



ANDREW O. ISAR

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
MILLERISAR.COM

Via Electronic Comment Filing Submission (E-CFS)

June 6, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Application of Healinc Telecom, LLC, for Certification of Eligibility for Compensation From the Interstate TRS Fund for Video Relay Services and IP Relay, Docket No. 03-123

Dear Secretary Dortch:

Attached for filing with the Federal Communications Commission is Healinc Telecom, LLC's ("Healinc") *Annual Compliance Report*, in the above-referenced matter. This Report demonstrates the Company's continued compliance with the Commission's Mandatory Minimum Standards¹ applicable to the provision of competitive advanced-technology video relay services to the Deaf Community, following the second anniversary of Healinc's Commission certification for federal Telecommunications Relay Service fund compensation.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

Andrew O. Isar

Regulatory Consultants to
Healinc Telecom, LLC

Attachment

cc: Thomas Chandler, Greg Hlibok, Disability Rights Office, FCC (via electronic delivery)
Dr. Stanley Schoenbach, Healinc Telecom, LLC

¹ Pursuant to 47 C.F.R. §§64.604 and 64.605.

Healinc Telecom, LLC

2008 Annual Report

Mandatory Minimum Standards Compliance

I. INTRODUCTION

Healinc Telecom, LLC (“Healinc”) is a provider of advanced technology video relay services (“VRS”) to the Deaf Community. Healinc’s VRS primarily relies upon, and was one of the first VRS providers to offer, innovative Voice over Internet Protocol (“VoIP”)-based VRS technology. Healinc’s VRS is supported by a cadre of professional communications assistants (“CAs”), dedicated to the provision of high quality of VRS. Healinc continues striving to provide VRS that exceeds the Commission’s Mandatory Minimum Standards (“MMS”)² and functional equivalency service requirements.

On June 9, 2006, the Federal Communications Commission (“Commission”) granted Healinc certification to receive compensation from the federal Telecommunications Relay Service fund.³ Healinc was one of the first competitive VRS providers to receive Commission certification, following adoption of the Commission’s *Certification Report and Order*.⁴ Healinc is representative of a new breed of competitive VRS provider envisioned by the Commission, as noted in its *Certification Report and Order*.

... this *Order* will enhance competition in the provision of VRS and IP Relay by permitting new entities to offer service, thereby giving consumers greater choice. In addition, we anticipate that new providers will bring innovation to the provision of VRS and IP Relay, both with new equipment and new service features. Finally, and more broadly, because VRS requires broadband Internet service, new VRS providers may stimulate greater broadband deployment.⁵

Now, in its second year following certification, Healinc continues to innovate, expand its offerings and enhance its level of service to the Deaf Community, consistent with the Commission’s pro-competitive policies, and in full compliance with the Commission’s MMS, as set forth below.⁶

² 47 C.F.R. §64.604.

³ *Certification Report and Order* at ¶21, citing to *In the Matter of Healinc Telecom, LLC for Video Relay Service and IP Certification of Eligibility for Compensation from the Interstate TRS Fund*, CH Docket No. 03-123 (2006). Healinc withdrew its request for IP certification prior to FCC grant of certification.

⁴ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *Report and Order and Order on Reconsideration*, FCC 05-203 (adopted December 8, 2005, released December 12, 2005) [“*Certification Report and Order*”].

⁵ See *2004 TRS Report & Order*, 19 FCC Rcd at 12568, para. 243 (as the Commission “embarks on a broader initiative to stimulate the deployment of broadband services, ... VRS can improve existing services for persons with disabilities and can be a demand driver for broadband connections”).

⁶ This *Annual Report* focuses exclusively on compliance with existing, non-waived MMS, following submission of Healinc’s recent 2008 Annual Report regarding compliance status with MMS VRS waivers.

