purposes, the CA will not have access to a PIN if the MURCP user does not provide it at the time of the call. It will be the caller's responsibility to retain the PIN.

All RCP information is strictly confidential and requires only the relay caller's phone number or PIN for identification. No customer information is sold or otherwise revealed in any manner. However, in compliance with FCC requirements, all customer information contained in an RCP is transferable to an incoming TRS vendor within the stated timeframe of 60 days.

A copy of the on-line RCP form appears as Appendix 17.

§64.605

State Certification

(a) State documentation- (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.

The Commonwealth of Virginia has complied with all requirements in this area. The narrative submitted contains thorough documentation of how Virginia Relay Service is full compliance with all federal mandates for the Relay Service.

(b) (1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(c)(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to 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.

(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change

[70 FR 76215, Dec. 23, 2005]

Together with the Virginia Relay Advisory Council, AT&T, and Sprint, VDDHH has established and maintained a quality TRS state program that meets or exceeds all operational, technical, and functional minimum standards contained in §64.604. We have worked diligently to ensure that changes, improvements, and technological updates to our service are consumer driven and are not based on contract limitations, budget restrictions, or the relay industry's status quo. VDDHH staff members regularly attend FCC Public Meetings and offer our feedback and support for improving TRS nationwide. We actively participate in the National Association for State Relay Administration (NASRA) and the Telecommunications Equipment Distribution Program

Association (TEDPA) to obtain information and guidance on implementing and offering the latest in relay features and related assistive technology. A VDDHH staff member also serves on the National Exchange Carriers Association (NECA) Interstate TRS Fund Advisory Council, and was the NASRA alternate to the former Consumer/Disability Telecommunications Advisory Committee (CDTAC), both excellent networking opportunities in the TRS arena.

As previously stated, VDDHH makes every effort to obtain and respond to all feedback from relay users. We maintain and advertise our toll-free customer service number and encourage on-line comments from our customer service e-mail address. Feedback is also obtained through our VRAC, our statewide Outreach program, and annual Town Hall Meetings. A staff member personally handles each complaint received by VDDHH and the associated resolution is documented. Relay users are also notified of their option to pursue complaints with the FCC on a formal or informal basis, and we routinely refer them to the appropriate FCC website or email address.

The current Virginia Relay contract as well as all subsequent Modifications has been reviewed by a representative of the Virginia's Office of the Attorney General. No evidence of conflict between federal laws and any state requirement or premium relay service has been identified. Throughout the course of this application, we have described in detail any instances where Virginia Relay exceeds the mandatory minimum standards contained in §64.604. These instances are primarily related to state-of-the-art relay features and customized calling procedures that are available to us because we maintain a dedicated in-state center. These premium services are also a direct result of relay user feedback and in no way violate the intent of the associated federal law.

As previously discussed in §64.604 C.5, funding for Virginia Relay is now provided through a comprehensive communications tax that appears on all landline, wireless, internet, phone, cable and satellite services. Directory information, billing inserts, and VDDHH Outreach activities have effectively and collectively promoted Virginia Relay to the citizens of the state in a positive and beneficial manner. To date, VDDHH has not received any comments from the public that would indicate a lack of support or unwillingness to financially support TRS.

With the continued success of our relay educational campaign and the guidance of VRAC members, substantive changes to future Virginia Relay contracts and modifications are possible. All such changes will be communicated to the FCC within 60 days of implementation as required in §64.605, item f.

Section 2.

Virginia Relay
Enhanced VCO Relay Services
CapTel

§64.604

Mandatory Minimum Standards

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) Operational standards. (1) Communications assistant (CA). (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(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.

(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.

(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.

(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.

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

Sprint, the currently contracted CapTel® provider for VA Relay, began providing CapTel on a trial basis in May 2002. In January 2004, Sprint successfully converted the CapTel trial to an FCC-compliant Enhanced VCO relay call service, the first in the TRS industry.

All CapTel CAs are required to have a high school graduate equivalency as a minimum qualification for the job. All CapTel CAs are tested and competent in typing, grammar, and

spelling structure skills meet the associated FCC and state contract requirements. CapTel CA training also provides familiarity with hearing, deaf, and speech-disabled cultures. Oral to text tests are administered to all CapTel CAs. CapTel's voice recognition technology transmits above 100 words per minute, exceeding the FCC requirement for a minimum of 60 words per minute.

