TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO

Application for Renewal of Certification of Telecommunications Relay Service

October 1st 2007

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Puerto Rico FCC Certification Renewal and Supporting Documents

Introduction

Puerto Rico is part of the United States under the definition of "State" Section 3 of the Communications Act. As such, for telecommunications purposes it is treated like any of the fifty (50) States. For that reason whatever is done by the U.S. Congress and the Federal Communications Commission (FCC) regarding interstate and foreign telecommunications services, impacts the Puerto Rico telecommunications market and how it is regulated.

The Telecommunications Regulatory Board of Puerto Rico (TRB) is the governmental agency created by virtue of Law Number 213 of September 12, 1996, known as the Telecommunications Act of Puerto Rico of 1996 to regulate the telecommunications and Cable TV markets. At present it has jurisdiction over intra-island services provided by the telecommunications companies, and is the franchising entity for Cable TV companies operating within Puerto Rico.

The TRB is also in charge of the administration of the Universal Service Fund of Puerto Rico (PRUSF) and the certification of eligibility to receive funds from both the U.S. and PRUSF. TRS is one of the programs subsidized by the TRB PRUSF.

The Board of Awards of the TRB issued an invitation for bid for the contracting of Telecommunication Relay Services on January 3, 2005. The bid was issued in accordance with the objectives of the TRB's Universal Service Rules (TRB Regulation number 5757), as amended by Regulation number 6124 and the FCC's Regulations for the provision of TRS, pursuant to Section 225 of the Federal Communications Act of 1934, as amended (Title IV of the Americans with Disabilities Act – ADA). A copy of TRB's TRS Request For Proposal is included in Appendix V. All potential providers were invited and the selected proposal was awarded to Sprint International Caribe, Inc. as representative of Sprint Communications Company L.P. (hereinafter referred to as "Sprint") the 28th of June, 2005 to provide intra-island Telecommunication Relay Service.

Therefore, beginning on July 1st, 2005 until June 30, 2008, Sprint shall be the provider of TRS within the Commonwealth of Puerto Rico as approved and authorized by TRB's Resolution and Order on case number JRT-2004-SU-0001. The TRB may renew this agreement for one (1) additional year term, up to two (2) years. As provider of TRS, a Sprint TRS operator/Communications Assistant (CA) located outside of Puerto Rico is handled between the origination and termination of any call to or from a TRS user in Puerto Rico.

In order to facilitate the evaluation of this petition for Re-certification, what follows describes each one of the FCC requirements and an explanation of how this TRB is complying with it.

Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

CA Employment Standards

Puerto Rico Relay's provider (Sprint Relay) has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

IP (Internet Relay) CAs follow the same employment and training standards as TRS CAs. In addition, the contracted provider has an enhanced VCO service called Captioned Telephone (*CapTel*) Services. They require that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job.

All Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. For more information about VRS interpreter qualifications and training expectations, see Appendix A.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Communication Assistants Training Program

Sprint Relay trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they

are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. Contracted provider works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. They also utilize videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receives extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and VRS interpreters as where appropriate. Please review the Sprint TRS, Speech to Speech (STS), CapTel and Video Relay Service (VRS) Training outlines in Appendix A.

A team of ASL fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

<u>Captioning Assistants Training Program</u>

CapTel CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the CTI standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages as well as attendance and attitude standards as set by *CapTel* management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminate employment.

All *CapTel* CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures. A captioned telephone user does not type while making a call therefore; there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in

the communications. The CA is permitted to provide background noise identification.

1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.

1.3 The CA shall be required to meet the FCC standards for TRS minimum transcription speed.

1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.

1.5 The CA shall pass along a *CapTel* caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.

1.6 Personnel supporting *CapTel* will have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel* Services in a professional manner.

Please review the Sprint TRS, STS, *CapTel* and Video Relay Service (VRS) Training outlines in Appendix A for more information on CA training requirements.

CA Quality Assurance Programs

Monthly Surveys

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint centers and or an independent third party quality testing firm has been retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter, but often conducts monthly tests of 100 test calls on *CapTel*.

Relay Program Management and Trainer Test Calls

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

Sprint Relay and the Relay Program Management team also perform test calls for *CapTel* CAs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

All Sprint Relay CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. This applies to Sprint IP and IP wireless relay CAs as well.

Sprint Relay utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

CapTel's voice recognition technology transmits above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all *CapTel* CAs.

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. For more information about VRS interpreter qualifications and training expectations, see Appendix A.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Sprint Relay requires all CAs, including Sprint IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs), to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix A, Module 4I, and the Video Relay Service Training Outline and Qualifications. CapTel CAs also stays on all calls for a minimum of 10 minutes.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

When a Sprint relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request.

When a Sprint VRS and Sprint IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of VIs is necessary during the call, every attempt will be made to accommodate the previous gender request.

CapTel CAs is waived from this requirement. See Appendix J, FCC *CapTel* Mandatory Minimum Standards & Compliance Matrix.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Sprint CAs transmits and relay all conversations between the caller and the called parties in real time.

CapTel is a transparent service. CAs transmits audio and captioned text conversations from the voice caller to the *CapTel* user in real time. Since the *CapTel* user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.
In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and VIs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. After the call has been terminated, billing information is transferred to billing files and is no longer accessible, except for billing purposes. The only exception to this policy relates to STS calls. Sprint STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Sprint Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

Prospective CAs and VIs are screened during the interview process on issues regarding ethics and confidentiality.
During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.
Breach of confidentiality will result in disciplinary action up to and including termination of employment.
CAs performs their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.

All Sprint Relay Centers have security key access.
Visitors are not allowed in Relay work areas.
Supervisors are present in the work area to observe behavior.
All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs and VIs to:
Keep all call information confidential.
Not edit or omit any content from the conversation.
Not add or interject anything into the content or spirit of the conversation.
Assure maximum user control.
Continuously improve their skills.

Please refer to Appendix B for the TRS and Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and IP/IP Wireless CAs.
CapTel Captioners must comply with the same rules that TRS does regarding confidentiality. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *Captel* Captioners. A copy of the *CapTel* confidentiality form signed by *CapTel* CAs can be found under Appendix B.

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel* in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A Captionist may feel the need to "vent" about a call due to problems, complaints or stress from handling the call. The Captionist may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination.

STS Limited Exception of Retention of Information

At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

Sprint Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

At the request of the relay user, Sprint Relay CAs will translate written ASL into conversational English. All Sprint Relay CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

Sprint VRS interpreters, Sprint IP/IP Wireless CAs and *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

Sprint Relay STS CAs receives training on how to facilitate STS communication without interfering with the independence of the user. STS CAs is evaluated on monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint Relay users have full control of all of their relay calls.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Sprint Relay Services

Sprint Relay provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Sprint Relay also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Sprint Relay retain full control of the length and number of calls placed anytime through relay. Sprint IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using relay services.

CapTel CAs are currently waived for outbound calls because the *CapTel* CA is not involved in the call set up and cannot refuse the call *CapTel* users dial sequential calls directly, therefore, it is not possible for a *CapTel* CA to refuse sequential calls or limit length of calls.

CapTel CAs is not waived for inbound calls to a *CapTel* user made through a TRS facility. However, if call is made directly to the captioned telephone access number, no set up is involved and the *CapTel* CA cannot refuse to call. Please see Appendix J for more information on these waivers.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services shall be capable of handling pay-per-call calls.

Sprint Relay works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other inter-exchange carrier. Sprint Relay will also process calls to or from restricted lines, e.g. hotel rooms and pay telephones.

When a TRS or *CapTel* call is placed through Sprint Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will

only be billed for conversation time, (which does not include call setup time, in between calls and wrap up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay. Sprint was the first provider to process pay-per-calls, beginning with the state of Texas in 1996.

Sprint VRS, Sprint IP and IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Report to the FCC, Appendix K.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Sprint Relay provides access to all available relay call types. A complete list of all call types proved by Sprint may be found in Appendix H Sprint Standard Features Matrix. Most call types are waived for IP and VRS users. Please refer to the Sprint VRS and IP Report to the FCC, Appendix K.

Except where waived by the FCC, *Captel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer

preference database along with a name for each entry. When initiating a call the user can then provide the name to Sprint Relay CAs, instead of the entire 10-digit number. The *CapTel* Consumer Premises Equipment (CPE or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

Sprint *CapTel* users are also able to participate in a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel.* For Two-Line *CapTel*, either party can initiate a three- way call should the user purchased this as a LEC option. Sprint *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

When a Sprint Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple out-dials. In addition, Sprint relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a

procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

Callers to Sprint relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

The Puerto Rico relay current 900 number is: 1 900 230 5656

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Sprint Relay TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Appendix H, Standard Call Features Matrix.

Answering Machine

Sprint Relay CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a “hot key” which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes Sprint’s recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA’s work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the Relay User to leave a message, as included in the outgoing message, if applicable.

The CA will leave the relay user's message in the appropriate mode of communication. Sprint has the capability to leave messages in both voice, text and touch tones (pagers).

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

(UR MSG LEFT) CA XXXXM/F GA

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials, the customer does not incur toll charges. Customers will only be charged for the first call. CapTel CAs is also equipped with the ability to retrieve messages stored on a local answering machine.

Voicemail Retrieval

Sprint has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed. *CapTel* user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

A.4 Handling of Emergency Calls

§64.604(a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Sprint meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint's intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP Center in Kansas. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Sprint Relay considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay, the Sprint CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a

communication modality other than TTY, [i.e., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or

- The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the Sprint CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

911 services are currently waived for IP and VRS providers. Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or phone.

Sprint IP via website permits manual 911 processing. If user tell operator to dial 911, operator will request supervisor assistance. User will need to provide the address and city where he/she is calling from. Supervisor will call Directory Assistance (on separate phone call) to obtain 10-digit emergency PSAP number. Then the supervisor will pass it to CA to make outbound call to a 911 dispatcher (PSAP). It can take few minutes or so to get the information. Users are encouraged to enter 10-digit emergency number on the website for more efficient call processing.

More information about Sprint's procedure for handling E911 calls, including *CapTel* calls, may be found in Appendix C.

Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP

program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- Miami Switch (Miami, FL)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay STATE users. Sprint is proud to voluntarily comply with the FCC's TSP program. Please see Appendix M for a copy of the general press release regarding the TSP program.

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Sprint's Relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term. Currently, STS is waived from Internet Relay, Video Relay and *CapTel* services.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Each Sprint CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps is supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

Sprint IP currently provides services via ASCII connection. Currently, ASCII and Baudot requirements are waived for *CapTel* services. For more information about *CapTel* waivers, see Appendix J.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Sprint Relay has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve Puerto Rico are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the Puerto Rico call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. These data are monitored for both short and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless, VRS and *CapTel* calls. Sprint *CapTel* ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of–answer calculation. Sprint *CapTel* system is designed to a P.01 standard or greater measured on a daily basis.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Sprint has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint currently samples every 15 minutes.

Sprint Relay is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. There will be no more the 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number.

Sprint begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not be placed in a queue or on hold after reaching the Relay switch.

Sprint's Service Level calculation for TRS

Sprint's Service Level calculation for all TRS calls, excluding *CapTel*, is described below:

Number of calls handled < 10 seconds / (total calls handled + total calls abandoned)

The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.

(Number of calls offered = total number of calls handled + total number of calls abandoned),

(SVL = Number of calls handled in < 10 / Number of calls offered).

Sprint's Service Level Calculation for CapTel

For *CapTel* users, the number of calls that arrive at the *CapTel* call center will be the number of Calls Offered.

The number of calls that are answered by a CA is the number of Calls Answered.

The time for each call between the time the call arrives at the *CapTel* call center and the time answered by a CA until it is abandoned is the Speed of Answer.

Any time spent in the Voice-in telephone menu is time controlled by the user to enter in the phone number of the CapTel user they are calling. This time is subtracted out from the Speed of Answer time.

