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Federal Communications Commission  
Office of the Secretary

In the Matter of

Telecommunications Relay Services for  
Individuals with Hearing and Speech  
Disabilities

CG Docket No. 03-123

**Petition for Clarification**

Provision and Cost Recovery of Deaf Blind Relay Service, a Telecommunications Relay  
Service

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## Introduction

The telephone is a ubiquitous tool that has evolved many times over since its inception in 1876. It is difficult to imagine life not being able to immediately, and effortlessly, get in touch with our colleagues, friends, and family for business and pleasure alike simply by dialing a set of numbers.

Yet, the everyday reality of the approximately 40,000-70,000 Americans who are deaf and blind<sup>1</sup> is that they are shut out of telephone usage or, at best, restricted to time-consuming and ineffective means of using telephones such as Braille TTYs, devices that are quickly becoming obsolete with relay service technology innovations. As a result, deaf-blind people lack functionally equivalent access to telephone services that are guaranteed by Title IV of the Americans with Disabilities Act of 1990.

This exclusion from telephone services and products is unnecessary—especially in light of the fact that the ADA is *more than 15 years old*. The TRS provision of this Act guarantees equal access to the telephone system by *everyone*. Yet, people who are deaf and blind have not enjoyed the improved access to telephone services that deaf people and hard of hearing people have experienced during this period.

To solve this, Hawk Relay intends to combine modern technology along with the existing manpower of local deaf-service organizations to launch Deaf Blind Telecommunications Access Centers (DBTACs). These centers would provide people who are deaf and blind with relay services customized towards their individual needs.

Ultimately, this service will:

- Ensure telecommunications access for people who are deaf and blind as spelled out in Title IV of the Americans with Disabilities Act of 1990;

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<sup>1</sup> [http://www.aadb.org/deafblind/DB\\_definition.htm](http://www.aadb.org/deafblind/DB_definition.htm)

- *Take a large step towards the functional equivalency ideal for deaf-blind people as it pertains to telecommunications; and*
- *Equip people who are deaf and blind with telecommunications access to both the general public and to each other at an exceptional value.*

Accordingly, Hawk Relay, LLC requests clarification from the Federal Communications Commission (FCC's) rules on Telecommunications Relay Services (TRS) with respect to the provision and reimbursement of 'Deaf Blind Relay Service' (DBRS). DBRS uses communication facilitators (CFs) and advanced technologies that can facilitate and enhance the use of relay services for a substantially underserved portion of the relay user population.

Title IV of the Americans with Disabilities Act (ADA) mandates the provision of relay services that are functionally equivalent to traditional voice communication telephone services. To this end, Congress directed the Commission to take action that would encourage the development of improved relay technologies.

In this Petition, Hawk Relay now proposes that the Commission permit implementation and reimbursement for a new offering of relay service, the DBRS. This service offers a solution that can assist the Commission to achieve telephone functional equivalency for a specific class of individuals with hearing disabilities not yet served by the current relay service provisions. To this end, Hawk Relay, LLC requests expedited approval from the Commission to allow for the recovery of costs associated with the provision of this service and a rule that will outline Commission standards that are not applicable to DBRS.

## **Overview**

Hawk Relay's commitment to provide functionally equivalent telecommunication access to deaf and hard of hearing consumers, although short in length, is very strong in spirit. In an effort to meet the needs of still underserved relay users, the deaf blind population, Hawk Relay has set forth a plan of implementation that is the subject of this petition, submitted under the authority of the directive outlined in the Improved Services Order.

In this petition, Hawk Relay requests that the FCC recognize DBRS as an optional relay service within the definition of TRS in Title IV of the ADA and as a service eligible for reimbursement from the interstate TRS fund managed by the National Exchange Carrier Association (TRS Fund Administrator).

The provision of DBRS will support the intent of Title IV of the ADA and the Commission's regulations implementing that Title as it will further the goal of functional equivalency. Hawk Relay asserts that once the Commission is cognizant of DBRS and the underserved relay users' populations, whose needs have long not yet met, it will grant this request for clarification of its rules and allow its costs to be reimbursed by the TRS Fund Administrator.

## **How Does Deaf Blind Relay Service Work?**

Deaf Blind Telecommunications Relay Service (DBRS) will utilize Communication Facilitators (CFs). These CFs will be to DBRS what Communication Assistants and Video Interpreters are to traditional TRS and VRS. Because many people who are deaf and blind do not have computers, TTYs, or videophones in their homes or offices—either due to the impracticability of such equipment in light of their disability or

*due to the high cost of adaptive equipment and/or bandwidth, Hawk Relay is establishing* a nationwide network of on-call CFs who can travel to a location of the deaf-blind consumer's choosing, e.g., their home or office. Deaf-blind people will be able to make requests for, and receive, on-site services on a 24/7 basis.

In addition, Hawk Relay proposes to establish ten Deaf Blind Relay Service Centers (DBRSCs) across the country. At each center, equipment is set up for access to various telephone services and staff would be trained to provide services in line with DBRS requirements. DBRS would be provided on a walk-in basis and by appointment. Each DBTAC will have at least one call station established and maintained in good working order for the purpose of connecting to the telephone network.

As there are varying levels of deaf-blindness, there are different types of communication modes utilized. Deaf-blind people with residual sight generally prefer watching a sign language interpreter up close. Deaf-blind with complete vision loss prefer to utilize tactile interpreting, where the client places his hands on those of an interpreter to follow what is being said. CFs will be skilled in both types of communication.

