

service, as set forth above, SHALL BE ineligible for compensation from the Interstate TRS Fund.”<sup>62</sup>

**HEALINC Compliance:** Applicant proposes to offer IP Relay exclusively as a tool for the public. Applicant does not, and avers not to offer, an inducement of any kind to promote usage for subscribers, increase, or otherwise inflate conversation minutes, subject to the Commission’s and/or Fund administrator’s ongoing verification. Applicant’s advertising and outreach will be limited solely to advise prospective subscribers of the availability of Applicant’s VRS and IP Relay as an alternative option.

**2. Spanish Language Translation Capabilities.** Spanish language translation capabilities were waived indefinitely for VRS providers pursuant to the *2004 TRS Report and Order*.<sup>63</sup> On July 19, 2005, the FCC, in an Order on Reconsideration in response to a Texas Public Utilities Commission petition for reconsideration of the *2004 TRS Report and Order* concluded that “non-shared language Spanish translation [VRS] – relay service in which the CA translates what is signed in ASL into spoken Spanish, and *vice versa* – is a form of TRS compensable from the Interstate TRS Fund. Therefore, although we do not mandate this service, providers offering ASL-to-Spanish VRS may be compensated from the Interstate TRS Fund.”<sup>64</sup>

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<sup>62</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, CG Docket No. 03-123, Order, FCC 05-2066 (July 28, 2005), at 4. Emphasis in original.

<sup>63</sup> *2004 TRS Report and Order*, para 138 and 139

<sup>64</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, CG Docket No. 03-123, Order on Reconsideration, FCC 05-139 (July 19, 2005).

Although as noted, a requirement for ASL translation into Spanish is waived for VRS providers by the FCC, the FCC's Order on Reconsideration underscores the expressed desirability for ASL translation into languages other than English. Translation of ASL into spoken languages other than English is increasingly becoming a key component to TRS/VRS. Anticipating increased demand for VRS language translation services, Applicant plans to engage multi-lingual CAs, particularly including those who speak Spanish. Each CA's specialized language capabilities appear on the page made available to subscribers, at the time the subscriber is given the option to select an interpreter.

**3. Internet-Based TRS Registration and Obligations regarding local number porting to and from interconnected VoIP or Internet-based TRS providers.**

The Commission's June 24, 2008 *Report and Order and Further Notice of Proposed Rulemaking* also promulgated two additional regulations associated with emergency call handling procedures established under amended Section 64.605; 1) an Internet-based TRS registration in new Section 64.611;<sup>65</sup> and 2) an obligation for local number portability in new Section 52.34.<sup>66 67</sup> As discussed *supra* and below, Applicant complies with, or is prepared to comply with, both new obligations.

**§ 64.611 Internet-Based TRS Registration**

**(a) Default Provider Registration.** Every provider of VRS or IP Relay must, no later than December 31, 2008, provide users with the capability to register with that VRS

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<sup>65</sup> 47 C.F.R. §64.611.

<sup>66</sup> 47 C.F.R. §52.34.

<sup>67</sup> The *Report and Order and Further Notice of Proposed Rulemaking* also promulgated new Section 64.613, Numbering Directory for Registered Internet-based TRS Users, 47 C.F.R §64.614, applicable to establishment of the TRS Numbering Directory, now administered by Neustar, Inc.

or IP Relay provider as a “default provider.” Upon a user’s registration, the VRS or IP Relay provider shall:

**(1) Either:**

**(i) Facilitate the user’s valid number portability request as set forth in 47 C.F.R. § 52.34; or**

**(ii) If the user does not wish to port a number, assign that user a geographically appropriate North American Numbering Plan telephone number; and**

**(2) Route and deliver all of that user’s inbound and outbound calls unless the user chooses to place a call with, or receives a call from, an alternate provider.**

**Healinc Compliance:** Applicant has developed the equivalent of a “letter of agency” establishing Applicant as the user’s default provider, when the user elects Applicant as the default provider. If the user has been assigned a ten-digit number from a former default provider, Applicant will coordinate with the former provider to obtain transfer of the assigned number and amend the Registered Location/TRS Number Directory, consistent with the Commission’s number portability requirements pursuant to Section 52.34. Alternatively, Applicant will obtain a new telephone number from its numbering partner, URrelay, Inc. which will be assigned to the user and incorporated into the TRS Number Directory. Once the number has been implemented, Applicant will serve as the user’s default provider and provide the user’s in bound and outbound calling.

