FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	minutes. STS CAs – 15 minutes.	STS CAs stay on the call for a minimum of 15 minutes.
δ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.
δ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.	Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user.
	This information must be transferred to any new provider.	Sprint will provide the STS user information to any new provider.
	Technical Standards	
δ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use. The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.
δ 64.604 B.2	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.
	Abandoned calls shall be included in the speed-of-answer calculation.	Abandoned calls are included in the speed-of -answer calculation.
	Speed of Answer is to be measured on a daily basis.	Speed of Answer is measured on a daily basis.
	The system shall be designed to a P.01 standard.	Sprint's system is designed to the P.01 standards.

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

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

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
		TRS.
	Conduct ongoing education and outreach programs to publicize availability of 711 access.	Sprint regularly provides 711 dialing information in its education and outreach programs.
δ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.
δ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations	(i) Sprint follows FCC requirements in the jurisdictional separation of costs.
	(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	(ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.
	(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)	(iii) Sprint works with NECA for reimbursement of interstate minutes.
δ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees.
δ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (¶16)	Sprint's SS7 platform supports Caller ID services.
Transmittal of Calling Party Information	Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (¶22)	Sprint complies with all FCC rules pertaining Caller ID and call blocking services.
	Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider. (¶25)	Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS. Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY	Sprint has provided the VCO and HCO calling combinations since 1996.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	VCO-to-VCO. This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (¶36)	
Handling of Emergency Calls	Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (¶42) This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)	Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party. Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (¶62)	Sprint has provided the Answering Machine Retrieval since 1996.
Call Release	Call release allows a CA to set up a TTY-to-TTY call that once set up, does not require the CA to relay the relay the conversation. Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (¶68) This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided the Call Release feature since 2003. Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.
Speed Dialing	Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Three-way Calling	Three-way calling feature is generally arranged in one of two ways. (¶73) 1. The TRS consumer may request that the CA set up the call with two other parties or; 2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.

Appendix K: FCC CapTel Mandatory Minimum Standards & Compliance Matrix

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

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

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

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

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

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

	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.6	Voicemail & Interactive Menus		
	CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.	Requirement applies.	CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.
	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.	Requirement applies.	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.
	TRS will handle pay-per-calls.		Sprint CapTel supports pay-per-call call types.

Functional Standards