All CapTel CAs are required to stay on a call for a minimum of 10 minutes.

A captioned telephone user speaks directly, in real time, to the called party during the call; therefore, there is not an opportunity for the CA to interpret the call from ASL to spoken English, and this requirement has been waived. In addition, the direct audio connection to the called party also eliminates the need for the caller to request CA gender.

Confidentiality of Calls

(2) Confidentiality and conversation content. (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.

(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.

CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided. CapTel CAs are also prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

In addition to these measures, Section 8.01-44.3 of the Code of Virginia prohibits the divulgence of communications by qualified interpreters or CAs. Such divulgence is defined as a civil offense punishable by recovery of actual damages or $100, whichever is greater. These stipulations exceed and strengthen the federal requirements for confidentiality and are not in conflict with its original intent.

Types of Calls

(3) Types of calls. (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.

(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.

(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.

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

(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.

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

CapTel relay services are capable of handling all call types normally provided by Common Carriers. CapTel users dial sequential calls directly; therefore there is no opportunity for a sequential call to be denied. CapTel will not refuse single or sequential inbound calls or limit the length of any call. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and again there is no opportunity for a CA to deny a call.

The processing of both Speech to Speech and Hearing Carry Over calls is currently waived by the FCC for CapTel. The requirement for Call Release where a CA can be removed from a relay call without disconnecting the call between the two parties has also been waived.

CapTel users hear and interact directly with recorded messages and make selections as required by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recorded message and/or seeing the captioned text of the recording as it is played. CapTel users can also replay the message until the message either heard or captioned to their full understanding. Calls to recorded messages are considered a single call.

Answering machine and voicemail retrieval is provided by Sprint CapTel. Answering machine retrieval is accomplished through CapTel when the CapTel facility captions the voice message to the CapTel user.

All Sprint CapTel users also have the ability to participate in a three-way call. Although the person using a single-line CapTel phone is unable to establish the three-way connection, the called party can establish the connection and captioning will still appear for the CapTel user. For two-line CapTel users, a conferencing feature can be utilized on the primary line while the second line connect and receives the captioning. Sprint CapTel users are also able to participate in a conference bridge to speak to three or more individuals during a single call.

All captioned telephone users are provided with a speed-dialing feature through their CapTel device.

Sprint CapTel also supports pay-per-call types.

(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.

CapTel users can dial 9-1-1 on their phones to reach their most appropriate PSAP. For one-line CapTel users, the CapTel phone defaults to a VCO device and delivers both the Automated Number Identification (ANI) and Automated Locator Identification directly to the ASAP. For two-line CapTel users, the primary line connects directly to the PSAP and delivers both the Automated Number Identification (ANI) and Automated Locator Identification. The second line connects to the CapTel center and the conversation with the PSAP operator is then captioned.

Information on emergency calls is included in the VA Relay brochures. In addition, each Virginia CapTel recipient is provided instructions on the use of their CapTel phone for emergency calls. VDDHH Outreach staff and contractors routinely provide training to Virginia's 137 PSAPS on the receipt of all types of calls from citizens who are deaf or hard of hearing, including those you are CapTel users. Many of the major metropolitan-area PSAPs in Virginia have obtained a TTY and CapTel phone to process test calls with their operators.

Technical Standards

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

The processing of both ASCII and Baudot calls is currently waived by the FCC for CapTel.

(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.

(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.

(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.

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

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

(D) The system shall be designed to a P.01 standard.

(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.

Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that the CapTel users calls are immediately launched. CapTel does not place calls on hold or in queue to wait for an available CA. Abandoned calls are included in the speed of answer calculation, and the Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.