**(b) *Mandatory Registration of New Users.* As of December 31, 2008, VRS and IP Relay providers must, prior to the initiation of service for an individual that has not previously utilized VRS or IP Relay, register that new user as described in paragraph (a) of this section.**

**Healinc Compliance:** Applicant will register all new users in accordance with section 64.611(a).

**(c) *Obligations of Default Providers and Former Default Providers.***

**(1) Default providers must:**

- (i) Obtain current routing information, including IP addresses or domain names and user names, from their Registered Internet-based TRS Users;**
- (ii) Provision such information to the TRS Numbering Directory; and**
- (iii) Maintain such information in their internal databases and in the TRS Numbering Directory.**

**Healinc Compliance:** Applicant avers compliance through its internal procedures in conjunction with its numbering partner and VRS/IP Relay Platform provider, URrelay, Inc.

**(2) Internet-based TRS providers (and, to the extent necessary, their Numbering Partners) must:**

- (i) Take such steps as are necessary to cease acquiring routing information from any VRS or IP Relay user that ports his or her number to another VRS or IP Relay provider or otherwise selects a new default provider; and**
- (ii) Communicate among themselves as necessary to ensure that:**
  - (A) Only the default provider provisions routing information to the central database; and**
  - (B) VRS and IP Relay providers other than the default provider are aware that they must query the TRS Numbering Directory in order to obtain accurate routing information for a particular user of VRS or IP Relay.**

**Healinc Compliance:** Applicant avers compliance through its internal procedures in conjunction with its numbering partner and VRS Platform provider, URrelay, Inc

**(d) *Proxy Numbers.* After December 31, 2008, a VRS or IP Relay provider:**

- (1) May not assign or issue a proxy or alias for a NANP telephone number to any user; and**

**(2) Must cease to use any proxy or alias for a NANP telephone number assigned or issued to any Registered Internet-based TRS User.**

**Healinc Compliance:** Applicant avers not to assign proxy or alias numbers to any user.

**(e) *Customer Premises Equipment (CPE).***

**(1) Every VRS or IP Relay provider must ensure that all CPE they have issued, leased, or otherwise provided to VRS or IP Relay users delivers routing information or other information only to the user's default provider, except as is necessary to complete or receive "dial around" calls on a case-by-case basis.**

**(2) All CPE issued, leased, or otherwise provided to VRS or IP Relay users by Internet-based TRS providers must be capable of facilitating the requirements of this section.**

**Healinc Compliance:** Applicant will not issue CPE.

**(f) *User Notification.*** Every VRS or IP Relay provider must include an advisory on its website and in any promotional materials addressing numbering or E911 services for VRS or IP Relay.

**(1) At a minimum, the advisory must address the following issues: (i) the process by which VRS or IP Relay users may obtain ten-digit telephone numbers, including a brief summary of the numbering assignment and administration processes; (ii) the portability of ten-digit telephone numbers assigned to VRS or IP Relay users; (iii) the process by which persons using VRS or IP Relay may submit, update, and confirm receipt by the provider of their Registered Location information; and (iv) an explanation emphasizing the importance of maintaining accurate, up-to-date Registered Location information with the user's default provider in the event that the individual places an emergency call via VRS or IP Relay.**

**(2) VRS and IP Relay providers must obtain and keep a record of affirmative acknowledgement by every Registered Internet-based TRS User of having received and understood the advisory described in this subsection.**

**Healinc Compliance:** Healinc has linked the Commission's advisory on its web site, [www.lifelinksvrs.com](http://www.lifelinksvrs.com) to comply with subsection f(1), and is preparing its own advisories. Applicant's advisory will also be provided to new subscribers at the time of

subscription. Applicant will maintain a permanent hard copy record of all new subscriptions and number assignments obtained via the Internet, via email, or via letter or telephonic subscriptions.