II. HEALINC VIDEO RELAY SERVICES

Since its inception, Healinc has offered a technologically-advanced VRS solution to the Deaf community, which utilizes a combination of a proprietary software-based applications, specialized open architecture IP-enabled telephone equipment, and Voice over Internet Protocol (“VoIP”) transmission over broadband facilities. Healinc has made enhancements to its VRS platforms throughout 2007 and is now evaluating a unified, fully automated VRS platform to enhance the efficiency of its operations, and moreover, to enhance the subscribers’ calling experience. Subscribers of Healinc’s “LifeLinks”-branded VRS will continue to receive virtually instant access to multi-lingual American Sign Language (“ASL”) Communications Assistants/interpreters through an IP-enabled phone or any modern computer system – including laptop computers - equipped with a digital camera and a high-speed Internet connection. Further, Healinc has expanded TTY access to better serve callers.

Healinc’s VRS platform will continue to require broadband Internet connectivity as an integral component of its VRS, furthering one of the goals of Section 225 of the Act.⁷ The Company’s VRS platform will maintain interoperable with all other VRS and TRS applications, including D-Link equipment, Ojo, and V-Pad, and will continue callers to access other TRS/VRS providers.

III. HEALINC’S VRS CONTINUES TO COMPLY WITH FEDERAL MANDATORY MINIMUM STANDARDS FOR THE PROVISION OF FEDERALLY FUNDED VRS PURSUANT TO 47 C.F.R. §64.604.

Section 64.604(a) of the FCC’s rules, as amended, establish operational, technical, and functional MMS governing the provision of VRS. As set forth below, Healinc maintains that it continues to meet and exceed federal MMS applicable to the provision of its VRS, and merits continued Commission certification to draw compensation from the federal TRS Fund. As Healinc’s *Application* for Certification⁸ details the Company’s compliance procedures, this filing addresses ongoing compliance and enhancements over the past year.

A. Operational Standards

1. Communications Assistant (“CA”) – Training (47 C.F.R. §64.604(a)(1)).⁹

⁷ See, e.g., Report and Order at para. 21.

⁸ In the Matter of Healinc Telecom, LLC for Video Relay Service and IP Certification of Eligibility for Compensation from the Interstate TRS Fund, CH Docket No. 03-123 (2006), *Application of Healinc Telecom, LLC for Video Relay Service and IP Certification* (February 22, 2007). [“*Application*”].

⁹ Standard vii governing TTY services has been intentionally deleted from the list as effectively inapplicable.

Standard (i): “TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.”

Standard (ii): “CAs must have competent skills in typing, grammar, spelling, interpretation of type written ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.”

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

Standard (iv): “TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A “qualified interpreter” is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.”

Standard (v): “CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.”¹⁰

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

Standard (vii) TRS shall transmit conversations between TTY and voice callers in real time.¹¹

Healinc Compliance: Healinc remains in compliance with each of the foregoing requirements. Healinc has experienced low turnover in staff, particularly for senior CAs. Senior CAs have gained in operational experience which has enabled them to take on more active management and training functions. Senior Healinc CAs and the management team continue to rigorously screen new CA applicants to verify American Sign Language proficiency, and that each CA applicant meets, and is fully trained on the applicable MMS, and is well suited to interact with callers in a professional and courteous manner. Healinc promotes Registry of Interpreters for the Deaf (RID), SCS, CI or CT, or National Association of the Deaf certification. Certified CAs are given priority for employment or engagement. CAs are routinely monitored and critiqued. Healinc further reviews user comments and incorporates recommendations or addresses concerns through changes in procedures. CA’s undergo ongoing coaching and formalized training, where necessary, to ensure MMS and Company policy compliance. Healinc communicates with CA’s frequently to address issues of general concern. Any

¹⁰Speech-to-Speech. (“ STS”) calling requirements has been waived indefinitely. *2004 TRS Report and Order*, para 138 and 139.

¹¹ Healinc has not received any TTY calls since receiving certification.

CA demonstrating a pattern of failing to meet MMS and company standards, despite corrective action, is dismissed.

Healinc's VRS VoIP platforms, and new unified platform, scheduled for deployment in late 2008, continue to enable users to request individual CAs, with whom the user may already have an established relationship. This feature remains a desirable user function.