The following table shows the reported speed of answer data for the past five calendar years:

Contract Year	Answered in 10 sec. (%)	Average Speed of Answer (sec)	Calculation Method
2003	n/a	n/a	Trial Period
2004	n/a	n/a	Trial Period
2005	96.53%	1.29	Daily Average
2006	98.12%	0.55	Daily Average
2007	99.09%	0.39	Daily Average

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

Virginia CapTel users are able to choose their local exchange carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to standard telephone users. Currently Virginia Relay callers have access to the following IXCs:

AT&T	Adelphia	Allegiance	Alliance	Amerivision
BellSouth	BroadWing	BusTelecom	CloseCall	CirChoie5TK
ComTech	CoreComm	Cox (Bus)	Cox (Res)	Eastern Tel
Easton	Excel	Excel1010	Frontier	GlobalCrossing
I-Link	Incomnet	LD Whse	LDDS	LDM Sys
LightYear	MCI	Matrix Tel	MetroMedia	North Amer

OneCall	OpenBand	OpexLD	Pembroke	PhoneTel
Primus Tel	Qwest	SBC	Sprint	TalkAmerica
Telecom	Touch1	Vartec	Verizon	V2 Verizon
VSS1	Wiltel	WorldXchg	Worldwide	Z-Tel
Zone Tel	ZoneTel			

(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.

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

CapTel service is available 24 hours a day, everyday. The service also offers redundancy features that provide functional equivalency, including an uninterruptible power source for emergency use.

The 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 over the traditional telephone network.

This opening of a second CapTel center in Milwaukee during the Summer of 2007, will provide a back-up facility to ensure 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 another.

Enhanced Technology

(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, Virginia's contracted CapTel provider, considers itself the nation's leader in the development and offering of technological features for the TRS industry. In response to the availability of SS7 technology in TRS facilities, Sprint CapTel users have the capability of transmit the 10-digit number and will recognize the ID blocking indicators.

(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.

Since the Fall of 2005, Virginia CapTel users who subscribe to the Caller ID feature from their telephone service, are able to view Caller ID information directly on the CapTel phone display window. Considered as "True Caller ID", the phone displays the name and/or number of the person calling, depending on the type of Caller ID service you subscribe to with your local telephone service company.

Functional Standards

(c) Functional standards. (1) Consumer complaint logs.(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.

(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.

Virginia Relay Service maintains full compliance with all FCC regulations through maintenance of an annual log of consumer complaints, inquiries, and commendations concerning Virginia Relay. Sprint CapTel maintains a log of all complaints and includes all of the required fields including states, nature of the complaint, date of resolution, and explanation of the decision. For complaints received directly by VDDHH, staff provides the response to the consumer in non-technical cases. A copy of the consumer's comments is forwarded to CapTel for appropriate documentation and follow-up.

VDDHH monitors and reconciles the monthly complaint report summary provided by Sprint. Staff immediately investigates any complaints not indicating resolution during the month in question. Since April of 2004, any CapTel entry related to an alleged violation of FCC TRS standards or of more stringent Virginia contract requirements is identified and filed separately. This allows for a clear annual accounting of specific complaints related to FCC or state contract requirements. These complaints are also noted in the required annual FCC Complaint Log. All CapTel log entries and monthly reports are retained by VDDHH for a minimum of five years.

Copies of our Annual Consumer Complaint Logs for 2003-2007 appear as Exhibits C through G respectively.

All complaints, grievances, inquiries, suggestions and commendations for Virginia Relay, including CapTel services, should be addressed to the VDDHH TRS Administrator:

Clayton E. Bowen, Relay and Technology Programs Manager
Virginia Department for the Deaf and Hard of Hearing
1602 Rolling Hills Drive, Suite 203
Richmond, Virginia 23229-5012
(800) 552-7917, voice & text
(804) 662-9704, voice & text
(804) 662-9718, fax
Clayton.Bowen@vddhh.virginia.gov

Public Access to TRS Information

(3) Public access to information. 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.

Sprint follows all FCC requirements for public access to information and publishes in directories, brochures, and billing inserts instructions for TRS access via 7-1-1. As Virginia's contracted TRS provider, AT&T, is compliant with the FCC requirement for 7-1-1 access to CapTel services, this approach is effective. The Virginia State Corporation Commission also requires phone companies to publish public information on the Virginia Relay service in the front of all local telephone directories. The directory information page also includes reference to 7-1-1 relay access and the confidentiality of calls. In their June 1, 2000 Order #PUC000045 related to three-digit relay dialing, the SCC required associated billing inserts that described the service, the availability of 7-1-1, and the difference between 7-1-1 and 9-1-1 be disseminated by all local phone companies by August 31, 2000. In all cases Virginia Relay is presented as a telecommunications service available and beneficial to both text-users and standard telephone users.