**§ 52.34 Obligations regarding local number porting to and from interconnected VoIP or Internet-based TRS providers.**

**(a) An interconnected VoIP or VRS or IP Relay provider must facilitate an end-user customer's or a Registered Internet-based TRS User's valid number portability request, as it is defined in this subpart, either to or from a telecommunications carrier or an interconnected VoIP or VRS or IP Relay provider. "Facilitate" is defined as the interconnected VoIP or VRS or IP Relay provider's affirmative legal obligation to take all steps necessary to initiate or allow a port-in or port-out itself or through the telecommunications carriers, if any, that it relies on to obtain numbering resources, subject to a valid port request, without unreasonable delay or unreasonable procedures that have the effect of delaying or denying porting of the NANP-based telephone number.**

**(b) An interconnected VoIP or VRS or IP Relay provider may not enter into any agreement that would prohibit an end-user customer or a Registered Internet-based TRS User from porting between interconnected VoIP or VRS or IP Relay providers, or to or from a telecommunications carrier.**

**Healinc Compliance:** Applicant avers to compliance as evidenced by the attached advisory, subject to subsequent Commission verification.

**B. TRS MMS Waivers for VRS and IP Relay**

The Commission, in its *Report and Order*, *Order on Reconsideration*, and *Further Notice of Proposed Rulemaking* in CH Docket No. 03-123 *et al.* as amended,<sup>68</sup> extended waivers of certain telecommunications relay service ("TRS")<sup>69</sup> mandatory

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<sup>68</sup> *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, CC Docket Nos. 90-571 and 98-67, CH Docket No. 03-123, FCC Rcd. at 12520-12521, para. 111 *et seq.* ["2004 TRS Report and Order"]. Cited throughout the instant Application.

<sup>69</sup> *See*, 47 C.F.R. §64.604.

minimum standards for the provision of VRS. Specifically, the *2004 TRS Report and Order* extend waivers of the TRS mandatory minimum standards to VRS applicable for: (1) types of calls that must be handled; (2) emergency call handling; (3) speed of answer; (4) equal access to interexchange carriers; and (5) pay-per-call services. Further, the *2004 TRS Report and Order* extended waivers for Voice Initiated Calls and HCO; VCO-to-TTY; HCO-to-TTY; VCO-to-VCO; HCO-to-HCO; Call Release; 3-way Calling; and Speed Dialing.<sup>70</sup>

As discussed below, Applicant already complies with – or is diligently working to meet – the Commission’s *2004 TRS Report and Order* current waiver extension conditions, as amended.<sup>71</sup>

**1. *Types of Calls.* Commission rules require TRS providers to handle any type of call normally handled by common carriers.<sup>72</sup> In the *VRS Waiver Order*,<sup>73</sup>**

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<sup>70</sup> 2004 TRS Report and Order at ¶112 and Appendix E, as amended; One-line voice carry over (VCO); VCO-to-teletypewriter (TTY); VCO-to-VCO; one-line hearing carry over (HCO); HCO-to-TTY; HCO-to-HCO; call release; speech-to-speech (STS); pay-per-call (900) calls; types of calls; equal access to interexchange carriers; and speed dialing extended for one year (four months in the case of speed dialing for VRS), “because the record demonstrates that it is technologically infeasible for VRS and IP Relay providers to offer these services at this time.” “The Bureau allowed the waivers of three-way calling for VRS and IP Relay to expire on January 1, 2008. The waivers of certain TRS mandatory minimum standards for VRS and IP Relay will expire on January 1, 2009, except the waiver of the speed dialing requirement for VRS, which will expire on April 30, 2008.” .See, e.g. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Order, DA 07-5098 (Dec. 26, 2007); See also *Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, CG Docket 03-123, DA 07-098; DA 08-45; *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities E911 Requirements for IP-Enabled Service Providers*, CG Docket 03-123 and WC Docket No. 05-196, *Report and Order*, FCC 08-78 (March 19, 2008)[“*Interim Emergency Call Handling Order*”].

<sup>71</sup> See also, *Healinc Telecom, Inc. 2008 Annual Mandatory Minimum Standards Waiver Report*, CH Docket No. 03-123 (May 21, 2008).

<sup>72</sup> See 47 C.F.R. § 64.604(a)(3).