The total number of calls with the Speed of Answer as 10 seconds or less is the number of Qualifying Calls.

Qualifying Calls divided by Calls Offered = Service Level (x percent of calls answered within 10 seconds).

Sprint's Weighted Service Level for TRS

Sprint uses a 'weighting' process to combine the results of several Call Centers into a single result:

The 'weighted' service level (SVL) is a calculation that multiplies the number of 'State' calls handled in each center by the center's daily SVL (the outcome is a factor called 'SVL points'). The resultant 'SVL points' for each center that handled that 'State' traffic is then summed. The sum of the 'SVL points' is then divided by the total number of 'State' calls to get a daily 'weighted' SVL.

Sprint will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is

delivered to the Sprint Relay Center and Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

Sprint's Weighted Service Level for CapTel

While *CapTel* operates two *CapTel* call centers, all calls are directed through one Automatic Call Distributor switch. All calls are answered in the order received and is measured, un-weighted, by this switch.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Sprint considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment and facilities, and system software for the complete TRS operation. Sprint is a certified Inter-exchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Please see (b)(2)(ii) above.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Please see (2) (b)(ii) above.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Sufficient transmission facilities have been provided to service all traffic levels, including busy hour peaks. Sprint utilizes trunks that are sized to provide a busy hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers state Relay customers the advantages of a superior digital fiber network unsurpassed in the industry. Through use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter Machine Trunks (IMT) which is engineered at P.01 Grade of Service (GOS) at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Sprint Relay complies with this requirement. Please refer to Sprint Relay's report to the FCC under Appendix K.

B.3 Equal Access to Inter-exchange Carriers

§64.604 (b)(3) Equal access to inter-exchange carriers. TRS users shall have access to their chosen inter-exchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Sprint provides Puerto Rico callers with the ability to have their intrastate, interstate and international calls carried by any Inter-exchange carrier who has agreed to participate in the Puerto Rico Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

AT&T Communications
Bell South Long Distance
Bestline
Birch Telecom
Broadwing Communications
Broadwing Telecommunications
Cox Communications
Excel Telecommunications, Inc.
Global Crossings Telecommunications
MCIWorldCom
McLeod USA
Qwest Communications
SBC Communications Long Distance
Souris River Telecommunications
Sprint
Telecomm*USA (MCIWorldCom)
Touch America Services, Inc.
U.S. Link
VarTec dba Clear Choice Communications
VarTec Telecom, Inc.
Verizon Long Distance
Winstar
Working Assets
WorldCom
WorldXChange

If a Puerto Rico caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix D for a sample of the Carrier of Choice letter sent to carriers when a customer has a preferred inter-exchange carrier that does not participate in the Sprint COC program.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. An UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless, VRS and *CapTel* Relay Services are also available 24 hours a day, seven days a week.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Sprint Relay Network Support Plan

Service Reliability

Sprint's service is provided over an all-fiber sophisticated management control networks that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to [State], and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for [State].

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Do everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.

- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.

- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:

- Utilization of established plans to respond effectively to these outages.

- The capability to rapidly deploy network transmission facilities when needed.

- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.

- The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

Fiber Backbone Loop Topology and Reconfiguration

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

Please see Appendix E for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Appendix F for a complete explanation of Sprint's back-up plan.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Sprint is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

Sprint meets all minimum technological standards regarding Video Relay Service. Sprint VRS is available through www.sprintVRS.com and www.sprintrelay.tv (for Videophone users).

On 31 July 2006, Sprint launched **MySprintVRS number.** This **MySprintVRS Number** feature empowers Deaf and hard of hearing Video Relay Service (VRS) users with a simply means of receiving incoming calls With MySprintVRS Number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the Deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the VI with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On 28 October 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. ***Sprint VRS Mail for wireless devices*** is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge technology using Sprint IP using AIM®. Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM.

Sprint also provides *CapTel* services, which is recognized as an enhanced VCO service.

For more information on technology provided through Sprint Relay, please refer to Appendix L: Sprint Relay Fact Sheet.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through,

to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Sprint Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is a received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the

TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Sprint provides copies of each TRS Customer Contact form, which includes filing date of the complaint, an explanation of the complaint, the date the complaint was resolved, and an explanation of the resolution and any other pertinent information to Puerto Rico. Furthermore, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

The name and address of the office that receives complaints grievances, inquiries, and suggestions; and the physical address to which correspondence should be sent are as follows:

Contact for TRS Complaints

Telecommunications Regulatory Board of Puerto Rico
Attn. Mr. Roberto Miranda
Capital Center II
235, Arterial Hostos Ave., Suite 1001
San Juan, PR 00918-1453
Telephone Number: 787-756-0804, Fax: 787-753-5684
e-mail: rmiranda@jrtpr.gobierno.pr

Sprint Relay Puerto Rico
Ms. Elizabeth A. Rios
Program / Sales Manager
304 Ponce De Leon Ave.
Hato Rey, PR 00918

Telephone Numbers: 787-775-6775 (TTY), fax: (787) 775-6740
e-mail: Elizabeth.A.Rios@sprint.com

Voice and TTY telephone numbers, fax number, e-mail address, and web address are as follows:

TRS Telephone Numbers
(Service Provider: Sprint Relay)
711 (English & Spanish) or
1-866-280-2050 (TTY)
1-866-280-2051 (Voice)
1-866-280-2052 (STS)
1-800-676-4290 (Customer Service)

Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Venues of State Relay Outreach Program

The TRS service rate for the contractual agreement between the TRB and Sprint Relay includes terms and conditions for Puerto Rico's State Relay Outreach Program, created to inform citizens about the availability of the TRS and Equipment Distribution Program (EDP) and how these programs help

improve communication between hearing and hearing and speech disabled users.

The agreement states that the Outreach Program will target multiple federal, state and local government agencies, as well as businesses, schools and universities. The outreach program includes an educational campaign labeled by Sprint Relay as “Do Not Hang-Up on Relay”. The campaign targets specific businesses and the medical community and provides information regarding:

1. Puerto Rico Relay program overview and it’s services
2. Equipment Distribution Program overview and eligibility criteria
3. Hands-on use of TRS equipment

The promotional means and publicity media used for the TRS Outreach Program include the following:

1. Letters to businesses
2. Press releases
3. TV Ad
4. PowerPoint presentations
5. Special family oriented activities within communities with hearing and speech disabilities
6. Distribution of promotional materials such as:
    a. Brochures and literature
    b. Stickers for doors and widows
    c. Magnetic Cards with Puerto Rico Relay contact numbers and calling instructions
    d. Other promotional items (mouse pads, bags, pens, etc.)

It is also stated that the Outreach Program will be provided in cooperation with representatives from the deaf of hearing communities, to assure that all publicity materials will be effective and appropriate.

Sprint Relay provides outreach services to the communities with hearing and speech disabilities, as well as to the general population and businesses in Puerto Rico through sub-contracts funded and managed by Sprint Relay, understanding that the purpose of this program is to educate existing and potential TRS users about the benefits provided under the Puerto Rico TRS programs.

Since then and until present day, activities under the Outreach Program have consisted of public speeches, workshops and presentations in municipal government offices and educational institutions, interviews on radio programs, training and hands-on assistance to users, ISP’s, Cable TV service providers and other companies which services might integrate usage of communications equipment for the hearing and speech disabled.

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

As indicated in Page 27–#8, Billing - of Bid No. 2005-01, Calls using the relay service shall be at no cost to the person making the call, except for applicable intrastate or interstate tolls. Applicable toll charges for TRS users will cost no more than charges for services paid by callers who use "regular" or "mainstream" phone services. Bidder will allow the relay user to access his or her preferred interexchange carrier when placing toll calls through relay and to all other operator services to the same extent as is provided in non-relay calling. Bidder must describe how access to Carrier of choice will be handled.

Relay Puerto Rico users are charged no more for services than for those charges paid by standard "voice" telephone users. Relay Puerto Rico users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the Relay Puerto Rico COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	Use State Specific Xx%	50%
Evening (7 PM – 10:59 PM)	Use State Specific Xx%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	Use State Specific Xx%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS,

costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Puerto Rico relay intrastate and interstate minutes are reported separately and distinctly by each telecommunications carrier, to both the FCC and TRB as applicable. Each telecommunication carrier ought to comply with the applicable rules. Carriers, such as the Incumbent Carrier are submitting to the FCC their corresponding Jurisdictional Cost Separations and other relevant reports, as appropriate. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The Universal Service Fund of Puerto Rico (PRUSF) administered by TRB subsidizes the TRS Center costs. Said PRUSF is made of by the contributions paid by the telecommunications carriers based on their intrastate telecommunication services revenues. The PRUSF rules allow for the recovery of those contributions from all subscribers, based on their intrastate telecommunication services.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Puerto Rico. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an

Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Puerto Rico customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the Puerto Rico Relay Program Manager to file complaints or commendations.

Sprint has the capability to transfer the caller on-line to Customer Service department. A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including relay web sites.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31st of each year by the July 1st deadline.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

The Sprint Customer Preference Database includes items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as

emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) Sprint will transfer all Puerto Rico database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

§64.605 State Certification

(a) (1) Certified state program.

Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All

documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

a) State documentation

1) Certified state program

Pursuant to the Federal Communications Commission ("FCC" or "Commission") rules for the provision of Telecommunications Relay Service ("TRS"), the Telecommunications Regulatory Board hereby submits its application for the renewal of certification of the TRS program in Puerto Rico. The TRS program in Puerto Rico is provided by Sprint Relay, using the service name "Puerto Rico Relay":

Puerto Rico Relay
Sprint Relay
304 Ponce de León, Suite 801
Hato Rey, PR 00936

On October 1, 2002 the Commission approved Puerto Rico's Application for Renewal of Certification of Telecommunications Relay Service. Later on June 28th, 2005 the Telecommunications Regulatory Board of Puerto Rico renewed the contract with the TRS provider, Sprint Relay.

For the reasons previously described TRB urges renewal of the Puerto Rico Relay program.

2) VRS and IP Relay provider

Video Relay Service (VRS) is an alternative TRS technology for the Deaf and Hard-of-Hearing communities and has grown dramatically in the last three years. ASL users have come to depend on VRS as a functionally equivalent TRS.

Previous to renewing Sprint's TRS contract, the TRB reviewed their proposal and qualifications which meets FCC's TRS requirements. In the documentation submitted by Sprint, the TRB came into knowledge that Sprint initially worked with the State of Texas to introduce the concept of VRS in 1995 where a one-month VRS trial was implemented. Later in 2002, Sprint teamed with CSD, the nation's largest non-profit Deaf organization, to launch the first nationwide VRS.

With almost 10 years of experience in the Video Relay industry, Sprint Relay has processed over 2.4 million minutes throughout the U.S, the

Commonwealth of Puerto Rico and the U.S territories through www.sprintvrs.com . In 2004, Sprint Relay processed approximately 2700 minutes of VRS calls for individuals initiating a call from the Commonwealth of Puerto Rico. Currently, VRS is funded by the Interstate TRS fund. Therefore, the TRB is not responsible for reimbursement of costs for consumers of Puerto Rico who choose to use VRS. Sprint must have complied with the VRS and IP Relay Certification Program in order to receive funding from the interstate Universal Service Fund. Should the FCC transition the funding mechanism to the States and the US Territories, the TRB will work with Sprint and further providers to endow with the best-cost value the service can provide Puerto Rico's ASL users.

b) 1) Requirements for State certification

The operational specifications of the TRS Center are dynamic in terms of the implementation of new requirements and also the provider of the service. Because the bid process for the new provider was based entirely on FCC requirements, Puerto Relay does not conflict or circumvent the federal requirements.

A copy of TRB's Telecommunications Relay Service RFP is included in Appendix U as evidence that TRB is committed to meet the minimum FCC TRS requirements.