In addition to directory information, the VDDHH Outreach Program has provided public access to information on CapTel services since 2004. Currently composed of two full-time staff and 16 contracted specialists, the statewide program provides as part of its on-going efforts relay education and training to businesses, consumer organizations, and public safety personnel. Current VDDHH Outreach contracts require annual Relay Forums and at least one Relay workshop be conducted in each of the state's Planning Districts. All such activities include direct reference to CapTel services and devices.

We also partner with Ultratec to distribute quarterly issues of *CapTel News* which provides helpful hints for people who use CapTel relay services. We also advertise CapTel services in state periodicals and advertorials whose primary audience is composed of senior citizens.

Copies of VA Relay CapTel promotional materials appear collectively as Appendix 18

Since October of 2002, the Virginia Relay Advisory Council (VRAC) has provided feedback to the state's relay program and oversees all educational and technical assistance activities which provide public access to information on Virginia Relay. The VRAC sets campaign priorities on a fiscal year schedule and monitors campaign progress on a quarterly basis. VRAC By-Laws establish a CapTel user as a voting member of the Council and a Sprint CapTel contract representative serves as a non-voting Council member. This structure ensures CapTel services are included in all Outreach activities overseen by the Council.

In fiscal years 2006 and 2007, the Virginia Relay Partner campaign was conducted where businesses were contacted and encouraged to sign-up as a partner for receipt of relay calls. In turn, contact information for and the types of products or services provided by their business or organization is listed on a website where relay users can access. As of June 30, 2007, there were 347 active VA Relay Partners. For fiscal year 2008, we will launch the *Kids Keeping in Touch* curriculum for grades 3 through 5 in the state's 1037 public elementary schools. The curriculum provides students with an introduction to hearing disabilities, sign language, relay services, and related technology and meets all current Standards of Learning (SOLs) for the state. The curriculum also includes a recently produced DVD on the use of Virginia Relay and will offer the technical support of the VDDHH Outreach network to elementary school teachers during presentation of the curriculum. Both programs include specific information on CapTel services.

Copies of a sample telephone bill and directory page are presented together as Appendix 13. A copy of Order # PUC000045 appears as Appendix 14. A copy of the VRAC By-Laws appears as Appendix 15. Copies of recent VA Outreach material including CapTel is presented in Exhibit H.

Rates

(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 CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services. In addition, CapTel users can establish a billing profile for themselves and their friends and family selecting a Carrier of Choice for any long distance calls placed through the CapTel centers. VDDHH Outreach ensures that all CapTel users complete this information for any phone obtained through the Virginia equipment distribution program.

Jurisdictional Separation of Costs

(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.

(iii) Telecommunications Relay Services Fund. Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity

selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

Costs for intrastate relay call minutes, including CapTel, are supported by a state Communications Tax as outlined in §58.1-662 of the *Code* of Virginia. This tax appears on all landline, wireless, internet long distance, cable and satellite bills. Costs for interstate relay call minutes are reimbursed to Sprint by the National Exchange Carrier Association, Incorporated (NECA) in accordance with the Interstate Cost Recovery Plan effective July 26, 1993.

Sprint also follows all FCC requirements for Jurisdictional Separation of Costs for interstate CapTel minutes. Reimbursement of interstate minutes and other applicable costs are received from the Telecommunications Relay Services Fund currently administered by the National Exchange Carrier Association (NECA).

Complaints

(6) Complaints. (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.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.605.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The

Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal complaints. (1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service, designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints. (1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service. (1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

Virginia consumers can provide comments directly to Sprint CapTel or through VDDHH in a number of ways.