The Company continues to rely upon performance surveys, quality assurance test calls, and subscriber surveys as part of Healinc's Quality Assurance Program to ensure CA support remains compliant and provides users with a gratifying call experience.

2. Communications Assistant ("CA") – Confidentiality and conversation content. (47 C.F.R. §64.604(a)(2)).

Standard (i): "Except as authorized by section 605 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content ... from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. The CA may retain the information only for as long as it takes to complete the subsequent calls."

Healinc Compliance: Healinc continues to maintain strict privacy standards regarding communications content and subscriber data adopted from the MMS, and remains in compliance with the above standard. All CAs must comply with Healinc's confidentiality policy. CA's found to have violated this policy are subject to immediate disciplinary action, up to and including termination following a full investigation. CAs retain access to call data and the identity of the caller (collectively "call set up data") only so long as the caller is connected to the CA. Following disconnection of a call, the CA does not maintain any ability to review or retain call set up data. Call detail is stored in a separate server and is not accessible to any CA. Only supervisory staff may monitor a calls for quality assurance and training, and then, only with the express approval of the caller. CAs receive calls in work areas that are physically isolated and preclude inadvertent call viewing by other individuals. CA's work from secured premises. CAs utilize hands-free headsets which preclude others from hearing call content. Healinc has posted information regarding protection of confidential customer proprietary network information and other customer information on its web site, accessible to the user when accessing Healinc's VRS platform.¹²

Standard (ii): "CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the

¹² See, <http://www.lifelinksvrs.com/privacy.html> .

user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.”

Healinc Compliance: CAs are bound to this standard through compliance with national interpreter association codes of ethics, adopted and enforced by Healinc. Consistent with Healinc’s policies regarding call content security, prohibitions against altering or summarizing a relayed conversation without the expressed direction of the subscriber are incorporated into Healinc’s training program and compliance checklist provided to all CAs. CA’s found to have violated such prohibition may be subject to immediate termination of employment, following investigation.

3. Types of Calls (47 C.F.R. §64.604(a)(3)).

Standard (i): “Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.”

Healinc Compliance: This standard is incorporated into Healinc’s training program and compliance checklist provided to all CAs and is verified through Healinc’s Quality Assurance Program. The appearance of an interpreter on the user’s computer screen indicates the CA’s availability; the CA may never refuse to interpret or limit the number or length of calls. Any confirmed intentional premature call termination is subject to disciplinary action, up to and including termination.

Standard (iii):¹³ “Relay service providers are permitted to decline to complete a call because credit authorization is denied.”

Healinc Compliance: This standard is inapplicable as Healinc does not charge users for any call, and therefore does not conduct credit authorizations or checks, as part of its obligations to retain the Equal Access to Interexchange Carrier waivers for VRS providers.¹⁴

Standard (vii):^{15 16 17} “Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key

¹³ **Standard (ii):** “Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so,” has been waived for VRS. See, e.g. *ommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CC Docket No. 98-67, DA 01-3029, 17 FCC Rcd 157 (Dec. 31, 2001) para. 10.

¹⁴ 47 C.F.R. § 64.604(b)(3).

¹⁵ **Standard (iv):** Pay-per-call Service requirements are waived for IP Relay and VRS providers through January 1, 2008. *2004 TRS Report and Order*, para 130 through 132.

¹⁶ **Standard (v):** “TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.” Types of Calls requirements are waived for VRS providers through January 1, 2008. *2004 TRS Report and Order*, paras. 134, 135.

on the CA's terminal. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages;" and

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

Healinc Compliance: Subscribers currently have the capability of receiving and recording Videomail through the LifeLinks' "Sightspeed" software. To receive videomail, subscribers receive a message when logging on the LifeLinks VRS alerting them that a video or text message has been received. Subscribers also receive a separate notice of videomail via an electronic (e-mail) message. The message may be retrieved by clicking on the mail icon when in the "Sightspeed" program. The subscriber is then given the option to record a message and respond. Videomail and other messages are store and may be accessed by the subscriber for a period of 30 days. Subscribers may also request that the CA assist in recording a video or voice mail message when the subscriber encounters a busy or do-not-answer call. Callers may also leave videomail for Lifelinks subscribers, recorded by the CA. As Healinc migrates to its new unified VRS platform, videomail capabilities will be incorporated into the new platform and function much in the same way as the current videomail functions.