The steps involved in the provision of DBRS are:

1. Communications Facilitator dials telephone number of hearing person.
2. CF commences interpreting between deaf-blind person and other party.
3. The deaf and blind person signs for him/herself to the CF.
4. The CF voices to the other party.

5. The CF interprets the hearing person's spoken words into sign, with the deaf-blind person following along either tactilely or by viewing the CF's signs up close.

At times, and with the explicit permission of the deaf and blind client, a 3<sup>rd</sup> party provided by Hawk Relay will be in the room along with the client and the service provider for quality assurance purposes. This person will be expected to maintain confidentiality and will be present only for the purpose of evaluating the CF's performance and making suggestions for improvement of such.

For more information about the logistics and operations of the provision of this new relay service, please refer to Appendix A: A Proposal for Deaf-Blind Relay Services.

#### **Deaf Blind Relay Service Falls Within the Scope of Title IV of the ADA**

DBRS Falls Within the Definition of TRS under 47 C.F.R. § 64.601(7)

Telecommunications Relay Service is defined in § 225 as:

'[t]elephone transmission services that provide the ability for an individual who has a hearing impairment or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio. Such term includes services that enable two-way communication between an individual who uses a TDD or other nonvoice terminal device and an individual who does not use such a device.'<sup>2</sup>

Legislative history clarifies that although the regulations apply only to the then-current/existing forms of relay services, the provisions was 'not intended to discourage innovation regarding telecommunication services to individuals with hearing and speech impairments.'<sup>3</sup> Furthermore, Congress requested that the Commission not 'discourage or

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<sup>2</sup> 47 U.S.C. §225(a)(3)

<sup>3</sup> S. Rep. No. 116, 101<sup>st</sup> Cong., 1<sup>st</sup> Sess. 78 (1989).

*impair the development of improved technology.*<sup>4</sup> Congress had the foresight to recognize that technological improvements can be very beneficial. The Commission's recognitions of Video Relay Service, IP-Relay, and Cap-Tel as relay services eligible for reimbursement from the TRS Fund Administrator serve as examples of this policy.

In the Improved Services Order, the Commission clarified that the 'ever-increasing availability of new services . . . continually challenge [the premises of relay service offerings] to determine what specific services and performance standards are necessary'<sup>5</sup> to ensure functional equivalency is achieved. Finally, the Commission interpreted that § 225 is 'to apply to any service that allows individuals with hearing and speech disabilities to communicate by wire or radio.'<sup>6</sup>

Congress and the Commission both recognize that innovation will continue to push the envelope towards the goal of functional equivalency for all deaf and hard of hearing individuals, and in pursuit of this goal, Hawk Relay offers a service for the relay users who are deaf and blind.

In the public interest, the Commission is to consider any and all provisions necessary 'to ensure that hearing and non-hearing individuals have equivalent access to the Nation's telephone networks'<sup>7</sup> to the greatest extent possible. The Commission recognizing DBRS as a relay provision eligible for reimbursement will advance the public interest.

It is recognized that Individuals who are deaf and blind comprise only a small percentage of the deaf and hard of hearing communities yet that does not minimize or

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<sup>4</sup> 47 U.S.C. §255(d)(2)

<sup>5</sup> *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking*, CC Dkt. No. 98-67, FCC 00-56 at para. 4 (March 6, 2000) ('Improved Services Order').

<sup>6</sup> *Id.* at para. 4

<sup>7</sup> S. Rep. No. 116 at 81.

dismiss their need to have functional equivalent access. Due to their double limitations, the only practical solution was to depend on other individuals to make the calls for them or use bulky antiquated and impractical Braille TTYs. DBRS represents an independent solution, where the deaf and blind can, on their own accord, make a telephone call independently. The public interest is served when a service allows a previously unutilized class of individuals to contribute to society.

**Clarification Regarding Minimum Mandatory Standards That are Not Applicable to DBRS**

To ensure the effectiveness of DBRS in its implementation and initial offering and to allow the yet served population to benefit from the service, Hawk Relay seeks clarification of the extent to which certain minimum standards are applicable to DBRS service. Hawk Relay believes that the minimum standards applicable to only Video Relay Service are applicable here as the service integrates VRS in its offering. Hawk Relay requests clarification of this point.

**Conclusion**

Hawk Relay is committed to working with various individuals, entities, and organizations to ensure that the needs of the underserved relay users will be met in a functionally equivalent manner. Hawk Relay also looks forward to working with the Commission in serving the public interest. Furthermore, Hawk Relay looks forward to the Commission's expedient action on this petition.

APPENDIX A  
A PROPOSAL FOR DEAF-BLIND RELAY SERVICES

www.hawkreelay.com



# **It's About Time: Ensuring Access for Deaf-Blind People**

A Proposal for

**Deaf-Blind Relay Services**

by



May 18, 2007

*Deaf and Hard of Hearing Owned and Operated*

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## Executive Summary

The telephone is a ubiquitous tool that has evolved many times over since its inception in 1876. It is difficult to imagine life not being able to immediately, and effortlessly, get in touch with our colleagues, friends, and family for business and pleasure alike simply by dialing a set of numbers.

Yet, the everyday reality of the approximately 40,000-70,000 Americans who are deaf-blind<sup>1</sup> is that they are shut out of telephone usage or, at best, restricted to time-consuming and ineffective means of using telephones such as Braille TTYs, devices that are quickly becoming obsolete with relay service technology innovations. As a result, deaf-blind people lack functionally equivalent access to telephone services that are guaranteed in Title IV of the Americans with Disabilities Act of 1990.