<sup>73</sup> *Telecommunications 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) (“*VRS Waiver Order*”)[footnote supplied].

the Commission granted VRS providers a two-year waiver of the requirement to offer operator assisted calls and to bill certain types of long distance calls to the end user.<sup>74</sup> The Commission conditioned this waiver on VRS providers allowing “VRS calls to be place[d] using calling cards and/or provid[ing] free long distance calls during the waiver period.”<sup>75 76</sup>

**Healinc Compliance:** Applicant’s URrelay, Inc. VRS and IP Relay platform already enables compliance with the *Types of Calls* requirement. Since its inception, Healinc has maintained the capability of providing any type of call function otherwise available from common carriers including, but not limited to, operator assisted calls and the ability to support pay-per call services. Healinc has established procedures that enable use of operator assisted calling through the caller’s preferred carrier or Healinc’s default presubscribed carrier’s operator services, and the ability to pass along caller credit card information for purposes of billing pay-per-call calls, as discussed *infra*. Healinc has not billed callers for long distance services, consistent with Equal Access VRS waiver obligations, and will continue to provide such calling capabilities at no charge. In 2007, Healinc received zero operator assisted and pay-per-call calls.

**2. *Speed of Answer.*** Our rules mandate that 85 percent of relay calls must be 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.”<sup>77</sup> Because this rule is based on projected call volumes and such projections are difficult to make for a new service, the *VRS Waiver Order* waived this TRS mandatory minimum standard for VRS providers.<sup>78</sup> The Commission’s aim was to encourage more entrants into the VRS market and help provide more time for technology to

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<sup>74</sup> *VRS Waiver Order* at ¶ 10.

<sup>75</sup> *Id.*

<sup>76</sup> 2004 TRS Report and Order, ¶ 113, footnotes from original.

<sup>77</sup> See 47 C.F.R. § 64.604(b)(2). This rule is often referred to as the 85/10 rule.

<sup>78</sup> *VRS Waiver Order* at ¶ 16.

develop.<sup>79</sup> The Commission also reasoned that because demand for VRS was undetermined, the 85/10 rule might keep potential VRS providers out of the market, thereby hindering the development and growth of VRS.<sup>80 81</sup>

**Healine Compliance:** Applicant already meets this standard. Please refer to response to Speed of Answer. (47 C.F.R. §64.604(b)(2)), Standard (ii), page 33, *supra*.

3. *Equal Access to Interexchange Carriers.* Our rules require that TRS users have access to their chosen interexchange carrier through TRS to the same extent that such access is provided to voice users.<sup>82</sup> In the *VRS Waiver Order*, the Commission granted VRS providers a two-year waiver of this TRS mandatory minimum standard, recognizing that the systems necessary to hand off a video teleconferencing call to a carrier preferred by the end user do not yet exist.<sup>83 84</sup>

**Healine Compliance:** Applicant already meets this standard. Please refer to response to Speed of Answer. (47 C.F.R. §64.604(b)(3)). page 33 *supra*.

4. *Pay-Per-Call Services – 900 number calls.* Our rules require TRS providers to be capable of handling pay-per-call calls (*i.e.*, 900 number calls).<sup>85</sup> The *VRS Waiver Order* granted VRS providers a two-year waiver of this TRS requirement, noting that demand for pay-per-call VRS was expected to be low and the cost of compliance was high.<sup>86 87</sup>

**Healine Compliance:** Applicant avers to already having the capability to process such calls, (47 C.F.R. §64.604(a)(3)) Standard (iv) page 21 *supra*.

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<sup>79</sup> *Id.*

<sup>80</sup> *Id.*

<sup>81</sup> 2004 TRS Report and Order, ¶ 119, footnotes from original.

<sup>82</sup> See 47 C.F.R. § 64.604(b)(3); see also *Second Improved TRS Order & NPRM* at ¶¶ 54-61.

<sup>83</sup> *VRS Waiver Order* at ¶¶ 17-18.

<sup>84</sup> 2004 TRS Report and Order at ¶ 124, footnotes from original.

<sup>85</sup> See 47 C.F.R. § 64.604(c)(6).

<sup>86</sup> *VRS Waiver Order* at ¶¶ 19-20.

<sup>87</sup> 2004 TRS Report and Order, ¶ 130, footnotes from original.

## **VI. THE GRANTING OF THE INSTANT PETITION IS IN THE PUBLIC INTEREST**

Although certification of compliance with federal mandatory minimum standards pursuant to sections 64.604 and 64.606 is fact-based and does not impose a public interest standard test, Applicant maintains that the granting of the instant Petition is in the public interest and will benefit the public throughout the U.S.