4. **Handling of emergency calls. (47 C.F.R. §64.604(a)(4)).**¹⁸

5. **STS Called Numbers (47 C.F.R. §64.604(a)(5)).**¹⁹

B. Technical Standards

1. **ASCII and Baudot. (47 C.F.R. §64.604(b)(1)).**

Standard: "TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use."

Healinc Compliance: Healinc's VRS platform supports text messaging, and may be accessible through other forms of conventional text/data transmissions including ASCII and Baudot format, generated through most TRS equipment. Nevertheless, Healinc has never processed a text call. The Company's new VRS platform will have texting capabilities.

¹⁷ **Standard (vi):** "TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality." Call Release, 3-Way Calling, and Speed Dialing requirements are waived for IP Relay and VRS providers through January 1, 2008. *2004 TRS Report and Order*, para 76.

¹⁸ Emergency Call Handling requirements are waived for IP Relay and VRS providers through January 1, 2008. *2004 TRS Report and Order*, para 116 through 118.

¹⁹ STS calling requirements are waived indefinitely. *2004 TRS Report and Order*, paras. 138 and 139.

2. **Speed of Answer. (47 C.F.R. §64.604(b)(2)).**

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

Healinc Compliance: Healinc has continued to staff its CAs to achieve a P.01 voice grade of service equivalency. The Company remains one of the only VRS providers to offer virtually instant answer and call process capabilities.

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

- (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.
- (B) Abandoned calls shall be included in the speed-of-answer calculation.
- (C) A TRS provider's compliance with this rule shall be measured on a daily basis.
- (D) The system shall be designed to a P.01 standard.
- (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.”

Standard (iii): “Speed of answer requirements for VRS providers are phased-in as follows: ...by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Healinc Compliance: Healinc's average answer time, for all calls, remains under five (5) seconds. This is possible for two primary reasons. First, Healinc has intentionally overstaffed its call center. Healinc's policy has been to mitigate lengthy queuing periods by ensuring that sufficient communications assistants are readily available to process calls. Healinc staffs its call center to exceed historic time of day calling volumes. CA

occupancy ranges from a high of 40% of estimated calling volume to 30% of estimated calling volume, the latter being more typical. This occupancy percentage continues to drop as additional CAs are added. Second, because of Healinc's use of VoIP technology in its VRS platform, unengaged communications assistants appear immediately on caller's computer screens, when callers use Healinc's licensed SightSpeed platform. The caller is able to select an available communications assistant and connect, virtually instantaneously. The Healinc system is designed to comply with the required standards and monitor system performance. Access and monitoring functions will be enhanced through Healinc's new unified VRS platform.

3. Equal access to interexchange carriers. (47 C.F.R. §64.604(b)(3)).²⁰

4. TRS facilities. (47 C.F.R. §64.604(b)(4)).

Standard (i): "TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not to be provided every day, 24 hours a day."²¹

Healinc Compliance: Healinc CAs are on duty 24 hours per day, 7 days per week.

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

Healinc Compliance: APC BR1500 Back-UPS 1500VA uninterruptible power supplies ("UPS") and fire suppression equipment are available for CA work stations. Call and other support data are stored in Company servers and backed up daily in secure, off-site servers. Servers are also supported by UPS, which provide power for as much as seven days. Healinc's VoIP technology enables users to access CAs located in multiple locations in the event any single location is unavailable. Healinc's relay center is housed in a commercial building that meets applicable codes for fire suppression. Multiple broadband facilities are used to provide diversity routing. Independent broadband facilities are connected directly to several CAs, supporting continued operations in the event of facility outages to any singular location.