This exclusion from telephone services and products is unnecessary—especially in light of the fact that the ADA is *more than 15 years old*. The TRS provision of this Act guarantees equal access to the telephone system by *everyone*. Yet, people who are deaf-blind have not enjoyed the improved access to telephone services that deaf people, hard of hearing people, and blind people have experienced during this period.

To alleviate this problem, Hawk Relay proposes to establish a nationwide network of Communication Facilitators for dispatch to deaf-blind consumers' homes or places of business for on-site provision of Deaf Blind Relay Service (DBRS). In addition, Hawk Relay seeks to utilize the existing manpower of local deaf-service organizations in launching ten Deaf Blind Relay Service Centers (DBRSCs). Besides being sites to where deaf-blind people can travel to utilize the services of a CF, Hawk Relay also envisions these DBRSCs acting as liaisons between the FCC and their respective local communities of deaf-blind persons.

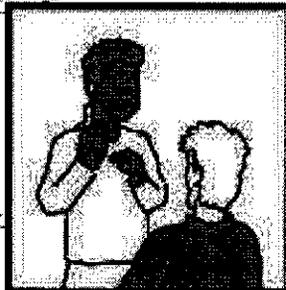
Hawk Relay proudly submits this proposal for a Deaf-Blind Relay Service nationwide. Ultimately, this service will:

- o Ensure 24/7/365 telecommunications access for people who are deaf-blind as spelled out in Title 4 of the Americans with Disabilities Act of 1990;
- o Escalate the functional equivalency ideal for deaf-blind people as it pertains to telecommunications;
- o Equip people who are deaf-blind with telecommunications access to the general public at an exceptional value; and
- o Establish channels for official FCC communications with the deaf-blind population.

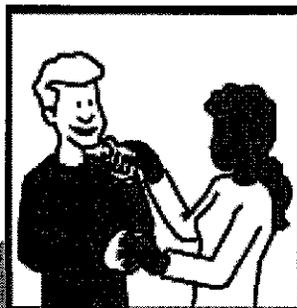
<sup>1</sup> Helen Keller National Center data, at: <http://www.hkn.org/AboutUS/WHOWESERVE.htm>. Please also refer to Appendix A for further information on numbers of deaf-blind people.

## Deaf Blind Relay Service

Deaf-blind people have varying levels and degrees of hearing and sight loss. Therefore, communication modes vary within the population. Some deaf-blind people—especially those with residual sight—might prefer watching a sign language interpreter up close, for example (see Figure 1, below). Other deaf-blind people might place their hands on those of an interpreter and follow what is being said in a process known as tactile interpreting (refer to Figure 2, below). As such, the Deaf Blind Relay Service (DBRS) will utilize what is known in the deaf-blind field as Communication Facilitators (CFs). These CFs will be to DBRS what Communication Assistants (CAs) are to present-day Telecommunication Relay Services (TRS) and what Video Interpreters (VIs) are to present-day Video Relay Services (VRS). TRS and VRS are both services with FCC oversight.



**Figure 1—CLOSE INTERPRETING: A Communication Facilitator (left) signs to a deaf-blind person who is utilizing his residual sight.**



**Figure 2—TACTILE INTERPRETING: A deaf-blind client (right) places her hands on those of a Communication Facilitator's (left).**

Utilizing a CF, the deaf-blind consumer will be able to call, and be called by, their hearing acquaintances who use a voice telephone. One major difference between this proposed service and traditional TRS and VRS services is that the CF with DBRS will be physically present with the deaf-blind consumer—due to the nature of this community's communication mode.

## ***Impact***

The DBRS provides deaf-blind people with functionally equivalent access to the telephone network that is afforded sighted deaf and hard of hearing users. In other words, people who are deaf-blind will be better able to:

- Gain, and retain, employment that requires some degree of telephone use;
- Conduct personal affairs with a larger degree of independence; and
- Establish, and maintain, professional and personal relationships via the telephone.

## **Service Delivery**

DBRS differs from traditional TRS and VRS in one important aspect. Due to the nature of their communication mode, deaf-blind people will require a Communication Facilitator employed by Hawk Relay DBRS to be physically present with them when making calls. Hawk Relay proposes to accomplish this in two different ways—bringing the CF to the deaf-blind consumer (available nationwide) and operating 10 service centers where deaf-blind people can utilize a CF at the DBRS on a walk-in basis.

### ***On-Location Services***

For many deaf-blind people, getting around the city or town they live in is cumbersome. A simple cross-town trip could take two hours one-way due to the fact that public transportation is not always reliable as far as scheduling and places accessed. In contrast, it is much easier for a sighted CF to utilize either private or public transportation to reach their destination. Therefore, Hawk Relay envisions developing and maintaining a nationwide network of CFs who are available at a moment's notice, on a 24/7 basis, to travel to the deaf-blind consumer's location to provide services. Upon receiving a request, Hawk Relay personnel would dispatch the nearest available CF to the consumer's location. Even though many deaf-blind people may not have telecommunications service or equipment in their homes, CFs will still be able to make calls due to the prevalence of wireless and cell technologies and services.

Hawk Relay has identified large population centers in which it would ensure availability of CFs, at a minimum. As education and outreach efforts progress and the need for DBRS becomes evident in more locations, Hawk Relay will take steps to ensure availability of CFs in these additional areas.

