

**Consumer Relations Office Monthly Outreach Summary
September 2006**

Month/Date	Type of Outreach	Location Name	City	Number of Participants	Business	CapTel	STIS	General FRS
September 01	Exhibit	Minnesota State Fair	St. Paul	1420				X
September 02	Exhibit	Minnesota State Fair	St. Paul	1420				X
September 03	Exhibit	Minnesota State Fair	St. Paul	1420				X
September 04	Exhibit	Minnesota State Fair	St. Paul	1420				X
September 07	Presentation	Cloverleaf Courts	Blaine	20		X		
September 09	Hard of Hearing Social Event	Private Home	Rosemount	16				
September 12	In Home Demonstration		Bloomington	1		X		
September 14	Meeting	Eagan Fire Administration Bldg	Eagan	33				X
September 14	In Home Demonstration		Eagan	3		X		
September 16	Exhibit	Brookdale Center	Brooklyn Center	750				X
September 19	Presentation	Anoka Ramsey Community College	Coon Rapids	25				X
September 19	In Home Demonstration		Maplewood	2		X		
September 19	Drop In	Village on Woodlyn	Maplewood	10		X		
September 19	Drop In	Walker at Hazel Ridge	Maplewood	6		X		
September 19	Drop In	Concordia Arms	Maplewood	4		X		
September 19	Drop In	Maple Pond	Maplewood	3		X		
September 19	Drop In	Ramsey County Library	Maplewood	4		X		
September 20	Presentation	Flagship Academy	St. Louis Park	8				X
September 21	Deaf Senior Meeting	Thompson Hall	St. Paul	154				X
September 21	In Home Demonstration		Elk River	2		X		
September 21	Meeting	MN Employment Center	St. Paul	15				X
September 25	Three Presentations	Cross Road Evenganical Church	Forest Lake	16				X
September 25	Presentation	University of MN	Falcon Heights	28				X
September 25	Exhibit	Senior Fall Expo at Mystic Lake	Prior Lake	800		X		
September 26	Exhibit	Senior Fall Expo at Mystic Lake	Prior Lake	700		X		
September 26	Two Presentations	University of MN	Falcon Heights	60				X
September 27	Three Presentation	University of MN	Falcon Heights	87				X
September 28	Three Presentation	University of MN	Falcon Heights	84				X
September 28	In Home Demonstration		St. Paul	2		X		
September 28	Presentation	Minneapolis Community Technical College	Minneapolis	28				X
September 30	DHHS Forum	Plumber & Stearn Fitters	Rochester	35				X
Total Presentations:		38						
Total Participants:		8,576						

**Consumer Relations Office Monthly Outreach Summary
October 2006**

Month/Date	Type of Outreach	Location Name	City	Number of Participants	Business	CapTel	STS	General TRS
October 02	Presentation	Highland Jr. High	St. Paul	13				X
October 03	Deaf/Hard of Hearing Community Forum	North Jr. High	St. Cloud	35				X
October 03	In Home Demonstration		Brooklyn Center	1		X		
October 03	Drop In	Hennepin County Library, Brookdale	Brooklyn Center	3		X		
October 03	Drop In	View Pointe at Shingle Creek	Brooklyn Center	2				X
October 04	Deaf/Hard of Hearing Community Forum	Detroit Lake Technical College	Detroit Lakes	44				X
October 05	Drop In	The Crystal	Crystal	4		X		
October 05	Drop In	Sonus Audiology	Crystal	4		X		
October 05	Deaf/Hard of Hearing Community Forum	Government Service Center	Duluth	48				X
October 10	2 Presentation	Ability Building Center	Rochester	14				X
October 10	Exhibition	St. Paul College	St. Paul	39				X
October 11	Exhibition	Duluth Senior Expo	Duluth	1100		X		
October 12	In Home Demonstration		Coon Rapids	3		X		
October 17	In Home Demonstration		Bloomington	2		X		
October 18	Drop In	Ramsey County Library, Roseville	Roseville	2		X		
October 19	In Home Demonstration		Ely	2		X		
October 19	Drop In	Woodland Mounds	Maple Grove	3		X		
October 19	Drop In	Birchwood Apartments	Maple Grove	3		X		
October 19	Drop In	Anderson Audiology Consulting	Maple Grove	1		X		
October 19	Drop In	Arbor Glen	Maple Grove	2		X		
October 23	2 Presentations	White Bear Lake High	White Bear Lake	58				X
October 24	Exhibition	East Side Neighborhood Health Fair	Minneapolis	65		X		
October 26	Drop In	St. Therese at Oxbow Lake	Brooklyn Park	1		X		
October 26	Drop In	Park Haven	Brooklyn Park	5		X		
October 26	2 Presentations	St. Cloud Technical High	St. Cloud	76				X
October 27	Presentation	Central Lakes College	Brainerd	26				X
October 31	Drop In	Celtic Crossing	Osseo	1		X		
October 31	Drop In	Real Life Cooperative of Osseo	Osseo	2		X		
October 31	Drop In	Osseo Gardens	Osseo	4		X		
Total Presentations:		32						
Total Participants:		1,563						

**Consumer Relations Office Monthly Outreach Summary
November 2006**

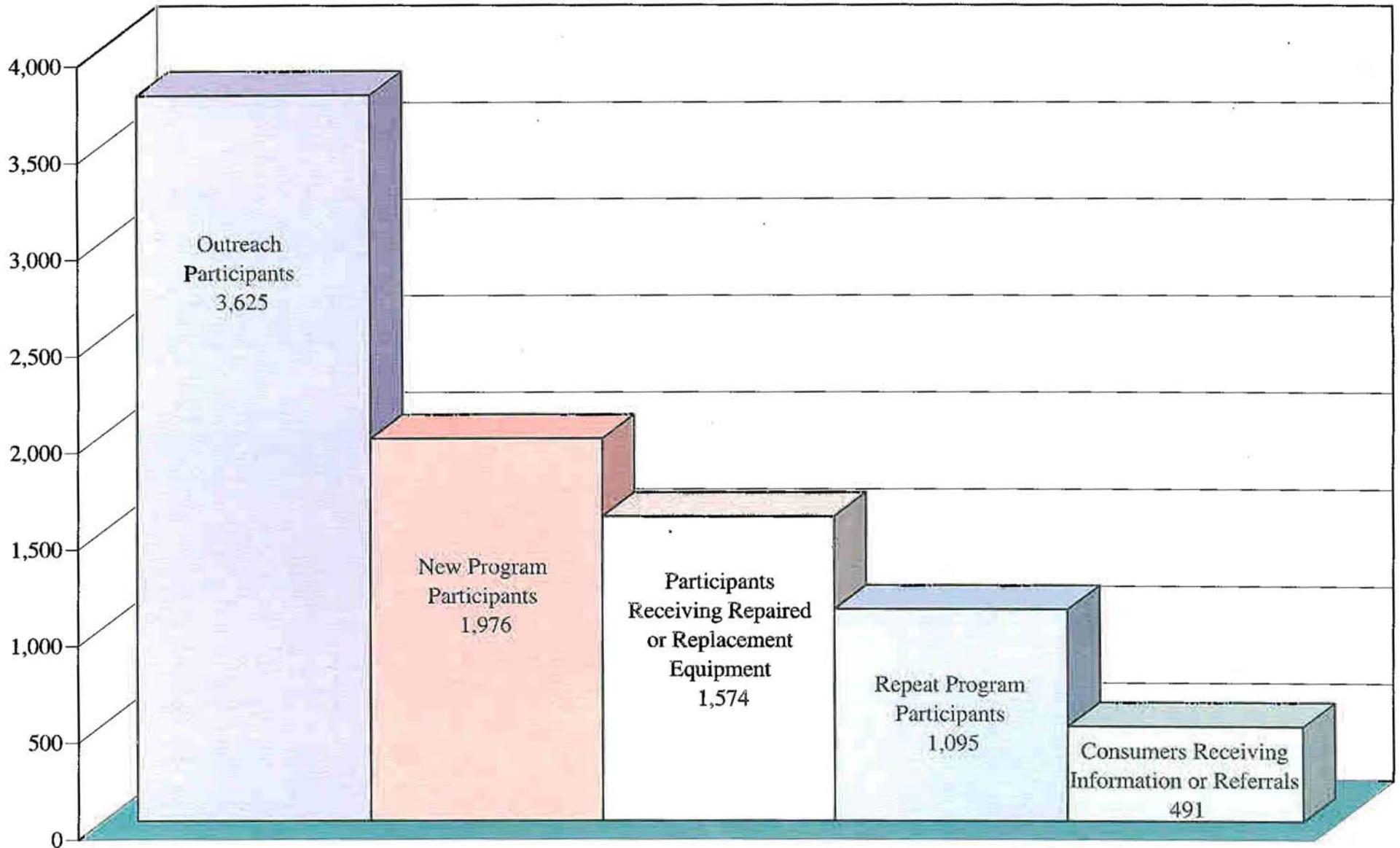
Month/Date	Type of Outreach	Location Name	City	Number of Participants	Business	CapTel	STIS	General TRS
November 07	In Home Demonstration		Minneapolis	1				X
November 07	In Home Demonstration		Minneapolis	2		X		
November 08	Meeting	Qwest Advisory Committee	Minneapolis	16				X
November 08	Open House	DeafBlind Service of MN	Minneapolis	35				X
November 09	In Home Demonstration		Minneapolis	2		X		
November 11	Social Event	Deaf/Blind Banquet	St. Paul	58				X
November 14	In Home Demonstration		Bloomington	2		X		
November 16	In Home Demonstration		Eagan	2		X		
November 16	Presentation	SW Jr High School	Forest Lake	8				X
November 17	Meeting	Minnesota Commission Serving Deaf & Hard of Hearing People	St. Paul	29				X
November 21	In Home Demonstration		Bloomington	1		X		
November 27	Presentation	Douglas County Task Force on Aging	Alexandria	35				X
November 27	Presentation	Winona Shores Senior Residence	Alexandria	20		X		
November 27	Drop In	Glenwood Public Library	Glenwood	2		X		
November 27	Drop In	Glenwood Village Care Center	Glenwood	3		X		
November 27	Drop In	Lakeview Good Samaritan Center	Glenwood	3		X		
November 27	Drop In	Ridgewood Villa	Glenwood	6		X		
November 27	Drop In	Glenwood Senior Center	Glenwood	7		X		
November 27	Drop In	Glenwood Retirement Village	Glenwood	2		X		
November 27	Drop In	Glacial Ridge Home Care	Glenwood	4		X		
November 27	Drop In	Glenwood Estates	Glenwood	3		X		
November 27	Drop In	Parkview Court	Glenwood	2		X		
November 27	Drop In	Pope County Public Health Nursing Service	Glenwood	8		X		
November 28	Drop In	Getty Street Assisted Living	Sauk Centre	3		X		
November 28	Drop In	St. Michaels Hospital Home Care	Sauk Centre	5		X		
November 28	Drop In	Bryant Public Library	Sauk Centre	1		X		
November 28	Drop In	Stearns County Public Health Department	Melrose	8		X		
November 28	Drop In	Roseview Manor	Melrose	3		X		
November 28	Drop In	Mother of Mercy Campus Care	Albany	3		X		
November 28	Drop In	Albany Area Hospital and Medical Center	Albany	2		X		
November 28	Drop In	Albany Branch Library	Albany	2		X		
November 29	Drop In	City Hall -Administration	Red Wing	2				X
November 29	Drop In	Chamber of Commerce	Red Wing	2				X
Total Presentations:		33						
Total Participants:		282						

**Consumer Relations Office Monthly Outreach Summary
December 2006**

Month/Date	Type of Outreach	Location Name	City	Number of Participants	Business	CapTel	SIS	General TRS
December 02	Deaf/HH Social Event	Ground Round Restaurant	St. Cloud	28				X
December 04	Presentation	Berg's Home	Marshall	13				X
December 04	Drop in	Chamber of Commerce	Marshall	2				X
December 04	Drop in	Lyon County Library	Marshall	2				X
December 04	In Home Demonstration		Buffalo Lake	1		X		
December 04	Drop in	Gaylord Public Library	Gaylord	1				X
December 04	Drop in	Hearing & Speech Center	Marshall	1				X
December 05	Drop in	Central MN Council on Aging	St. Cloud	4		X		
December 05	Drop in	Whitney Senior Center	St. Cloud	5		X		
December 05	Drop in	Skylight Gardens	St. Cloud	4		X		
December 05	Drop in	Stearns County Public Health	St. Cloud	3		X		
December 05	Drop in	Professional Hearing and Audiology Associates	St. Cloud	1		X		
December 05	Drop in	Certien Hearing Center	St. Cloud	2		X		
December 07	Presentation	Apollo High School	St. Cloud	32				X
December 07	Drop in	Demarr Catered Living	Coon Rapids	1		X		
December 07	Drop in	Eagle Street Catered Living	Coon Rapids	1		X		
December 12	In Home Demonstration		Circle Pines	2		X		
December 14	Drop in	St. Cloud Hospital Homecare Services	St. Cloud	2		X		
December 14	Drop in	Shiffo Home Healthcare Corp	St. Cloud	1		X		
December 14	Drop in	Catholic Charities	St. Cloud	4		X		
December 14	Drop in	Home Instead Senior Care	Waite Park	3		X		
December 14	Drop in	Senior Linkage Line	St. Cloud	2		X		
December 17	Drop in	Northfield Area Chamber of Commerce	Northfield	1				X
December 17	Drop in	Northfield Public Library	Northfield	2				X
December 17	Drop in	Safety Center	Northfield	2				X
December 17	Presentation	Cannon Falls Medical Center	Cannon Falls	4				X
December 19	Drop in	Central MN Senior Federation	St. Cloud	3		X		
December 19	Drop in	Carefree Living	St. Cloud	4		X		
December 19	Drop in	Saint Benedict's Senior Community	St. Cloud	6		X		
December 19	Drop in	Benedict Court	St. Cloud	3		X		
December 19	Drop in	Benet Place	St. Cloud	3		X		
December 19	Drop in	Benet Place South	St. Cloud	2		X		
December 21	In Home Demonstration		Minneapolis	1		X		
December 28	Drop in	Comfort Keepers	St. Cloud	5		X		
December 28	Drop in	St. Cloud Housing and Redevelopment Authority	St. Cloud	4		X		
December 28	Drop in	Prairie River Home Care, Inc.	St. Cloud	4		X		
December 28	Drop in	Amdahl Hearing, LLC	St. Cloud	2		X		
December 28	Drop in	American Red Cross	St. Cloud	2		X		
Total Presentations:		38						
Total Participants:		163						