2) Requirements for VRS and IP Relay Provider FCC Certification

Please refer to section §64.605 (a)(2) above.

c) (1) State certification period

The TRB will comply with FCC's requirements herein and after the approval by the Commission of this filing for the term specified. The approval shall remain in effect for five years.

a) VRS and IP Relay Provider FCC certification period

Please refer to section §64.605 (a)(2) above.

d) Method of funding

Currently the TRS service is funded through the PRUSF. Funding mechanism if labeled, does not refers to the TRS program in particular. Therefore, funding mechanism through the PRUSF is labeled in a manner that promotes National understanding and does not offend the public.

e) (1) Suspension or revocation of state certification

The submitted documentation herein evidences the TRB's compliance with FCC minimum standards. However, if required, the TRB will submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

2) Suspension or revocation of VRS and IP Relay Provider FCC Certification

The provider of VRS or IP Relay, Sprint, if required, shall submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

f) (1) Notification of substantive change

TRB will notify the Commission of any substantive change in the TRS program, services, and features within 60 days of when they occur. In such case, TRB will also certify that the State TRS program continues to meet federal minimum standards after implementing the substantive change.

g) VRS and IP Relay providers in compliance with §64.605

Please refer to section §64.605 (a)(2) above.

The aforementioned materials demonstrate that the Puerto Rico Relay program meets all operational, technical and functional standards; makes available adequate procedures and remedies for enforcing the Puerto Rico Relay program and does not conflicts with Federal law.

APPENDIX

Appendix A: Sprint TRS, STS, CapTel, and VRS Training Outlines

Sprint TRS Training Outline

Module	Module Description
Module 1	Orientation ▪ Objectives ▪ Welcome & History ▪ Future of Sprint ▪ What is Relay? ▪ CA Training ▪ Call Flow Chart
Module 2	Phone Image ▪ Objectives ▪ Introduction ▪ Communicating Information ▪ Using Conversational Tone ▪ Managing Dissatisfied Customers
Module 3A	Overview of System and Equipment ▪ Objectives ▪ Logging In ▪ Logging Out ▪ Screen Display ▪ Checking for Understanding ▪ Headsets ▪ Modem ▪ Error Correction ▪ Keyboard ▪ Last Typed Macro Feature ▪ English Macros ▪ Spanish Macros ▪ Telephony Terms
Module 3B	Interactive Terminals ▪ Knowing Your TTY ▪ Closing a Conversation ▪ Typing Background Noises
Module 3C	Overview of System and Equipment (FRS Only) ▪ Malfunctions ▪ Relay Procedures ▪ Confidentiality ▪ Statistics ▪ Handling Obscene Calls ▪ Requesting a Supervisor ▪ Reporting ▪ Macros
Module 4A	Call Processing Procedures ▪ Objectives ▪ Your Role as CA ▪ Call Processing for All States

Module	Module Description
Module 4B	Destinations of Traffic ▪ Destinations not Allowed ▪ IntraLATA Competition ▪ State Differences
Module 4C	Answering Machines and Audiotext ▪ Record Feature ▪ Voice Answering Machine ▪ Voice to TTY Answering Machine ▪ Information Line ▪ Audiotext ▪ Voice Mail ▪ Pagers/Beepers (TTY-Voice) ▪ Pagers/Beepers (Voice - TTY) ▪ Variations ▪ Answering Machine Retrieval
Module 4D	Voice Originated Calls ▪ Local Call Description ▪ Toll Free and Paid ▪ Paid over Sprint Network ▪ Paid over Alternate Carrier ▪ Variations
Module 4E	Long Distance Calling ▪ FONcard ▪ LEC Card ▪ Optional Cards ▪ Pre-Paid Cards ▪ Collect ▪ Third Party ▪ Immediate Credit
Module 4F	VCO and HCO ▪ Voice Carry Over (VCO) ▪ Inbound VCO Branding ▪ Busy Line ▪ No Answer ▪ Two-Line VCO ▪ Hearing Carry Over (HCO) ▪ Non-Branded HCO ▪ Branded HCO

Module	Module Description
Module 4G	Alternate Call Types ▪ VCO to VCO ▪ VCO to TTY ▪ TTY to VCO ▪ HCO to HCO ▪ HCO to TTY ▪ TTY to HCO
Module 4H	Customer Database ▪ Customer Database Feature ▪ Customer Notes Window ▪ UCR Main Menu ▪ Name Submenu ▪ COC Submenu ▪ InterLATA COC ▪ IntraLATA COC ▪ Billing Method Window ▪ Billing Options ▪ Numbers Submenu ▪ Emergency Numbers ▪ Frequently Dialed Numbers (FD) ▪ Blocked Numbers ▪ Customer Notes
Module 4H	Customer Database ▪ Preferences ▪ Answer Type ▪ Language Type ▪ Outdial Restrictions ▪ Macros ▪ Last Number Redial

Module	Module Description
Module 4I	Variations ▪ Busy Signals ▪ Poor Connection ▪ No Answer ▪ Request for Information ▪ Speech Impaired ▪ Pacing Voice Customer ▪ Profanity towards CA ▪ Request for M or F CA ▪ CA Knows Customer ▪ Suicide ▪ Abuse ▪ Illegal Calls ▪ Sensitive Topics ▪ Redialing ▪ Switchboards ▪ Young Children ▪ Inbound ASCII ▪ Repeating Information ▪ Request for Relay Number ▪ Restricted Calls ▪ ASCII on Outbound Line ▪ Regional 800 ▪ Two Calling From Numbers ▪ LEC Service Office ▪ Double Letters ▪ Call Waiting ▪ Conference Calls ▪ Three-Way Calling ▪ Changing CAs ▪ 800 Number Referral ▪ Hard-of-Hearing Customer ▪ Call Backs for TTYs ▪ Multiple Calls
Module 4I	Variations ▪ Call Modification ▪ Holding ▪ Alternate Language ▪ Typing in Parenthesis ▪ Product Information ▪ Spanish Calls ▪ Voice Customer Hangs Up ▪ Variable Time Stamp ▪ TTY Customer Hangs Up ▪ Conversation being Recorded ▪ Prompting Voice for "GA" ▪ Non-Standard TTY Capability ▪ Internet Characters ▪ TTY does not type "GA" ▪ Cellular Long Distance Calls ▪ Party Line Calls

Module	Module Description
Module 5	Emergency Call Processing ▪ Emergency Calls ▪ Non-Emergency Calls ▪ Emergency Incident Form
Module 6A	Performance and Procedures ▪ Performance Measurement Plan ▪ Quality Customer Service ▪ Commitment ▪ Personal Effectiveness ▪ Assessment Survey and Replay ▪ Emergency Procedures ▪ Emergency Assistance Form ▪ Checking for Understanding
Module 6B	Healthy Relay ▪ Introduction ▪ Analogy ▪ Stretching Exercises ▪ CA Reinforcement ▪ Ergonomic Review ▪ Setting up Workstation ▪ GUAM - Get up and move
Module 6B	Healthy Relay ▪ Ergonomic Relief ▪ Slowing the Customer ▪ Overtime Relaxation
Module 7A	Responding Positively ▪ Stress Management ▪ Thoughts and Feelings ▪ Relaxing Emotionally ▪ Thinking Powerfully ▪ Exercise ▪ Nutrition ▪ Relaxation/Meditation ▪ Energy Resource Assessment ▪ Suggested Reading ▪ Leader's Notes
Module 7B	Healthy Detachment ▪ Interactive Communication ▪ TDD Communication ▪ Potential Stressors ▪ Detaching
Module 8	Assessing Performance ▪ Assessment Process ▪ Coaching ▪ Feedback ▪ Pass/Fail Guidelines ▪ Role Plays

Module	Module Description
Module 9	Supervisor as Trainer and Coach ▪ Introduction ▪ Objectives ▪ Being a Coach/Trainer ▪ An Adult Learner ▪ Giving Effective Instruction ▪ Feedback
Module 10	A Healthy Approach to Relay ▪ Learning Continuum ▪ Adult Education ▪ Dale's Cone of Experience ▪ Elements of Lesson Design ▪ Preparation for Training ▪ Warm Ups ▪ Voice Inflection ▪ Handling Interruptions ▪ Prep for Final ▪ Hearing Thru (TDD - Voice) ▪ Hearing Thru (Voice - TDD) ▪ Voice Thru (TDD - Voice) ▪ Voice Thru (Voice - TDD) ▪ Audiotext ▪ Information Lines ▪ Business Answering Machines ▪ Residential Answering Machines ▪ Beepers ▪ Spanish Answering Machine ▪ TTY Answering Machine

Speech-to-Speech Training Outline

Module 1	Orientation ▪ Objectives ▪ Welcome & Introductions ▪ Description ▪ History	What is Speech to Speech Differences from Relay Agent Training
Module 2	Speech to Speech Customers ▪ Objectives ▪ Introduction ▪ Phone Image ▪ Characteristics of Speech to Speech Customers ▪ Breaking the Stereotypes	Varying Speech Patterns Voice Synthesizers Types of Calls Transparency & Confidentiality Phrases
Module 3	Attributes of STS CAs ▪ Objectives ▪ Patience ▪ Concentration ▪ Listening Skills	Caller Control Sensitivity and Understanding
Module 4A	Call Processing Procedures ▪ Objectives ▪ Your Role as CA ▪ Billing ▪ Directory Assistance ▪ Changing CAs	
Module 4B	Answering Machines and Audiotext ▪ Answering Machines ▪ SA to SD Answering Machine ▪ Busy/Disconnects ▪ Audiotext Message ▪ Pagers/Beepers	
Module 4C	Emergency Call Processing ▪ Emergency Services ▪ EM Numbers ▪ Emergency Incident Form	
Module 4D	Variations ▪ Outbound to Relay ▪ Personal Conversations ▪ Operator Calls ▪ Talking on Hold ▪ Keeping the Customer Informed ▪ Differentiating STS and Relay ▪ Outdialing to STS	Using GA Spelling Announcement 900 Calls Request to Hold SD to SD through STS Non STS Calls

Sprint CapTel Training Outline

1.0 Training Summary Outline

1.1 Introduction/Tour

Introductions: Lead trainer, training assistant, Call Center director, and other administrative personnel that may be involved in the first day of training. Prospective CAs is given a tour of the building and the facilities. Each individual is given a security passkey and shown how to use it. The CTI building is a secured facility and the passkey is needed to enter the parking lot after normal business hours, enter the building and gain access to the Call Center floor by stairway or elevator.

1.2 Human Resources Overview

The Human Resource coordinator meets with each group to go over required employment paperwork for the State of Wisconsin, Call Center policies, non-disclosure agreement, confidentiality requirements, expected standards that must be met to pass out of training, and current scheduling needs.

1.3 Videos

Several videos are shown to better demonstrate the job of a CA and how the technology works and how it provides improved communication for our clients. After each video, questions are answered or clarified as needed.

1.4 Mini Demonstration *CapTel* Phone

A brief explanation of the *CapTel* phone and the captioning system is given including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using the *CapTel* phone. This helps individuals to better understand what we are asking them to provide our clients and what the client experiences.

1.5 Introduction - Developing a Personal Voice Profile

Developing a personal voice profile is the most important step to successfully process *CapTel* calls. CAs is given specific instruction as to how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy.

1.6 Introduction - Training Program

The *CapTel* training program allows individuals to listen to various pre-recorded scripts and “re-voice” what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the

computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

1.7 Introduction - Call Handling Tools

Macros are utilized to aid in the speed and accuracy of calls. CAs listens to pre-recorded scripts that consist mainly of macro type words and learn to utilize the macros accordingly.

1.8 Introduction - Call Handling Skills –Pacing a Conversation

CAs are introduced to further call handling skills that allow them to pace various calls in order to provide accurate captions.

1.9 Introduction - Call Handling Skills – Inserting Words

CapTel trains its CAs to insert particular words that the Voice Recognition is not able to caption successfully or in a consistent manner. These words include such things as people's names and regional cities and towns.