### **A. Healinc's IP Relay Service Will Introduce A Technologically-Advanced VRS Option To the Public That Brings Deaf and Disabled Users a Step Closer to "Functionally Equivalent" Communications.**

Applicant's deployment of an IP Relay, made possible through the grant of the instant Petition, will enable users to gain additional flexibility in communications and expand the communications options available to all users. As the VRS/IP Relay software is accessible from any computer having a wireline or wireless broadband connection, users gain mobility and enhanced ease in connection. Users will not require specialized equipment, but will be able to expand the utility of their computers for sight-based, interactive communications from a home, office, or remote location. These capabilities bring the speech and hearing disabled a major step closer to the "functionally equivalent" communications they deserve, and that Congress and the FCC have established as a matter of public policy.

### **B. The Granting of the Instant Application Will Promote Innovation and Improved Service by All Providers**

The granting of the instant Application and Healinc's provision of IP Relay services in addition to its VRS services will provide the public, and Deaf users in particular, with an added choice of service providers for a several different services. This

new alternative will create competitive pressure on existing providers to innovate, incorporate new advanced technology approaches, and improve service offerings and capabilities, to the ultimate benefit of consumers.

**C. The Granting of the Instant Application Will Enhance Access to Information Through Applicant's Outreach Efforts**

Healinc will continue to engage in an extensive outreach program, which will include information regarding VRS accessibility and moreover, a host of information that will benefit the speech and hearing impaired community, as discussed above. Healinc commits to expand its outreach program and increase the accessibility of information and program content geared to enhancing the lives of the Deaf Community.

**D. Healinc Will Contribute to the Expansion of the Pool of Certified CAs.**

Healinc will continue to contribute resources to accredited educational institutions that maintain certified CA training programs, will create job opportunities for graduates, and will assist educational institutions with job placement, as desired by the institution.

**VII. CONCLUSION**

The Commission's *Report and Order* establishes a process whereby a VRS - and IP relay - provider may seek Commission certification of compliance with applicable minimum mandatory standards. Such Commission certification now enables companies like Healinc, to draw from the federal TRS fund for the provision of compensable VRS, and IP Relay when not otherwise associated with a state program, when demonstrating compliance with the MMS.

Healinc has invested considerable resources and effort in developing desirable full-featured VRS and IP Relay services for the Deaf community, consistent with Congress' and the Commission's established policy of promoting "functionally equivalency" in telecommunications services between the deaf and hard-of-hearing and others. Healinc's ability to make its services generally available to the Deaf Community has been predicated on its ability draw from the federal fund to recoup the costs associated with the provision of these services.

Healinc has demonstrated ongoing compliance with the Commission's MMS, currently waived MMS, and now new Commission regulations, for the provision of VRS. Healinc remains active in consumer outreach efforts, and maintains a fully staffed customer service center and complaint logging capabilities, consistent with existing complaint logging requirements. Compliance with existing and future requirements, now for the provision of IP Relay services, is simply an extension of Healinc's current capabilities and compliance.

Finally, Healinc has demonstrated that its services do not differ, or in any way violate, the Commission's applicable mandatory minimum standards.

In light of the foregoing, Healinc respectfully requests that the Commission certify Healinc as a provider eligible for compensation from the federal TRS fund, now for the provision of IP relay services.

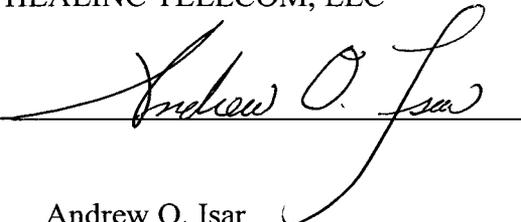
Healinc further avers to comply with such additional requirements as may from time to time be imposed by the Commission with respect to IP Relay services services,

including such reports or response to *ad hoc* information requests, on-site visits, inspection of books, materials, and operations. Healinc acknowledges Commission certification of compliance is not static, but entails ongoing verification. Healinc will at all times cooperate with the Commission and assist the Commission in verification of compliance, response to complaints and inquiries, and in any such requirement or request as may be made by the Commission to Healinc.

WHEREFORE, Healinc Telecom, LLC hereby respectfully requests that the Commission certify Healinc as compliant with Mandatory Minimum Standards and other requirements for the provision of IP Relay and therefore eligible to be compensated from the federal TRS Fund for the provision of IP Relay services.

Respectfully submitted, this 18th day of November, 2008.

