

MILLER
ISAR INC.
TRUSTED ADVISORS

4423 POINT FOSDICK DRIVE, NW
SUITE 306
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 866.474.3630
WWW.MILLERISAR.COM

ANDREW O. ISAR

Via ECFS and Overnight Delivery

March 10, 2011

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

RE: In the Matter of Application of Healinc Telecom, LLC for Eligibility to be Compensated
From the Interstate Telecommunications Relay Service Fund for the Provision of Video
Relay Service and IP Relay Services, Docket No. 03-123

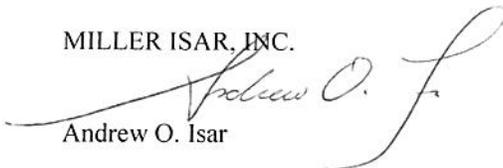
Dear Secretary Dortch:

Healinc Telecom, LLC's ("Healinc"), by its regulatory consultants and pursuant to Section 64.606(a)(2) of the Commission's rules, is pleased to submit this *VRS and IP Relay Certification Application* ("Application"), in the above-referenced matter. Healinc's Application clearly demonstrates the Company's continued compliance with the Commission's Mandatory Minimum Standards, waived Mandatory Minimum Standards, and Commission Orders and policies for the provision of video relay services and IP-Relay services. Further, Healinc's Application also demonstrates that its implementation of significant operational, service, and outreach program enhancements together with its ongoing compliance, warrant renewed Commission certification of federal Telecommunications Relay Service fund compensation eligibility for video relay services, and now too for Internet Protocol relay services. Healinc respectfully requests that such certification be granted on or before June 9, 2011 to ensure a seamless continuation of Healinc's services to the public.

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

Enclosure

cc: Ms. Karen Peltz Strauss (via electronic delivery, Karen.Strauss@fcc.gov)
Mr. Mark Stone (via electronic delivery, Mark.Stone@fcc.gov)
Mr. Greg Hlibok (via electronic delivery, Gregory.Hlibok@fcc.gov)

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

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Application of Healinc Telecom, LLC for)	
Eligibility to be Compensated From the)	Docket No. 03-123
Interstate Telecommunications Relay Service)	
Fund for the Provision of Video Relay Service)	
and IP Relay Services)	

VRS AND IP RELAY CERTIFICATION APPLICATION

**ANDREW O. ISAR
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335**

**Regulatory Consultants to
Healinc Telecom, LLC**

March 7, 2011

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VRS AND IP RELAY CERTIFICATION APPLICATION

Healinc Telecom, LLC (“Healinc,” “Applicant,” or “Company”), by its regulatory consultants, and pursuant to Section 64.606(a)(2) of the Commission’s rules,¹ hereby respectfully applies to the Commission for continued certification of the Company’s eligibility to draw from the federal Telecommunications Relay Service Fund (the “Fund”) for the provision of video relay services (“VRS”). And, to the extent possible, Healinc renews its request for certification the Company’s eligibility to draw from the Fund for the provision of Internet Protocol (“IP”) relay services.²

Since first demonstrating compliance with the Commission’s mandatory minimum standards (“MMS”)³ for the provision of VRS service, Applicant has maintained, routinely exceeded, and annually demonstrated compliance with the MMS and waived VRS MMS, to be deemed eligible for compensation from the Fund for the provision of VRS. As the fifth year anniversary of the Company’s initial eligibility draws to a close, Healinc now re-

¹ 47 C.F.R. §64.606(a)(2).

² Applicant incorporates herein by reference its pending IP Relay Certification Application; *In the Matter of Application of Healinc Telecom, LLC for Eligibility to be Compensated From the Interstate Telecommunications Relay Service Fund For the Provision of Internet Protocol Relay Services*, Docket No 03-123 (November 18, 2008)[“IP Relay Application”]. To the extent that Commission action on the Company’s pending IP Relay Application is not ripe for consolidation with the instant Application, Healinc limits its Application to the provision of VRS exclusively.

³ 47 C.F.R. §64.604.

applies to the Commission for continued eligibility to drawing from the Fund for the provision of VRS and IP-Relay services, so that it may and continue serving the Deaf Community and public without interruption.

Though continually meeting and exceeding MMS and waived MMS and complying with Commission orders and policy, Applicant has made significant technical enhancements to its service platform in its relentless pursuit of improving customers' calling experience and coming ever closer to meeting full functional equivalency for the provision of VRS services. Applicant has also worked tirelessly to build a team of experienced, certified interpreters, support staff, and management dedicated to serving the needs of its subscribers and the public. And Applicant has pursued initiatives aimed at outreach and further integration and responsiveness to the Deaf Community.