Sprint CapTel receives consumer comments from:

- CapTel Customer Service Line 1-800-482-2424 (TTY) 1-877-243-2823 (Voice)
- CapTel Customer Service Email service@ultratec.com
- CapTel National Website www.captionedtelephone.com

- Virginia CapTel Account Karl.A.Ewan@sprint.com
- Consumer Correspondence

VDDHH receives comments from:

- VDDHH Toll-Free Customer Service Number - 1-800-552-7917 (TTY/Voice)
- On-line Relay Consumer Input Form - www.vddhh.org
- VDDHH E-mail Address - frontdsk@vddhh.virginia.gov
- Virginia Relay Advisory Council Members
- VDDHH Town Hall Meetings
- Contracted Outreach Staff
- Consumer Correspondence

Ultratec, VDDHH, Sprint, and the VDDHH TRS Administrator work closely together to quickly address and resolve customer issues involving relay service. Over the past three contract years, the average turnaround time for resolution of complaints has been 24 hours or less, with the majority of complaints being resolved on the same day they are reported. Complaints or inquiries related to technical or billing issues are not subject to a specific deadline since technical research or follow-up with other entities may be necessary. However, timely resolution of these items is still required and monitored by VDDHH.

If a complaint takes longer than 30 days to resolve and could appears to address a violation of FCC standards, the VDDHH TRS Administrator would handle the CapTel complaint. The consumer would be contacted for additional information and a dialog with Sprint CapTel established. If the complaint is not resolved within an additional 30 days, VDDHH initiates a formal Complaint to State Vendor Form. The filing of this form involves the State's Contract Manager and the Office of the Attorney General into the resolution process. The form is then forwarded to Sprint with a state-mandated ten-day written response deadline. Once a response is received, contract terms and conditions are reviewed, and, where appropriate, formal action is taken according to the Virginia Public Procurement Act and *Vendor's Manual.*

If for any reason a complaint does not appear to be progressing towards timely resolution within the FCC required 180 day timeframe, VDDHH contacts the consumer and informs them of procedures for filing formal or informal complaints with the FCC. The consumer is also provided information for contacting the Virginia Office of Protection and Advocacy for additional assistance with the filing processes outlined in §64.604 K.6.

Both Sprint CapTel and Virginia Relay are in full compliance with FCC requirements regarding consumer complaint processes.

Confidentiality and Portability of TRS Customer Information

(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.

Sprint transfers all applicable CapTel customer data to incoming Captel vendors. All RCP information remains strictly confidential. The data is provided in useable format at least 60 days prior to the last day of contracted service provision and under no circumstances sold, distributed, shared or revealed in any other way by Sprint or Sprint employee unless Sprint is compelled by legal process to provide such information.

§64.605

State Certification

(a) State documentation—(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.

The Commonwealth of Virginia has complied with all requirements in this area. The narrative submitted contains thorough documentation of how Virginia Relay, including CapTel relay services, is full compliance with all federal mandates for the Relay Service.

(b) (1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(c)(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to 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.

(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

[70 FR 76215, Dec. 23, 2005]

Together with the Virginia Relay Advisory Council, AT&T, and Sprint, VDDHH has established and maintained a quality TRS state program that meets or exceeds all operational, technical, and functional minimum standards contained in §64.604. We have worked diligently to ensure that changes, improvements, and technological updates to our service are consumer driven and are not based on contract limitations, budget restrictions, or the relay industry's status quo. VDDHH staff members regularly attend FCC Public Meetings and offer our feedback and support for improving TRS nationwide. We actively participate in the National Association for State Relay Administration (NASRA) and the Telecommunications Equipment Distribution Program Association (TEDPA) to obtain information and guidance on implementing and offering the latest in relay features and related assistive technology. A VDDHH staff member also serves on the National Exchange Carriers Association (NECA) Interstate TRS Fund Advisory Council, and was the NASRA alternate to the former Consumer/Disability Telecommunications Advisory Committee (CDTAC), both excellent networking opportunities in the TRS arena.

As previously stated, VDDHH makes every effort to obtain and respond to all feedback from relay users. We maintain and advertise our toll-free customer service number and encourage on-line comments from our customer service e-mail address. Feedback is also obtained through our VRAC, our statewide Outreach program, and annual Town Hall Meetings. A staff member personally handles each complaint received by VDDHH and the associated resolution is documented. Relay users are also notified of their option to pursue complaints with the FCC on a formal or informal basis, and we routinely refer them to the appropriate FCC website or email address.