For HEALINC TELECOM, LLC

By: 

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
Telephone: 253.851.6700

Regulatory Consultants to  
Healinc Telecom, LLC

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Application of Healinc Telecom, LLC for	)	
Eligibility to be Compensated From the Interstate	)	CG Docket No. 03-123
Telecommunications Relay Service Fund	)	
For the Provision of Internet Protocol Relay	)	
Services	)	

**LISTING OF EXHIBITS**

- A Senior Management Experience, Representative Communications Assistant  
*Curriculum Vitae*
- B User IP Relay Call Screen
- C URrelay, Inc. 911 Call Processing
- D Neustar, Inc. Registered Location Database Access Registration
- E VRS/IP Relay Platform Call Detail Record Format

## **Exhibit A**

### **Senior Management Experience** *Representative Communications Assistant Curriculum Vitae*

#### **Dr. Stanley F. Schoen, Chief Executive Officer**

Dr. Schoen is the founder and Chief Executive Officer of Healinc. He received his M.B.A. in Healthcare Administration from the City University of New York, Baruch College and his M.D. degree from New York University Medical School. He has over 30 years experience in the healthcare industry. He has published articles in various medical journals and has lectured on trauma, burns, and cancer surgery. As a result of a lifetime of relationships after practicing medicine for twenty years, Dr. Schoen brings unique access to hospitals as well as an in-depth understanding of the patients needs. His understanding of the healthcare marketplace as well his knowledge of healthcare corporate workings have facilitated the unique combination of strategic partnerships which characterize and are the strength of Healinc. As the chief of surgery at three hospitals, before he stopped practicing, he obtained managerial, hospital purchasing, as well as interpersonal experience, which has served to facilitate Healinc' sensitivity to patient's interactive needs. Dr. Schoen has been instrumental in expanding Healinc's service to the Deaf Community.

#### **Wes Waite, Sr., Chief Operations Officer**

Mr. Waite joined LifeLinks Video Interpreting Services in 2008 as the Chief Operating Office. The company was formed in 2004 by Dr. Stanley Schoen who quickly built the company around a core of top tier interpreters making LifeLinks one of the most sought after companies in its field. Headquartered in New York, the company has offices in Indianapolis, Phoenix, and Florida.

V & D Communications: After starting the company in 1999 and leading its growth and development as President, Mr. Waite, acquired Aelix, through V & D Communications, from its parent company in September 2006. With renewed focus on customer centric products and services he is expanding the scope of the company to bring it more in line with customer needs. Mr. Waite brings with him more than 30 years of experience in executive corporate management, operations and communications.

Prior to his tenure with Aelix Mr. Waite held the title of Vice President of Operations for Southern European Communications Corporation. Previously, he was Vice President of Operations for MilleCom, Inc., a multinational telecommunications company, and oversaw the development and implementation of telephone infrastructures, functionality and operations. Earlier, from 1995 to 1998, Mr. Waite was COO of Nusantara Communications, and was responsible for the development of the Advanced Telephone System and the operational development of Nusantara's manufacturing facility in Indonesia and their marketing efforts in Poland.

## **Exhibit A**

### **Senior Management Experience** Representative Communications Assistant *Curriculum Vitae*

#### **Wes Waite, Sr., Chief Operations Officer, Continued**

Prior to that, from 1989 to 1995, Mr. Waite was Director of Field Operations for McCaw Cellular Communications where he was a part of the national deployment of the first Cellular Digital Packet Data (CDPD) network and he led the UPS Cellular Circuit Switched Data national network deployment. Prior to 1989, he held various technical and operational roles within New York Telephone and NYNEX Corporation, culminating his tenure there as its Director of New Station Technology.

#### **Eliane R. Uscher, M.B.A., Dipl.Int.**

Eliane R. Uscher, serves as a consultant to, Healinc. She earned advanced business degree in Zurich, Switzerland and has studied at the University of Geneva and the Polytechnic of London. Eliane Uscher is a multilingual interpreter in four languages and has broad business experience. Through her interpreting skills, she has obtained extensive business contacts. Eliane Uscher has also managed a healthcare business for 20 years. At present, she owns Uscher Management, a medical practice management business.

## Exhibit B

### User IP Relay Call Screen

The screenshot shows a web browser window titled "URrelay - Now UR Talking! @". The address bar contains "urrelay.com | FAQ | About Relay | Contact Us". A speech bubble logo in the top right corner says "URrelay Now UR Talking!".