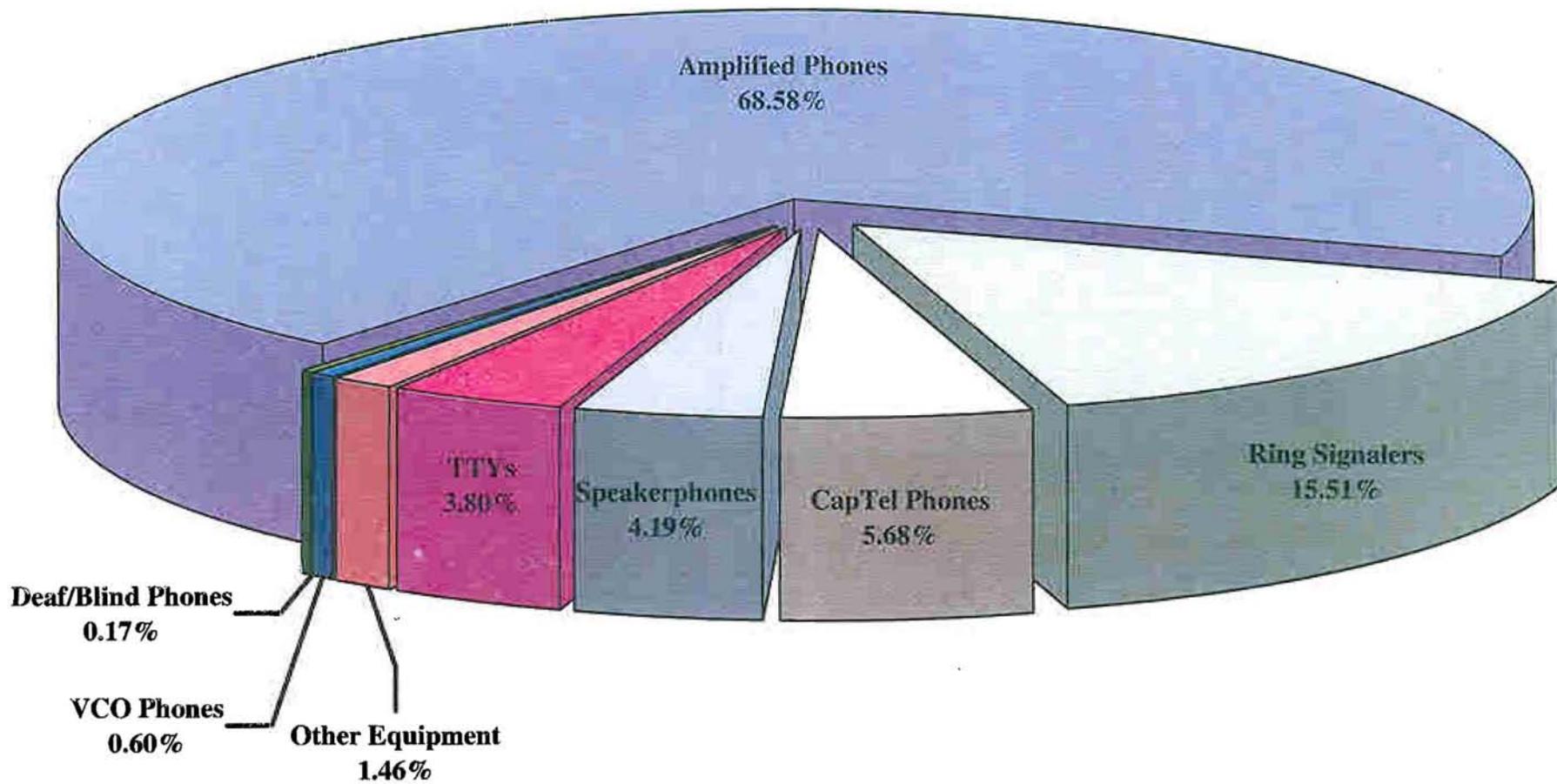
APPENDIX F

2006 TED Program Outreach Services



TED Program

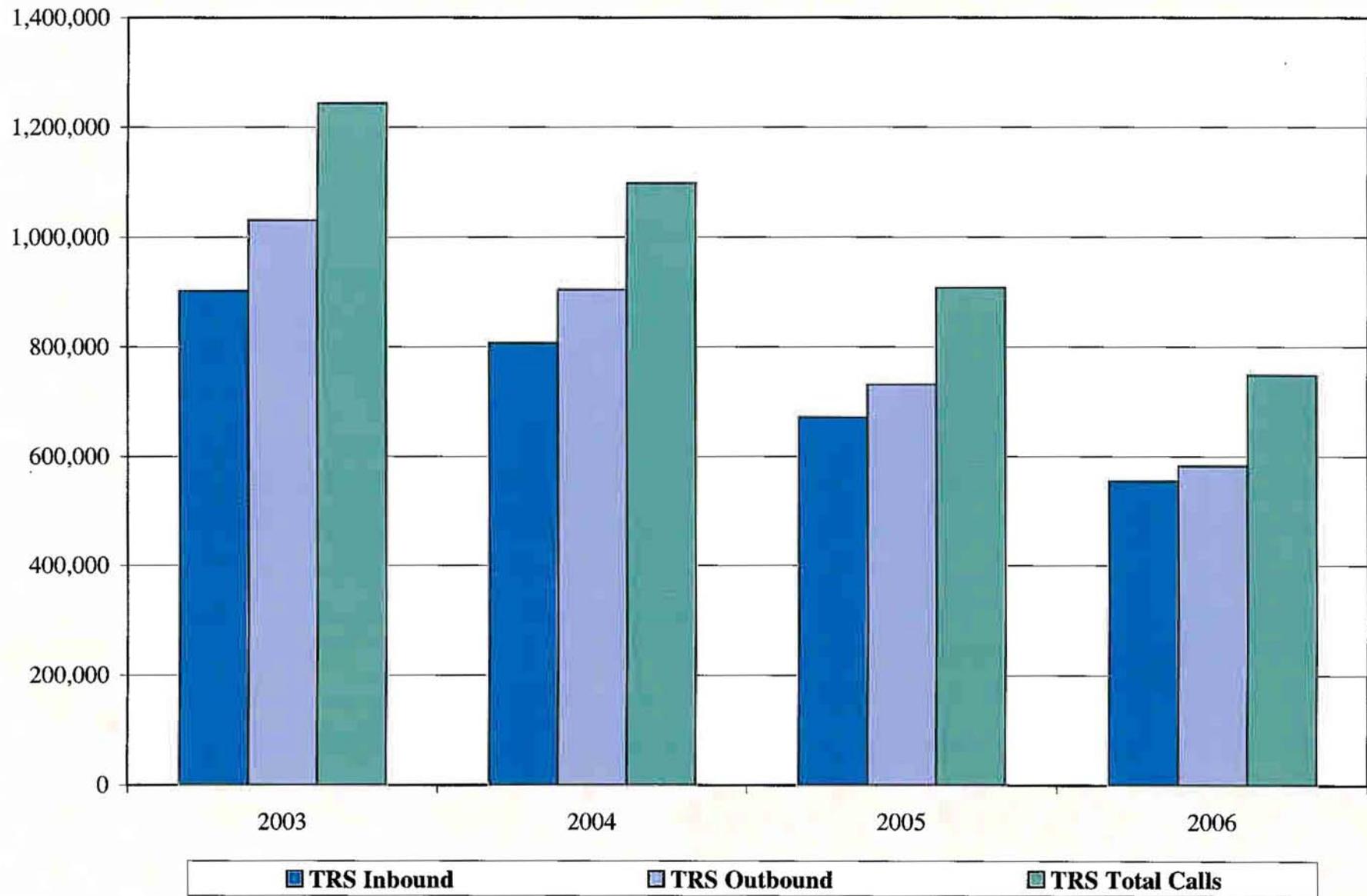
Types of Equipment Distributed in 2006



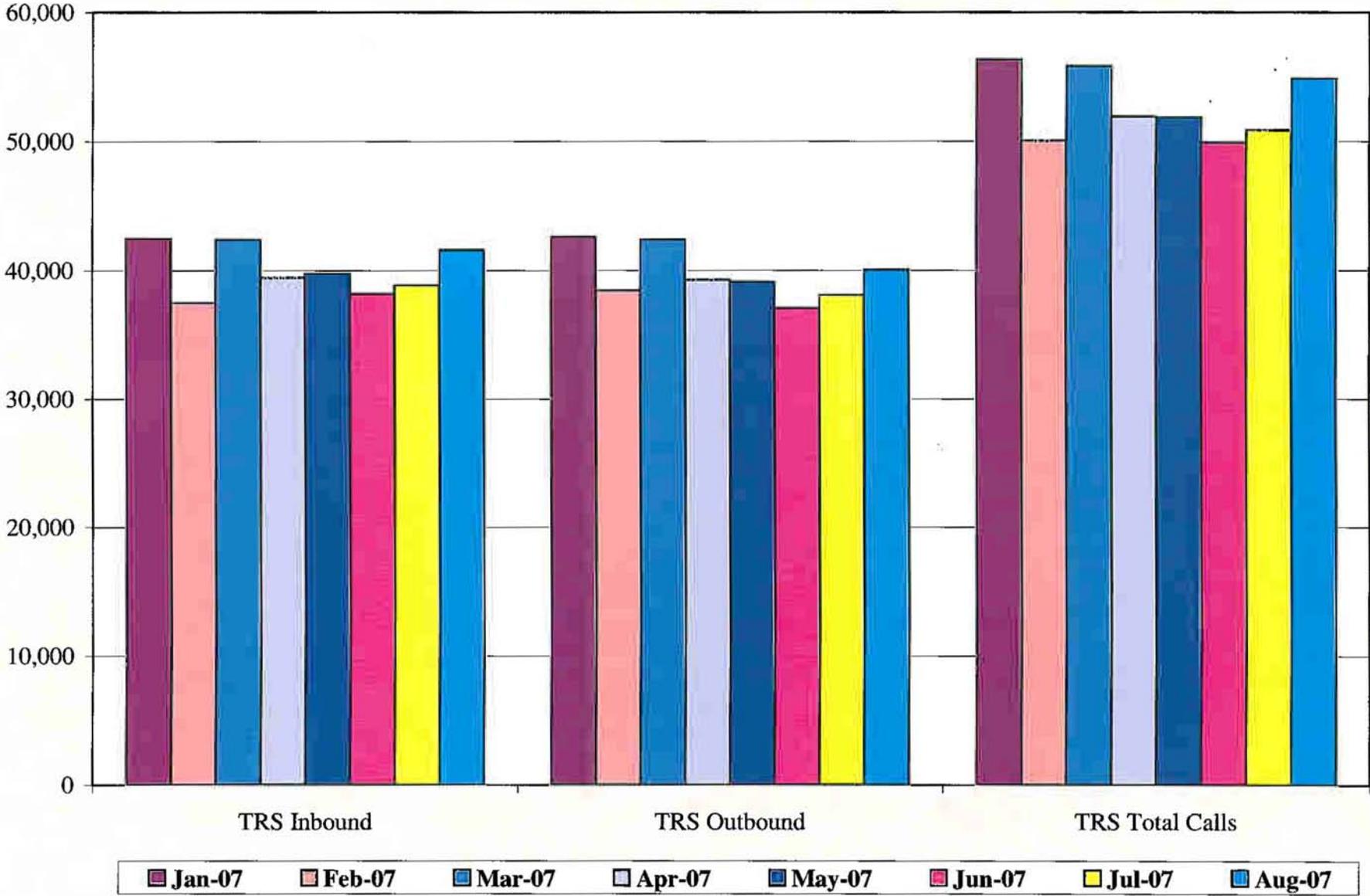
Appendix E

Minnesota Relay Call Volume Charts

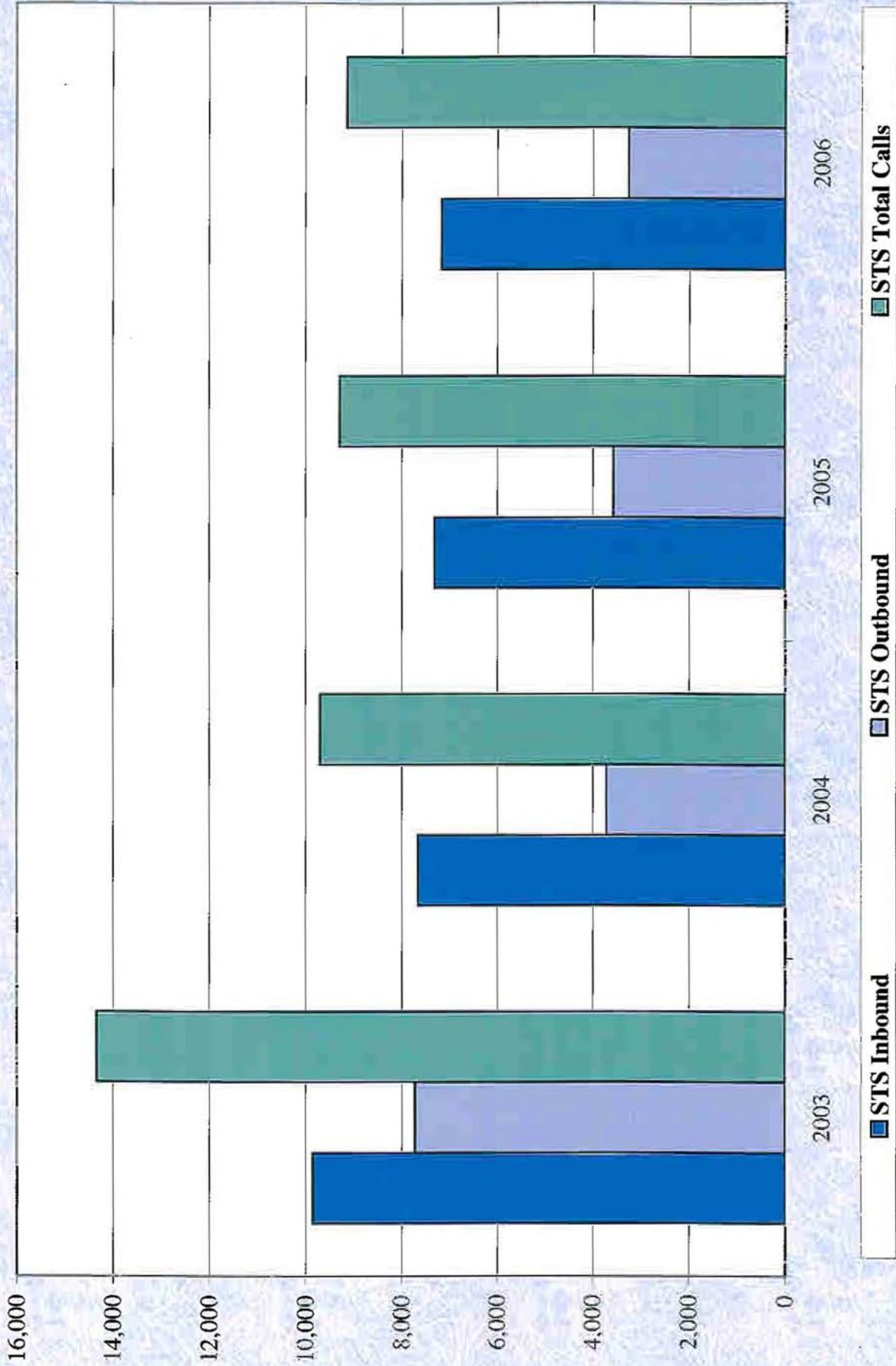
TRS Call Volumes For 2003-2006



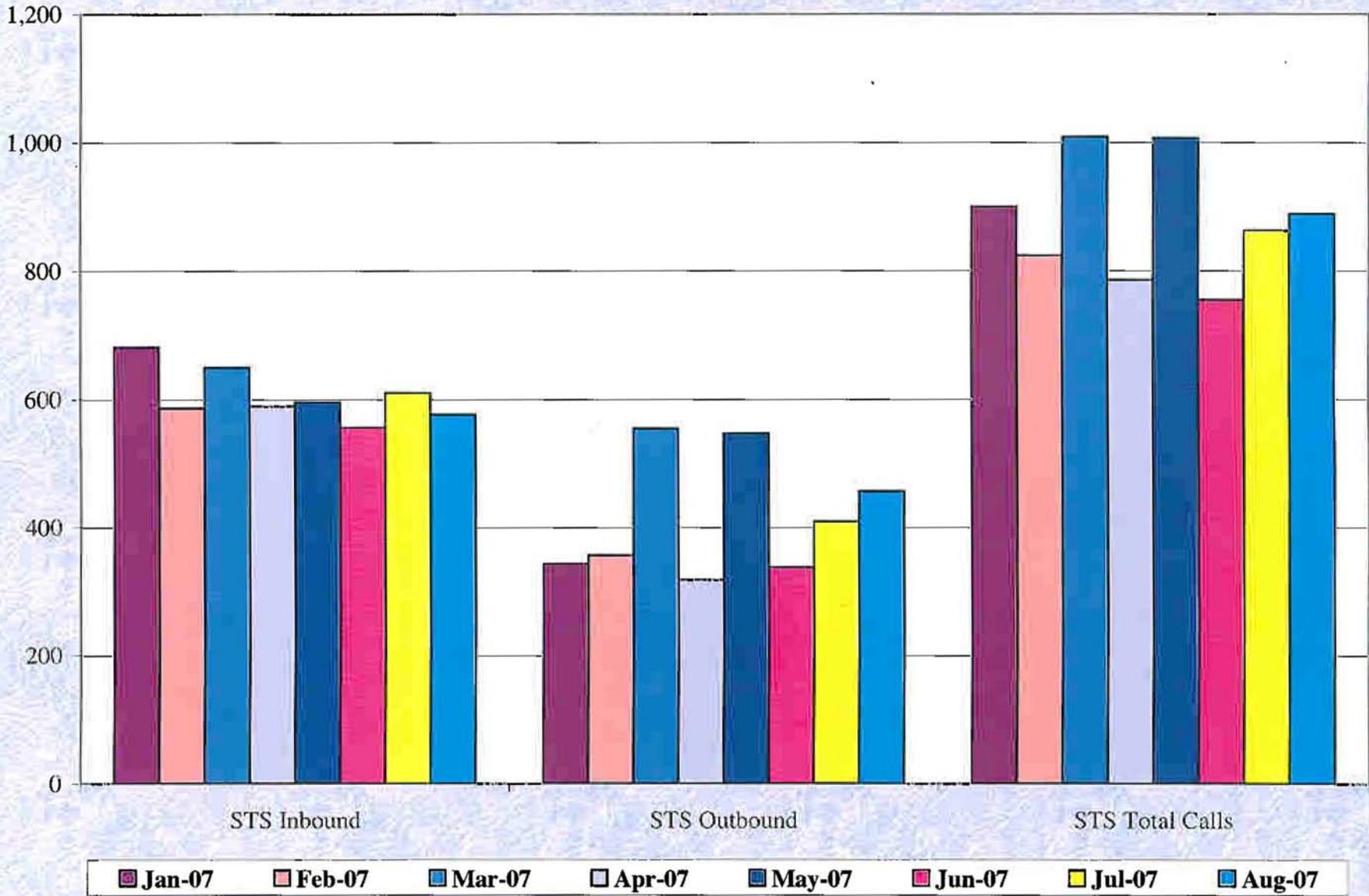
TRS Call Volumes For 2007



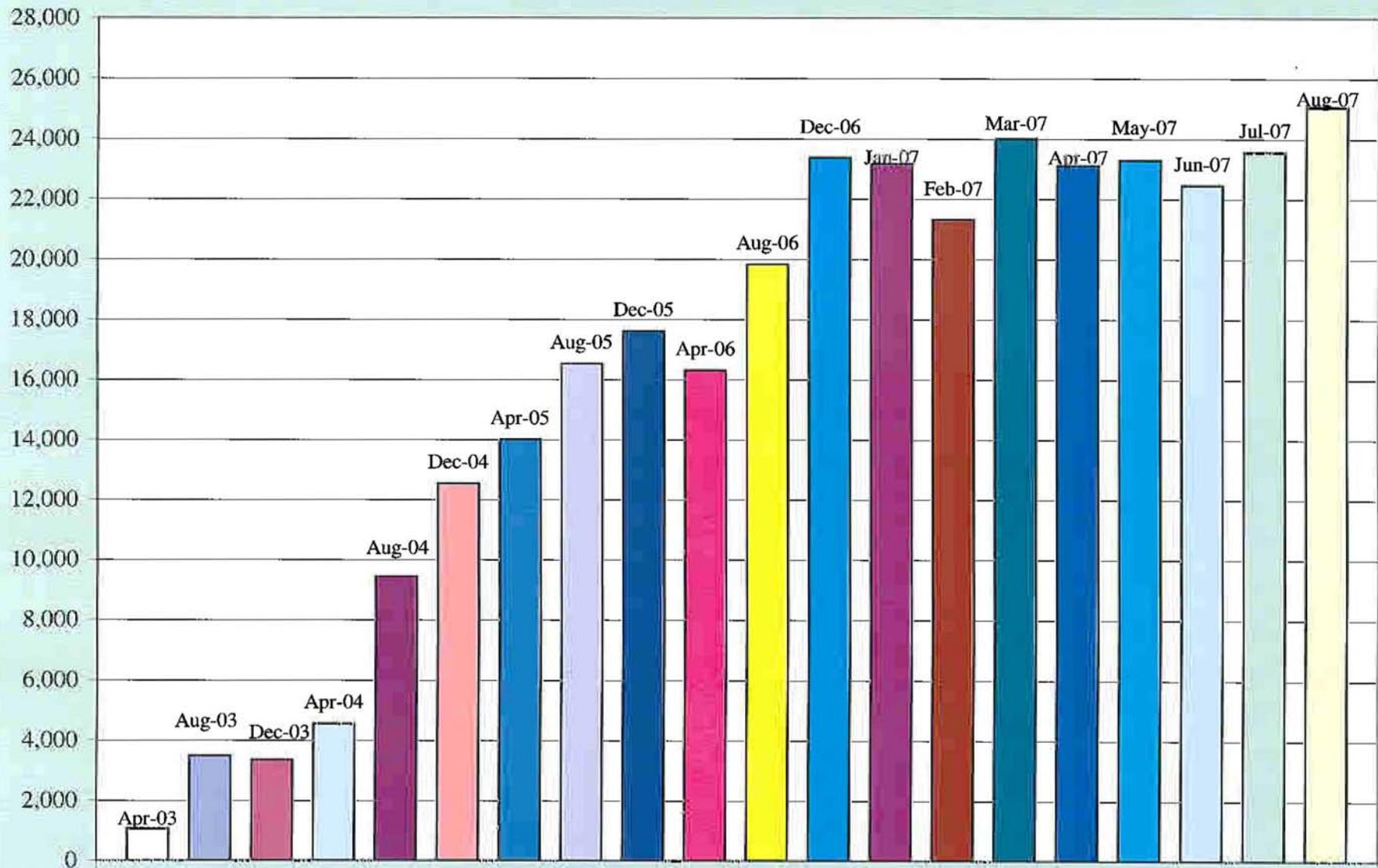
STS Call Volumes For 2003-2006



STS Call Volumes For 2007



CapTel Total Calls for April 2003 - August 2007

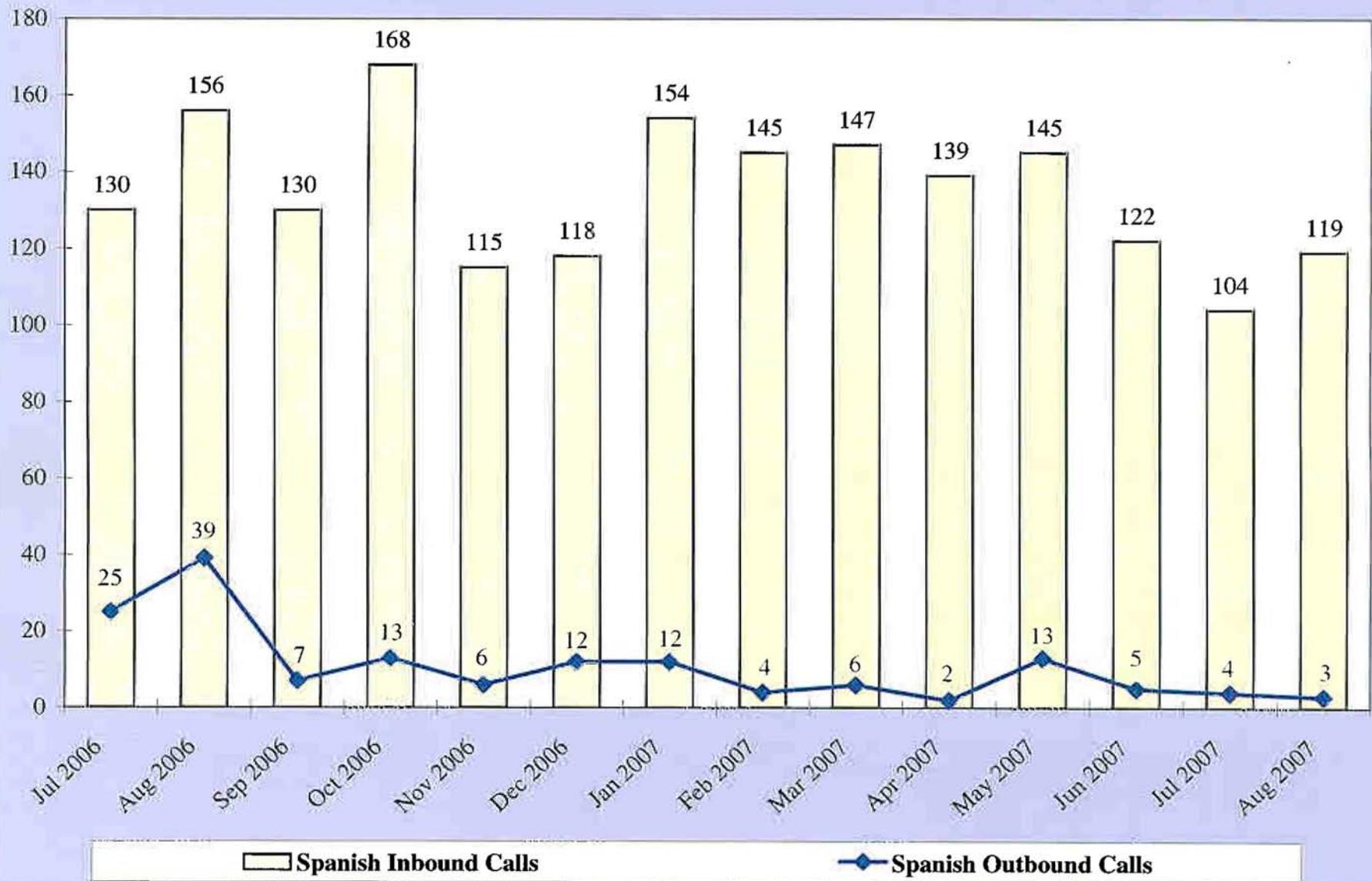


CapTel Conversation Minutes For April 2003 - August 2007



Spanish Inbound and Outbound Calls For July 2006-August 2007

(data only available beginning in July 2006)



Appendix F

*FCC CapTel Mandatory Minimum
Standards & Compliance Matrix*

FCC CapTel Mandatory Minimum Standards & Compliance Matrix

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
§ 64.603	<p>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.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>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)</p>	<p>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.</p> <p>Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3.</p> <p>Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>Sprint is able to process inbound 711 calls to include access to CapTel services.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Operational Standards			
<p>§ 64.604 A.1</p>	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Requirement applies.</p> <p>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).</p> <p>Waived. Interpreting typed ASL is not applicable.</p> <p>Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for ... enhancing transmission speed..." (§39)</p> <p>Waived. Permits use of Oral-to-text tests instead.</p>	<p>Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>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.</p> <p>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</p> <p>CapTel's voice recognition technology transmits above 100 WPM.</p> <p>Oral to text tests are given to all CapTel CAs</p>
<p>§ 64.604 A.2</p>	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 A.3</p>	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>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.</p>	<p>Waived for outbound calls (§ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (§46).</p> <p>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).</p> <p>Requirement applies.</p> <p>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).</p> <p>Also STS and HCO are waived (§29).</p>	<p>CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls.</p> <p>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.</p> <p>CapTel is capable of handling all call types normally provided by common carriers.</p>
<p>§ 64.604 A.4</p>	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user dials 9-1-1. Sprint will route the call directly to the most appropriate PSAP.</p> <p>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.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.</p>	Requirement applies.	CapTel CAs stay on all calls for a minimum of 10 minutes.
§ 64.604 A.6	<p>CA Gender Preferences</p> <p>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.</p>	Waived. (§ 36, 47-48);	
§ 64.604 A.7	<p>STS Called Numbers</p> <p>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.</p>	Waived. (§29)	
Technical Standards			
§ 64.604 B.1	<p>ASCII & Baudot</p> <p>TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.</p>	Waived. (§53-54)	

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 B.2	<p>Speed of Answer</p> <p>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.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis. The system shall be designed to a P.01 standard.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p> <p>Requirement applies.</p>	<p>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.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.</p>
§ 64.604 B.3	<p>Equal Access to IXCs</p> <p>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.</p>	<p>Requirement applies.</p>	<p>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.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 B.4	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>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)</p> <p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p>	<p>Sprint CapTel is available 24 hours a day, everyday.</p> <p>Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>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.</p>
§ 64.604 B.5	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecom to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>FCC acknowledged that CapTel is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.6</p>	<p><u>Voicemail & Interactive Menus</u></p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>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.</p> <p>TRS will handle pay-per-calls.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>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.</p> <p>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.</p> <p>Sprint CapTel supports pay-per-call call types.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Functional Standards			
§ 64.604 C.1	<p>Consumer Complaint Logs</p> <p>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.</p> <p>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.</p>	Requirement applies.	<p>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.</p> <p>Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p>
§ 64.604 C.2	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	Requirement applies.	Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
§ 64.604 C.3	<p>Public Access to Info</p> <p>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.</p> <p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	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 access 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 Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.4	<p>Rates</p> <p>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.</p>	Requirement applies.	CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.