1.10 Introduction – How to Handle Various Recordings

CAs is introduced to various types of calls and how to handle each. The importance of verbatim transcription, confidentiality, accuracy and speed are reviewed. CAs views a demonstration by the training assistant, and then each CA is assigned scripts relating to answering machines and automated recordings.

1.11 Introduction & Demo of *CapTel* Conversation

Each trainee observes each end of the "telephone call", (CA, *CapTel* user, hearing person). Each CA assists in making "live" calls to other trainees. This encourages each CA to observe and experience what our clients experience on every call. It also allows the CA who is captioning an opportunity to practice their learned techniques on more realistic, true to life calls.

2.0 Introduction to Call Simulation

Live call simulation allows CAs to gain exposure to real incoming calls landing on the production floor, however they do not interfere with the quality of captions going to the *CapTel* user. New CAs is paired with experienced CAs on the production floor to observe and listen to live calls.

2.1 Call Simulation-Timings

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy baseline timings provide a

progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

2.2 Review of Baseline Timings

Training Scripts are assigned to the group. One at a time, each CA meets with the trainer to review their baseline timings. Feedback and review of standards and expectation are given.

2.3 Introduction to Correction Tool

The correction tool is introduced to provide CAs with another opportunity to provide the highest quality captions.

2.4 Review Training Elements

CAs meets as a group with the trainer to review the various elements that enable them to provide the quality of captions we expect from each CA.

3.0 Monthly Timing Policy

CTI's monthly timing policy is reviewed with all CAs. The importance of successfully passing these timings is emphasized.

3.1 Call Simulation-Timings

CAs is placed into a rotation of call simulation and receives an official timing. This second timing is a base-line timing in which re-voicing accuracy and call handling skills along with the ability to correct errors are evaluated. Each CA is unaware of when the timing will occur.

4.0 Production Floor Orientation

Current supervisors meet with the group of CAs to go over specific Call Floor procedures, expectations, break adherence, time clock, lockers, emergency plans, and point of contact individuals for questions and assistance.

CAs continue to progress onto the production floor and practice in the training room as needed. CAs are timed each day and progress is reviewed until a CA meets the expected standards or it is determined the individual is not suited for the position. Action is taken as necessary.

Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Ethics.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Posses the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

Appendix B: TRS Pledge of Confidentiality

RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISITORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. **ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL.** The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

_____

EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE DATE

_____ _____

MANAGER/SUPERVISOR SIGNATURE DATE

CapTel CA Pledge of Confidentiality

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the *CapTel* management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any *CapTel* call.
- I will not act upon any information received while processing a *CapTel* call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel* Inc.
- I will not share any information about *CapTel* calls with anyone except a member of the *CapTel* Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel* Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel* Inc. management staff.
- I will not share with anyone any technical aspect of my position at *CapTel* Inc. unless asked by a member of the *CapTel* Inc. management staff.

- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at *CapTel* Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

_____

Employee Name Date

Appendix C: E 911 Call Procedure

Sprint uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a “hot key”.
- The CA’s terminal sends a query to the E911 database containing the caller's geographic area ANI.
- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller’s ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller’s ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller’s ANI to the E911 center operator.

When a CapTel user dials 9-1-1, Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller’s Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.

If a CapTel user had only one line connected to their CapTel phone, captions will not be engaged on the call. A prompt on the phone will instruct the CapTel user how to communicate with the 9-1-1 center to request Voice-Carry-Over communications to begin. The PSAP would be engaged in typing directly to the user, and the user would be able to speak to the 911 dispatcher.

Appendix D: Sprint Carrier of Choice Letter of Invitation

(date)

(name)
(Company name)
(address)
(telephone)
(fax)
(e-mail address)

Re: (Customer's name and phone number – requested LEC for COC)

Thank you for your interest to complete (Company Name) Long Distance calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use (Company Name) LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS.

The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is

not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you *are a participating member* at Sprint Carrier of Choice program, please disregard.
2. If you *are not a participating member* at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Non-facility based provider

1. If your underlying toll carrier *is a participating member* at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.
2. If your underlying toll carrier *is not a participating member* at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

3. Your CIC codes or your underlying toll carrier CIC codes associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.
4. You or your underlying toll carrier will need to support SS7 tandem interconnection.
5. You or your underlying toll carrier will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair ***60, 66, and 67***.
6. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

   Note*: For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.*

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access

Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days).

Information obtained from the carriers will be used solely for the purpose of providing equal access for (Company Name) **LD customers and shall be held proprietary.**

Sprint welcomes your company's participation in our TRS Carrier of Choice program at **no cost** to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue.

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint
Angela Officer, Program Manager, Sprint

Attachment A

Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

Entity	CIC Code
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

Attachment B

Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern E
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

Attachment C

S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager
<Street1> <Street2>
<City>, <State> <Zip Code>
FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

1. **Regional COC Tandems**

   You will need to provide Sprint with the following:

   Toll Carrier: < insert name>

   CIC Code: <insert CIC)

   Underlying Toll Carrier: <insert name>
   Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern E
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

2. <u>Call Type Restrictions</u>

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

<u>OR</u>

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

Appendix E: Sprint Route Outage Prevention Programs

Call Before You Dig Program

This program uses a nationwide 800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

Route Surveillance Program

This is a Network Operations department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

Technician Program

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

Fiber/Switch Trending Program

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

Network Management and Control Systems

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for

maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOCC in cases where a network problem may affect Puerto Rico operations. In cases such as these, the NOCC or RCC immediately alerts the ESOCC of the situation so that appropriate steps can be taken to minimize service impacts. The NOCC and RCCs also serve as reference points for the ESOCC when problems are detected in the TRS center that is not the result of internal center operations.

Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect the Puerto Rico call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management, into a two-level organization which maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmental
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

CAPTEL OUTAGE PREVENTION

Sprint will provide FCC compliant *CapTel* service from the two *CapTel* Service Centers in Madison and Milwaukee, WI. Sprint's *CapTel* vendor *CapTel Inc*. (CTI) operates the two current *CapTel* Service Centers in the nation. These unique Centers operate with enough terminals for 200 agents each, along with support personnel, Technicians, and Supervisors.

Both *CapTel* Service Centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two *CapTel* Service Centres ensures minimum interruptions in service if something unexpectedly halts operations in one Center or the other such as a flood or a tornado. In those instances, traffic from one Center can automatically be routed to the other.

Appendix F: Disaster Recovery Plan

Sprint's comprehensive Disaster Recovery Plan developed for Puerto Rico details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the Puerto Rico Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation of Puerto Rico is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other States; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore Puerto Rico to its full operating level in the shortest possible time.

Puerto Rico Notification Procedure

To provide Puerto Rico with the most complete and timely information on problems affecting their TRS, the trouble reporting procedure for Puerto Rico will include three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the Puerto Rico within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to Puerto Rico has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Puerto Rico Administrator within five business days of return to normal operation. Examples of service disruption to Puerto Rico include:

- ACD failure or malfunction

- Major transmission facility blockage
- Threat to Puerto Rico CA's safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC) in Overland Park, KS.

Disaster Recovery Procedures

If the problem is within the relay center serving Puerto Rico, maintenance can usually be performed by the on-site technician, with assistance from Sprint's ESOCC. If the problem occurs during non-business hours and requires on-site assistance, the ESOCC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

Time Frames for Service Restoration

Complete or Partial Loss of Service Due to Sprint Equipment or Facilities

- **Sprint Call Center Equipment -** A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- **Sprint or Telco Network Facilities -** For an outage of facilities directly serving Puerto Rico, incoming TRS calls will immediately be routed to one of ten other centers throughout the US. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- **Due to Utilities or Disaster at the Center -** Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.
- **Due to Telco Facilities Equipment** - A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a Telco central office - In (CITY), for example, only local (CITY) residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

Trouble Reporting Procedures

The following information is required when a Puerto Rico user is reporting trouble:

- Service Description Puerto Rico
- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by Puerto Rico users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the ESOCC will handle calls from the Customer Service agents 24 hours a day, 7 days a week. The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's11 TRS Call Centers to respond quickly to any event, including natural disasters.

Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1 Time to Investigate + Time to Repair + Time to Notify

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table A-2 Current MTTR Objectives

Switched Services	8 Hours
Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

Escalation Procedures

If adequate results have not been achieved within two hours, a Puerto Rico user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3 Escalation Levels

Escalation Level	Contact	Phone
2	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
3	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

Service Reliability

Sprint's service is provided over an all-fiber sophisticated management control networks support backbone networks with digital switching architecture that. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network, with significant fiber miles in Puerto Rico, provides critical advantages over the other carriers. These advantages include:

- **Quality**
  Since voice or data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- **Economy**
  The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings onto our customers.

- **Expandability**
  As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- **Survivability**
  Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Puerto Rico, and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The XXXX LATAs in Puerto Rico are served by XXXX Sprint POPs. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With XXXX POPs in the state, all areas will be adequately serviced by Sprint.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. Puerto Rico would primarily be served by the DMS switches in XXXXXXXXXXXXXXX, with other diversely located facilities also serving Puerto Rico.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability

through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control centers. These factors combine to assure outstanding network performance and reliability for Puerto Rico.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Sprint Outage Notification from *CapTel* Service Center

Performance at the *CapTel* Service Center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the *CapTel* Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the *CapTel* Service Center, OR
- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
    - An accidental switch rebooting
    - Loss of transmission facilities through the telephone network
    - Terrorist attack
    - Bomb threat or other work stoppage
    - Sudden loss of agent position capabilities.
    - Impact to minimum ASA / Speed of Answer times
    - Acts of God

Contact from the *CapTel* Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

1) What time did the outage happen in CENTRAL TIME?
2) What caused it?
3) Which customers are (or were) impacted?
4) What is (was) the solution to restore service?
5) What is the time that service will be (or was restored by) IN CENTRAL TIME?

Sprint Procedure for Outage Notification to Contract Administrators during Business Hours

Upon receiving notification from CTI during business hours (8AM to 5PM CT), Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 468-4345 M: (925) 895-9176 E: John.E.Moore@sprint.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable CA positions or, local area network outages, the *CapTel* Center on-site technician will notify *CapTel* Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 15 minutes will be email to the state Contract Administrator.

If the problem is within the *CapTel* Center, maintenance can usually be performed by the on-site technicians. Hardware spares are retailed at the *CapTel* Service center to allow for the most common type of repair required without the ordering of additional equipment.

Sprint Procedure for Outage Notification to Contract Administrators outside of Business Hours

Upon receiving notification from CTI outside of business hours (5PM to 8AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify Contract Administrators immediately by email of an outage if possible, but by no later than 8AM CT the next business day. Follow-ups and post-mortem will still be provided within the required guidelines.

Disaster Recovery Follow-Up

Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with CapTel Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

Disaster Recovery Post-mortem documentation

72 hours (3 days) after the outage is resolved, CTI will need to provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point of contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

1) What time did the outage happen in CENTRAL TIME?
2) What caused it?
3) Which customers are or were impacted?
4) What is the solution to restore service?
5) What is the time that service will be or was restored IN CENTRAL TIME?
6) What will *CapTel*, Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

Time Frames for Service Restoration

Complete loss of service due to equipment -

- Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level
- Four hours at second level
- Eight hours at third level

These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level

- Twenty-four hours at second level

These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

Trouble Reporting Procedures (for Individual Customers to Customer Service)

All calls concerning customer service issues should be placed by dialing the *CapTel* Customer Service at 1-888-269-7477 (800-482-2424 TTY) in English only. A Customer Service agent will take information concerning:

- Caller's Name
- Contact Number
- Calling to / Calling from (if applicable)
- Description of the trouble

Report service affecting trouble to Customer Service during normal business hours, 8:00 AM to 5:00 PM Central Time, Monday through Friday. Normal business hours do not include Saturday, Sunday, and holidays.

Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 captel@captelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@captelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(877) 437-4660 Pam.Frazier@captelmail.com

Table 4 – CapTel Customer Service Escalation Procedures

Hours outside the normal business day are 5:00 PM to 8:00 AM Central Time for every day of the week (Monday through Friday), and all day Saturday, Sunday, and holidays. Outside of normal business day hours, a recording will play and trouble calls can leave a message for customer service to follow up during the next business day.

The recording played to customers outside of CapTel customer service business hours:

Thank you for calling CapTel customer service. Our hours are Monday through Friday
from 8AM to 5PM central time. You may try again during business hours or leave a
Voice mail message by pressing 3 now.

If the "3" button is pressed, then the customer will hear the following message:

Thank you for calling CapTel customer service. We are unable to take your call at this time. Please leave a detailed message with your name and phone number with area

code, or email address, and a reason for your call, and one of our representatives will return your call as soon as possible.

Alternative usage for CapTel phone during outage for VCO users.

CapTel phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 711 (user must dial only 711 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call.

Appendix G: Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as "CA".	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State's requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA's tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system's ability to answer an incoming call based on the previous call in the caller's communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system's ability to brand the caller's preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialed and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE]RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE]RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

Appendix H: Policy on 10- and 15-Minute Rule

Sprint understands that a change of CAs can interrupt the natural call flow. Therefore, Sprint strives to keep the same CA dedicated to each call. Sprint will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for Speech-to-Speech call). If a change of CA is unavoidable, CAs is trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in their headset at the position and watch the call for several minutes in order to assess the "spirit" of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY user:

"THIS IS CA # CONTINUING YOUR CALL."

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

Appendix I: FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Provision of Services		
δ 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.	Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.
	Speech-to-speech relay service shall be provided by March 1, 2001.	Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).
	Interstate Spanish language relay service shall be provided by March 1, 2001.	Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.
	In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.
Operational Standards		
δ 64.604 A.1	Communications Assistant (CA) Competency Skills	
	CAs is to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.
	Typing Speed - 60 WPM with technological aids	Each Sprint CA is required to take the 60 WPM typing test quarterly (four times a year).
	Oral-to-type tests	Sprint administers Oral-to-type tests.
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
		to RID Code of Ethics.
δ 64.604 A.2	Confidentiality & Conversation Context CAs are prohibited from disclosing the content of any relayed conversation regardless of content Certain exceptions are provided for Speech-to-Speech calls. CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise	CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided. Sprint CAs are prohibited from disclosing any call content. STS CAs is permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls. CAs relay calls verbatim and does not alter relayed conversation. During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.
δ 64.604 A.3	Types of Calls CAs is prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services. TRS shall be capable of handling any type of call normally provided by common carriers.	CAs processes all calls and never prohibits sequential calls or limit length of calls. Sprint TRS is capable of handling all call types normally provided by common carriers
δ 64.604 A.4	Handling of Emergency Calls Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP. A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.	Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP. CAs passes along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.
δ 64.604 A.5	In-call Replacement of CAs CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes. STS CAs – 15 minutes.	TRS and VRS CAs stay on the call for a minimum of 10 minutes. STS CAs stays on the call for a minimum of 15 minutes.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.
δ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user. Sprint will provide the STS user information to any new provider.
	Technical Standards	
δ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use. The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.
δ 64.604 B.2	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. Abandoned calls shall be included in the speed-of-answer calculation. Speed of Answer is to be measured on a daily basis. The system shall be designed to a P.01 standard.	Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of -answer calculation. Speed of Answer is measured on a daily basis. Sprint's system is designed to the P.01 standards.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.604 B.3	Equal Access to IXCs TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.	Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.
δ 64.604 B.4	TRS Facilities TRS shall operate everyday, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.	Sprint TRS is available 24 hours a day, everyday. Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use. Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.
δ 64.604 B.5	Technology No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities. VCO & HCO technology are required to be standard features of TRS.	Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression. Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.
δ 64.604 B.6	Voicemail & Interactive Menus CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal. TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.	CAs keeps the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call. Sprint does not charge for any additional calls necessary to complete call involving recorded or interactive menus.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	TRS will handle pay-per-calls.	Sprint was the first provider to process pay-per-calls (Texas, 1996).
	Functional Standards	
δ 64.604 C.1	Consumer Complaint Logs States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution. States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.	Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution. Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st. Sprint has submitted annual summary of Consumer Complaints log report: June 1, 2002-May 31, 2003 June 1, 2003-May 31, 2004 June 1, 2004-May 31, 2005 June 1, 2005-May 31, 2006 June 1, 2006-May 31, 2007
δ 64.604 C.2	Contact Persons States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
δ 64.604 C.3	Public Access to Info Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 accesses in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	Conduct ongoing education and outreach programs to publicize availability of 711 access.	Sprint regularly provides 711 dialing information in its education and outreach programs.
δ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.
δ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (SOLIX, INC.)	(i) Sprint follows FCC requirements in the jurisdictional separation of costs. (ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism. (iii) Sprint works with SOLIX, INC. for reimbursement of interstate minutes.
δ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.
δ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data	Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	revealed in any other way by Sprint, or Sprint employees.
δ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities Transmittal of Calling Party Information	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (¶16) Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (¶22) Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider.(¶25)	Sprint's SS7 platform supports Caller ID services. Sprint complies with all FCC rules pertaining Caller ID and call blocking services. Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS. Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (¶36)	Sprint has provided the VCO and HCO calling combinations since 1996.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Handling of Emergency Calls	Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (¶42) This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)	Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party. Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (¶62)	Sprint has provided the Answering Machine Retrieval since 1996.
Call Release	Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation. Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (¶68) This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided the Call Release feature since 2003. Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.
Speed Dialing	Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.
Three-way Calling	Three-way calling feature is generally arranged in one of two ways. (¶73) 1. The TRS consumer may request that the CA set up the call with two other parties or; 2. The second way is to set up a three-way call is for TRS user to	Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	

Appendix J: FCC CapTel Mandatory Minimum Standards & Compliance Matrix

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
		Provision of Services	
δ 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers. Speech-to-speech relay service shall be provided by March 1, 2001. Interstate Spanish language relay service shall be provided by March 1, 2001. In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing 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." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition – i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities – we conclude that captioned telephone VCO service falls within statutory definition of TRS. (¶7)	Sprint has been a CapTel provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-complaint CapTel service, first -ever in the TRS Industry. Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3. Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004. Sprint is able to process inbound 711 calls to include access to CapTel services.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
	Operational Standards		
δ 64.604 A.1	Communications Assistant (CA) Competency Skills	Requirement applies.	Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAs is to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Use of CapTel's voice recognition software "is a permissible means …for achieving the CA's competency skills required by the TRS mandatory minimum standards" (¶39).	All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.
	CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	Waived. Interpreting typed ASL is not applicable.	A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL
	Typing Speed - 60 WPM with technological aids	Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for … enhancing transmission speed…"(¶39)	CapTel's voice recognition technology transmits above 100 WPM.
	Oral-to-type tests	Waived. Permits use of Oral-to-text tests instead.	Oral to text tests are given to all CapTel CAs
δ 64.604 A.2	Confidentiality & Conversation Context		
	CAs is prohibited from disclosing the content of any relayed conversation regardless of content.	Requirement applies.	CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.
	CAs is prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.	Requirement applies.	CapTel CAs is prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 A.3	Types of Calls CAs is prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services. TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.	Waived for outbound calls (¶ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (¶46) Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call (¶46). Requirement applies. Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound 711 calling waived for one year (8/1/03 – 7/31/04). Also STS and HCO are waived (¶29).	CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls. CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call. CapTel is capable of handling all call types normally provided by common carriers.
δ 64.604 A.4	Handling of Emergency Calls Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP. A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.	Requirement applies. Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 A.5	In-call Replacement of CAs CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.	Requirement applies.	CapTel CAs stay on all calls for a minimum of 10 minutes.
δ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Waived. (¶ 36, 47-48).	
δ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	Waived. (¶29)	
Technical Standards			
δ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Waived. (¶53-54)	

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.2	Speed of Answer		
	TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	Requirement applies Requirement applies.	Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.
	Abandoned calls shall be included in the speed-of-answer calculation.	Requirement applies.	Abandoned calls are included in the speed-of -answer calculation.
	Speed of Answer is to be measured on a daily basis. The system shall be designed to a P.01 standard.		Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.
δ 64.604 B.3	Equal Access to IXCs		
	TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.	Requirement applies.	CapTel users will be able to choose their IXC carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to voice users.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.4	TRS Facilities TRS shall operate everyday, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.	FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (¶ 22, 24) State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (¶ 22).	Sprint CapTel is available 24 hours a day, everyday. Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use. Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.
δ 64.604 B.5	Technology No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities. VCO & HCO technology are required to be standard features of TRS.	FCC acknowledged that CapTel is an enhanced VCO service of TRS (¶ 44). Waived for HCO. (¶ 29)	Sprint is the nation's leader in the development and offering of technological features for TRS.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.6	Voicemail & Interactive Menus CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal. TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages. TRS will handle pay-per-calls.	Requirement applies. Requirement applies.	CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call. Sprint CapTel supports pay-per-call call types.
Functional Standards			

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 C.1	Consumer Complaint Logs States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution. States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.	Requirement applies.	Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution. Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.
δ 64.604 C.2	Contact Persons States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	Requirement applies.	Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
δ 64.604 C.3	Public Access to Info Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS. Conduct ongoing education and outreach programs to publicize availability of 711 access.	Requirement applies.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 accesses in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	Requirement applies.	CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.
δ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (SOLIX, INC.)	Requirement applies.	(i) Sprint follows FCC requirements in the jurisdictional separation of costs. (ii) Interstate CapTel is recovered from all subscribers of interstate services (iii) Sprint works with SOLIX, INC. for reimbursement of interstate minutes.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	Requirement applies.	The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.
δ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Requirement applies.	Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.
δ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators. Sprint CapTel will deliver the SS7 technology on February 1, 2004.
Types of Calls	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived. VCO requirements still apply.	Sprint CapTel supports the VCO calling combinations.
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call directly to the most appropriate PSAP.
Answering Machine Retrieval	Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users. Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.	The requirement was not addressed in the Declaratory Ruling.	Answering machine and voicemail retrieval is provided by CapTel. Answering machine retrieval through CapTel is accomplished when the CapTel facility caption the voice message to the CapTel users.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	Concluded that call release is required under FCC's functional equivalency mandate. Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.	Waived. (¶ 52)	
Speed Dialing	Concluded that speed dialing feature is required under FCC's equivalency mandate. Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.	The requirement was not addressed in the Declaratory ruling.	CapTel telephones have the Speed Dial feature.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide. The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways " One way is for the TRS consumer to request that the CA set up the call with two other parties. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.	The requirement was not addressed in the Declaratory Ruling.	Sprint CapTel users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint CapTel meets the requirement for three-way calling. (For One-Line CapTel.) For Two-Line CapTel either party can initiate a 3 way call should the user purchased this as a LEC option. Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals.

Appendix K: Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report
April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dissimilar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP (VoIP) requires Quality of Service. QoS means that all the associated data packets	We are currently providing two-line VCO and HCO controlled at the agent

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dissimilar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies. Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.	position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated Number	Sprint implemented a "manual" (directory assistance lookup)	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated Number	No additional information to submit beyond our recent submission to

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to interexchange	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					carrier features for Video Relay Service.	
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO – to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. the videoconferencing via internet or ISDN protocols is not compatible.
11. HCO – t o-TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO – to – VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			compatible.			ISDN protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not need to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						between two video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

Appendix L: Sprint Relay Fact Sheet

Sprint Relay
www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

Sprint Relay Services

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:
Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by SOLIX, INC. (National Exchange Carriers Association).

Currently, two technologies are funded through SOLIX, INC. – video and Internet relay services. There is strong competition in the TRS industry due to the fact

that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experience Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.

2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

CapTel℠ (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, *CapTel*-equipped phone is required in order to place a call through the *CapTel* relay service. The *CapTel* phone works like any traditional phone with callers talking and listening to

each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the *CapTel* phone's built-in screen so the user can read the words while listening to the voice of the other party. For more information on CapTel, visit www.captionedtelephone.com.