As demonstrated herein, Applicant continues to meet and exceed the MMS, waived MMS, Commission orders and policy, continues to provide exceptional service, strives to surpass caller expectations, and warrants Commission recertification as eligible to continue drawing from the federal Fund for the provision of VRS and now IP-Relay services. Applicant seeks Commission recertification on or before the fifth year anniversary of its initial Fund eligibility period set to expire on June 9, 2011, to ensure the seamless continuation of its services to the public. In support of its Application, Applicant states as follows.

I. INTRODUCTION.

On June 9, 2006, Healinc was granted authority to receive compensation from the Fund independent from any certified state TRS program.⁴ Pursuant to Section 64.606(c)(2),

⁴ *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). At that time, Healinc withdrew its request for IP-Relay certification prior to FCC grant of certification, in anticipation of applying for Fund eligibility at a subsequent date.

“Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.” Healinc now submits this Application within the 90th day prior to the expiration of its current certification.

Section 64.606(a)(2) governing certification of VRS or IP Relay service providers independent from any certified state TRS program, ostensibly requires applicants to describe: the services to be provided; how the applicant will meet all non-waived MMS; how the applicant’s procedures will ensure compliance with the Commission’s TRS rules; the applicant’s complaint procedures; how applicant’s service will differ from the applicable MMS; how services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards; and to demonstration of the applicant’s status as a common carrier and provide a statement that the provider will file annual compliance reports demonstrating continued compliance with these rules. The instant Application addresses each of these specific requirements.

The instant Application further addresses significant technical, operational, organizational, and outreach initiatives that Healinc has undertaken since first certified as eligible for Fund compensation to distinguish itself as a premier VRS provider of desirable and compliant VRS and IP relay services to the public.

Further, as Healinc has recently reported,⁵ the Company currently works with thirteen independent partners who provide VRS through their relationship with Healinc. Healinc has implemented procedures to ensure that all Healinc partners are compliant with the entirety of

⁵ See, Healinc Telecom, LLC 2011 Relay Services Data Request Submission to the National Exchange Carriers Association TRS Fund Administration.

the MMS, either directly or through capabilities made available to partners by Healinc. Attached hereto at **Exhibit 1** is an overview of Healinc's *Partner Program*, demonstrating the procedures Healinc has implemented to ensure ongoing partner compliance with MMS and waived MMS, for which Healinc is ultimately responsible.

Taken together, Healinc maintains that the following demonstration of compliance and public service warrant the Company's continued certification of eligibility to draw from the Fund for the provision of VRS and now for the provision of IP-Relay services.

II. HEALINC VIDEO RELAY SERVICES AND PROPOSED INTERNET PROTOCOL RELAY SERVICES (47 C.F.R. §64.606(a)(2)(i))

Healinc continues to provide advanced VRS solutions to the public. These solutions utilize a combination of a proprietary software-based applications, specialized open architecture IP-enabled telephone equipment, now exclusively over the AuPix VRS platform using Voice over Internet Protocol ("VoIP") transmission over broadband facilities. The Company's platform supports ten-digit telephone number assignment, full 911 access, and support of default carrier selection. The Company's VRS platform is interoperable with all other VRS and TRS applications, including, but not limited to, D-Link equipment, Ojo, and V-Pad, and will continue callers to access other TRS/VRS providers.

Since its inception, the Company has continually refined its policies and procedures to maximize the efficiency of its operations, while providing the public with the best possible calling experience possible. An overview of the Company's operational functions – its operational "Blueprint" - is attached hereto at **Exhibit 2**.

Healinc maintains that it is exceptionally well positioned to continue providing desirable, high-quality VRS and now IP-Relay services to the Public.⁶

III. HEALINC'S VRS CONTINUES TO COMPLY WITH THE NON-WAIVED MANDATORY MINIMUM STANDARDS FOR THE PROVISION OF FEDERALLY FUNDED VRS (47 C.F.R. §64.606(a)(2)(ii))

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 demonstrates that it continues to meet federal MMS applicable to the provision of VRS, and merits continued Commission certification to draw compensation from the federal TRS Fund.

A. Operational Standards

1. Communications Assistant ("CA") – Training (47 C.F.R. §64.604(a)(1)).⁷

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."⁸

⁶ Though the following explicitly makes reference to Applicant's compliance with MMS with respect to VRS, such compliance is equally applicable to its provision of IP-Relay services.

⁷ Standard vii governing TTY services has been intentionally deleted from the list as effectively inapplicable.