§ 64.604 C.5	<p>Jurisdictional Separation of Costs</p> <p>(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</p> <p>(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</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	Requirement applies.	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate CapTel is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.6	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	Requirement applies.	The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.
§ 64.604 C.7	<p>Treatment of TRS Customer Info</p> <p>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.</p>	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.

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.605	<p>State Certification</p> <p>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.</p>	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
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.	<p>Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators.</p> <p>Sprint CapTel will deliver the SS7 technology on February 1, 2004.</p>
Types of Calls	<p>Two Line VCO</p> <p>Two Line HCO</p> <p>HCO-to-TTY</p> <p>HCO-to-HCO</p> <p>VCO-to-TTY</p> <p>VCO-to-VCO</p>	<p>Minimum standards pertaining to HCO are waived.</p> <p>VCO requirements still apply.</p>	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 <u>directly</u> to the most appropriate PSAP.

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Answering Machine Retrieval	<p>Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users.</p> <p>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.</p>	The requirement was not addressed in the Declaratory Ruling.	<p>Answering machine and voicemail retrieval is provided by CapTel.</p> <p>Answering machine retrieval through CapTel is accomplished when the CapTel facility captions the voice message to the CapTel users.</p>
Call Release	<p>Concluded that call release is required under FCC's functional equivalency mandate.</p> <p>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.</p>	Waived. (§ 52)	
Speed Dialing	<p>Concluded that speed dialing feature is required under FCC's equivalency mandate.</p> <p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p>	The requirement was not addressed in the Declaratory ruling.	CapTel telephones have a Speed Dial feature.

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The requirement was not addressed in the Declaratory Ruling.</p>	<p>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.</p> <p>Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals.</p>

Appendix G

Relay Center Confidentiality Agreement



CSD

Relay Center Confidentiality Agreement

Pursuant to FCC Regulation 47 C.F.R. § 64.601-64.605 and other applicable federal and state regulations, as well as CSD's policies on confidential information, I, the undersigned employee/subcontractor for **CSD Relay**, recognize the serious and confidential nature of my position and therefore unconditionally agree to the following:

1. Under no circumstances will I disclose the identity of any caller or information I may learn as a result of my position, including information I may learn about a caller from a relay call.
2. Under no circumstances will I disclose to any caller the names, schedules, or personal information of myself or any past or present employee of CSD.
3. I will only share upon request information about a call with persons who have authorized consulting and/or supervisory function over my work. I will not discuss, even among other Relay employees or my supervisors, any names or specifics of any relay call, except as required in the course of resolving complaints. I may, however, discuss the general situation that I need assistance with in order to clarify how to process a particular type of relay call.
4. I will not watch or listen to actual calls unless I am involved in processing the call, training, or monitoring for quality as directed by management.
5. I will not use or act upon any information I have received from a relay call.
6. I shall continually keep all assignment and related information strictly confidential. In the event of my resignation or termination, I will continue to hold in the strictest confidence all information related to the work I performed as an employee/contractor for CSD.
7. I shall render relay conversations faithfully, always conveying the content and spirit of the speaker using the language that is most readily understood by the person(s) involved, and rendering the communication in its exact form and content. I understand that this may involve ASL translation and will include products approved for such use.
8. I shall not counsel, advise, or interject personal opinions (other than trained) on any relay call at any time.
9. I understand that the content of the conversation(s) that I will observe, directly or indirectly, relayed by **CSD** and other designated relay services, is confidential and that improper disclosure of the content is punishable under applicable federal and state laws.

10. In addition to the above confidentiality provisions stated in law, I also further agree that all information regarding CSD and the CSD Relay Center is proprietary and not to be shared with anyone other than CSD Relay management. This information includes, but is not limited to all documents, equipment, software, physical layout and general operations of the Relay Center and CSD office(s).

11. I agree that during my employment with CSD and for a period of two (2) years following termination, I will not engage in any business that competes with CSD within 350 square miles of any CSD Relay facility.

12. I acknowledge that I have read and understand the “CSD Confidentiality Agreement.” I agree to comply with all of the provisions of this agreement and understand that failure to do so will lead to corrective action, which may include discharge from employment.

Dated this _____ day of _____, _____, at CSD.