²⁰ Waived. See e.g. *In the matter of Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Order, DA 01-3029 (December 31, 2001) at para. 10 Extended indefinitely for IP Relay providers and until January 1, 2008 for VRS providers by the *2004 TRS Report and Order* at para 124 through 129.

²¹ Amended by the FCC's *Report and Order* in CG Docket No. 03-123 and CC Docket No. 98-67, as discussed below. The *2004 TRS Report and Order* notes that pursuant to 47 C.F.R. §64.604(b)(4), "Relay services that are not mandated by this Commission are not required to be provided every day, 24 hours a day." The FCC goes on to state that "VRS is not a mandatory TRS service" and therefore not subject to perpetual staffing requirements.

5. Technology. (47 C.F.R. §64.604(b)(5)).

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

Healinc Compliance: Healinc’s LifeLinks VoIP-based VRS platforms and new Healinc-specific customized unified VRS platform remain an advanced-technology application that represents the very type of innovative technology the Commission envisioned.

6. Caller ID. (47 C.F.R. §64.604(b)(6)).

Standard: “When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.”

Healinc Compliance: Healinc’s relay center passes through the number of the center from which the interpreter is placing the call, identifying the called party as Healinc VRS. Healinc’s automatic number identification is provided to the called party whether the call is placed via the public switched network or through Voice over Internet Protocol telephony. This capability is enabling Healinc to comply with accurate emergency 911 call routing obligations.

C. Functional Standards

1. Consumer Complaint Logs. (47 C.F.R. §64.604(c)(1)).

Standard (i): “States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.”

Healinc Compliance: Healinc maintains a complaint log consistent with the format used by the Commission. Users may initiate complaints to the CA, a CA supervisor, or customer service representative at any time during the call and/or via electronic mail. The complaint is logged into Healinc’s complaint tracking system. The CA who received the complaint, or customer service supervisor, in instances where complaints are not directed to an individual CA, will assign a complaint tracking number, will investigate

the issue, and will respond to the complainant in no more than 48 hours. The response is recorded in Healinc's complaint log. The customer supervisor will monitor complaint status and will ensure that action is taken within the specified period.

If the complaint entails a technical issue, then a trouble ticket is prepared, and the trouble investigated and resolved by a technician. The technician is responsible for responding to the assigned CA or customer service supervisor who then communicates with the complainant, and the result is documented.

Standard (ii): "Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Healinc Compliance: Healinc will provide complaint logs in accordance with such direction as the Commission may provide.

2. Contact Persons. (47 C.F.R. §64.604(c)(2)).

"Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:"

Standard(i): "The name and address of the office that receives complaints, grievances, inquiries, and suggestions."

Healinc Compliance: The senior individual responsible to receive complaints, grievances, inquiries, and suggestions for Healinc is:

David Rhodes
c/o Healinc Telecom, LLC
3333 Henry Hudson Parkway, Suite 1A
Riverdale, N.Y. 10463
Telephone: 718.543.4100
E-mail: drhodes@lifelinks.net

Standard(ii): "Voice and TTY telephone numbers, fax number, e-mail address, and web address;"

Healinc Compliance: Voice telephone numbers, fax number, e-mail address, and web address are:

Voice telephone: 718.543.4100
TTY Telephone: 360.750.7412
212.714.9889 (9TTY)
Fax number: 718.601.5400
E-Mail Address: response@lifelinks.net
Web Address: www.lifelinksvrs.com

Standard(iii): “The physical address to which correspondence should be sent.”

Healinc Compliance: Correspondence should be sent to:

David Rhodes
c/o Healinc Telecom, LLC
3333 Henry Hudson Parkway, Suite 1A
Riverdale, N.Y. 10463
Telephone: 718.543.4100 {should we use David’s AZ number?}
E-mail: drhodes@lifelinks.net

Commission inquiries should be addressed to:

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
Telephone: 253.851.6700
E-mail: aisar@millerisar.com

3. Public Access to Information. (47 C.F.R. §64.604(c)(2)).

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

Healinc Compliance: Healinc continues to maintain a three-pronged program entailing active marketing, targeted educational services, and direct outreach to the Deaf Community:

Advertising. Healinc’s advertising strategy includes a combination of press releases, as well as general and targeted advertising through web-based Deaf community publications including *The Deaf Times*. The Company has also prepared informational brochures to be available at a variety of functions including Deaf expositions. . Healinc has also provided links and content on web sites geared to the Deaf.