### ***Relay Service Centers***

Traditionally, deaf-blind people have gone to agencies to receive various services. Because many such people may be more comfortable with utilizing DBRS services in these offices rather than allowing a CF into their home or office, Hawk Relay envisions also establishing Deaf-Blind Relay Service Centers (DBRS Centers) in 10 large deaf-blind population centers across the United States. At each of these centers, equipment would be set up for access to telephone services and staff would be trained to provide services in line with DBRS requirements. Such DBRS would be provided both on a walk-in basis and by appointment during normal office hours. After-hours requests would still be able to be met via the 24/7 availability of on-location services.

Besides providing telephone network access for deaf-blind people, Hawk Relay also proposes that each DBRS Center act as a liaison between the FCC and the local deaf-blind community. Information and postings on FCC matters related to the community of deaf-blind people would be made available to deaf-blind people in Braille and large-print formats. These centers would be the deaf-blind community's link to the FCC—for

distribution of official announcements and notices, as well as for comment collection from deaf-blind people as a part of the FCC's efforts to ensure input from the community.

### **Call Procedures**

The deaf-blind consumer has two options when making a call through the Hawk Relay DBRS:

- 1) Requesting a CF to visit his/her residence or place of employment; or
- 2) Stopping in one of the aforementioned Deaf Blind Relay Service Centers.

To request on-location services of a CF, the deaf-blind person would simply need to send an email requesting service, or visit the Hawk Relay DBRS website to fill out a request form. These requests will be immediately routed to personnel at a 24/7 dispatch center, who will then assign a CF from a list of available providers within the consumer's area.

Otherwise, the consumer can walk in to one of the Deaf Blind Relay Service Centers and request immediate service.

Please see Appendix B for a detailed description of steps involved with making and receiving calls through the Hawk Relay Deaf Blind Relay Service.

## **Personnel**

The success of Hawk Relay's Deaf Blind Relay Service hinges on its personnel. Hawk Relay has lined up the appropriate players and strategy in order for this service to launch smoothly and to be of a great benefit to the deaf-blind community. Listed below are the various key players within the Hawk Relay DBRS.

### ***Communication Facilitators***

CFs are the front-line personnel that most consumers of the DBRS will deal with on a daily basis. They provide telephone access services to deaf-blind clients and will all be expected to have a basic set of skills and qualifications as follows:

- Certification, or ability to obtain certification, in sign language interpreting
- Ability to communicate with deaf-blind people. Experience preferred.
- Pleasant demeanor.
- Fluency in American Sign Language.
- Provide tactile interpreting.
- Provide close interpreting.
- Maintain a transparent role during calls.
- Maintain confidentiality of all call content at all times.
- Perform call set-up and wrap-up duties such as equipment set-up and operation.
- Ability to travel in order to provide above services to deaf-blind people at their residences or places of employment as needed.

The DBRS is specifically tailored to provide deaf-blind people with access to the telephone system. As such, CFs will not provide consumers with non-telecommunications based support services such as:

- Reading/reviewing literature
- Independent living skills activities
- General writing services

### ***Management Staff***

Hawk Relay is ultimately responsible for the success of this project, as well as for the day-to-day operations. Hawk Relay's founder is himself deaf, with an intricate understanding of the needs related to providing functionally-equivalent access to the telephone service network. Please refer to Appendix C for background information on Sam Hawk, Hawk Relay's founder. The principal project manager also is himself deaf, with several years of experience in the TRS and VRS fields. The person responsible for coordinating the training of Communications Facilitators, likewise, is deaf and has more than a decade of experience in the telecommunications relay field.

Hawk Relay intends to hire several staff to support operations of the Deaf Blind Relay Service and to ensure that Communications Facilitators are best trained and equipped to provide the highest level of services. These positions are as follows:

### **Program Director**

Has the ultimate responsibility for the DBRS program—ensuring highest quality of service in the most efficient manner. Provides direction to the program, interfacing with consumer groups to continually improve the service and to come up with enhancements. Prepares reports for the FCC on consumer feedback and service performance. Has budgetary authority for the entire program and reports to Hawk Relay's President. The Program Director will be supported by an Administrative Assistant.

### **System Engineer**

Responsible for the overall technical performance of the DBRS, including Center equipment, CF equipment, and reporting equipment. Develops and generates system reports covering usage trends, minutes of usage, etc. Works with the Affiliates operating the Centers to ensure proper use and maintenance of equipment.

### **On Location Coordinator**

Develops and maintains a listing of Communications Facilitators to serve on an on-call basis for the provision of DBRS services on location (i.e.: at consumer's home or office). Ensures these CFs are properly equipped and trained to provide such service. Sets up and manages team of dispatchers to be available on a 24/7/365 basis to respond to requests for on-location CFs, sending the first responder to the consumer's location..

### **DBRS Center Coordinator**

Responsible for working with the 10 affiliates to ensure uniform delivery of services at each center. Ensures each affiliate meets expectations and monitors their compliance with contract. Trains intake staff at the affiliates on various service aspects. Compiles comments from the various affiliates for the FCC's perusal.

### **Intake Staff**

Front line personnel handling walk-in requests at the DBRS Centers. Ensures quick service delivery by maintaining contact with on-site CF. Maintains postings of FCC-related information and collects consumer comments for the FCC, sending these to the DBRS Center Coordinator.

### **Outreach Coordinator**

Responsible for education and outreach efforts as they relate to DBRS. Responsible for coordinating the Ambassador program. Recruits, hires, and trains ambassadors. Assigns regions to each ambassador—ensuring that every corner of the U.S. is served by an ambassador. Develops and disseminates a uniform message about DBRS. Works with ambassadors to ensure that each state PUC designates appropriate equipment for their telecommunications equipment distribution program. Works with the multimedia specialist for timely development of education and outreach material.