Employee Signature

Printed Employee Name

Appendix H

CapTel CA Pledge of Confidentiality Form

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 I

*Minnesota Relay Emergency 911
Call Tracking Reports*

Monthly Volumes of Emergency Calls
 (Relayed and Transferred Call Count)
July 2006

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Sat 7/1/2006	-	0					0	
Sun 7/2/2006	-	0					0	
Mon 7/3/2006	-	1	1				1	2
Tues 7/4/2006	-	0					0	
Weds 7/5/2006	-	0					0	
Thurs 7/6/2006	-	1	1				1	4
Fri 7/7/2006	-	0					0	
Sat 7/8/2006	-	1	1				1	1
Sun 7/9/2006	-	1	1				1	2
Mon 7/10/2006	-	0					0	
Tues 7/11/2006	-	0					0	
Weds 7/12/2006	-	1	1				1	2
Thurs 7/13/2006	-	1	1				1	5
Fri 7/14/2006	-	0					0	
Sat 7/15/2006	-	0					0	
Sun 7/16/2006	-	0					0	
Mon 7/17/2006	-	1	1				1	1
Tues 7/18/2006	-	1	1				1	5
Weds 7/19/2006	-	0					0	
Thurs 7/20/2006	-	0					0	
Fri 7/21/2006	-	1	1				1	4
Sat 7/22/2006	-	0					0	
Sun 7/23/2006	-	0					0	
Mon 7/24/2006	-	0					0	
Tues 7/25/2006	-	0					0	
Weds 7/26/2006	-	0					0	
Thurs 7/27/2006	-	0					0	
Fri 7/28/2006	-	1		1			1	3
Sat 7/29/2006	-	2	1	1			2	14
Sun 7/30/2006	-	2	2				2	8
Mon 7/31/2006	-	1	1				1	2
Monthly Total:	0	15	13	2	0	0	15	53

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

August 2006

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Tues 8/1/2006	-	2	1	1			2	7
Weds 8/2/2006	-	0					0	
Thurs 8/3/2006	-	0					0	
Fri 8/4/2006	-	2	2				2	10
Sat 8/5/2006	-	3	2	1			3	7
Sun 8/6/2006	-	0					0	
Mon 8/7/2006	-	0					0	
Tues 8/8/2006	-	2	2				2	6
Weds 8/9/2006	-	0					0	
Thurs 8/10/2006	-	0					0	
Fri 8/11/2006	-	0					0	
Sat 8/12/2006	-	1	1				1	1
Sun 8/13/2006	-	0					0	
Mon 8/14/2006	-	1		1			1	2
Tues 8/15/2006	-	2	2				2	6
Weds 8/16/2006	-	0					0	
Thurs 8/17/2006	-	0					0	
Fri 8/18/2006	-	0					0	
Sat 8/19/2006	-	0					0	
Sun 8/20/2006	-	3	3				3	17
Mon 8/21/2006	-	1		1			1	7
Tues 8/22/2006	-	0					0	
Weds 8/23/2006	-	1	1				1	3
Thurs 8/24/2006	-	0					0	
Fri 8/25/2006	-	0					0	
Sat 8/26/2006	-	2	2				2	3
Sun 8/27/2006	-	0					0	
Mon 8/28/2006	-	0					0	
Tues 8/29/2006	-	0					0	
Weds 8/30/2006	-	1		1			1	7
Thurs 8/31/2006	-	0					0	
Monthly Total:	0	21	16	5	0	0	21	76

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

September 2006

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Fri 9/1/2006	-	0					0	
Sat 9/2/2006	-	0					0	
Sun 9/3/2006	-	4	4				4	7
Mon 9/4/2006	-	1	1				1	3
Tues 9/5/2006	-	1	1				1	4
Weds 9/6/2006	-	0					0	
Thurs 9/7/2006	-	0					0	
Fri 9/8/2006	-	1		1			1	5
Sat 9/9/2006	-	1	1				1	2
Sun 9/10/2006	-	0					0	
Mon 9/11/2006	-	1	1				1	7
Tues 9/12/2006	-	0					0	
Weds 9/13/2006	-	0					0	
Thurs 9/14/2006	-	0					0	
Fri 9/15/2006	-	0					0	
Sat 9/16/2006	-	0					0	
Sun 9/17/2006	-	0					0	
Mon 9/18/2006	-	0					0	
Tues 9/19/2006	-	1		1			1	9
Weds 9/20/2006	-	0					0	
Thurs 9/21/2006	-	0					0	
Fri 9/22/2006	-	0					0	
Sat 9/23/2006	-	1	1				1	16
Sun 9/24/2006	-	1	1				1	4
Mon 9/25/2006	-	1	1				1	4
Tues 9/26/2006	-	4	2	2			4	21
Weds 9/27/2006	-	0					0	
Thurs 9/28/2006	-	0					0	
Fri 9/29/2006	-	2	1	1			2	11
Sat 9/30/2006	-	1	1				1	4
Monthly Total:	0	20	15	5	0	0	20	97

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls
 (Relayed and Transferred Call Count)
October 2006

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Sun 10/1/2006	-	0					0	
Mon 10/2/2006	-	1		1			1	3
Tues 10/3/2006	-	0					0	
Weds 10/4/2006	-	0					0	
Thurs 10/5/2006	-	0					0	
Fri 10/6/2006	-	2	2				2	18
Sat 10/7/2006	-	2	2				2	5
Sun 10/8/2006	-	0					0	
Mon 10/9/2006	-	1		1			1	7
Tues 10/10/2006	-	0					0	
Weds 10/11/2006	-	0					0	
Thurs 10/12/2006	-	0					0	
Fri 10/13/2006	-	0					0	
Sat 10/14/2006	-	1	1				1	5
Sun 10/15/2006	-	0					0	
Mon 10/16/2006	-	0					0	
Tues 10/17/2006	-	1	1				1	5
Weds 10/18/2006	-	0					0	
Thurs 10/19/2006	-	0					0	
Fri 10/20/2006	-	0					0	
Sat 10/21/2006	-	0					0	
Sun 10/22/2006	-	0					0	
Mon 10/23/2006	-	0					0	
Tues 10/24/2006	-	0					0	
Weds 10/25/2006	-	1		1			1	4
Thurs 10/26/2006	-	1		1			1	1
Fri 10/27/2006	-	1	1				1	2
Sat 10/28/2006	-	1	1				1	10
Sun 10/29/2006	-	1	1				1	4
Mon 10/30/2006	-	1	1				1	5
Tues 10/31/2006	-	3	3				3	
Monthly Total:	0	17	13	4	0	0	17	69

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls
 (Relayed and Transferred Call Count)
 November 2006

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Weds 11/1/2006	-	0					0	
Thurs 11/2/2006	-	0					0	
Fri 11/3/2006	-	0					0	
Sat 11/4/2006	-	2	2				2	8
Sun 11/5/2006	-	1		1			1	11
Mon 11/6/2006	-	2	1	1			2	11
Tues 11/7/2006	-	0					0	
Weds 11/8/2006	-	1	1				1	7
Thurs 11/9/2006	-	1		1			1	8
Fri 11/10/2006	-	3	2	1			3	8
Sat 11/11/2006	-	0					0	
Sun 11/12/2006	-	1		1			1	12
Mon 11/13/2006	-	0					0	
Tues 11/14/2006	-	0					0	
Weds 11/15/2006	-	1		1			1	1
Thurs 11/16/2006	-	0					0	
Fri 11/17/2006	-	2	2				2	2
Sat 11/18/2006	-	0					0	
Sun 11/19/2006	-	0					0	
Mon 11/20/2006	-	2		2			2	8
Tues 11/21/2006	-	0					0	
Weds 11/22/2006	-	0					0	
Thurs 11/23/2006	-	1	1				1	3
Fri 11/24/2006	-	0					0	
Sat 11/25/2006	-	1		1			1	6
Sun 11/26/2006	-	0					0	
Mon 11/27/2006	-	0					0	
Tues 11/28/2006	-	0					0	
Weds 11/29/2006	-	0					0	
Thurs 11/30/2006	-	1	1				1	1
Monthly Total:	0	19	10	9	0	0	19	86

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

December 2006

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Fri 12/1/2006	-	0					0	
Sat 12/2/2006	-	0					0	
Sun 12/3/2006	-	0					0	
Mon 12/4/2006	-	0					0	
Tues 12/5/2006	-	1	1				1	3
Weds 12/6/2006	-	2	1	1			2	15
Thurs 12/7/2006	-	0					0	
Fri 12/8/2006	-	1	1				1	1
Sat 12/9/2006	-	0					0	
Sun 12/10/2006	-	0					0	
Mon 12/11/2006	-	0					0	
Tues 12/12/2006	-	0					0	
Weds 12/13/2006	-	1	1				1	2
Thurs 12/14/2006	-	0					0	
Fri 12/15/2006	-	1		1			1	10
Sat 12/16/2006	-	0					0	
Sun 12/17/2006	-	0					0	
Mon 12/18/2006	-	0					0	
Tues 12/19/2006	-	0					0	
Weds 12/20/2006	-	0					0	
Thurs 12/21/2006	-	0					0	
Fri 12/22/2006	-	2	2				2	6
Sat 12/23/2006	-	0					0	
Sun 12/24/2006	-	0					0	
Mon 12/25/2006	-	0					0	
Tues 12/26/2006	-	2	1	1			2	36
Weds 12/27/2006	-	0					0	
Thurs 12/28/2006	-	0					0	
Fri 12/29/2006	-	1	1				1	4
Sat 12/30/2006	-	1	1				1	4
Sun 12/31/2006	-	3	3				3	20
Monthly Total:	0	15	12	3	0	0	15	101

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls
(Relayed and Transferred Call Count)
January 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Mon 1/1/2007	-	1	1				1	3
Tues 1/2/2007	-	2		2			2	5
Weds 1/3/2007	-	0					0	
Thurs 1/4/2007	-	0					0	
Fri 1/5/2007	-	0					0	
Sat 1/6/2007	-	1		1			1	6
Sun 1/7/2007	-	0					0	
Mon 1/8/2007	-	0					0	
Tues 1/9/2007	-	0					0	
Weds 1/10/2007	-	0					0	
Thurs 1/11/2007	-	1	1				1	1
Fri 1/12/2007	-	0					0	
Sat 1/13/2007	-	1		1			1	7
Sun 1/14/2007	-	2		2			2	10
Mon 1/15/2007	-	1		1			1	6
Tues 1/16/2007	-	0					0	
Weds 1/17/2007	-	0					0	
Thurs 1/18/2007	-	0					0	
Fri 1/19/2007	-	1	1				1	6
Sat 1/20/2007	-	2	2				2	9
Sun 1/21/2007	-	2	1	1			2	6
Mon 1/22/2007	-	0					0	
Tues 1/23/2007	-	1		1			1	21
Weds 1/24/2007	-	0					0	
Thurs 1/25/2007	-	0					0	
Fri 1/26/2007	-	1		1			1	11
Sat 1/27/2007	-	2	2				2	18
Sun 1/28/2007	-	0					0	
Mon 1/29/2007	-	1	1				1	13
Tues 1/30/2007	-	1	1				1	1
Weds 1/31/2007	-	1	1				1	4
Monthly Total:	0	21	11	10	0	0	21	127

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

February 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes	
			Voice	TTY	ASCII	STS			
Thurs	2/1/2007	-	0				0		
Fri	2/2/2007	-	1	1			1	3	
Sat	2/3/2007	-	0				0		
Sun	2/4/2007	-	0				0		
Mon	2/5/2007	-	0				0		
Tues	2/6/2007	-	0				0		
Weds	2/7/2007	-	0				0		
Thurs	2/8/2007	-	0				0		
Fri	2/9/2007	-	0				0		
Sat	2/10/2007	-	1	1			1	2	
Sun	2/11/2007	-	1	1			1	1	
Mon	2/12/2007	-	0				0		
Tues	2/13/2007	-	0				0		
Weds	2/14/2007	-	1		1		1	5	
Thurs	2/15/2007	-	0				0		
Fri	2/16/2007	-	2	2			2	8	
Sat	2/17/2007	-	1	1			1	3	
Sun	2/18/2007	-	1	1			1	3	
Mon	2/19/2007	-	0				0		
Tues	2/20/2007	-	0				0		
Weds	2/21/2007	-	0				0		
Thurs	2/22/2007	-	0				0		
Fri	2/23/2007	-	0				0		
Sat	2/24/2007	-	0				0		
Sun	2/25/2007	-	1		1		1	7	
Mon	2/26/2007	-	2	1	1		2	7	
Tues	2/27/2007	-	1		1		1	10	
Weds	2/28/2007	-	0				0		
Monthly Total:		0	12	8	4	0	0	12	49

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls
(Relayed and Transferred Call Count)
March 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Thurs 3/1/2007	-	0					0	
Fri 3/2/2007	-	1	1				1	3
Sat 3/3/2007	-	0					0	
Sun 3/4/2007	-	3	3				3	14
Mon 3/5/2007	-	0					0	
Tues 3/6/2007	-	0					0	
Weds 3/7/2007	-	0					0	
Thurs 3/8/2007	-	1		1			1	5
Fri 3/9/2007	-	1	1				1	3
Sat 3/10/2007	-	1	1				1	3
Sun 3/11/2007	-	0					0	
Mon 3/12/2007	-	2	2				2	13
Tues 3/13/2007	-	2	1	1			2	8
Weds 3/14/2007	-	1		1			1	4
Thurs 3/15/2007	-	2		2			2	17
Fri 3/16/2007	-	1		1			1	6
Sat 3/17/2007	-	0					0	
Sun 3/18/2007	-	1	1				1	4
Mon 3/19/2007	-	2	2				2	8
Tues 3/20/2007	-	2	2				2	6
Weds 3/21/2007	-	2	2				2	16
Thurs 3/22/2007	-	1		1			1	16
Fri 3/23/2007	-	1	1				1	9
Sat 3/24/2007	-	2	1	1			2	11
Sun 3/25/2007	-	0					0	
Mon 3/26/2007	-	1	1				1	6
Tues 3/27/2007	-	0					0	
Weds 3/28/2007	-	0					0	
Thurs 3/29/2007	-	1	1				1	1
Fri 3/30/2007	-	3	2	1			3	31
Sat 3/31/2007	-	0					0	
Monthly Total:	0	31	22	9	0	0	31	184

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

April 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes	
			Voice	TTY	ASCII	STS			
Sun	4/1/2007	-	0				0		
Mon	4/2/2007	-	2	2			2	4	
Tues	4/3/2007	-	2		2		2	40	
Weds	4/4/2007	-	0				0		
Thurs	4/5/2007	-	0				0		
Fri	4/6/2007	-	0				0		
Sat	4/7/2007	-	1	1			1	4	
Sun	4/8/2007	-	2	2			2	6	
Mon	4/9/2007	-	1		1		1	13	
Tues	4/10/2007	-	0				0		
Weds	4/11/2007	-	0				0		
Thurs	4/12/2007	-	1		1		1	5	
Fri	4/13/2007	-	0				0		
Sat	4/14/2007	-	0				0		
Sun	4/15/2007	-	0				0		
Mon	4/16/2007	-	0				0		
Tues	4/17/2007	-	0				0		
Weds	4/18/2007	-	0				0		
Thurs	4/19/2007	-	1	1			1	2	
Fri	4/20/2007	-	2	2			2	5	
Sat	4/21/2007	-	0				0		
Sun	4/22/2007	-	2	1	1		2	10	
Mon	4/23/2007	-	3	3			3	5	
Tues	4/24/2007	-	0				0		
Weds	4/25/2007	-	0				0		
Thurs	4/26/2007	-	1	1			1	3	
Fri	4/27/2007	-	0				0		
Sat	4/28/2007	-	0				0		
Sun	4/29/2007	-	0				0		
Mon	4/30/2007	-	0				0		
Monthly Total:		0	18	13	5	0	0	18	97

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls
 (Relayed and Transferred Call Count)
 May 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Tues 5/1/2007	-	1		1			1	8
Weds 5/2/2007	-	3	3				3	25
Thurs 5/3/2007	-	2	1	1			2	13
Fri 5/4/2007	-	2	2				2	10
Sat 5/5/2007	-	0					0	
Sun 5/6/2007	-	1		1			1	7
Mon 5/7/2007	-	1	1				1	2
Tues 5/8/2007	-	0					0	
Weds 5/9/2007	-	2		2			2	7
Thurs 5/10/2007	-	0					0	
Fri 5/11/2007	-	0					0	
Sat 5/12/2007	-	0					0	
Sun 5/13/2007	-	0					0	
Mon 5/14/2007	-	0					0	
Tues 5/15/2007	-	0					0	
Weds 5/16/2007	-	1	1				1	9
Thurs 5/17/2007	-	1	1				1	7
Fri 5/18/2007	-	1	1				1	9
Sat 5/19/2007	-	0					0	
Sun 5/20/2007	-	1	1				1	2
Mon 5/21/2007	-	2		2			2	20
Tues 5/22/2007	-	3	2	1			3	8
Weds 5/23/2007	-	2	2				2	7
Thurs 5/24/2007	-	0					0	
Fri 5/25/2007	-	0					0	
Sat 5/26/2007	-	1	1				1	7
Sun 5/27/2007	-	1	1				1	3
Mon 5/28/2007	-	3	3				3	8
Tues 5/29/2007	-	1	1				1	4
Weds 5/30/2007	-	0					0	
Thurs 5/31/2007	-	1	1				1	5
Monthly Total:	0	30	22	8	0	0	30	161