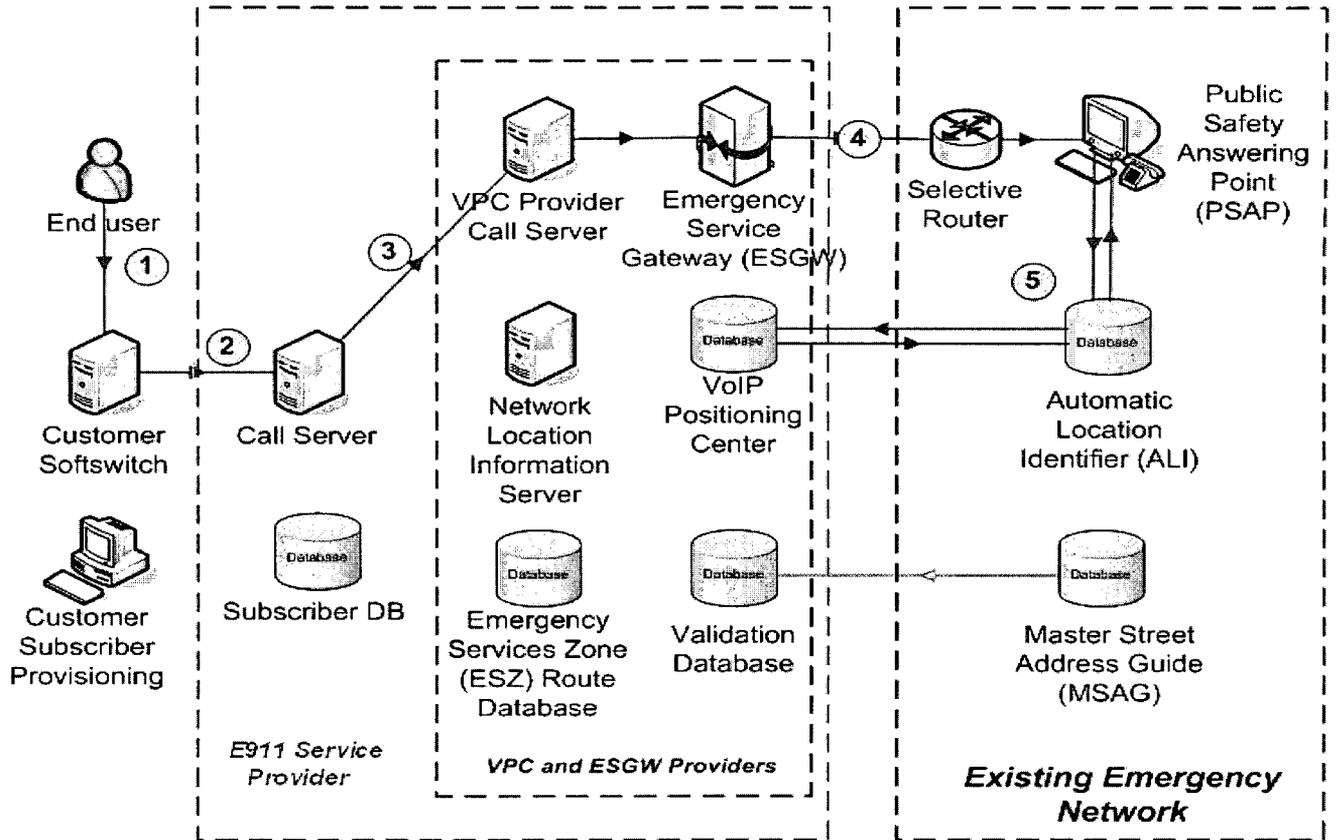
Below the navigation bar, a four-step instruction bar reads: "1 Enter 'Number to Dial' 2 Press 'Connect' 3 Wait for CA 4 Start UR Conversation!".

The main interface is split into two panels:

- Left Panel:**
  - "Number to Dial": A text input field with a cursor.
  - "Connect": A button with a telephone handset icon.
  - "CA Instructions": A section titled "Enter Special Instructions here" with a text input field.
  - "CA Gender": A dropdown menu currently set to "First Available".
- Right Panel:**
  - Menu: "File Edit".
  - Toolbar: Includes "Hangup" (with a red X icon), "Clear", font style "SansSerif", and font size "16".
  - Text Area: A large empty text area for communication.
  - Status: "Status: not connected" at the bottom.