### **Ambassadors**

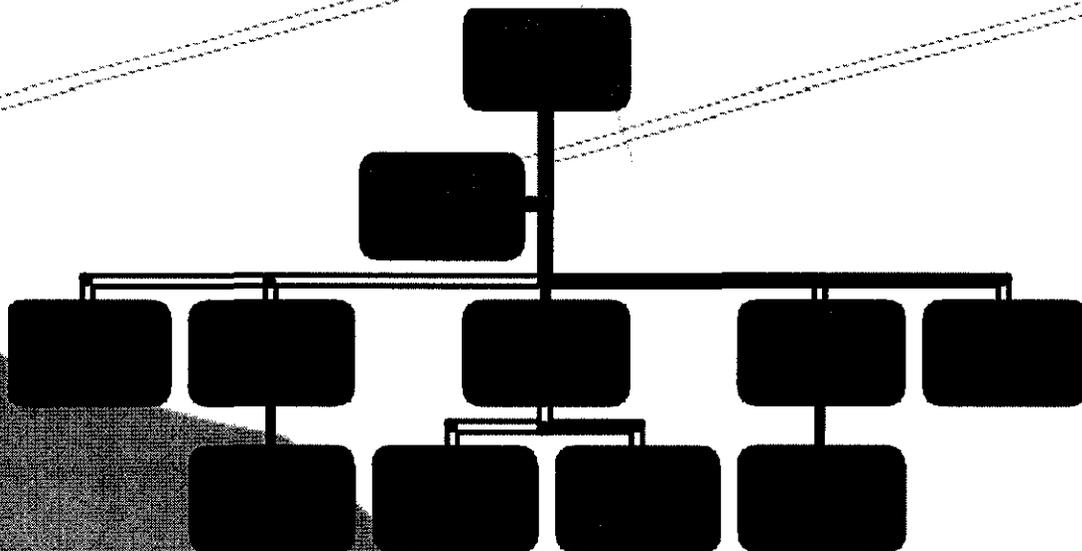
Disseminates information about the DBRS to deaf-blind consumers within their region. Collects feedback and comments from DBRS users on the service and relays this to the Outreach Coordinator for follow-up action-as-needed. Works with state PUCs to ensure inclusion of deaf-blind telecommunications equipment in state equipment distribution programs. Shares pertinent FCC-related information with the deaf-blind community and gathers comments from consumers for the FCC's perusal.

### **Multimedia Specialist**

Responsible for the arrangement of information about the DBRS in an attractive medium—whether it is electronic or print. Develops material with the audience (i.e.: deaf-blind consumers) in mind. Familiarity with specific needs of deaf-blind audience required. Works with the Outreach Coordinator for timely development and release of various media.

### **Organization Chart**

This organization chart reflects the structure of the DBRS as operated by Hawk Relay. This set-up is subject to change as the service grows and evolves.



### **Affiliates**

Hawk Relay recognizes the importance and economic feasibility of partnering with existing service providers to establish Deaf Blind Relay Service Centers—rather than attempting to establish 10 new, stand-alone centers. To this end, Hawk Relay intends to contract with agencies that already provide services to deaf-blind people and/or to deaf

people. Criteria for selecting such agencies in each city are as follows:

- o Already provide services to deaf people.
- o Experience with Deaf-Blind community preferred.
- o In a location with a high density of deaf-blind people.
- o On public transportation routes for ease of access by deaf-blind people.
- o Certified interpreters OR ability to contract with such personnel.
- o Space available for client intake, FCC postings, and for actual processing of DBRS calls in privacy.
- o Available to receive clients on a walk-in basis between 8am to 5pm weekdays.

Hawk Relay will select agencies to provide DBRS Centers through a competitive Request for Proposal process.

At each DBRSC, Hawk Relay will require two different staffing positions for the provision of DBRS. An intake person, usually the center's existing front desk staff, would be the deaf-blind person's first contact with the center. A communication facilitator (CF) would be the one to actually provide services. In some instances, the same person might fill both roles. However, should an intake staffer provide CF services, it is expected that another, equally qualified, intake staff person will take over meeting-and-greeting duties should a second deaf-blind person visit the center at the same time for services.

### **Quality Assurance**

At times, and with the permission of the deaf-blind client, a 3<sup>rd</sup> party provided by Hawk Relay will be in the room along with the client and the service provider for quality assurance purposes. This person will be expected to maintain confidentiality and will be present only for the purpose of evaluating the CF's performance and making suggestions for improvement of such.

### **Training**

For any new endeavor, staff training is an essential component of ensuring project success. To this end, Hawk Relay utilized Thruvo People Solutions to develop a training program geared towards ensuring the highest level of quality service available to deaf-blind consumers.

Specific training will consist of 2 days, on-site training of DBRS staff in the areas of:

- o Working with people who are deaf-blind
- o Call set-up and wrap-up procedures
- o Procedures for processing walk-in, by appointment, and on-site requests at DBRSCs
- o Acting as liaison between the FCC and the local community of deaf-blind people

### ***Advisory Board***

The best wisdom about a particular service comes from the population it is intended to serve. To this end, Hawk Relay intends to establish a DBRS Advisory Board, comprised of consumers and other stakeholders. This Board will consist of five members, as follows: 3 from the American Association of the Deaf Blind; 1 from Telecommunications for the Deaf and Hard of Hearing, Inc., and 1 at-large member.

## **Outreach**

Information disseminated about the DBTRS will be conducted on two levels—national and local.