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

June 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Fri 6/1/2007	-	2	1	1			2	7
Sat 6/2/2007	-	1	1				1	2
Sun 6/3/2007	-	2	2				2	7
Mon 6/4/2007	-	0					0	
Tues 6/5/2007	-	0					0	
Weds 6/6/2007	-	0					0	
Thurs 6/7/2007	-	2	2				2	7
Fri 6/8/2007	-	1	1				1	12
Sat 6/9/2007	-	1	1				1	8
Sun 6/10/2007	-	0					0	
Mon 6/11/2007	-	0					0	
Tues 6/12/2007	-	0					0	
Weds 6/13/2007	-	3	2	1			3	15
Thurs 6/14/2007	-	0					0	
Fri 6/15/2007	-	0					0	
Sat 6/16/2007	-	1	1				1	3
Sun 6/17/2007	-	2	2				2	3
Mon 6/18/2007	-	2	2				2	2
Tues 6/19/2007	-	0					0	
Weds 6/20/2007	-	0					0	
Thurs 6/21/2007	-	0					0	
Fri 6/22/2007	-	3	3				3	3
Sat 6/23/2007	-	1	1				1	3
Sun 6/24/2007	-	1	1				1	6
Mon 6/25/2007	-	0					0	
Tues 6/26/2007	-	0					0	
Weds 6/27/2007	-	1	1				1	1
Thurs 6/28/2007	-	0					0	
Fri 6/29/2007	-	1	1				1	6
Sat 6/30/2007	-	3	3				3	8
Monthly Total:	0	27	25	2	0	0	27	93

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls
 (Relayed and Transferred Call Count)
 July 2007

Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
Sun 7/1/2007	-	1	1				1	1
Mon 7/2/2007	-	1	1				1	2
Tues 7/3/2007	-	2	2				2	5
Weds 7/4/2007	-	0					0	
Thurs 7/5/2007	-	1	1				1	3
Fri 7/6/2007	-	0					0	
Sat 7/7/2007	-	0					0	
Sun 7/8/2007	-	1	1				1	2
Mon 7/9/2007	-	2	1	1			2	9
Tues 7/10/2007	-	1	1				1	5
Weds 7/11/2007	-	2	2				2	13
Thurs 7/12/2007	-	2	1	1			2	10
Fri 7/13/2007	-	1	1				1	6
Sat 7/14/2007	-	0					0	
Sun 7/15/2007	-	1	1				1	1
Mon 7/16/2007	-	0					0	
Tues 7/17/2007	-	0					0	
Weds 7/18/2007	-	0					0	
Thurs 7/19/2007	-	0					0	
Fri 7/20/2007	-	0					0	
Sat 7/21/2007	-	0					0	
Sun 7/22/2007	-	1		1			1	11
Mon 7/23/2007	-	0					0	
Tues 7/24/2007	-	0					0	
Weds 7/25/2007	-	3	3				3	10
Thurs 7/26/2007	-	0					0	
Fri 7/27/2007	-	0					0	
Sat 7/28/2007	-	1	1				1	2
Sun 7/29/2007	-	0					0	
Mon 7/30/2007	-	1		1			1	8
Tues 7/31/2007	-	0					0	
Monthly Total:	0	21	17	4	0	0	21	88

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

Monthly Volumes of Emergency Calls

(Relayed and Transferred Call Count)

August 2007

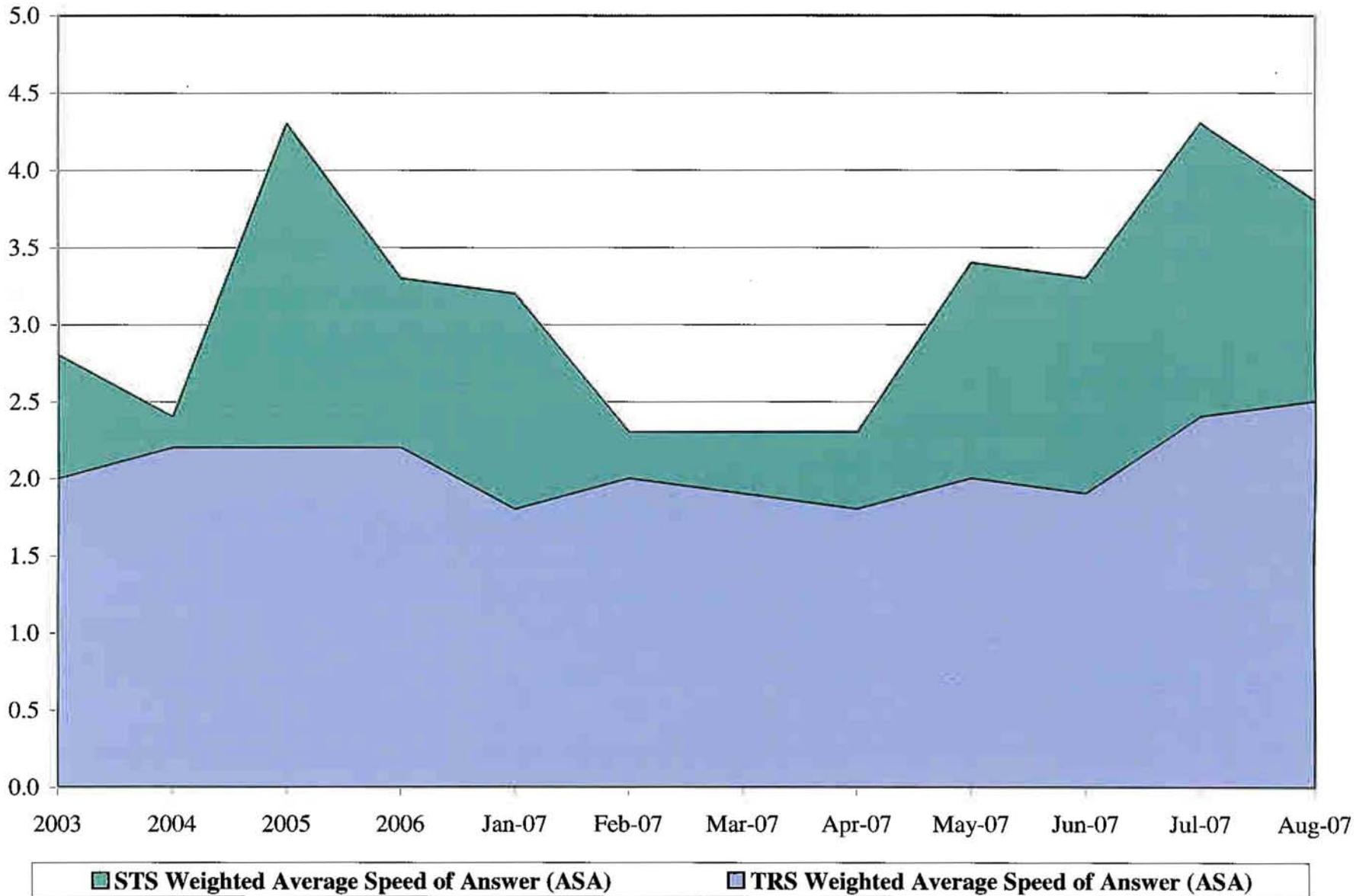
Date	Transferred Directly to PSAP	Monitored/Relayed By MN	Inbound Modality				Total Calls	Session Minutes
			Voice	TTY	ASCII	STS		
8/1/2007	-	0						
Weds								
Thurs 8/2/2007	-	1	1					1
Fri 8/3/2007	-	2		2				17
Sat 8/4/2007	-	0						
Sun 8/5/2007	-	0						
Mon 8/6/2007	-	0						
Tues 8/7/2007	-	2	1	1				9
Weds 8/8/2007	-	3	2	1				20
Thurs 8/9/2007	-	0						
Fri 8/10/2007	-	0						
Sat 8/11/2007	-	0						
Sun 8/12/2007	-	0						
Mon 8/13/2007	-	0						
Tues 8/14/2007	-	0						
Weds 8/15/2007	-	0						
Thurs 8/16/2007	-	1	1					1
Fri 8/17/2007	-	2	1	1				9
Sat 8/18/2007	-	2	1	1				17
Sun 8/19/2007	-	2	2					3
Mon 8/20/2007	-	2	2					3
Tues 8/21/2007	-	0						
Weds 8/22/2007	-	2	2					5
Thurs 8/23/2007	-	0						
Fri 8/24/2007	-	0						
Sat 8/25/2007	-	0						
Sun 8/26/2007	-	0						
Mon 8/27/2007	-	2	1	1				6
Tues 8/28/2007	-	0						
Weds 8/29/2007	-	0						
Thurs 8/30/2007	-	0						
Fri 8/31/2007	-	0						
Monthly Total:	0	21	14	7	0	0	0	91

The Relayed by MN column includes calls where the MN was requested to remain on the call regardless of whether they were an active or passive participant (relaying) of the call.

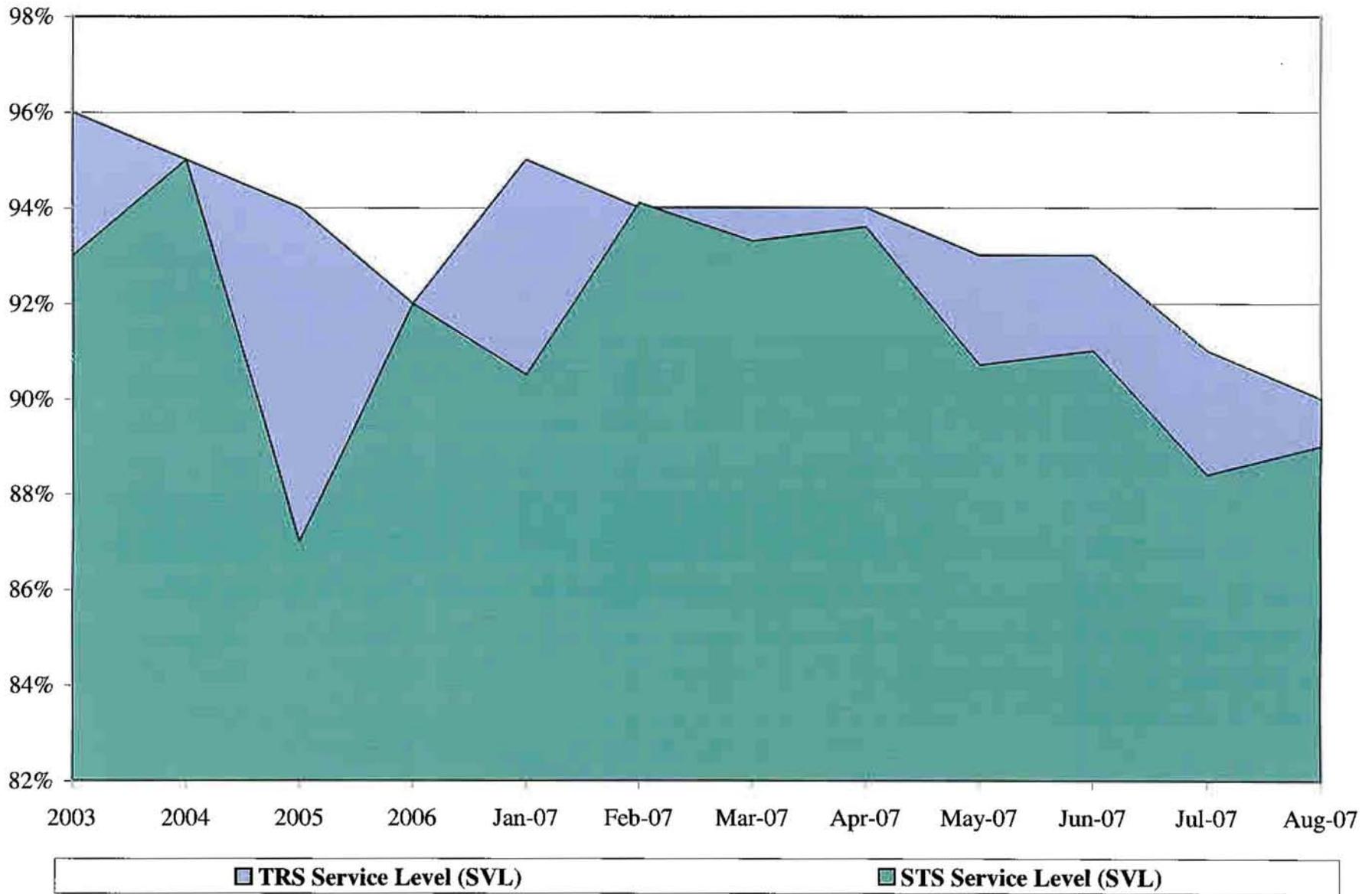
Appendix J

Minnesota Relay ASA & SVL Statistics

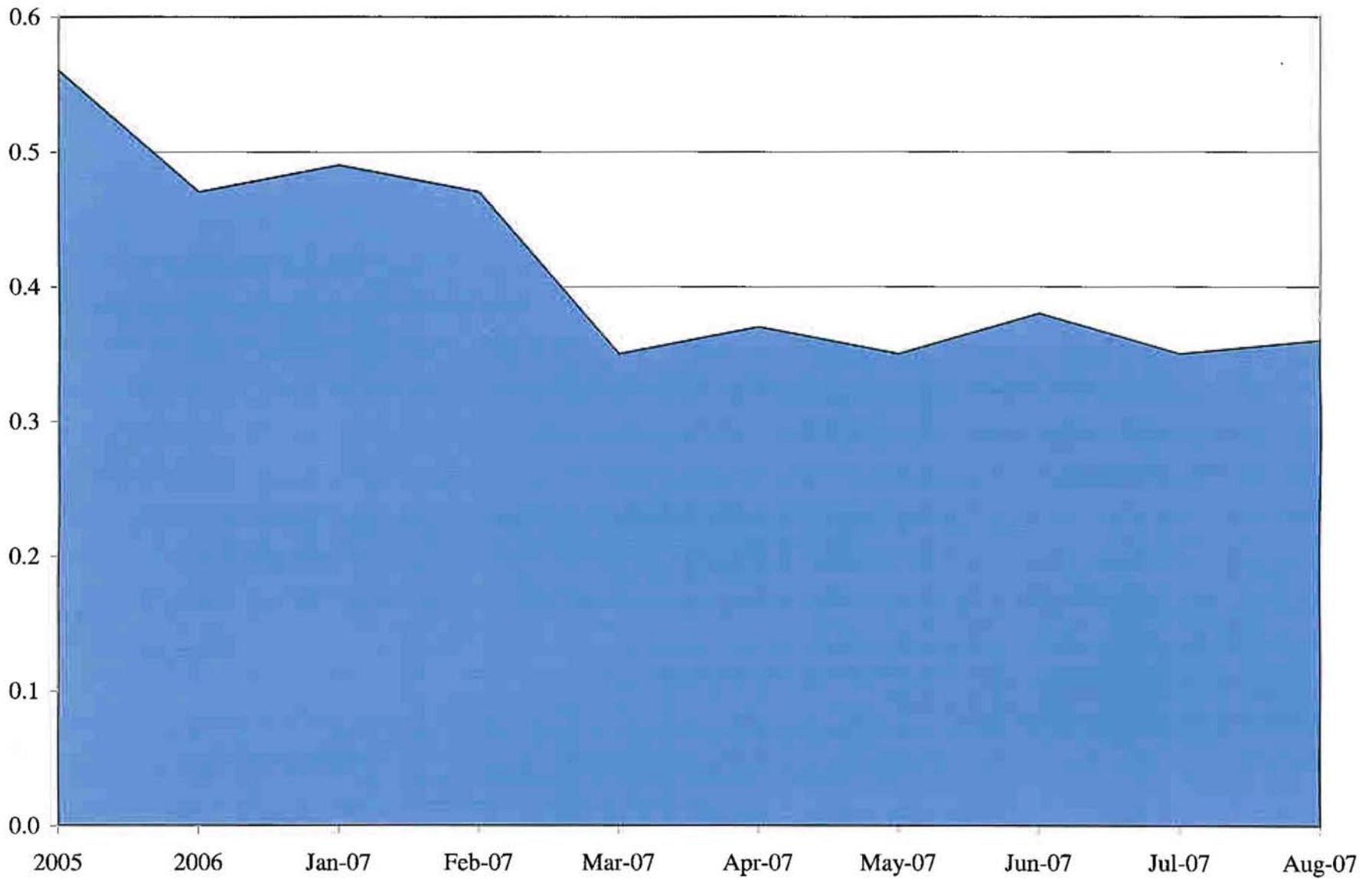
TRS and STS Weighted Average Speed of Answer