Relay Conference Captioning[SM] , developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled Captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit www.sprintrelay.com

Appendix M: Copy of TSP Press Release

Media Contact:
Stephanie Taliaferro, 913-794-3658
stephanie.c.taliaferro@sprint.com General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when

telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services

Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and Wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.

Appendix N: TRS Information in Telephone Directories

SERVICIO DE RELEVO DE TELECOMUNICACIONES

Las personas con impedimentos de audición o del habla pueden comunicarse por teléfono con personas oyentes a cualquier hora y día del año. Puerto Rico Telephone comenzó a ofrecer el 15 de julio de 1993 el Servicio de Relevo de Telecomunicaciones (SRT). El personal del Centro de Relevo, llamado Asistente de Comunicaciones (AC), recibirá el mensaje en texto enviado por el audioimpedido y lo leerá en voz alta al oyente a través de otra línea y viceversa.

Ya está disponible el servicio STS *(Speech-to-speech)* en los idiomas español e inglés. Este servicio consiste en la utilización de Asistente de Comunicaciones (AC) que comprenden los patrones del habla de las personas con impedimentos del habla, y pueden repetirle las palabras al otro interlocutor.

¿Cómo funciona el servicio de mensaje en texto?

Para comunicarse, las personas con impedimento de audición o del habla utilizan un teléfono de texto (TT) conectado a un teléfono de voz para mecanografiar su parte de la conversación.

Si es usted una persona con impedimentos...

1. Coloque el manófono del teléfono sobre TT.
2. Llame al Centro de Relevo:
   1-800-240-2050 (Texto)
3. Espere a que el Centro le escriba la contestación.
4. Escriba el nombre y el número de teléfono de la persona con quien desea comunicarse y/o el tipo de servicio deseado.
5. El AC le indicará cuándo puede comenzar su conversación. Escriba "GA" para indicarle a la otra persona que puede hablar, "SK" para indicar que usted terminó de hablar y "SKSK" cuando recibe un "SK" y está de acuerdo con finalizar la conversación.
6. Si desea hacer otra llamada, no enganche; el AC le completará todas sus llamadas.

Si es usted el oyente...

1. Llame al Centro de Relevo: ***1-800-260-2050 (Voz)***
2. Indique el nombre y número de teléfono de la persona con quien desea comunicarse.
3. El AC le indicará cuándo puede comenzar su conversación. Diga "GA", "Go Ahead" o "Adelante" para indicarle a la otra persona que puede hablar; "SK", "Stop Keying" o "Es todo" para indicar que terminó de hablar, y "SKSK" o "Adiós" cuando reciba "SK" y esté de acuerdo con finalizar la conversación.
4. Si desea hacer otra llamada, no enganche; el AC le completará todas las llamadas que requieran SRT.

LLAMADAS DENTRO Y FUERA DE PUERTO RICO UTILIZANDO EL SERVICIO DE RELEVO DE TELECOMUNICACIONES (SRT)

Toda llamada es manejada con la más estricta confidencialidad y sin límite de tiempo. Información adicional sobre SRT y/o los teléfonos de texto disponibles (TDD), puede llamar a su Representante de Servicio al 1-800-981-2050 (llamadas originadas desde teléfonos de texto solamente).

Para nuestro servicio de Relevo de Telecomunicaciones pueden marcar: 7-1-1

	Texto (TT)	Voz (TDD)
PRT/PRTLD	1-800-240-2050	1-800-260-2050
SPRINT	1-866-280-2050	1-866-280-2051
AT&T	1-800-342-7762	1-800-342-7760
TLD	1-800-208-2828	1-800-290-2828
MCI	1-800-688-4889	1-800-947-8642

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Appendix O: Copy of Telephone Bill Inserts

PRT
Puerto Rico Telephone

PARA SERVICIOS LLAME AL:
787-775-0000
Solicitud de Servicio Residencial/
Negocio Pequeño
Orientación de factura
Residencial/Negocios

6-1-1
Reportar Averías de Residencias
Contrato de Mantenimiento
Residencias

787 792-6262
Ventas Servicios a Empresas

787 729-3131
Reportar Averías Negocios

Visítanos en:
www.telefonicapr.com

** Usted tiene 20 días después de la fecha de envío de la factura para pagar, reclamar y/o solicitar investigación inicial de aquellos cargos corrientes, llamando al Representante de Servicio a través del 787-775-0000.*

** Para evitar una penalidad por balance vencido de 1.5% en su factura, el pago debe ser recibido en o antes de 13 MAY 2007.*

Balances en Atrasos o Créditos	**$0.0**
Resumen de Cargos Corrientes	
Servicios PRT	
Renta Servicios Básicos Mensuales	276.0
Acceso Línea Impuesto por la FCC	46.0
Servicio Medido / Servicio Local	132.9
Cargos Directorio	0.0
WATS	0.0
Uso de Información	3.7
Otros Cargos y/o Créditos	10.6
Total de Servicios PRT	469.4
Total de Larga Distancia	0.0
TOTAL DE CARGOS CORRIENTES	469.4
Fecha de Vencimiento	08 MAY 2007
TOTAL A PAGAR	**$469.42**

AVISO

A partir del 13 de abril de 2007, el número de teléfono 8-1-1 para contactar Servicio al Cliente cambiará al 787-775-0000, un número local de 10 dígitos a utilizarse desde cualquier punto de la isla. Este cambio se debe a que la Comisión Federal de Comunicaciones ha designado el número telefónico 8-1-1 como número nacional para los Centros de Excavaciones; en conformidad con el "Pipeline Safety Improvement Act del 2002".

Desprenda aquí y devuelva el talonario con su pago.

Total a pagar después del 13 MAY 2007
$476.46

Total a pagar en o antes del 08 MAY 2007
$469.42

Cantidad Enviada
$

PRT
Puerto Rico Telephone

CKDE 00

08 ABR 24 OFIC. INVESTIGACIONES

2 71535

PRT
Puerto Rico Telephone

SERVICIOS PRT

Renta Servicios Básicos Mensuales

Número del Teléfono	Unidades	Descripción del Servicio	Cantidad
787 977-5677	1	BUS MAIN LINE KEY TEL SYS	$36.65
	1	LOCAL NUMBER PORTABILITY CHARGE	0.24
	1	GROUP HUNT FEA BUS MAIN	10.00
	1	CARGO POR SERVICIO 9-1-1	1.00
	1	CARGO SERVICIO AREA EXTENDIDA	2.25
Servicios Básicos Mensuales del 787 977-5677			50.14
787 977-5678	1	ADD BUS MAIN LINE KEY TEL	36.65
	1	LOCAL NUMBER PORTABILITY CHARGE	0.24
	1	CARGO POR SERVICIO 9-1-1	1.00
	1	CARGO SERVICIO AREA EXTENDIDA	2.25
Servicios Básicos Mensuales del 787 977-5678			40.14
787 977-5679	1	ADD BUS MAIN LINE KEY TEL	36.65
	1	LOCAL NUMBER PORTABILITY CHARGE	0.24
	1	CARGO POR SERVICIO 9-1-1	1.00
	1	CARGO SERVICIO AREA EXTENDIDA	2.25
Servicios Básicos Mensuales del 787 977-5679			40.14
787 977-5680	1	ADD BUS MAIN LINE KEY TEL	36.65
	1	LOCAL NUMBER PORTABILITY CHARGE	0.24
	1	CARGO POR SERVICIO 9-1-1	1.00
	1	CARGO SERVICIO AREA EXTENDIDA	2.25
Servicios Básicos Mensuales del 787 977-5680			40.14
787 977-5681	1	TELEFONO ADICIONAL NEGOC	23.05
	3	PROCESSING FEE FOR ADSL SERVICE	0.00
	1	CALL RES 900 & 976 NOT CHGS	0.00
	1	LOCAL NUMBER PORTABILITY CHARGE	0.24
	1	DMAX GENERATION	41.00
	1	DMAX INTERNET ACCESS	18.95
	1	ADSL INTERNET FOR 512K OTHER	18.95
	1	CARGO POR SERVICIO 9-1-1	1.00
	1	CARGO SERVICIO AREA EXTENDIDA	2.25
	1	XDSL PRT	0.00
Servicios Básicos Mensuales del 787 977-5681			105.44
Total de Servicios Básicos Mensuales			**$276.00**

Servicio Medido

Número de Teléfono	Unidades	Permitidas	Exceso	Tarifa	Cantidad
787 977-5677	406	85	321	.13	
787 977-5678	330	85	245	.13	
787 977-5679	345	85	260	.13	
787 977-5680	226	85	141	.13	
787 977-5681	141	85	56	.13	
Total de Servicio Medido					**$32.99**

Uso de Información

Número de Teléfono	Llamadas	Tarifa	Cantidad
787 977-5677	3	1.25	3.75
Total de 411			**$3.75**

PRT
Puerto Rico Telephone

Detalle de Otros Cargos y/o Créditos

Número de Teléfono	*Desde*	*Hasta*	*Referencia*	*Descripción del Servicio*	*Cantidad*
787 977-5677				FEDERAL UNIVERSAL SERVICE FUND CHARGE	$10.32
				FONDO DE SERVICIO UNIVERSAL DE P.R.	0.36
Otros Cargos y/o Créditos del 787 977-5677					10.68
Total de Otros Cargos y/o Créditos					**$10.68**

'07 APR 24 OFIC. INVESTIGACIONES

Appendix P: Copies of Relay Newsletters

Sprint
The point of contact™

Relay today™

Want to Communicate? Go Ahead.℠ Summer/Fall • 200

Sprint Won Relay Service Contract in Puerto Rico

Commonwealth Awards 3-Year Contract

Sprint has been awarded a $3.2 million contract by the Puerto Rico Telecommunications Regulatory Board (TRB) to provide state-of-the-art Telecommunications Relay Service (TRS) to the commonwealth's Deaf, hard-of-hearing, Deaf-blind, and speech disabled citizens. The contract will extend for three years. Service began on Aug. 30, 2001.

Sprint will handle approximately 9,000 relay calls per month, providing dependable and reliable high-capacity service. A Sprint account manager resides in Puerto Rico and provides education and outreach programs concerning relay service.

"The Puerto Rico TRB looks forward to working with Sprint in providing our citizens with a quality and reliable communications capability," said Phoebe Forsythe Isales, president of the TRB. "We are excited about the new services and capabilities Sprint will offer."

Six new toll-free relay numbers have been instituted to enable access to various Relay Services. They are:

Spanish TTY: 866-280-2050
Spanish Voice: 866-280-2051
Spanish Speech-to-Speech: 866-280-2052

English TTY: 866-280-2053
English Voice: 866-280-2054
English Speech-to-Speech: 866-280-2055

Sprint Wins Relay Service Contract in Puerto Rico
continued on page 3

L to R: Phoebe Forsythe Isales, President-Puerto Rico Telecommunications Regulatory Board (PRTRB), Andrew Brenneman, Senior Government Sales Manager and Maria Casablanca Baldrich, PRTRB Attorney

Highlights

Letter from Tony D'Agata
Sprint Relay Welcomes New Puerto Rico Account Manager
7-1-1 Dialing in the State of South Carolina
Federal Relay Service Bridges Worlds of Telecommunication
Sprint Relay℠ Operates through Terrorist Incident with Continuous Quality Service

Appendix Q: Copy of Annual Report or Other

Appendix R: Copy of Relay Brochures or Other Advertisements

Sprint Relay

Servicio de Relevo de Telecomunicaciones de Puerto Rico

Programa de Distribución de Equipo

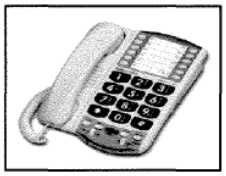
Solicitud para Renta de Equipo con Subsidio del Fondo de Servicio Universal

Equipo de Telecomunicaciones para personas sorda/sordo parcial (TTY)

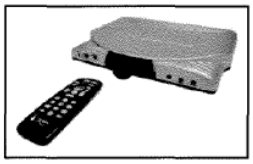
• ***Ultratec Miniprint 425***
Un teléfono de texto que permite a la persona sorda, sordo parcial y aquella persona con problema del habla usar este teléfono con escribir mensaje, leer mensajes o escribir mensajes a otra persona. El TTY requieres que en la parte posterior, conectar a la línea de teléfono o la persona oyente puede hacer una llamada a través de servicio de relevo de Puerto Rico. El Miniprint 425 tiene una conexión directa con dos jacks de teléfono y mensaje contestado automático que imprime los mensajes para que usted lo leas. Tiene una lucecita insertada para notificar cuando el teléfono esté soñando.

