



**Dave Freudenthal**  
Governor

# State of Wyoming

## Department of Workforce Services

DIVISION OF VOCATIONAL REHABILITATION  
WYOMING RELAY  
851 Werner Court, Suite 120  
Casper, WY 82601  
Phone & TDD (307) 577-0539 \* Toll Free (800) 452-1408  
Fax (307) 472-5601



**Joan K. Evans**  
Director  
**Lisa M. Osvold**  
Deputy Director

### **CG Docket 03-123**

DA 10-1090  
June 29, 2010

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> St., S.W.  
Washington, DC 20554

Reference: Annual Consumer Complaint Log Summary: June 2009 – May 2010

Ladies and Gentlemen:

Pursuant to the Federal Communications Commission's rules, 47 C.F.R. §64.604(c)(1), the State of Wyoming, Division of Vocational Rehabilitation, Telecommunications Relay Service submits the enclosed annual consumer complaint log summary for the twelve-month period ending May 31, 2010.

The enclosed consumer complaint log from the State of Wyoming Telecommunications Relay Service includes all complaints about the Telecommunications Relay Service (TRS) in the state, whether filed with the TRS provider Hamilton Relay or with the State. This log includes the date the complaint was filed, the nature of the complaint, the date of the resolution, an explanation of the resolution, and monthly complaint totals. There is also a tally sheet which indicates the total number of complaints for the year, the monthly totals, the number of complaints by category, and the percentage that each category of complaint is of the total "Service, Technical, and Miscellaneous Complaints." The aforementioned complaint log will be retained until the next application for certification is granted.

For the period of June 1, 2009, through May 31, 2010, the TRS provider processed nine thousand, nine hundred fifty-six (9,956) traditional TRS outbound calls on behalf of Wyoming Relay. The TRS provider also processed a total of thirty-three thousand, eighty-six (33,086) CapTel outbound calls on behalf of Wyoming Relay. A total of seventeen (17) customer complaints were received, which is a rate of four one-hundredths of a percent (.04%). Of the seventeen (17) complaints, one was filed with CTI CapTel Customer Service, five were filed with Hamilton's Wyoming Relay Customer Service, one was filed with a Hamilton Lead CA, two were filed with a Hamilton Operations Manager, five were filed with the state agency, and three were filed with a Hamilton Supervisor.

Wyoming Relay processes any complaint, regardless of whether it originates via e-mail, fax, telephone, regular mail, outreach events, advisory committee meetings, at workstations, etc. Resolutions to all complaints are normally provided within 72 hours. The complaints enclosed are resolved. None of the eighteen (18) complaints were escalated for action by the Federal Communications Commission.

The nature of the complaints were as follows:

- Carrier of Choice not available
- Scam or harassing call through relay
- CapTel complaint
- LEC Busy
- Garbling of message through VCO device

Complaint resolutions included:

- Encouraged and worked with carriers to participate as a Wyoming Relay Carrier of Choice
- Referred customer to their phone provider or law enforcement
- Provided information/education to customer
- Referred customer to their local phone provider
- Suggestions on how to clear the garbling and follow-up test calls

Over half (56%) of all the complaints received were associated with fraudulent phone calls through the relay service. Wyoming Relay has worked hard to successfully promote the use and understanding of relay service. We have specifically targeted the business community to provide information regarding customers who may be trying to contact their business through relay so that they do not hang up on them. To the extent that we have been able to verify the information from the complaints, all the fraudulent calls have been placed through internet relay providers and not Wyoming Relay. To the businesses and citizens of Wyoming, however, "relay is relay," and most individuals do not know that internet relay service is not provided by Wyoming Relay. Results of these fraudulent internet relay service calls include the following: businesses lose money and productivity; Wyoming Relay's reputation is harmed; and—most importantly—individuals who are deaf or hard-of-hearing are harmed when businesses are reluctant to (or simply refuse to take) calls through relay.

This is a systemic problem that is not limited to one provider. There is an inherent conflict of interest for relay providers to aggressively pursue solutions to this problem because the providers are reimbursed for calls whether they are fraudulent or legitimate. Thus, fraudulent calls can be a substantial source of income for the providers.

The Wyoming Division of Vocational Rehabilitation applauds the FCC's previous efforts to address fraudulent relay service activities and hopes that the FCC will continue to explore options. To assist Wyoming Relay (as well as other states' relay programs) in resolving these complaints, it would help if the FCC required that providers verify that the addresses of registered users are valid addresses. Of further assistance would be to require that relay operator identification numbers be unique to each operator, with specific, non-duplicated number blocks assigned to each provider.

Wyoming Relay will continue to educate users on ways to recognize fraudulent/scam calls, ways to prevent being victimized by the calls, and what to do if you have already been a victim of a fraudulent relay call.

Wyoming's relay provider (Hamilton Telephone Company) is filing the requested call type data (interstate traditional TRS, STS, captioned telephone, IP Relay, and VRS) under protective seal.

If the information contained within the annual consumer complaint log summary is not sufficient, or if you have any questions, please notify us and we will be happy to provide additional information.

Respectfully,



Lori Cielinski  
WY Relay Program Consultant

Enclosures: Consumer Complaint Log Summary, 12 pages  
Wyoming Relay Complaint Tally Sheet, 3 pages  
Wyoming Relay Complaint Report, 5 pages