The current Virginia Relay contracts with both AT&T and Sprint as well as all subsequent Modifications has been reviewed by a representative of the Virginia's Office of the Attorney General. No evidence of conflict between federal laws and any state requirement or premium relay service has been identified. Throughout the course of this application, we have described in detail any instances where Virginia Relay exceeds the mandatory minimum standards contained in §64.604. These instances are primarily related to state-of-the-art relay features and customized calling procedures that are available to us because we maintain a dedicated in-state center. These

premium services are also a direct result of relay user feedback and in no way violate the intent of the associated federal law.

As previously discussed in §64.604 C.5, funding for Virginia Relay is now provided through a comprehensive communications tax that appears on all landline, wireless, internet, phone, cable and satellite services. Directory information, billing inserts, and VDDHH Outreach activities have effectively and collectively promoted Virginia Relay to the citizens of the state in a positive

and beneficial manner. To date, VDDHH has not received any comments from the public that would indicate a lack of support or unwillingness to financially support TRS.

The continued success of our relay educational campaign and the guidance of VRAC members, substantive changes to future Virginia Relay contracts and modifications are possible. In addition, all such changes will be communicated to the FCC within 60 days of implementation as required in §64.605, item f.

Attachment I

AT&T State Relay Certification Matrix 2007

FCC Order Ref 90-571	FCC Requirement	*AT&T RELAY SERVICES*
	Provision of Services	
d 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.	*AT&T Relay Services was the first organization to provide 24/7/365 relay services. AT&T recently celebrated 20 years of serving the Deaf/HOH community.*
	Speech-to-speech relay service shall be provided by March 1, 2001.	*AT&T is fully compliant with the FCC requirement of offering Speech-TO-Speech Relay Service. This is a standard offering in the states that we serve.*
	Interstate Spanish language relay service shall be provided by March 1, 2001.	*AT&T is fully compliant with the FCC requirement of offering Spanish language relay services. AT&T is proud to process calls for our Spanish-Speaking customers.*
	In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	*AT&T is fully compliant with 711 access to all of its Relay Services. Customers in the states we serve dial 711 and their calls are routed to our call-handling centers for processing.*
	Operational Standards	
d 64.604 A (1).i	Communications Assistant (CA) Competency Skills	
	CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	*AT&T Relay exceeds this FCC standard by requiring that training of Relay operators includes special call type processing, cross cultural training, and on-going training and interaction of the various user communities for all operators. In addition, the VA Relay Operators participate in Outreach Events to Hone their skills and ensure community interaction.*

d 64.604 A.(1).ii	CAs must have 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 FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures, with relay etiquette and with ASL translation. ASL translation is the default for our VA customers and ASL Interpreters are available in the center. All AT&T Relay Oprs are tested for grammar and spelling competency prior to being employed by the relay provider.*
d 64.604 A.(1).iii	Typing Speed - 60 WPM with technological aids	*Each AT&T Relay Opr is required to take an anuual typing test and qualify at minimum of 60 wpm without technological aids.*
	Oral-to-type tests	*All AT&T Relay Oprs are tested annually on dictation-type tests where they must type from spoken conversation.*
d 64.604 A.(1).iv	VRS 'qualified' Interpreters	*AT&T Relay Services does not currently provide Video Relay Services for the State of VA.*
d 64.604 A.(1).v	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.	*AT&T Relay meets the FCC requirement. Change of operators during a call is discouraged. An operator must stay on a STS call for a minimum of 15 minutes or on a non-STS call for a minimum of ten minutes. If a change is necessary, both parties shall be informed. If a change of Operators is requested by the TTY or standard phone user without explanation, it shall be done without question. A change of Operator is indicated to both parties by the words " relief Opr XXX (M/F)".*
	STS CAs – 15 minutes.	*VA STS Ops stay on the call for a minimum of 15 minutes as required.*