• ***Dialogue VCO Phone***
El Diálogo VCO es un teléfono con un potente amplificador y es compatible para audífonos, de la compañía Ameriphone que le permite hacer una llamada VCO a través de servicio de relevo local. Este equipo permite al individuo que no puede oir y desea usar su voz para comunicarse directamente con la otra persona. El mensaje de la otra persona es visto en la pantalla del teléfono. Simplemente habla con el manófono, y luego lee las respuestas en la pantalla.

• ***Ultratec Uniphone 1140***
Hearing Carry Over (HCO) es un teléfono que combinan voz y comunicación en texto por encima de la línea de teléfono. El teléfono HCO permite al individuo que no puede hablar bien escribir su mensaje y escuchar a la persona hablar. Desde que el usuario de HCO escriba su mensaje a la otra persona, la otra persona debe tener un equipo que le permita recibir mensajes o debe usar el Servicio de Relevo de Puerto Rico. (el usuario de VCO quien desea comunicar con amigos sordos escribiendo mensajes en el teclado puede también usar el Uniphone 1140).



• ***Ameriphone Dialogue XL-25s***
El Diálogo XL-25s haces que la voz de la persona sea mas alto (hasta un máximo de 20 dB) para una comunicación de Speech to Speech. El operador/a del Servicio de Relevo de Puerto Rico con destreza cualificado sirve de intermediario para el usuario con problema del habla y repite los mensajes a la otra línea, hasta tanto queda entendido el mensaje.



• ***D-Link DVC 1000 Videophone (i2eye)***
El video-teléfono permite al cliente comunicarse a lo natural con el lenguaje de señas y de modo visual a través de una conexión de Internet de alta velocidad ya sea con DSL o Cable Modem.

"El programa de distribución de equipo está disponible para residentes de Puerto Rico que sean parcial o completamente sordos y/o tengan dificultad del habla y cumplan con los requisitos de elegibilidad del programa. Participar en el programa es libre de costo y el mismo brinda un (1) equipo por hogar. Se requiere tener línea telefónica o servicio de acceso al Internet de alta velocidad."

Para más información puede comunicarse con Elizabeth A. Rios al ***787-775-6775 TTY e-mail: elizabeth.a.rios@sprint.com***

Relevo de Escuchar pero no Hablar (HCO)

EN ESPAÑOL	EN INGLÉS
1-866-280-2050	1-866-280-2053

El servicio HCO permite que los usuarios oyentes con dificultad en el habla escucha a la persona a quien le está llamando.El usuario HCO escribe su conversación para que el operador de relevo lea su mensaje a la persona que recibe la llamada.

De HCO a TTY. Los usuarios de HCO pueden escuchar mientras el operador lee/articula el mensaje escrito del usuario de TTY. El usuario de HCO escribe su conversación directamente al usuario de TTY.

De HCO a HCO. El operador articulará lo que ambas partes escriben en el TTY de cada uno. Permite además el rediscado automático de llamada, corrección de error ortográfico y discado del último número llamado

Transferencia de Voz (VCO)

EN ESPAÑOL	EN INGLÉS
1-866-280-2656	1-866-280-2657

VCO PARA TRADUCCIÓN (ESPAÑOL AL INGLÉS O INGLÉS AL ESPAÑOL)
1-866-280-2657

El servicio de VCO le ofrece a las personas sordas y/o sordos parciales hablar directamente con una persona oyente usando su propia voz. El operador/a de relevo escribe los mensajes de la persona oyente al TTY o a un teléfono VCO (Dialogue VCO) del usuario que tiene la dificultad en escuchar,este a su vez leerá el mensaje.

El servicio VCO de dos lineas permite que el cliente con dos líneas telefónicas y/o una computadora, use una de las líneas para hablar directamente a la persona oyente y la otra para recibir las repuestas escritas de la persona oyente. El resultado es uan comunicación de fluidez más natural, sin pausa en la conversación.

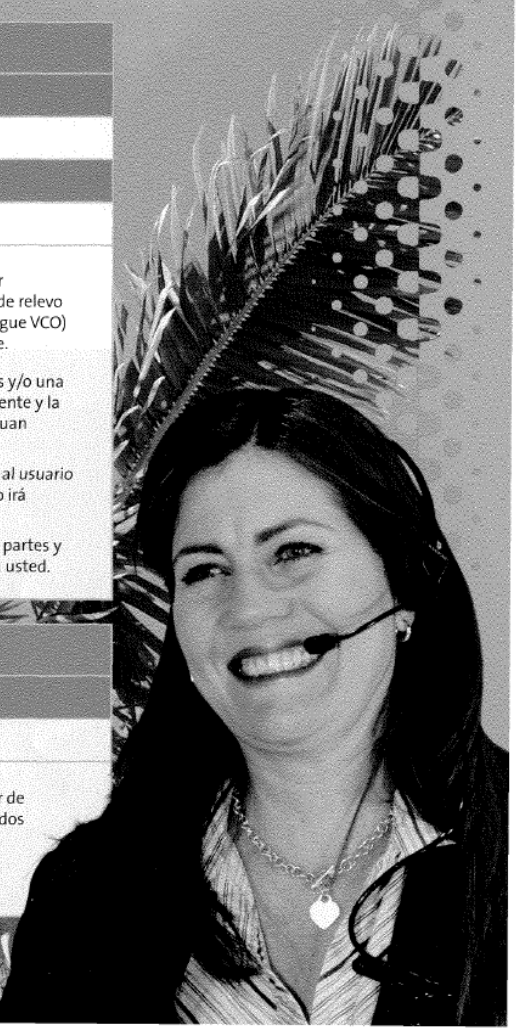
De VCO al TTY. *El operador/a de relevo escribe en el teclado lo que usted diga al usuario* de TTY a quien usted llama. Todo lo que el usuario de TTY escriba en el teclado irá directamente a su TTY o equipo de desplegar texto para que usted lo lea.

De VCO a VCO. El operador/a de relevo hará las veces de "oídos" para las dos partes y escribirá, no sólo lo que usted le diga a su interlocutor, sino lo que le dicen a usted.

Transferencia Voz a Voz (STS)

EN ESPAÑOL	EN INGLÉS
1-866-280-2052	1-866-280-2055

La persona con dificultad del habla puede usar su propia voz o un sintetizador de voz a través del teléfono. Tenemos operadores de relevo altamente cualificados que sirven de voz del usuario con problema del habla. Habrá ocasiones en que se le pedirá al usuario con dificultad del habla que repita su mensaje para asegurar que éste sea comunicado correctamente.



Comuníquese libremente.

Números de llamadas [illegible]

	EN ESPAÑOL	EN INGLÉS
TTY	7-1-1 | 1-866-280-2050	7-1-1 | 1-866-280-2053
VOICE	7-1-1 | 1-866-866-2051	7-1-1 | 1-866-280-2054
VCO	1-866-280-2656	1-866-280-2657
VCO TRADUCCION	1-866-280-2657	1-866-280-2657
HCO	1-866-280-2050	1-866-280-2053
STS	1-866-280-2052	1-866-280-2055
900 CALLS	1-900-230-5656	1-900-230-5656
SERVICIO AL CLIENTE	1-800-676-4290	1-800-676-3777

No hay excusa para una barrera en la comunicación

Puerto Rico 711 RELAY

Servicio de Relevo

Junta Reglamentadora de Telecomunicaciones de Puerto Rico
Resolviendo el mañana, hoy.
Estado Libre Asociado de Puerto Rico

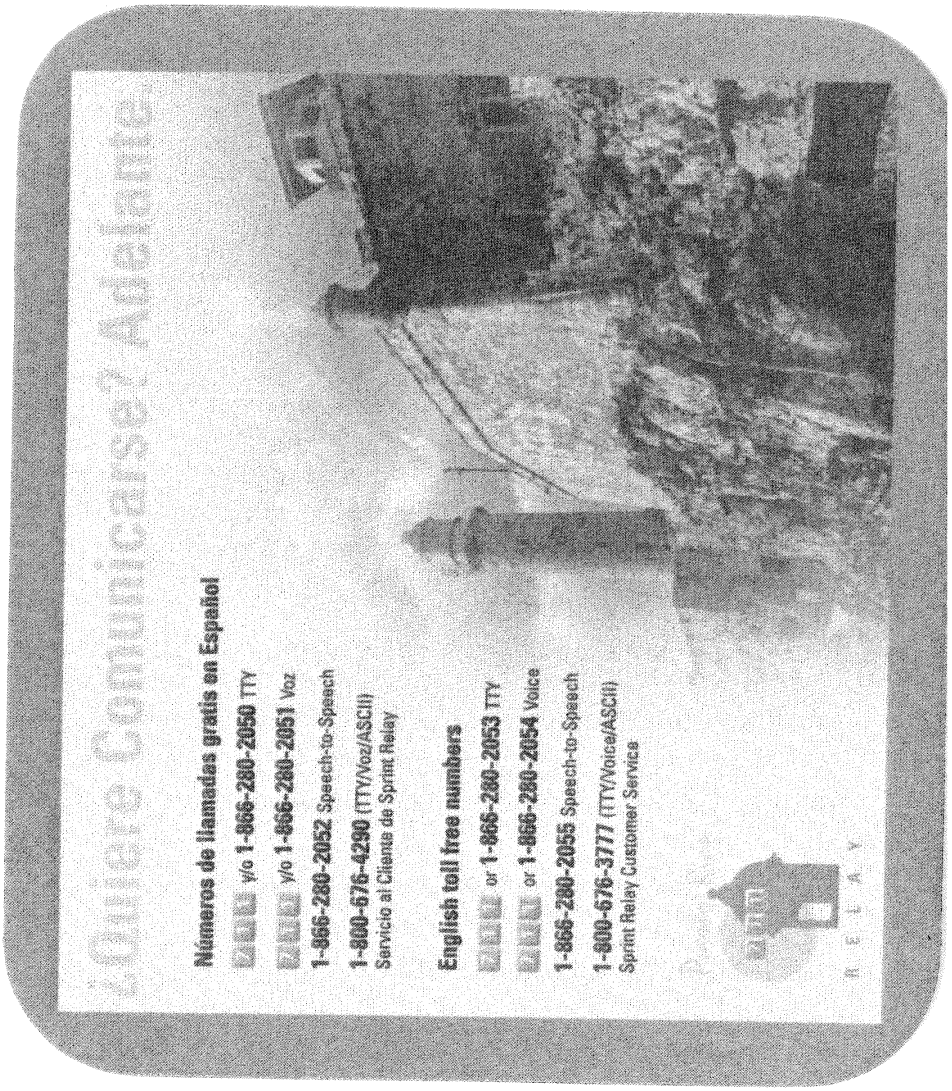
CD with TRS info.