Affiliations. Healinc continues to seek partnerships and affiliations with state and national organizations serving the Deaf Community to make information concerning the Company’s VRS services widely available. Healinc has and will work with these organizations and community groups to provide no-cost counseling services in sign language to the speech and hearing impaired community in such areas as vocations, finances, psychology, etc. Additionally, Healinc will consider sponsorship opportunities to broaden company name and service recognition, including Deaf Access Network www.deafaccess.org .

Direct Outreach. Healinc is an active participant in Deaf events and conferences. The Company has developed educational seminars, learning assistance programs, and is a corporate sponsor of individuals and events. Among the events in which Healinc is participating, are the New Mexico Commission for Deaf and Hard of Hearing conference, May, 2008 and Deaf Nation Expo, Columbus Ohio, May, 2008.

4. Rates. (47 C.F.R. §64.604(c)(4)).

Standard: “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.”

Healinc Compliance: Inapplicable. Healinc’s subscribers will not be charged for Healinc’s VRS service. See, Compliance with Types of Calls (47 C.F.R. §64.604(a)(3)), at page 5, *supra*.

5. Jurisdictional Separation of Costs. (47 C.F.R. §64.604(c)(5)).

Standard(iii)(C): “Data Collection from TRS Providers. TRS providers shall provide the administrator with true and adequate data necessary to determine the TRS fund revenue requirements and payments....

Healinc Compliance: Healinc has submitted 2006 ,2007, and 2008 data collection forms to the National Exchange Carriers Association and responded to all applicable data requests.

IV. HEALINC CONTINUES TO INNOVATE AND ENHANCE SERVICE CAPABILITIES.

Healinc has continued to experience steady growth in VRS usage; testament to the acceptance and desirability of its services. Since receiving VRS certification, Healinc began deploying its Au Pix VRS video phone, while enhancing the capabilities of its SightSpeed VoIP-based VRS platform to streamline access functions. The Company is now in the final process of evaluating a successor unified VRS platform that will more fully integrate and automate its operations and data retrieval and reporting capabilities. . Over the past year, Healinc has added two new management employees to focus on operations and strategic planning, added a part-time programmer to update and enhance existing platforms, and continued to attract highly professional, dedicated CAs who further enhance customer calling experiences and improve service delivery.

V. CONCLUSION

Healinc provides the very type of innovative, advanced-technology VRS envisioned by the Commission, consistent with the Commission's pro-competitive policy. As set forth above, Healinc continues to provide desirable, functionally equivalent, VRS that meets or exceeds the MMS for certification to draw compensation from the federal TRS fund. Healinc respectfully requests that its certification be maintained, accordingly.

Respectfully submitted this 9th day of June, 2008.

HEALINC TELECOM, LLC

By: 

Stanley Schoenbach, MD.
Managing Member
3333 Henry Hudson Parkway
Riverdale, NY 10463
Telephone: 718.543.4100

STATE OF NEW YORK

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) ss.

COUNTY OF BRONX

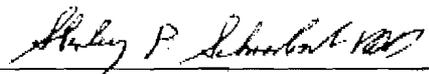
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CERTIFICATION

I, Stanley Schoenbach, do hereby certify and affirm under penalty of perjury, that I am a Managing Member of Healinc Telecom, LLC, that I have examined the foregoing *Annual Report*, and, to the best of my knowledge, information, and belief, all statements of fact contained in this *Annual Report*, are accurate and to those statements made on belief, I believe them to be accurate and true

Respectfully submitted this 9th day of June, 2008.

HEALINC TELECOM, LLC

By: 

Stanley Schoenbach, MD.
Managing Member
3333 Henry Hudson Parkway
Riverdale, NY 10463
Telephone: 718.543.4100