### ***National***

In conjunction with the AADB, Hawk Relay will develop outreach materials to be disseminated to the deaf-blind community. This material will be in accessible formats (i.e., Braille and large type, among others). The focus here will be on generating and spreading awareness about the Deaf Blind Relay Service.

Moreover, Hawk Relay will utilize national community vehicles, such as the AADB website and e-newsletter, to spread awareness about the DBRS.

### ***Local***

Hawk Relay intends to commission ten DBRS consumers to serve as ambassadors throughout the United States. Each ambassador would serve one of ten different regions and they will be responsible for maximizing knowledge about the DBRS among their respective deaf-blind communities. They will disseminate the outreach materials developed by Hawk Relay, along with any additional information pertinent to the local community. They will also serve as the conduits between the DBRS centers and the community in matters relating to the FCC. In other words, they can help in disseminating FCC-related news, notices, and other developments. In return, they will work with DBRSC staff to act as the FCC's hand on the pulse of the deaf-blind community.

Last, but not least, these outreach staff will also work with the Telephone Access Program (or its equivalent) in each state within their region to promote issuance of telecommunications equipment and service that is necessary for a deaf-blind person to be able to make a request for DBRS usage from their home or office.

## Equipment and Service

For on-location access to the telecommunications network, each CF will have their own cell phone or pager.

Hawk Relay recognizes that a significant number of deaf-blind people do not have any telecommunications equipment or access at all. Therefore, they would be unable to easily send an email or fill out an online request form for services. To this end, Hawk Relay envisions working with the Telephone Access Program (or their equivalent) in each state to ensure that the necessary equipment and service are provided to deaf-blind people in order that they may make requests for DBRS.

As for the Deaf Blind Relay Service Centers, each of them will have a call station established and maintained in good working order for the purpose of connecting to the telephone network. Equipment and service required is as follows:

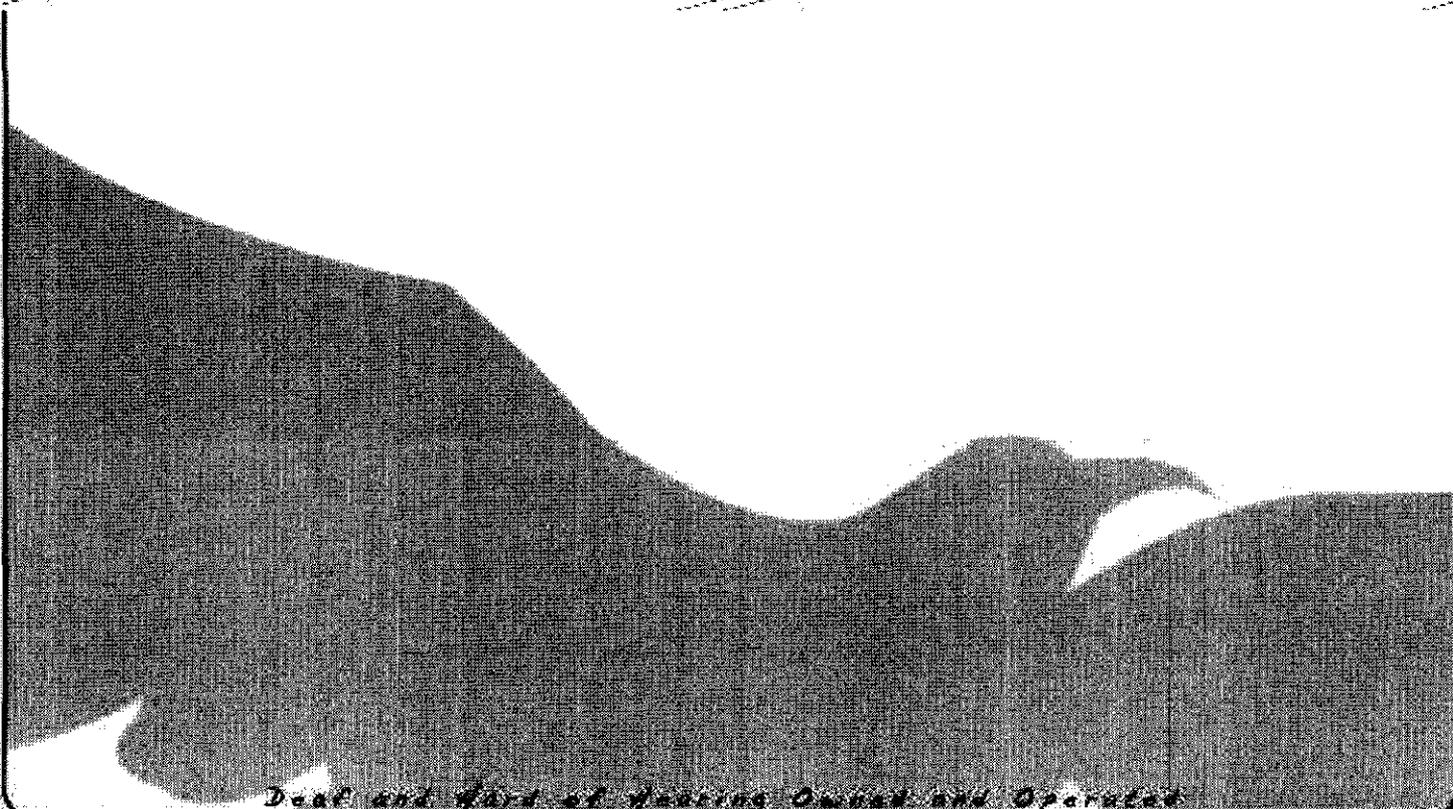
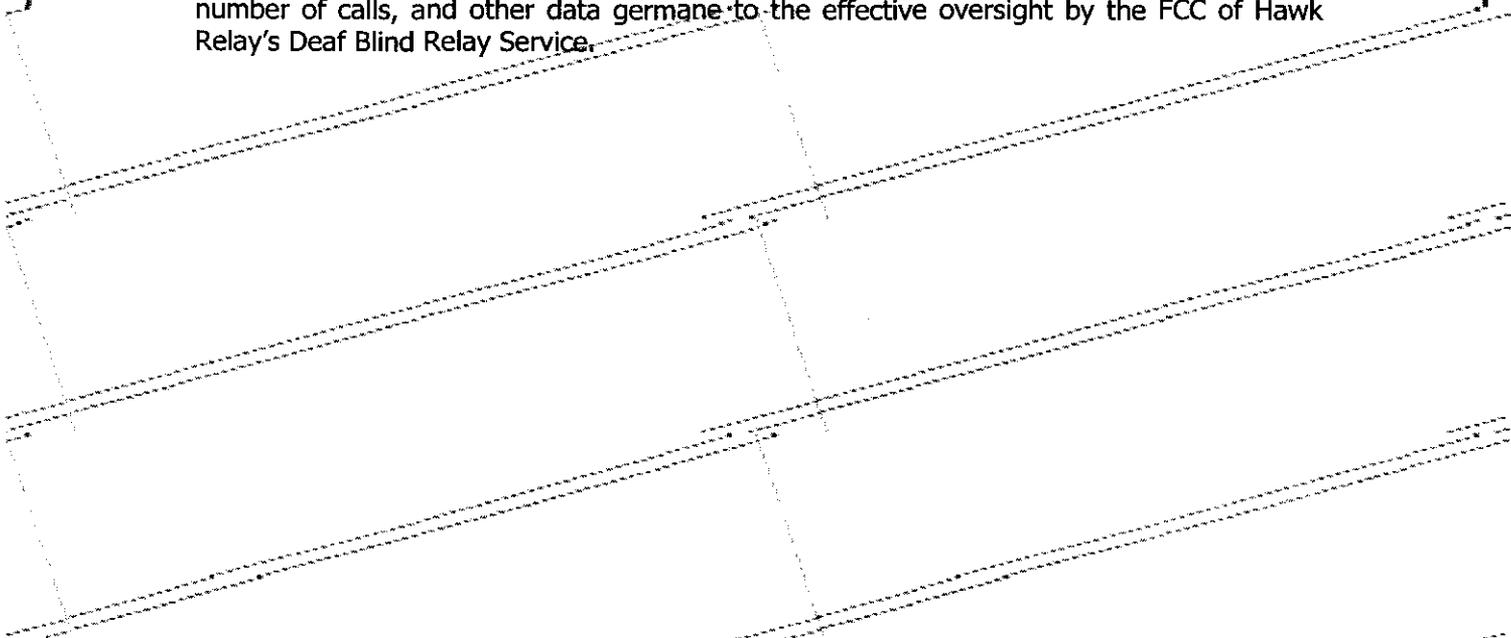
- Voice telephone with speakerphone (hands-free) capability
- Local and long distance telephone service
- Comfortable seating for both the deaf-blind client and the CF
- Enclosed, confidential space for call processing.
- Appropriate and adjustable lighting to accommodate those with low vision
- Braille printer for FCC announcements and notices