⁸Speech-to-Speech. (" STS") calling requirements has been waived indefinitely. *2004 TRS Report and Order*, para 138 and 139.

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.⁹

Healinc Compliance: Healinc remains in compliance with each of the foregoing requirements. Healinc continues to focus on developing a highly professional competent CA staff. This focus includes an emphasis on training, ongoing development or refinement of policies and procedures to improve responsiveness and maintain service consistency, and in hiring of qualified CAs, while terminating a minority of CAs who do not meet Healinc’s professional service standards.

As in years past, Senior Healinc CAs and experienced management team continue to rigorously screen new CA applicants, to verify American Sign Language proficiency, to ensure that CA applicants meet and are fully trained on the MMS, and are generally well suited to interact with callers in a professional and courteous manner. Beyond promoting Registry of Interpreters for the Deaf (RID), SCS, CI or CT, or National Association of the Deaf certification, Healinc now requires that new interpreters either maintain such certification or be actively working toward certification. Certified CAs are given priority for employment or engagement. CAs are routinely monitored and critiqued. Healinc further reviews user comments and complaints, and incorporates recommendations or addresses concerns through changes in procedures. CAs undergo ongoing coaching and formalized training, where necessary, to ensure MMS and Company policy compliance. Healinc communicates with CAs frequently to address issues of general concern. Any CA demonstrating a pattern of failing to meet MMS and company standards, despite corrective action, is dismissed.

⁹ Healinc has not received any TTY calls since receiving certification.

Healinc's VRS and pending IP Relay service platform enables callers to select interpreters by gender. All CAs receive thorough training on the MMS including minimum call service times and fully supervised to ensure compliance.

The Company continues to rely upon performance surveys, quality assurance test calls, subscriber surveys, and direct supervision, 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 in all CA work locations. All CAs must comply with Healinc's confidentiality policy, which has been refined to account for unique circumstances that have arisen over the past year. CAs 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 calls for quality assurance and training, and then, only with the express approval of the caller. CA receive calls in work areas that are physically isolated and preclude inadvertent call viewing by other individuals, regardless of work location. All CAs work from secured premises. All 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 caller when accessing Healinc's VRS platform.¹⁰

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 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, as well as through Healinc's own established policies. 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. CAs 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. A compliance checklist is provided to all CAs and is verified through Healinc's Quality Assurance Program, a summary of which is attached hereto at **Exhibit 3**. The appearance of an interpreter on the user's computer screen indicates the CAs availability; the CA may not refuse to interpret

¹⁰ See, <http://www.lifelinks.net/privacy.html>.

or limit the number or length of legitimate calls.¹¹ Any confirmed intentional premature call termination is subject to disciplinary action, up to and including termination.

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. Relay service providers have the burden of proving the infeasibility of handling any type of call.”¹²

Healinc Compliance: Applicant’s platform is designed to process a variety of relay calls, including non-VRS calls. Healinc does not bill subscribers or called parties for calls. Alternative-billing calls such as person-to-person, reverse bill, or third-party billed typically placed as operator-assisted calls are inapplicable, accordingly.

Standard (iii): “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.¹³

¹¹ Healinc CAs on occasion experience calls involving pornography, calls entailing protracted silences for no apparent reason, and calls that cannot be interpreted, such as calls which connect to recorded music. In instances of calls entailing pornography, Healinc has determined that the CA have the discretion to interpret such calls or transfer calls to the manager on duty who has the discretion to transfer such calls to another interpreter or advise the caller that the call cannot be interpreted. As to dubious calls, in addition to removal of such calling time from compensable calling time reported to the Fund administrator, Healinc has established policies that entail advising callers that absences must be limited and of the inability to process calls that do not entail interpretation, following consultation with the Commission.

¹² Types of Calls requirements was waived through January 1, 2009. *2004 TRS Report and Order*, para 113 through 115. “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) [“*Extension Order*”]; *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)

¹³ 47 C.F.R. § 64.604(b)(3). Waived for IP-Relay. Waived through July 1, 2011. *See, e.g. 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 No. 03-123, WC Docket No. 05-196, *Order*, [DA 10-1235](#) (June 30, 2010) [“*2010 MMS Waiver Extension Order*”].

Standard (iv): “Relay services shall be capable of handling pay-per-call calls.”¹⁴

Healinc Compliance: Applicant has the ability of accepting pay-per-call calls though CAs will simply convey credit or debit card information on behalf of the caller. Such information is translated only and never recorded.