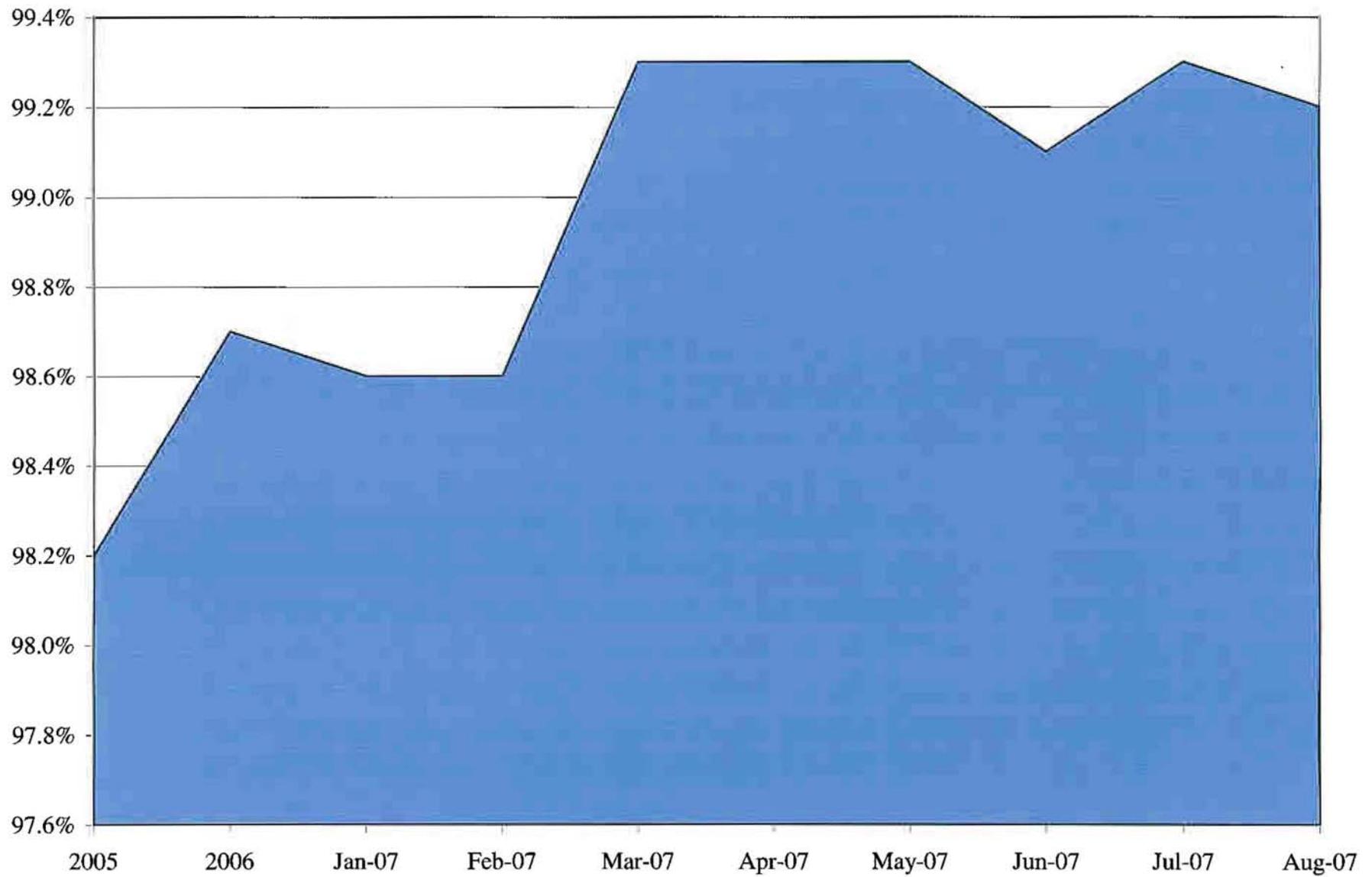
TRS and STS Weighted Service Level



CapTel Average Speed of Answer



CapTel Service Level



Appendix K

Minnesota Relay Carrier of Choice Letter

DATE

Carrier's Name
Attn:
Carrier's Address
City, State, Zip

Re: Obligation of interexchange carriers to provide access to their services via
Telecommunications Relay Services

Dear Carrier's Name:

This letter serves to notify you that a Minnesota consumer has requested to use Carrier's Name as his/her carrier of choice for long distance Telecommunications Relay Services (TRS) calls. However, our records indicate that Carrier's Name has not taken the steps necessary to enable access to its services by TRS users.

47 C.F.R. § 64.604 (b)(3) states that "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."

TRS is mandated by the Americans with Disabilities Act of 1990 and allows people with hearing or speech disabilities to have functionally equivalent telecommunications and equal access to the telecommunications network in the same manner as an individual who does not have a hearing or speech disability. TRS standards are established and regulated by the Federal Communications Commission (FCC), and the Telecommunications Access Minnesota (TAM) program within the Minnesota Department of Commerce (DOC) is responsible for TRS management and compliance in Minnesota. DOC-TAM administers the Minnesota Relay (TRS) through a contract with Communication Service for the Deaf (with Sprint Communications Company, LP as a subcontractor).

Please review the attached information detailing the steps necessary to ensure that your services can be accessed by TRS users.

If Carrier's Name believes that it has already taken the steps to be a carrier of choice (including submission of a Letter of Authorization to Sprint), please contact me and I will research the matter and resolve any discrepancies so that Carrier's Name is listed as an available carrier for TRS calls.

If Carrier's Name *has not* yet taken the necessary steps to be a carrier of choice, please do so at this time.

If you have questions on the arrangements necessary to ensure that your services can be accessed by TRS users, please contact Emma Danielson with Sprint Relay at emma.danielson@sprint.com or 217-698-4031.

Please Note: In a Public Notice released by the FCC on October 23, 2000, the FCC reminded carriers that “[A] carrier’s failure to take appropriate steps to enable access to its services by TRS users may lead to monetary forfeitures or other enforcement actions by the Commission.”¹

At the request of the FCC, DOC-TAM submits to the FCC any failure of a company to achieve compliance. If this matter is satisfactorily addressed prior to [45 days], referral to the FCC will not be necessary.

If **Carrier’s Name** is in the process of achieving compliance with 47 C.F.R. § 64.604 (b)(3), but needs additional time, please contact me prior to [45 days] to address when compliance is anticipated.

Thank you for your prompt attention to this matter.

Sincerely,



Rochelle Renee Garrow, Administrator
Telecommunications Access Minnesota
Minnesota Department of Commerce
85 Seventh Place East, Suite 600
St. Paul, MN 55101-3165
651-297-8941 / 800-657-3599
Fax: 651-297-7891
rochelle.garrow@state.mn.us

CC: Jim Skjeveland, CSD
Trich Shipley, CSD CRO
Emma Danielson, Sprint

¹ See Enforcement Bureau Issues Letter in Support of Initiatives by the Maryland Public Service Commission to promote Compliance with FCC Rules Pertaining to Telecommunications Relay Services, Public Notice , DA-00-2383(Enf. Bur. Rel. Oct. 23, 2000).

Attachment A lists the facility-based providers who are currently available as a Minnesota Relay Carrier of Choice. If your company (or your facility based provider) is not currently listed, please review the following and determine the appropriate action needed to be taken:

Facility-based provider

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). You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information.

Non-facility based provider

1. If your underlying toll carrier ***is a current provider*** for Minnesota Relay's Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code and SS7 Transit Network Selector information. 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 (Please see Attachment C for sample letter of authorization).
2. If your underlying toll carrier ***is not a current provider*** for Minnesota Relay's 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). You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information.

Attachment B lists Sprint TRS Access Tandem Interconnection locations. The best way to provide access to your long distance network through TRS for your customers is to designate the 8 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off long distance 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 an example of a Letter of Authorization that will need to be submitted to Sprint. **Before you submit a Letter of Authorization to Sprint:**

1. Your (or your underlying toll carrier) CIC codes and SS7 Transit Network Selector information associated with 1+, 0+, and 0- dialing must be loaded into the regional (and/or state) access tandems.
2. You (or your underlying toll carrier) will need to support SS7 tandem interconnection.
3. 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**.
4. 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 Services – Technical Needs" document.

Once Sprint receives your written authorization, they will schedule translation updates in the next available release (usually 30 to 90 days). **Information obtained from the carriers will be used solely for the purpose of providing equal access for Minnesota Relay users and shall be held proprietary.**

We encourage you to contact Sprint Relay to discuss the necessary steps to allow your customer(s) to use your long distance services through TRS. Please contact:

Emma Danielson
Sprint Relay
2055 West Iles Ave, Suite D
Springfield IL 62704
217-698-4031
emma.danielson@sprint.com

Current facility-based providers for Minnesota TRS long distance calls

<u>Entity</u>	<u>CIC Code</u>
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 5/23/2006

Attachment A

Sprint TRS 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
Massachusetts(West)	Springfield	SPFDMAWO01T	Verizon
Massachusetts(East)	Cambridge	CMBRMABE01T	Verizon
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
Alaska	Via GCI (Seattle)	STTLWAWBLMO/ ANCRKGCDS0	GCI
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bell
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bell
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 5/23/06

Attachment B

SAMPLE Letter of Authorization

< DATE >

Emma Danielson, Account Manager
Sprint Relay
2055 West Iles Ave, Suite D
Springfield IL 62704
Fax: 1-866-410-4260

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- dialing through Sprint TRS at the < Regional Center Tandems >.

1. Regional Center Tandems

Toll Carrier: < insert name> You will need to provide Sprint with your toll carrier's OZZ, SS7 Network Transit Selector information and the values for Transit Network Selector (TNS) SS7 field. That field is made up of two values, the CIC code and the carrier's Circuit Codes for the carrier at that Access Tandem.

Underlying Toll Carrier: <insert name>

State	Access Tandem	Tandem CLLI Code	Tandem LEC	CIC Code	TNS	OZZ
Florida	Miami	NDADFLGG01T	Bell South			
Missouri	Kansas City	KSCYM05503T	SBC			
New York	Syracuse	SYRCNYSU50T	Bell Atlantic			
Ohio	Dayton	DYTNOH225GT	Ameritech			
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest			
Texas	Ft Worth	FTWOTXED03T	SBC			
Texas International	Austin	AUSTTXGR06T	SBC			
California	Sacramento	SCRMCA0103T	Verizon/ Pac Bell			

Updated 5/23/06

OR

<State Located > Tandem

Toll Carrier: < insert carrier name>. You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information and the values for Transit Network Selector (TNS) SS7 field. That field is made up of two values, the CIC code and the carrier's Circuit Codes for the carrier at that Access Tandem.

Underlying Toll Carrier: <insert carrier name>

CIC: < insert carrier identification code > and SS7 Transit Network Selector information associated with 1+, 0+, and 0- dialing must be loaded into the regional (and/or state) access tandems and the values for Transit Network Selector (TNS) SS7 field. That field is made up of two values, the CIC code and the carrier's Circuit Codes for the carrier at that Access Tandem.

2. Call Type Restrictions

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

OR

< 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 L

*DOC-TAM's Letters to FCC Regarding
Compliance with § 64.604 (b)(3)*

April 25, 2006

Consumer Inquiries & Complaints Division
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554
Attn: Jenifer Simpson

Re: Consumer Complaint Regarding Comcast Not Available
as a Carrier of Choice in Minnesota.

Dear Ms. Simpson,

As required by Federal Communications Commission (FCC) 47 C.F.R §64.604 (c) (6) (iii), the Minnesota Department of Commerce-Telecommunications Access Minnesota respectfully surrenders jurisdiction of a Telecommunications Relay Service (TRS) complaint filed in Minnesota that has been unresolved for over 180 days.

I do not have all of the details, but from the information I have been provided with, the complaint details are as follows:

Minnesota Relay user Deb Jarnagin (TTY 651-994-7972) wanted to use Comcast as her long distance carrier for relay calls. However, Comcast is not available as a Carrier of Choice (COC) in Minnesota at this time. As per 47 C.F.R. §64.604 (b) (3) "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." I believe Ms. Jarnagin contacted Comcast directly to express her concern that Comcast was not available as a COC through Minnesota Relay.

On August 23, 2005, Mike Eggert with Comcast (651-493-5260) contacted Trich Shipley with the Minnesota Relay Consumer Relations Office to notify Minnesota Relay that a Comcast customer, Deb Jarnagin, was not able to bill her long distance TRS calls to her home phone number. Trich Shipley referred the issue to Andy Lange, Sprint TRS account manager, to begin the COC process with Comcast.

On September 11, 2005, I received an e-mail from Mary Tittes, Comcast TRAC technician, stating that a customer had contacted Comcast to issue a complaint because she was not able to bill her TRS long distance calls to her home number. Ms. Tittes requested information on how this issue could be resolved. I forwarded Ms. Tittes' e-mail to Trich Shipley as it appeared to be the same complaint Minnesota Relay received in August 2005.

Trich Shipley contacted Ms. Tittes to let her know that Mike Eggert, Nancy Sander, Darren Hanson and Beth Choroser (Comcast personnel) were already working with Sprint on this issue.

Emma Danielson, Sprint account manager, notified me that she was working with Beth Choroser, Comcast Senior Director of Regulatory Compliance (215-981-7893) on the COC complaint issue. On April 11, 2005, Ms. Choroser e-mailed Ms. Danielson and explained that Comcast had meet with Sprint a few weeks ago (John Hogue, Sprint Program Manager, participated in the meeting). Ms. Choroser stated that Comcast is waiting for their Sprint long distance account manager to set up a meeting to discuss the contract for Sprint to act as their underlying long distance provider.

In an April 21, 2006, e-mail from John Hogue (Sprint) to Jim Skjeveland (Communication Service for the Deaf), Mr. Hogue stated: "It is my understanding that Comcast is working with Sprint's wholesale group to purchase a CIC Activation package and then Sprint wholesale will send in an Access Service Request (ASR) to SBC KC switch and a Fort Worth switch to activate the Comcast CIC and then Comcast will select which of the Sprint Relay states that they want to be offered as a CoC. Until Comcast and Sprint wholesale completes it network arrangements there is nothing for Sprint Relay to do."

To date, Comcast is still not available as a TRS COC in Minnesota. As it has been eight months since Ms. Jarnagin submitted a complaint to have Comcast available as her TRS long distance provider, and as this complaint is still unresolved, in accordance with 47 C.F.R §64.604 (c) (6) (iii) the Minnesota department of Commerce –Telecommunications Access Minnesota is turning jurisdiction of this complaint over to the FCC.

If I can be of further assistance, please feel free to contact me.

Sincerely,



Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 7th Place East, Suite 600
St. Paul, MN 55101-3165
(651) 297-8941
rochelle.garrow@state.mn.us

cc: Emma Danielson, Sprint Relay Account Manager
Beth Choroser, Comcast Cable Communications Senior Director of Regulatory Compliance

May 4, 2006

Consumer Inquiries & Complaints Division
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554
Attn: Jenifer Simpson

Re: Consumer Complaint Regarding CP Telecom Not Available
as a Carrier of Choice in Minnesota

Dear Ms. Simpson,

As required by Federal Communications Commission (FCC) 47 C.F.R. §64.604 (c) (6) (iii), the Minnesota Department of Commerce-Telecommunications Access Minnesota respectfully surrenders jurisdiction of a Telecommunications Relay Services (TRS) complaint filed in Minnesota that has been unresolved for over 180 days.

Below please find information regarding the CP Telecom TRS complaint:

- On November 3, 2005, Becky McGilton (Sprint Relay Customer Service Representative) e-mailed Trich Shipley (Minnesota Relay Consumer Relations Office) stating that John Bergman, calling in care of St. Louis County Jail, wanted to use CP Telecom as their Carrier of Choice (COC) for long distance Minnesota Relay calls. CP Telecom is not currently a COC in Minnesota.
- On November 4, 2005, Ms. Shipley e-mailed Andrea King (CP Telecom Account Manager) notifying her of the TRS complaint from Mr. Bergman. Ms. Shipley also carbon copied Mr. Bergman and Andy Leffler (Sprint Account Manager) on this correspondence.
- On November 9, 2005, Linda Dobinson (CP Telecom's Director of Legal and Regulatory Compliance) responded to Ms. Shipley's e-mail and indicated that that CP Telecom will provide anything necessary to implement COC, and asked that the appropriate paperwork be sent to her. Ms. Shipley acknowledged Ms. Dobson's e-mail and forwarded it on to Mr. Leffler, so that Sprint could send the necessary COC paperwork to CP Telecom.
- On December 20, 2005, Ms. Dobinson e-mailed Ms. Shipley stating that she had not received the COC paperwork from Sprint. Ms. Shipley responded and forwarded Ms. Dobinson's e-mail to Mr. Leffler asking him to send the appropriate paperwork.
- On January 11, 2006, Ms. Dobinson again e-mailed Ms. Shipley stating that she still had not received the COC paperwork from Sprint. Emma Danielson (Sprint Account

Manager) e-mailed Ms. Dobinson asking for her contact information as stated that she would send CP Telecom a letter the following day regarding COC.