[www.hawkreelay.com](http://www.hawkreelay.com)



### **Reporting**

Call data such as time, length, and so forth will be tracked via usage records of cell phones that the Communications Facilitators use. This reporting will occur and be retrievable in real-time. Hawk Relay will provide to the FCC such information as number of minutes, number of calls, and other data germane to the effective oversight by the FCC of Hawk Relay's Deaf Blind Relay Service.



*Deaf and Hard of Hearing Owned and Operated*

## Costs

Hawk Relay proposes a two-tiered pricing system. The first tier would consist of invoices for projected fixed costs for the upcoming quarter (3 months), plus any differential for actual fixed costs of the previous quarter. The second tier would be a monthly billing to the FCC (by the 15<sup>th</sup> of the month following the calendar month in question) of Hawk Relay's on-location service costs (consisting mostly of Communication Facilitators' fees).

An estimated invoice for the first quarter of DBRS operations would, therefore, be \$3,101,066.50. In addition, the estimated monthly invoice amounts for on location Communication Facilitator support would be \$ 117,901.67, subject to change according to demand of the service.

## Appendix A—Deaf-Blind Data

A paucity of data exists on the entire population of deaf-blind people in the United States. Far more specific data do exist, however, on the numbers of deaf-blind children. From these statistics, various organizations have extrapolated to arrive at the commonly-held figure of 40 thousand to 70 thousand deaf-blind people in the United States.

This data below emanates from the National Deaf-Blind Child Count, conducted annually. It can be found at the National Consortium on Deaf-Blindness's website (<http://www.tr.wou.edu/ntac/documents/census/2005-Census-Tables.xls>).