# Exhibit C

## URrelay, Inc. 911 Call Processing (U.S. Originated 911 Calling Only)



**Exhibit D**

Neustar, Inc. Registered Location Database Access Registration  
(Attached)



October 6, 2008

Hello Wesley,

Welcome to iTRS. You are receiving this email because you recently submitted a registration form for access to the iTRS platform and are now ready to set up your connectivity. I am a representative from the iTRS Customer Connectivity Services group and we will be your primary contact during the provisioning process.

I have attached the iTRS Profile form to be completed and submitted to [iTRS@NeuStar.biz](mailto:iTRS@NeuStar.biz). We will review the completed form and work with you on any missing information or discrepancies. Once the form has been accepted you will receive an email confirmation with the next steps. If you have any questions in the meantime or need any assistance with completing the form please contact us at 571-434-5125 or [iTRS@NeuStar.biz](mailto:iTRS@NeuStar.biz) we are available Monday-Friday from 8:00 am - 5:00 pm Eastern Time.

Thank you,  
Amanda Jensen  
iTRS Customer Connectivity Services  
NeuStar Inc.  
(571)434-5125  
Fax (703) 738-7518  
[iTRS@Neustar.biz](mailto:iTRS@Neustar.biz)



October 27, 2008

Below you will find your PIN code to access the iTRS test environment Web GUI at <https://itrs-trial.neustar.biz/itrs/> . You will need to enter this PIN code followed by the 6-digit number displayed on the SecurID token as your GUI password.

PIN:   
Username: wes@lifelinks.net

Your SecurID token was sent separately via express mail delivery. If you do not receive your token shipment within the next 2 business days, please let us know.

Please feel free to contact us for any problems that may arise. Our contact information is listed below. We look forward to assist you in any way we can.

Thank you,  
*Amanda Jensen*  
Lead Project Manager  
iTRS Customer Connectivity Services  
NeuStar Inc.  
(571)434-5125  
Fax (703) 738-7518  
iTRS@Neustar.biz

**Exhibit E**

VRS/IP Relay Platform Call Detail Record Format  
(Attached)

## Exhibit E

### VRS/IP Relay Platform Call Detail Record Format

Column	A	B	C	D	E
Field Name	id	t_connected	t_queued	t_processed	t_answered
Data	534053	2008-07-01 09:47:11	2008-07-01 09:47:11	2008-07-01 09:47:11	2008-07-01 09:47:11
Data	534054	2008-07-01 09:46:35	2008-07-01 09:46:35	2008-07-01 09:46:35	2008-07-01 09:46:35
Data	534055	2008-07-01 09:38:28	2008-07-01 09:38:28	2008-07-01 09:38:28	2008-07-01 09:38:28
Data	534056	2008-07-01 10:48:10	2008-07-01 10:48:10	2008-07-01 10:48:10	2008-07-01 10:48:08
Column	F	G	H	I	J
Field Name	t_dialed_out	t_relay_start	t_relay_end	t_session_end	ca_id
Data	2008-07-01 09:47:42	2008-07-01 09:47:42	2008-07-01 09:47:42	2008-07-01 09:47:42	1234
Data	2008-07-01 09:46:49	2008-07-01 09:47:02	2008-07-01 09:47:51	2008-07-01 09:47:52	1234
Data	2008-07-01 09:47:12	2008-07-01 09:47:37	2008-07-01 09:47:51	2008-07-01 09:47:53	1234
Data	2008-07-01 10:48:33	2008-07-01 10:48:37	2008-07-01 10:49:20	2008-07-01 10:49:20	1234
Column	K	L	M	N	O
Field Name	ca_pos	unique_id	cc_id	cli_type	abandon
Data	2222	2XX.1XX.3XX.2XX;121492;XXX		ENJH3	0
Data	2222	2XX.1XX.3XX.2XX;121492;XXX		ENJH3	0
Data	2222	2XX.1XX.3XX.2XX;121492;XXX		ENJH3	0
Data	2222	2XX.1XX.3XX.2XX;121492;XXX		ENJH3	0
Column	P	Q	R	S	T
Field Name	term_num	orig_ip	bdr_link_key	rejected	vco_num
Data	(123) 456-7890	12.24.2.X		0	
Data	(123) 456-7891	12.24.2.X		0	
Data	(123) 456-7892	12.24.2.X		0	
Data	(123) 456-7893	12.24.2.X		0	
Column	U	V			
Field Name	username	e911			
Data			0		
Data			0		
Data			0		
Data			0		