d64 604.A.(1).v	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.	*VA Relay users are given the operator's identifying number and gender at the beginning and end of the Relay call and informed if there is a change of operator during the call. Upon request of the Relay user, the operator will be switched to the requested gender. The new Opr will indicate his/her Opr number and gender.*
	Conversations transmitted in real time	
d64 604.A.(1).vi	TRS shall transmit conversations between TTY and voice callers in real time.	*AT&T Relay Services transmits conversations in real time as required by the FCC.*
	Confidentiality & Conversation Context	
d64.604.(2).i	CAs are prohibited from disclosing the content of any relayed conversation regardless of content	*AT&T Relay has written confidentiality policies in place and copies are provided to users upon request. Oprs are reviewed on the Code of Ethics and the Pledge of Confidentiality on a regular basis. AT&T Relay Oprs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.* *AT&T Relay Oprs are prohibited from disclosing any call content.* *If a user is in an emergency or life-threatening situation or causes an emergency situation to exist by threatening the operator or the Relay Center, names and specific information may be disclosed by the operator to a supervisor to expeditiously address the situation. In the case of threats against the Relay center, Operators, Supervisors, or Other Personnel, such information may be disclosed to appropriate law enforcement agencies.*
	Certain exceptions are provided for Speech-to-Speech calls.	*STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.*

d 64.604 A.2 ii	CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise	*VA Relay Oprs relay verbatim when spoken English is typed. The default for the VA relay center is ASL translation and our Relay Oprs are highly-trained to translate the written text into spoken English when an ASL user types in ASL.*
	Types of Calls	
d 64.604 A.3 i	CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.	*AT&T Relay promotes relay equivalency and processes all calls as requested. There are no limits placed on sequential calls or the length of calls.*
d 64.604 A.3 ii	TRS shall be capable of handling any type of call normally provided by common carriers.	*AT&T Relay complies with this FCC standard. Relay users are able to place any type of call normally provided by common carriers.*
d 64.604 A.3 iii	Relay service providers are permitted to decline a call because credit authorization is denied.	*AT&T Relay declines calls when necessary due to credit being denied.*
d 64.604 A.3 iv	Relay services shall be capable of handling pay-per-call calls.	*AT&T Relay Services processes pay-per calls in an equivalent fashion to how they would be processed for hearing individuals.*
	Types of Calls	
d 64.604 A.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-TTY, VCO-VCO, (3) HCO, two-line HCO, HCO-TTY, HCO-to HCO.	*VA Relay processes the following call types:* *Text to Voice, Voice to Text, Voice to Voice, Text to VCO,* *VCO to Text, VCO to HCO, VCO with Privacy, Hearing to Hearing,* *HCO to VCO, Text to HCO, HCO with Privacy, HCO to Text,* *Two Line VCO, Speech-to-Speech, Spanish-to-Spanish, VCO-to-VCO, HCO-to-HCO, Two line HCO, Pay-Per-Calls (900).*
d 64.604 A.3 vi	TRS Providers are required to provide call release, speed-dialing, and three way calling functionality.	*AT&T Relay Servicies is fully-compliant with Call release regulations. AT&T Relay Services "releases" TTY-TTY calls after they are connected. Per-minute reimbursement ceases after a call is released from the CA position.*

	TRS Providers are required to provide speed-dialing.	*AT&T Relay Services allows Relay Users to set up profiles containing their frequently called numbers. These numbers will be speed-dialed upon a customer's request*
	TRS Providers are required to provide three-way calling functionality.	*AT&T Relay Services processes three-way calls for our customers. Customers utilize their "flash" button to join on two lines and the Relay Opr then relays the three-way call.*
d 64.604 A.3 vii	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.	*AT&T Relay customers have the option of informing the Relay Opr that they are dialing to a recorded message or interactive menu. Customers may provide the Relay Opr with upfront instructions on how to proceed with the call and which options to select. If no upfront instructions are given, the relay Operator will dial to the recording, inform the caller a recording has been reached, and relay the complete recorded message.*
	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.	*AT&T Relay Oprs have electronic means to capture automated menus and type them verbatim to the caller. AT&T does not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.*
	Answering Machine/ Voice Mail Message Retrieval	
d 64.604 A.3 viii	TRS Providers shall provide, as TRS features, answering machine and voice mail retrieval.	AT&T Relay Services offers answering machine or voice mailbox retrieval as a standard offering.
	Handling of Emergency Calls	
d 64.604 A.4	At a minumum, TRS Providers must be able to pass emergency callers to the appropriate PSAP.	*AT&T Relay Services processes emergency calls in complaince with FCC regulations. Emergency calls are connected to the appropriate PSAPs.*