### National Deaf-Blind Child Count Summary December 1, 2005 (Ages birth through 21\*)

	AGE OF CHILD (Respective Count Year)					Total
	0 - 2	3 - 5	6 - 11	12 - 17	18 - 22	
ALABAMA	0	14	52	142	61	269
ALASKA	1	4	4	10	5	24
ARIZONA	23	26	46	38	20	153
ARKANSAS	3	7	24	32	21	87
CALIFORNIA	74	111	242	264	136	827
COLORADO	21	26	29	29	7	112
CONNECTICUT	2	7	18	21	15	63
DELAWARE	8	11	19	23	8	69
DISTRICT OF COLUMBIA	0	0	6	4	1	11
FLORIDA	4	19	73	76	62	234
GEORGIA	34	33	74	76	20	237
HAWAII	1	3	22	7	9	42
IDAHO	5	6	19	15	8	53
ILLINOIS	44	41	142	131	50	408
INDIANA	10	30	74	40	29	183
IOWA	0	7	21	20	13	61
KANSAS	4	7	27	32	14	84
KENTUCKY	2	22	51	47	27	149
LOUISIANA	3	9	36	57	27	132
MAINE	2	7	13	18	10	50
MARYLAND	19	28	52	51	20	170
MASSACHUSETTS	4	16	46	49	38	153
MICHIGAN	11	29	85	76	30	231
MINNESOTA	13	31	66	96	25	231
MISSISSIPPI	1	2	15	35	22	75

MISSOURI	7	22	44	64	39	176
MONTANA	6	20	29	22	10	87
NEBRASKA	3	7	34	46	26	116
NEVADA	4	18	32	26	6	86
NEW HAMPSHIRE	2	8	11	18	10	49
NEW JERSEY	3	12	61	144	91	311
NEW MEXICO	7	19	35	40	28	129
NEW YORK	4	35	154	460	308	961
NORTH CAROLINA	3	27	124	190	110	454
NORTH DAKOTA	7	6	11	10	4	38
OHIO	6	38	138	136	90	408
OKLAHOMA	4	7	60	55	26	152
OREGON	6	16	23	25	10	80
PENNSYLVANIA	19	54	119	138	40	370
PUERTO RICO	3	10	20	29	5	67
RHODE ISLAND	8	6	8	19	9	50
SOUTH CAROLINA	17	22	25	22	5	91
SOUTH DAKOTA	7	8	9	10	6	40
TENNESSEE	12	32	69	64	16	193
TEXAS	56	142	239	234	93	764
UTAH	8	21	39	34	6	108
VERMONT	1	4	5	8	6	24
VIRGINIA	8	14	37	27	32	118
WASHINGTON	22	31	60	76	20	209
WEST VIRGINIA	4	19	44	32	14	113
WISCONSIN	9	36	84	91	50	270
WYOMING	4	4	12	6	3	29
PACIFIC BASIN	4	5	22	14	12	57
Total	533	1139	2804	3429	1753	9658

\*Some states continue to provide services through the end of the school year in which the individual turns 22 years old

Further statistics on deaf-blind counts can be found at the following websites:

1. Helen Keller National Center  
(<http://www.hknc.org/AboutUs/WHOWESERVE.htm>)
2. American Association of the Deaf-Blind  
([http://www.aacb.org/deafblind/DB\\_definition.htm](http://www.aacb.org/deafblind/DB_definition.htm))

## **Appendix B—Call Procedures**

DBRS differs from other relay services in that its primary customers often do not have direct access to a telephone. Therefore, deaf-blind people will usually be the ones to initiate a live relay call through the DBRS. Hearing people attempting to reach a deaf-blind person through the DBRS would often need to leave a message for the deaf-blind person.

The steps involved in a deaf-blind user initiating a DBRS call are:

1. Communications Facilitator dials telephone number of hearing person.
2. CF commences interpreting between deaf-blind person and other party.
3. The deaf-blind person signs for him/herself to the CF.
4. The CF voices to the other party.
5. The CF interprets the hearing person's spoken words into sign, with the deaf-blind person following along either tactilely or by viewing the CF's signs up close.

When a hearing person utilizes the DBRS to reach a deaf-blind person, these are the steps that occur:

1. Hearing person dials the 800 voice number for DBRS.
2. An agent at Hawk Relay takes a message for the deaf-blind person.
3. The agent forwards this message to the deaf-blind person according to the medium pre-established by the deaf-blind person (email, pager, fax, phone, etc.)

The agent does not initiate a live relay connection between the hearing person and the deaf-blind person.

### On-location services:

Deaf-blind people will be able to obtain services through the Deaf-Blind Telecommunications Access Service at any time of day and night. This will be accomplished through use of on-call CFs. Hawk Relay will maintain a 24/7 dispatch center that handles all requests for on-call services, utilizing a list of nationwide qualified CFs. Following are the steps involved in processing such requests:

1. Deaf-blind user visits the request page found at the Hawk Relay website or sends an email to the address listed on the website. Request is routed to a 24/7 dispatch center operated by Hawk Relay.
2. Agent consults listing of qualified on-call CFs in the area of the customer, and sends out a request to all available CFs.
3. The first CF to respond will be dispatched to the customer's workplace or place of residence, along with any other information pertinent to the call.

## **Appendix D—Implementation Timeline**

### After submittal of proposal to FCC:

- Day 1: RFPs out to potential affiliates for provision of Relay Service Centers and Outreach offices.
- Day 1: Job announcements posted.
- Day 60: Affiliates chosen, pending FCC implementation decision
- Day 60: DBRS personnel selected, final hire pending FCC implementation decision

### After FCC acceptance of proposal:

- Day 1: Personnel are hired
- Day 1: Agreements signed with Affiliates
- Day 1: Hawk Relay begins development of education and outreach material (brochures, website, etc.) and commences nationwide education and outreach program
- Day 15: Training of Communication Facilitators commences
- Day 30: DBRS education and outreach campaign hits full stride
- Day 30: Full cut of DBRS services