set up and router configuration. Informed customer that linksys was probably not the best choice to use with VP, but it was working. Informed customer the d-link router would be a better choice. |

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| 08/08/05 | The customer stated the interpreter #324 did not voice correctly on a message left on an answering machine. | 08/12/05 | Call Center Supervisor spoke with VI and provided additional training. |
| 08/10/05 | We are trying to set up a system through our district fire wall using a D-Link camera connected directly to our high speed network. Our network tech opened the firewall (did H.322 through firewall) but here's the problem: 1. It won't detect the public address 2. It dials but doesn't connect using test IP XXXXXX Our internal router is XXXXXX. We were able to ping out | 08/12/05 | Emailed customer list of ports to open on firewall, and also IP ranges to allow for VRS connection. |
| 08/10/05 | Customer called to test speed. | 08/10/05 | All looked good and reported to customer. Explained to customer differences between upload and download speed. |
| 08/18/05 | I am unable to receive the Videosign software from www.hovrs.com website as I received error messages and wasn't successful after few retry attempts. Are there any way could you send stand-alone Videosign software by e-mail so I can install it separately? | 08/18/05 | CC emailed customer direct link to download. Instructed how to download and make a call. |
| 08/19/05 | VI #202. When customer called a customer rep at a phone company, there were confusion in communication. Customer suspects that interpreter not understand him. VI #202 seemed to be involved in conversation and not relaying conversation professionally. Not sure if VI was mimicking the receiver's emotional state or if interpreter was involved. | 08/24/05 | Call Center Supervisor spoke with VI about situation. VI acknowledged and will try to relay emotions better next time. |
| 08/22/05 | Norton Internet security is on. | 08/22/05 | Educated customer on how to turn off Norton Internet Security temporarily to make successful VRS calls. |
| 08/23/05 | I spoke with IT dept here at my work and they told me H323 has always open outbound on our firewall. IT tech wants to know what is exactly problem. Can any of hovrs tech support contact and explain to IT here of what to look for? Let me know. | 08/23/05 | Sent customer link at Apple website containing information about port settings in firewall. Customer was able to open those ports and tested fine. |
| 08/23/05 | Installer came to her house 2 weeks ago, now having very bad quality. | 08/23/05 | Customer Care rep got a hold of installer, he will go back to customers' house to check on settings. |

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| 08/23/05 | Video flashing. D-link is from another VRS provider. | 08/23/05 | Customer will call other provider's VRS tech's for replacement of their VP. |
| 08/24/05 | Netmeeting: Customer inquired about how to improve video quality. | 08/24/05 | Suggested using Video Sign instead of netmeeting. Explained how to download Videosign. Customer called back and reports it works well. |
| 08/24/05 | Interpreter # 305 had trouble understanding my signs and had a lack of facial expression. | 09/09/05 | Call Center Supervisor spoke with VI in question and VI has acknowledged. Supervisor coached VI on using expressive interpreting while in a calls with customers. |
| 08/25/05 | Customer had questions on how to improve speed. | 08/25/05 | Directed customer to contact her ISP provider. |
| 08/26/05 | Caller asks, "When will HOVRS offer Spanish speaking interpreters?" | 08/26/05 | Customer Care explained to customer that we will offer it soon. |
| 08/29/05 | looks like incompatible camera. Logitech Quickcam 8.1.3 | 08/29/05 | Incompatible camera. Customer Care Informed customer about compatible cameras that are available. |
| 08/29/05 | Looks like incompatible camera. Logitech Quickcam 8.1.3 | 08/29/05 | Customer Care informed customer that the webcam is incompatible. Gave recommendations for proper webcams. |
| 09/07/05 | Customer called-VS-low. Long time user needed to use computer recovery tool, now cannot call us. He has Windows Firewall. He'll turn that off and call again. | 09/07/05 | Customer did not call back after advised customer to call back to test. |
| 09/09/05 | VS-low. Customer Care advised change speed to VS-med. | 09/09/05 | Customer care was not able to verify settings were successful because customer did not call back to test. |
| 09/19/05 | I would like to know if there are ASL to Spanish VI available or when will the HOVRS will be providing? As I read from NAD's webpage regard to the FCC put new rules require VRS to be provide the Spanish to ASL and vice versa. So I like to know when will you be provide? | 09/21/05 | Customer Care emailed customer that we are working on it and that a release will be out soon. |
| 09/21/05 | I can see myself both on self mirror and vi video but I do not see interpreter and neither interpreter could not see me. How do I fix the problem? | 09/23/05 | CC directed customer to turn off firewalls and try again. Customer found Zone Alarm Firewall was on, turned it off and was able to make calls. |