- On February 6, 2006, Ms. Dobinson e-mailed Ms. Shipley and Ms. Danielson stating:

“We have reviewed the documents provided by Sprint in detail. At this time, we do not feel CP Telecom is a large enough carrier to justify the equipment, setup, testing, and cost necessary to allow this customer to get billed for the toll portion of the call through CP Telecom directly vs. one of the 29 certified LD providers on your list.

We already provide the ability for our local end users to dial 711 and get routed to the MN Telerelay office where they can choose to set up a free local based call or choose a certified LD carrier of choice to complete an LD portion of a call if necessary. Our understanding is that this meets the requirements of the federal mandate and FCC.”

Ms. Shipley responded via e-mail and explained that FCC 47 C.F.R. §64.604 (b) (3) states that “TRS users shall have access to their chosen interexchange carrier through TRS, and to all other operator services, to the same extent that such access is provided to voice users.”

Over the next couple of months there were a great number of e-mails and phone calls between CP Telecom, Sprint, CSD, and the Department of Commerce regarding the implementation of CP Telecom as a COC for Minnesota Relay.

Currently, CP Telecom has indicated that they are in the process of completing the steps necessary to be available as a TRS COC in Minnesota. On May 4, 2006, the Department of Commerce received the following update from CP Telecom:

“We believe we can set this up with CP Telecom as a non-facilities based carrier by using Global Crossing, who is already an COC, as our underlying carrier. We have been working with Global Crossing and we all agree it should work, but we want to test this before submitting the paperwork.

It took several days to get a test number setup in their system, but it is now ready for testing. The representative that we are working with, and need to test with, is out of the office until Monday, so we can't test until then. Once we do test however, then we can submit the COC paperwork. I'm not sure how long that paperwork takes to process, but as soon as it does, we will officially be setup as a carrier of choice and St. Louis County will be able to utilize CP Telecom as their long distance provider on MN-Relay calls.

If the test fails and we find that we can not use Global Crossing as our underlying carrier, then we will have no choice remaining but to install a T1 to the Rochester tandem. This will be very costly to us for 1 customer requesting CP LD via Relay, so we are hoping this option isn't necessary.”

To date, CP Telecom is not available as a TRS COC in Minnesota. As it has been 180 days since Mr. Bergman submitted a complaint to have CP Telecom available as a TRS long distance provider, and as this complaint has not been fully resolved, in accordance with 47 C.F.R. §64.604 (c) (6) (iii) the Minnesota Department of Commerce – Telecommunications Access Minnesota is turning jurisdiction of this complaint over to the FCC.

Also enclosed for your reference is a copy of the Sprint complaint report for this issue.

Contact information for persons referenced in this notice are as follows:

1. John Bergman, St. Louis County Jail
Phone: 218-726-2000
E-mail: bergmanj@co.st-louis.mn.us
2. Trich Shipley, Minnesota Relay Consumer Relations Office
Phone: 651-602-9005
E-mail: trichshipley@qwest.net
3. Emma Danielson, Sprint Relay
Phone: 877-698-5520 (TTY)
E-mail: emma.danielson@sprint.com
4. Linda Dobinson, CP Telecom
Phone: 218-336-1125
E-mail: linda.dobinson@cptelecom.net

If I can be of further assistance, please feel free to contact me.

Sincerely,



Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 7th Place East, Suite 600
St. Paul, MN 55101-3165
(651) 297-8941
rochelle.garrow@state.mn.us

cc: John Bergman, St. Louis County Jail
Trich Shipley, Minnesota Relay Consumer Relations Office
Emma Danielson, Sprint Relay
Linda Dobinson, CP Telecom

May 23, 2006

Consumer Inquiries & Complaints Division
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554
Attn: Jenifer Simpson

Re: Consumer Complaint Regarding Frontier Communications of America's
Unavailability as a Carrier of Choice in Minnesota

Dear Ms. Simpson,

As required by Federal Communications Commission (FCC) 47 C.F.R. § 64.604 (c) (6) (iii), the Minnesota Department of Commerce-Telecommunications Access Minnesota respectfully surrenders jurisdiction of a Telecommunications Relay Services (TRS) complaint filed in Minnesota that has been unresolved for over 180 days.

Below please find information regarding the TRS complaint regarding Frontier Communications of America (Frontier):

Minnesota Relay VCO user Wayne Mediger would like to use Frontier as his long distance carrier for TRS calls. However, Frontier is not available as a TRS Carrier of Choice (COC) in Minnesota at this time. As per 47 C.F.R. § 64.604 (b) (3) "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."

On November 21, 2005, Mr. Mediger contacted Sprint Customer Service to express his concern that Frontier was not available as a COC through Minnesota Relay. Sprint forwarded the complaint information to Trich Shipley (Minnesota Relay Consumer Relations Office).

On January 13, 2006, Ms. Shipley stated that she had forwarded the complaint information to Sprint so that Sprint could contact Frontier and provide them with information and instructions regarding the steps necessary to become a COC for Minnesota TRS.

On February 12, 2006, Emma Danielson (Sprint Relay Account Manager) contacted Frontier to obtain information on to whom Sprint should send the COC information and instructions. The following day Ms. Danielson mailed the COC letter to Scott Bohler at Frontier.

On March 23, 2006, Ms. Danielson sent a follow-up e-mail to Mr. Bohler. She did not receive a response.

On April 11, 2006, Ms. Danielson sent another e-mail to Mr. Bohler requesting a status on Frontier's COC implementation.

On May 12, 2006, Sprint conducted a conference call with Mr. Bohler and Nadya Wirlo at Frontier to discuss implementation. In the interim, they have established a procedure where Mr. Mediger will be billed for long distance TRS calls by Global Crossing (Frontier's underlying carrier).

On May 17, 2006, I received a call from John Harber with Frontier. He stated that he had some technical questions regarding the steps necessary to establish Frontier as a COC, and asked for contact information for someone with whom he could discuss the technical aspects. I e-mailed Emma Danielson and requested a contact name. She responded that Mr. Harber should contact Chely Vogler at Sprint. I passed Ms. Vogler's contact information on to Mr. Harber.

On May 18, 2006, I received a voice mail from Walt Protich with Frontier. He was also inquiring about with whom he should speak to regarding technical questions for implementing Frontier as a COC for TRS. I returned his call and left a message on his voice mail providing him with Chely Vogler's contact information. I also let him know that Scott Bohler and John Harber from Frontier were also working on this issue.

To date, Frontier is not available as a TRS COC in Minnesota. As it has been 180 days since Mr. Mediger submitted a complaint to have Frontier available as his TRS long distance provider, and as his complaint has not been fully resolved, in accordance with 47 C.F.R. § 64.604 (c) (6) (iii) Minnesota is turning jurisdiction of this complaint over to the FCC.

Enclosed for your reference is a copy of the Sprint complaint report for this issue. The complaint report appears to be missing information on the steps Sprint and Frontier have taken to resolve this issue. I apologize that I can not provide you with more information.

Contact information for persons referenced in this notice is as follows:

5. Wayne Mediger, Minnesota Relay Customer
Phone: 952-873-2075 (VCO)
6. Emma Danielson, Sprint Relay
Phone: 877-698-5520 (TTY)
E-mail: emma.danielson@sprint.com
7. Chely Vogler, Sprint
Phone: 913-219-2899
8. Scott Bohler, Frontier
Phone: 952-491-5534
E-mail: sbohler@czn.com

9. Walt Protich, Frontier
Phone: 651-213-9913

10. John Harber, Frontier
Phone: 952-435-1274

11. Trich Shipley, Minnesota Relay Consumer Relations Office
Phone: 651-602-9005
E-mail: trichshipley@qwest.net

Please note: On May, 1, 2006, a complaint was filed by another Minnesota Relay user who requested Frontier as his long distance carrier for TRS calls. This complaint was filed by Lawrence Schleeter 218-834-2379 (VCO).

If I can be of further assistance, please feel free to contact me.

Sincerely,

Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 7th Place East, Suite 600
St. Paul, MN 55101-3165
(651) 297-8941
rochelle.garrow@state.mn.us

cc: Emma Danielson, Sprint Relay Account Manager
Scott Bohler, Frontier
Trich Shipley, Minnesota Relay Consumer Relations Office

May 30, 2007

Federal Communications Commission
Attn: Pam Gregory
445 12th Street, SW
Room 3C-417
Washington, DC 20554

Re: Obligation of Interexchange Carriers to Provide Access to Their Services Via
Telecommunications Relay Services

Dear Ms. Gregory,

On March 7, 2007, the Department of Commerce – Telecommunications Access Minnesota program (DOC-TAM) was notified by our Telecommunications Relay Services (TRS) provider, Communications Service for the Deaf, that a Minnesota Relay user had requested to use Enhanced Communications Group, LLC (ECG) as his/her long distance Carrier of Choice. However, our TRS provider's records indicate that ECG has not taken the steps necessary to enable access to its long distance services by TRS users.

On March 13, 2007, DOC-TAM sent a letter (copy enclosed) to ECG notifying them that a Minnesota consumer had requested to use ECG as his/her carrier of choice for long distance TRS calls, and informing them of federal regulation 47 C.F.R. § 64.604 (b)(3), which states "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."

The letter also included instructions on the steps necessary to ensure that ECG's long distance services were accessible to TRS users. ECG was notified that if they failed to satisfactorily address this matter by April 23, 2007, DOC-TAM would submit their failure to comply to the Federal Communications Commission (FCC).

Emma Danielson with Sprint Relay (a Minnesota Relay subcontractor) attempted to contact ECG on three occasions (she left a voicemail message for ECG on March 13, 2007; sent an e-mail to ECG on March 20, 2007; sent another e-mail to ECG and April 14, 2007.) ECG has been non-responsive to all contact attempts.

At this time, DOC-TAM submits this matter to the FCC. The regulatory contact information reported to the Department of Commerce for ECG is:

Enhanced Communications Group, LLC

Attn: Carla Dimond
P.O. Box 936
Bartlesville OK 74005
Phone: 918-333-8833
Phone: 888-869-1141
E-mail: cdimond@ecg1.com

If I can be of further assistance, please feel free to contact me.

Sincerely,

Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 7th Place East, Suite 600
St. Paul, MN 55101-3165
Phone: 651-297-8941 / 800-657-3599
Fax: 651-297-7891
E-mail: rochelle.garrow@state.mn.us

May 30, 2007

Federal Communications Commission
Attn: Pam Gregory
445 12th Street, SW
Room 3C-417
Washington, DC 20554

Re: Obligation of Interexchange Carriers to Provide Access to Their Services Via
Telecommunications Relay Services

Dear Ms. Gregory,

The Minnesota Department of Commerce – Telecommunications Access Minnesota program (DOC-TAM) is committed to providing equal and functionally equivalent access to the telecommunications network for persons who are deaf, deaf/blind, hard of hearing or speech disabled. DOC-TAM recently began a campaign to address carriers that may not be compliant with 47 C.F.R. § 64.604 (b)(3), which requires that “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.”

On April 12, 2007, DOC-TAM sent a letter (see Attachment A) to approximately 100 carriers in order to ascertain whether or not the carrier is required to comply with 47 C.F.R. § 64.604 (b)(3). The letter was sent to carriers who met the following criteria:

1. Carrier holds an active certificate of authority to provide interexchange services in Minnesota.
2. Carrier reported more than a minimal level of Minnesota intrastate interexchange services revenue (including all toll and interexchange private line services) in their 2005 annual report submitted to the Department of Commerce.
3. Carrier is not currently listed as a Carrier of Choice for Minnesota Relay.

All carriers that were sent the April 12, 2007, letter were required to complete a *Carrier Status Report form* (see Attachment B) and return it to DOC-TAM by May 9, 2007. The form listed three categories related to compliance with 47 C.F.R. § 64.604 (b)(3). Carriers were instructed to place a check mark in the category that was most appropriate for their carrier, and to review instructions for the selected category. The April 12, 2007, letter to carriers stated that interexchange carriers that do not return the form will be referred to the FCC.

The first category on the *Carrier Status Report form* pertained to carriers that believe they are exempt from 47 C.F.R. § 64.604 (b)(3) either because they are not currently offering long distance service in Minnesota, or for some other reason (for which they were asked to provide an explanation). If a carrier selected this category, DOC-TAM attempted to determine if the carrier’s exemption was accurate and valid.

The second category pertained to carriers that believe they have already taken the steps necessary to ensure that their services can be accessed by Minnesota TRS users. If a carrier selected this category DOC-TAM worked with the carrier to determine whether the carrier had, in fact, completed the Carrier of Choice process, and if so, the reason the carrier's name is not currently listed as a Carrier of Choice for Minnesota Relay. If it was determined that the carrier had not taken the necessary steps to become a Carrier of Choice, they were provided with instructions.

The third category pertained to carriers that currently offer long distance services in Minnesota but *are not* an available Carrier of Choice for Minnesota TRS users. Carriers in this category were sent information on the steps necessary to ensure that their services can be accessed by Minnesota TRS users.

To date, DOC-TAM has provided approximately 57 carriers information regarding the steps necessary to ensure that their long distance services can be accessed by Minnesota TRS users. It is DOC-TAM's intention to allow these carriers an opportunity to review the information, make necessary arrangements, contact Sprint Relay with any questions, provide Sprint with a Letter of Authorization, and conduct test calls with Sprint. DOC-TAM will be in contact with Sprint regarding which carriers have completed the Carrier of Choice process, and the date the carrier will be available as a Carrier of Choice for Minnesota Relay users.

If by June 20, 2007, DOC-TAM determines that a carrier is not engaged in a good faith effort to complete the Carrier of Choice process, we will forward the carrier's name and contact information to the FCC to investigate the possible failure to comply with 47 C.F.R. § 64.604 (b)(3).

At this time, DOC-TAM respectfully submits the names and contact information for carriers that did not submit the *Carrier Status Report form* (carrier list provided in Attachment C). With this submission to the FCC, DOC-TAM only contends that the carriers have not provided requested information in order to ascertain whether or not the carrier is in violation of 47 C.F.R. § 64.604 (b)(3).

If I can be of further assistance, please feel free to contact me.

Sincerely,

Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 7th Place East, Suite 600
St. Paul, MN 55101-3165
Phone: 651-297-8941 / 800-657-3599
Fax: 651-297-7891
E-mail: rochelle.garrow@state.mn.us

April 12, 2007

Carrier's Name
Attn:
Carrier's Address
City, State, Zip

Re: Obligation of interexchange carriers to provide access to their services via Telecommunications Relay Services.

Dear Carrier's Name:

Telecommunications Relay Service (TRS) is mandated by the Americans with Disabilities Act of 1990 and allows people with hearing or speech disabilities to have functionally equivalent telecommunications and equal access to the telecommunications network in the same manner as an individual who does not have a hearing or speech disability. TRS standards are established and regulated by the Federal Communications Commission (FCC), and the Telecommunications Access Minnesota (TAM) program within the Minnesota Department of Commerce (DOC) is responsible for TRS management and compliance in Minnesota. DOC-TAM administers the Minnesota Relay (TRS) through a contract with Communication Service for the Deaf (with Sprint Communications Company, LP as a subcontractor).

47 C.F.R. § 64.604 (b)(3) states that "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."

Please Note: In a Public Notice released by the FCC on October 23, 2000, the FCC reminded carriers that "[A] carrier's failure to take appropriate steps to enable access to its services by TRS users may lead to monetary forfeitures or other enforcement actions by the Commission."¹

At the request of the FCC, DOC-TAM submits to the FCC any failure of a company to achieve compliance.

Carrier's Name is not currently listed as a carrier for TRS users. DOC-TAM recognizes that there are certain *limited* circumstances that may exempt a carrier from the above federal requirement. DOC-TAM also acknowledges the possibility that a carrier may have completed the necessary steps to enable its customers to access its services through TRS, but our records simply do not indicate such.