Refrigerator magnet with calling instructions

Sticker

Postcard

Mouse Pad


¿Quiere Comunicarse? Adelante
Números de llamadas gratis en Español
y/o 1-866-280-2050 TTY
y/o 1-866-280-2051 Voz
1-866-280-2052 Speech-to-Speech
1-800-676-4290 (TTY/Voz/ASCII)
Servicio al Cliente de Sprint Relay
English toll free numbers
or 1-866-280-2053 TTY
or 1-866-280-2054 Voice
1-866-280-2055 Speech-to-Speech
1-800-676-3777 (TTY/Voice/ASCII)
Sprint Relay Customer Service
sprint
RELAY

Appendix S: Copy of Legislation or Other Establishing TRS in the State

Puerto Rico's legislation regarding the establishment of the Board, Puerto Rico Universal Service Fund and TRS is referred as to Act 213 approved September 12, 1996. The document is over 50 pages long. For your convenience, the following hyperlink will give you access to Puerto Rico Telecommunications Regulatory Board's Internet site. Once there, you may access the file by selecting Reglamentos/Leyes in the left pane:

http://www.jrtpr.gobierno.pr/

Appendix T: Copies of Complaint Logs from 2002-2007

October 2001

Cat. # of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
24	Customer reports they are unable to reach PR Spanish TTY nbr. Customer receives no answer. Customer has dialed it successfully in the past. Customer is able to reach Customer Service fine. CS rep called the PR Spanish nbr and got through successfully.	10/03/01	Problem ticket has been closed. Tech made test calls and was able to connect. AM could place calls fine. Tech will investigate further.
26	Customer called to CS through relay opr. Customer is Spanish speaking VCO user. Customer is complaining of garbling on his relay calls and said it didn't use to happen. Customer was receiving a lot of garbling while on line with me and relay agent 9482. C	10/15/01	AM placed calls to the customer and there was no answer from customer. Will try again at a later time. For several days anytime, I've been trying to reach the customer. Every time I made a call his line was always busy.
26	Spanish speaking VCO customer cannot read anything from the agents because they are entirely garbled. CS rep talked with this person as well as possible with his limited English and my limited Spanish. Decided that a TT would be entered. TT# 04383397	10/30/01	The number being used by the customer is a long distance number from AT & T. Closed the TT since giving him the other number it took care of the problem

November 2001

Tracking #	Date of Compl.	Cat. # of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
3379E	11/28/01	24	TTY customer cannot reach the relay from his home nbr. He has no problem when at a friend's house but cannot reach it from his nbr and would like this looked into and fixed. RCS response: Apologized for the inconvenience and let the customer know that we would turn in a TT to get the problem corrected. Thanked him for letting us know. TT # 04554623	12/18/01	Contacted customer three times and busy each time. Last night at 10p try again…busy. Looks like customer's problem solved. Will contact again.

Summary Log for June 1, 2001 – May 31, 2002
Puerto Rico Relay

For the period of June 1, 2001 through May 31, 2002, Sprint processed more than 64,395 outbound calls on behalf of Puerto Rico Relay, receiving a total of four (0.006%) customer complaints. All four complaints were filed with supervisors at one of the eleven Sprint TRS centers. All of these complaints were resolved in a timely fashion. None of these four complaints were escalated for action to the Commonwealth of Puerto Rico or to the Federal Communications Commission.

July 2002

Tracking #	Date of Compl.	Cat. # of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
3133G	07/01/02	29	Customer stated that her caller ID block is not working properly. When she calls a certain number, her number is showing when calling through relay. Apologized for the inconvenience and assured that A trouble ticket would be turned in on the problem so that it could be investigated further. Looked up the number in TRS and the caller ID block showing as on. Customer wants contact back when problem is fixed. TROUBLE TICKET I000267539	08/22/02	TROUBLE TICKET results - Test call conducted by Florida Relay Technician revealed that in the Customer's Records there appeared an entry into the Data Base to " N" pertaining to the Caller ID Send. Also when I dropped a call into my 1FB line with Caller ID, the caller's ID did not appear, and showed as "UNKNOWN". Also made the attempt to contact the caller, but she was unavailable, no message was left, as no answering device was available either. The purpose of contacting the caller was to verify from her end that the caller id in fact does not send. The system appears to be working as designed. Attempted to contact customer using relay service. Said that she doesn't understand what the talking is about. Used TTY to TTY. No response. 3rd time tried no response from the customer.

May 2003

Tracking #	Date of Compl.	Cat. # of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
4155Z	05/05/03	5	Agent hung up after answering the phone. Told customer the complaint would be forwarded to the agent's supervisor. Customer doesn't want follow-up.	05/06/03	The agent number given by the customer isn't assigned to any employee. The customer didn't request a follow-up, so further investigation isn't possible.
7755A	05/05/03	3	Voice person told the operator to dial 711. Operator would not dial, then the voice caller gave the operator another number to dial, which the operator also refused to dial, saying that number was only for deaf or hard-of-hearing people. Voice then told the operator that this call was indeed for a deaf person. Team leader told customer that the matter would be taken up with that agent's supervisor.	05/05/03	The agent number given by the customer isn't assigned to any employee. The customer didn't request a follow-up, so further investigation isn't possible.

Elizabeth A. Rios
304 Ponce de Leon Ave. Suite 8
SanJuan, Puerto Rico 00918
(787) 775-6775 TTY
(787) 775-6795 Voicemail
(787)775 5850 Fax
(787)529-9435 mobile

June 17, 2004

Attorney Miguel Reyes Dávila
President
Puerto Rico Telecommunication Regulatory Board

Dear Mr. Reyes,

Every year Sprint provides the following information to support your filing with the FCC for Puerto Rico:

- Annual Complaint Log which includes the number of complaints received from June 1, 2003 through May 31, 2004 that allege a violation of the federal TRS mandatory minimum standards, the date of the complaint, the nature of the complaint, the date of its resolution, and an explanation of the resolution.

- Annual Tally Report with total complaints by category to give you an overall view.

Sprint is pleased to report that we have not received any complaints from June 2003 through May 2004 so there is no log and tally report attached. You can inform the FCC that Puerto Rico Relay Service has received no complaints.

For your information:

As mandated by the Federal Communications Commission (FCC), Sprint has maintained a log of all consumer complaints that allege a violation of the federal minimum standards for Telecommunications Relay Services and is providing you with a summary to file with the FCC.

Please note that your state must send an original and four copies on or before Thursday, July 1, 2004, of the printed report and a 3.5 diskette to the Commission's Secretary at:

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

Please also note that your state is also encouraged to send an additional printed copy on or before July 1st, to the Consumer & Governmental Affairs at:

Erica Myers
Federal Communications Commission
Consumer & Governmental Affairs Bureau
445 12th St., SW, Rm 6-A432
Washington, DC 20554

For your reference, Sprint has included a copy of the FCC Public Notice from June 2, 2004 requiring this action.

Should you have any questions concerning this report, please contact me.

Sincerely,

Elizabeth A. Rios
Sprint Account Manager – Puerto Rico

Complaint Tracking for PR (06/01/2004-05/31/2005). Total Customer Contacts: 1

Tracking #	Date of Compl.	Agent ID	Cat. # Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
K64519756	03/30/05	8951F	#19	Operator was bad in Spanish language and did not seem to follow rules of relay.	03/31/05	CA had some difficulty typing verbatim what the voice caller was saying in Spanish. Sometimes the voice caller was talking rapidly and sometimes mumbling throughout the call. CA tried her best to comprehend and type what she could hear. I coached CA to interject whenever necessary in order to ask the caller to please slow down and speak clearer in order to type verbatim.

Date Generated: Wed, Jun. 8th, 2005 @ 10:44:20 AM CT

Tracking #	Date of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
K646924198	07/31/05	Customerreceived no answer on the PR Spanish tty number 866-280-2050 on July 31, 2005. Apologized. Trouble ticket 228143 has been opened. Follow up requested.	07/31/05	No problem conecting thru 1 866 2802 2050. Tested. Test 1 866 280 2050 from office desk and was able to connect. Unable to contact the customer to follow up.
K6410285310	12/20/05	Customer stated that she was having a lot of problems connecting to relay. She was not getting the any info/reponse from the relay. Customer made call through relay and got no reponse but the light signal showed " busy".	12/20/05	AM made varies test call and it went through just fine. Complaint closed

Complaint Tracking for PR (06/01/2006-05/31/2007). Total Customer Contacts: 1

Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
07/20/06	PR TTY customer called to report that she was unable to reach PR relay about noon, has tried five times and still unable to connect. Internal Update Performed	07/20/06	Apologized for inconvenience and opened Trouble Ticket. Follow-up requested.CRM II made a test at noon today to contact relay service. It all went through smoothly. But had a shut down for a while when customer was trying to reach.

Appendix U: Copy of TRS RFP

Appendix V: Copy of Phone Bill with Surcharge Rate or Legislative Order

PUERTO RICO RELAY
DETAIL OF RELAY CARRIER MONTHLY COMPENSATION
FOR THE MONTH OF JUNE 2007

INVOICE DATE:
ACCOUNT NUMBER: 200041649
INVOICE NUMBER: 0002157979

Under penalty of forfeiture I certify that, to the best of my knowledge and belief, no public employee of the Telecommunications Regulatory Board of Puerto Rico (the Board) is part of or has an interest in the profits or benefits derived from the contract under which this invoice is issued and if such a relationship does exist the party has previously obtained a waiver. The only consideration of providing the goods or services under this contract has been the payment of the amount agreed upon with the authorized Board representative. The total amount due for this invoice is fair and correct. The services were rendered and they have been not paid.

Elizabeth A. Ríos
Relay Program Manager
Sprint Puerto Rico Relay

14/sept./2007
Date

PUERTO RICO RELAY
Attn: ELIZABETH RIOS
304 AVE PONCE DE LEON FL 8
SAN JUAN, PR 00918-2029

ACCOUNT SUMMARY

PAGE: 3
ACTIVITY THROUGH: 08/31/07
BILLING ACCOUNT #: 200041649
INVOICE NUMBER: 0002157979
INVOICE DATE: 09/01/07

SERVICE/CHARGE TYPE	MINUTES	CALLS	AVERAGE	PRICE/ MINUTE	ADJUSTMENTS	TOTAL CHARGES
TOTAL CONVERSATION MINUTES OF SERVICE	6,996.31					
TOTAL SESSION MINUTES OF SERVICE	13,611.19					
LESS INTERSTATE SESSION MINUTES	(145.74)					
INTERNATIONAL SESSION MINUTES	(4.14)					
INTERSTATE TOLLFREE SESSION MINUTES 51%	(77.71)					
INTERSTATE DIRECTORY ASSISTANCE SESSION MIN	(10.29)					
900 SESSION MINUTES 51%	0.00					
TEST CALLS SESSION MINUTES	0.00					
TOTAL BILLABLE INTRASTATE SESSION MINUTES	**13,373.31**					
TOTAL SPEECH TO SPEECH CONVERSATION MINUTES	10.57					
TOTAL SPEECH TO SPEECH SESSION MINUTES	14.70					
LESS INTERSTATE SESSION MINUTES	0.00					
INTERNATIONAL SESSION MINUTES	0.00					
INTERSTATE TOLLFREE SESSION MINUTES 51%	0.00					
INTERSTATE DIRECTORY ASSISTANCE SESSION MIN	0.00					
900 SESSION MINUTES 51%	0.00					
TEST CALLS SESSION MINUTES	0.00					
TOTAL BILLABLE INTRASTATE SPEECH TO SPEECH MINUTES	**14.70**					
TOTAL MINUTES OF SERVICE COMPENSATION	13,388.01			2.25		$30,122.96
NUMBER OF CALLS INTO RELAY SERVICE PUERTO RICO RELAY		10129				
AVERAGE LENGTH OF CALL FOR SESSION MINUTES			1.54			
AVERAGE LENGTH OF CALL FOR CONVERSATION MINUTES			0.79			
AVERAGE LENGTH OF COMPLETED CALLS			8.65			
CALL SETUP/WRAPUP TIME (IN MINUTES)	1.19					
CALL SETUP/WRAPUP TIME (IN PERCENT)	77.20					
TOTAL NUMBER OF CALLS		10129				
TOTAL NUMBER OF INBOUND CALLS		8819				
TOTAL ACCOUNT SUMMARY						**$30,122.96**

XSLBPSKD0000905