DOC-TAM requests that all interexchange carriers complete the enclosed *Carrier Status Report Form* and return it to our office by May 9, 2007. Interexchange carriers that do not return the form will be referred to the FCC.

If you have questions on the arrangements necessary to ensure that your services can be accessed by TRS users, please contact Emma Danielson with Sprint Relay at emma.danielson@sprint.com or 217-698-4031.

Thank you for your prompt attention to this matter.



Sincerely,
Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 Seventh Place East, Suite 600
St. Paul, MN 55101-3165
Phone: 651-297-8941
Fax: 651-297-7891
E-mail: rochelle.garrow@state.mn

Attachment A

¹ See *Enforcement Bureau Issues Letter in Support of Initiatives by the Maryland Public Service Commission to promote Compliance with FCC Rules Pertaining to Telecommunications Relay Services*, Public Notice, DA-00-2383(Enf. Bur. Rel. Oct. 23, 2000).

Access to Interexchange Carrier Through Telecommunications Relay Services

Carrier Status Report Form

47 C.F.R. § 64.604 (b)(3) states that "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."

As a demonstration of your company's status regarding the above federal regulation, please complete this form and mail or fax it to DOC-TAM by May 9, 2007.

Name of Telecommunications Provider: _____

Company DBA Name(s) Registered in Minnesota: _____

Address: _____

City: _____ State: _____ Zip: _____

Contact Name: _____ Title: _____

Contact Phone: _____ Contact E-mail: _____

Signature: _____

Please place a check mark in the category below that is appropriate for your carrier, and review the instructions for that category. (Indicate only one category)

The above named Telecommunications Provider is exempt from the requirement because:

- Carrier is not currently offering long distance services (residential or business) in Minnesota.
- Other. Explain: _____

Instructions: There are no instructions for carriers in this category.

The above named Telecommunications Provider believes that it has already taken the steps necessary to ensure that its services can be accessed by Minnesota TRS users.

Instructions: Please review the information provided on our Web site (www.mnrelay.org) and click on Telecommunications Providers) detailing the steps to become a *Carrier of Choice* for TRS calls. If you have completed all the necessary steps, check the box for this category. DOC-TAM will research and resolve any discrepancies so that carrier is listed as an available long distance carrier for Minnesota TRS calls.

The above named Telecommunications Provider currently offers long distance services in Minnesota, **but is not** an available Carrier of Choice for Minnesota TRS calls.

Instructions: DOC-TAM will mail you information on the steps necessary to ensure that your services can be accessed by Minnesota TRS users.

Please mail or fax this form to:
Minnesota Department of Commerce
Attn: Rochelle Renee Garrow, TAM Administrator
85 Seventh Place East, Suite 600
St. Paul, MN 55101-3165

Fax: 651-297-7891

Attachment B

2007

Name of Telecommunications Carrier	Regulatory Contact (First Name)	Regulatory Contact (Last name)	Contact Title	Regulatory Address	City	State	Zip Code	Contact Phone 1	Contact Phone 2	Contact E-mail Address	Web Site
ACCESS ONE, INC.	Maureen	Wirth		820 W Jackson Blvd, 6th Floor	Chicago	IL	60607	3124411000	8008048333	info@accessoneinc.com	www.accessoneinc.com
ACCESSLINE COMMUNICATIONS CORPORATION	Ann	Furuva		11201 SE 8th St, Suite 200	Bellevue	WA	98004	2066213500	8777162540		
ATX LICENSING, INC.	John	Dragani		2100 Renaissance Blvd	King of Prussia	PA	19406	6107554395	8002204900	John.Dragani@atx.com	www.atx.com
BCN TELECOM, INC.	Richard M	Boudria	President	550 Route 202-206, 2nd Floor	Bedminster	NJ	07921			www.nui.com	www.bcntelecom.com
CENTRAL TRANSPORT GROUP, LLC	Robert	Olson		P.O. Box 45	Parkers Prairie	MN	56361	2183384000	8007539104	rolson@brainerd.net	
COGNIGEN NETWORKS, INC.	Glenda	Probst		6405 218th St SW, Suite 305	Mountlake Terrace	WA	98043-2180	2062976151	8776083769		
COOP LIGHT & POWER ASSOC OF LAKE COUNTY, INC.	Steve	Wattnem	General Manager	1554 Highway 2, PO Box 69	Two Harbor	MN	55616	2188342226			www.lakenet.com
COVISTA, INC.	Harriet	Brunker	Tax Manager	4803 Highway 58	Chattanooga	TN	37416	4236489504	4236489602	hbrunker@covista.com	www.covista.com
CTI LONG DISTANCE, INC.	Monty	Wirth	President	P.O. Box 80070	Portland	OR	97280	2538516700	8006549437	sklinzman@millerisar.com	
DIRECT COMMUNICATIONS, LLC	Gene	South	President	c/o Lakedale Telephone, 9938 State Hwy 55, P.O. Box 340	Annandale	MN	55302	6122624100	8774670849		
GTC TELECOM	Jerry	DeCiccio		3171 Airway Ave, Suite P-3	Costa Mesa	CA	92626-4626	7145497700	8004864030	abreslow@teamgtc.com	www.gtctelecom.com
LIGHTYEAR NETWORK SOLUTIONS, LLC	Linda	Hunt	Manager of Regulatory Affairs	1901 Eastpoint Parkway	Louisville	KY	40223	5022446666	8003937300		
NETWORK US, INC. DBA CA AFFINITY	Tara	Rodriguez	Regulatory Contact	40 Shuman Blvd, Suite 270	Naperville	IL	60563	6305050005	8009643863	tarar@connectamerica.biz	www.afinitycorp.com
NORSTAN NETWORK SERVICES, INC.	Sheri	Evans		4805 Independence Pkwy	Tampa	FL	33634	8132868644	8006768870	@netwolves.com	www.netwolves.com
NORTH DAKOTA LONG DISTANCE, LLC	Juli	Devier		P.O. Box 857	Devils Lake	ND	58301	7016627350	8005076353	jdevier@ndld.com	www.ndld.com
NOS COMMUNICATIONS, INC.	Rowena	Hardin	Regulatory Compliance	4380 Boulder Highway	Las Vegas	NV	89121-3002	7025478421	8005694667	rhardin@nos.com	www.nos.com
PAUL BUNYAN RURAL TELEPHONE COOP	Paul	Freude	General Manager	1831 Anne St SW	Bemidji	MN	56601-5660	2187513552	8885863100	dschultz@paulbunyan.net	www.paulbunyan.net

PRIMUS TELECOMMUNICATIONS, INC.	Kathleen	Lawrence	Tax Dept	7901 Jones Branch Dr., Suite 900	McLean	VA	22102	7033944503	8008774687	klawrence@primustel.com	www.primustel.com
TELENATIONAL COMMUNICATIONS, INC.	Christopher J	Canfield	CEO & President	7310 Woolworth Ave	Omaha	NE	68124	9705478165	8006365436	chris@telenational.net	
TELRITE CORPORATION	Darryl E	Davis	President	4113 Monticello St, Suite 330	Covington	GA	30014	6782020820	8668904135		
TIME WARNER CABLE INFORMATION SERVICES (MN), LLC	Julie	Patterson		290 Harbor Drive	Stamford	CT	06902	2033280671		amber.moon@twcable.com	
TOTAL CALL INTERNATIONAL, INC.	Mark	Leafstedt	President	707 Wilshire Blvd, 9th Floor	Los Angeles	CA	90017	2132390910			www.totalcallusa.com
TOUCHTONE COMMUNICATIONS INC.	Gary	Glodek	Director, Retail Operations	16 S Jefferson Rd	Whippany	NJ	07981	9737399300	8002664006		
UNI-TEL COMMUNICATIONS GROUP, INC.	John	Gustaitis	President	47 East Chicago Ave, Suite 328	Naperville	IL	60560	6305790058	8004995912	bobbi@visiology.com	
WH COMM	Gene R.	South, Sr.	President	9938 State Hwy 55, P.O. Box 340	Annandale	MN	55302-0340	3202747271	8778275945		www.wh-link.com
X2COMM, INC. DBA DC COMMUNICATIONS	Mark	Pavol	Secretary/Treasurer	270 S Main St	Flemington	NJ	08822	9088064479	8663304322	tina@x2comm.com	www.dccld.com
ZONE TELECOM, INC.	Lawton	Bloom	VP & Secretary	3 Executive Campus, Suite 520	Cherry Hill	NJ	08002	8566672550	8669663835	jpapenhausen@zonecms.com	www.zonetelecom.com

August 14, 2007

Federal Communications Commission
Attn: Pam Gregory
445 12th Street, SW
Room 3C-417
Washington, DC 20554

Re: Obligation of Interexchange Carriers to Provide Access to Their Services Via
Telecommunications Relay Services

Dear Ms. Gregory,

On April 12, 2007, DOC-TAM sent a letter to approximately 100 telecommunications carriers in order to ascertain whether or not the carrier is required to comply with 47 C.F.R. § 64.604 (b)(3). The letter was sent to carriers who met the following criteria:

4. Carrier holds an active certificate of authority to provide interexchange services in Minnesota.
5. Carrier reported more than a minimal level of Minnesota intrastate interexchange services revenue (including all toll and interexchange private line services) in their 2005 annual report submitted to the Department of Commerce.
6. Carrier is not currently listed as a Carrier of Choice for Minnesota Relay.

All carriers that were sent the April 12, 2007, letter were required to complete a *Carrier Status Report Form* and return it to DOC-TAM by May 9, 2007. The form listed three categories related to compliance with 47 C.F.R. § 64.604 (b)(3). Carriers were instructed to place a check mark in the category that was most appropriate for their carrier, and to review instructions for the selected category. The April 12, 2007, letter to carriers stated that interexchange carriers that do not return the form will be referred to the FCC.

On May 30, 2007, DOC-TAM submitted to the FCC the names and contact information for carriers that had not submit the *Carrier Status Report Form* to date.

Approximately 80 carriers complied with DOC-TAM's request for information by submitting the *Carrier Status Report Form* to our office by May 9, 2007. Appropriate carriers were sent instructions on the steps necessary to ensure that their long distance services can be accessed by Minnesota TRS users. As stated in DOC-TAM's May 30, 2007, letter to the FCC, DOC-TAM allowed these carriers an opportunity to review the Carrier of Choice information, contact Sprint Relay with any questions, make necessary arrangements, provide Sprint with a Letter of Authorization, and conduct test calls with Sprint.

On July 2, 2007, DOC-TAM sent a follow-up correspondence to approximately 50 carriers asking that they provide our office with a written update, by August 6, 2007, detailing the steps the carrier has taken to complete the Carrier of Choice process. DOC-TAM wanted to ensure that carriers that had been provided instructions on becoming a Carrier of Choice were actively progressing through the process so that their long distance services would soon be accessible through TRS. In our July 23, 2007, letter to carriers DOC-TAM stated that carriers that are not actively progressing through the process to become a Carrier of Choice for Minnesota TRS users, and carriers that choose not to respond to our request for information by August 6, 2007, will be referred to the FCC.

At this time, DOC-TAM respectfully submits the names and contact information of carriers that are not currently listed as a Carrier of Choice in Minnesota for TRS and that do not appear to be actively engaged in becoming a Carrier of Choice (carrier list provided in Attachment A). DOC-TAM is forwarding this information so that the FCC may investigate the possible failure to comply with 47 C.F.R. § 64.604 (b)(3) if they so choose.

If I can be of further assistance, please feel free to contact me.

Sincerely,



Rochelle Renee Garrow, TAM Administrator
Minnesota Department of Commerce
85 7th Place East, Suite 600
St. Paul, MN 55101-3165
Phone: 651-297-8941 / 800-657-3599
Fax: 651-297-7891
E-mail: rochelle.garrow@state.mn.us

Carrier's Name	Contact Name	E-mail Address	Phone	Mailing Address	City	State	Zip
Advantage Telecommunications Corp.	Jennifer DePinto	regdbg@dominionbusinessgroup.com	800-435-9217	3001 Aloma Ave., Suite 304	Winter Park	FL	32792
American Phone Services Corp.	Ricardo Ferranti	rferranti@amphone.com	770-569-1213	308 Maxwell Rd, Suite 100	Alpharetta	GA	30004
BellSouth Long Distance, Inc. (dba AT&T Long Distance Service)	Thomas Margavio	thomas.margavio@bellsouth.com	404-829-8269	2180 Lake Blvd NE, Suite/Floor 5C48	Atlanta	GA	30319-6004
Entrix Telecom, Inc.	Ana Bataille	ana.bataille@corp.IDT.net	973-438-4491	520 Broad Street	Newark	N J	7102
Horizon Telecom, Inc.	Jennifer DePinto	regdbg@dominionbusinessgroup.com	800-435-9217	3993 Howard Hughes Parkway, Suite 250	Las Vegas	NV	89109
LCR Telecommunications, LLC	Larry Tibbitts	None Given	536-443-2005	100 W. Big Beaver Rd, Suite 200	Troy	MI	48084
NYNEX Long Distance Company (dba Verizon Enterprise Solutions)	Cheryl Powers	verizonlongdistance@vz-ld.com	703-526-3377	1320 North Court House Rd, 9th Floor	Arlington	VA	22201

Orbitcom Inc	Brad Van Leur	bvanleur@svtv.com	605-977-6900	1701 N Louise Ave	Sioux Falls	SD	57107
PNG Telecommunications, Inc.	Robert Johnson	rjohnson@pngmail.com	513-645-4816	100 Commercial Dr.	Fairfield	OH	45014
UCN, Inc.	Kimm Partridge	kimm.partridge@ucn.net	866-541-0000	14870 South Pony Express Rd	Bluffdale	UT	84065
USA Digital Communications, Inc.	Celeste Eckroat	ceckroat@amcat.com	800-598-7949	300 Jonny Bench Dr., Suite 120	Oklahoma City	OK	73104

Appendix M

Minnesota Relay Disaster Recovery Plan

Minnesota Relay Disaster Recovery Plan

Sprint's comprehensive Disaster Recovery Plan developed for Minnesota Relay 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 Minnesota Relay 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 Minnesota Relay 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 Minnesota Relay to its full operating level in the shortest possible time.

Minnesota Relay Disaster Notification Procedure

Within 30 minutes of any major problem that occurs on the CSD and Sprint relay network, CSD will immediately notify the TAM administrator. As a follow up, CSD will provide a written report to TAM administrator within three calendar days after the service as been restored. This written report will further explain how and when the problem occurred, what was required to fix the problem, as well as the time and date when the service for Minnesota Relay was restored back to full operations.

Examples of service disruption include:

- ACD failure or malfunction
- Major transmission facility blockage
- Threat to Minnesota Relay CA's safety or other CA work stoppage
- Loss of CA position capabilities
- Performance at each CSD and 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 Moorhead relay center, 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 the Moorhead center, 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 Moorhead, for example, only local Moorhead 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 Minnesota Relay user is reporting trouble:

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

Service disruptions or anomalies that are identified by Minnesota Relay 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 ESOC 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's 11 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 Minnesota Relay 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 through an all-fiber sophisticated management control networks 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, with significant fiber miles in Minnesota, 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 makes 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 Minnesota Relay 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 one (1) LATA in Minnesota is served by three 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 three 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. Minnesota would primarily be served by the DMS switches in Brainerd, MN, East Grand Forks, MN and Fargo, ND, with other diversely located facilities also serving Minnesota.

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 Minnesota.

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:

1. A complete (100 percent) loss of the CapTel Service Center, OR
2. 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 CapTel Outage Notification to State Contract Administrators During Business Hours

Upon receiving notification from CTI during business hours (8 AM to 5 PM CT), Sprint will have one of the below managers contact the State 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 e-mail to the State 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 State Contract Administrators Outside of Business Hours

Upon receiving notification from CTI outside of business hours (5 PM to 8 AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify State Contract Administrators immediately by e-mail 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 State 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 State Contract Administrators through Sprint.

Time Frames for Service Restoration

- 1) 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.
- 2) 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).
- 3) 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.

- 4) 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.
- 5) 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.
- 6) 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.

CapTel Relay Trouble Reporting Procedures (for Individual Customers to Customer Service)

All calls concerning customer service issues should be placed by calling the CapTel Customer Service at 1-888-269-7477 (voice), 1-800-482-2424 (TTY), 1-866-670-9134 (Spanish). 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
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 8 AM to 5 PM 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 can not 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 Minnesota Relay 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 N

Sprint's Route Outage Prevention Programs

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 Minnesota Relay 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 are 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 Minnesota Relay 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 environmentals
- 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 Centers 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 O

Minnesota Relay Features