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.”¹⁵

Healinc Compliance: Applicant’s platform maintains the capability of supporting all types of calls. Healinc’s AuPix VRS platform has the capability of supporting Voice Carry Over (VCO), allowing a user to speak directly to the person he or she is calling and receiving responses through the CA and vice-versa. Healinc has the capability to support VCO-VCO calls, VCO-HCO calls, VCO-TTY, and Two-Line VCO calls. Healinc’s VRS is also capable of supporting Hearing Carry Over (HCO) that allows an individual to listen to the called party and respond in text to be voiced by the CA and vice-versa. HCO users are able to hear the call set-up, ringing, and the called party answering the telephone. Healinc supports HCO-HCO calls, HCO-VCO calls, HCO-TTY calls, and Two-Line HCO calls.

Standard (vi): “TRS providers are required to provide the following features: (1) Call release functionality;¹⁶ (2) speed dialing functionality; and (3) three-way calling functionality.”

Healinc Compliance: Both callers and CAs have the ability to release calls immediately when terminated through the VRS platform software application for users, and platform capabilities for CAs. The application software inherently allows for speed dialing once the called number is

¹⁴ Waived through July 1, 2011. *2010 MMS Waiver Extension Order.*

¹⁵ *Id.*

¹⁶ *Id.*

input into the calling screen. Healinc CAs retain the ability to initiate three-way calls through the platform.

Standard (vii): “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 on the CAs 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: Healinc will record voice mail messages for subscribers who currently use voice mail devices, as requested by the subscriber. Healinc has been working with its platform developers to establish a process for recording video mail and informing subscribers of new messages, which can be accessed directly by the subscriber. Healinc anticipates deployment on or before April 1, 2011. 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.

4. Handling of emergency calls. (47 C.F.R. §64.604(a)(4)) and amended Section 64.605.

Standard: “(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.”¹⁷

¹⁷ See *Telecommunications Relay Services And Speech-to-Speech Services For Individuals With Hearing And Speech Disabilities, E911 Requirements For IP-Enabled Service Providers*, CG Docket No. 03-123, WC Docket No. 05-196, *Report and Order*, 23 FCC Rcd 5255 (Mar. 19, 2008) (“*Interim Emergency Call Handling Order*”), [FCC 08-78], amended *Telecommunications Relay Services And Speech-to-Speech Services For Individuals With Hearing And Speech Disabilities, E911 Requirements For IP-Enabled Service Providers*, CG Docket No. 03-123, WC Docket No. 05-196, *Order*, FCC 08-210, (rel. September 19, 2008), Appendix B.

“Our rules require TRS providers to automatically and immediately transfer emergency calls to an appropriate public safety answering point (PSAP).¹⁸ The *VRS Waiver Order* granted VRS providers a two-year waiver of this requirement, but also required VRS providers to clearly explain on their website and in any VRS promotional materials “the shortcomings and potential dangers of using VRS to place an emergency call using 911.”¹⁹²⁰ **“In the *Interim Emergency Call Handling Order*, the Commission terminated the temporary waivers of the emergency call handling rule, effective May 21, 2008, for VRS, IP Relay, and IP CTS in light of the “present imperative to provide Internet-based TRS users a reliable means of accessing emergency services.”²¹ The Commission required Internet-based TRS providers to “accept and handle emergency calls” and to access, either directly or via a third party, a commercially available database that will allow the provider to determine an appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority that corresponds to the caller’s location, and to relay the call to that entity. Further, the Commission promulgated the following Standards under Section 64.605, as amended by the Commission’s June 2008 *Report and Order and Further Notice of Proposed Rulemaking*.^{22 23}**

Healinc Compliance: Healinc does not provide TTY-based TRS services although it maintains the capability to process TTY calls if received. The provisions of Section 64.604(a)(4), as amended, governing TTY-based TRS services are inapplicable, accordingly.²⁴ Healinc’s compliance focuses on the amended provisions of Section 64.605(b) governing emergency call handling requirements for VRS providers, and related requirements for Internet-based TRS Registration promulgated under Sections 64.611²⁵ and 52.34²⁶ applicable to Internet-Based TRS providers adopted under the *Interim Emergency Call Handling Order and Report and Order and Further Notice of Proposed Rulemaking*, addressed further below. Healinc’s calling platform

¹⁸ See 47 C.F.R. § 64.604(a)(4); see also *Second Improved TRS Order & NPRM* at ¶¶ 37-42.

¹⁹ *VRS Waiver Order* at ¶ 14.

²⁰ 2004 *TRS Report and Order*, ¶ 116, footnotes from original.

²¹ *Interim Emergency Call Handling Order*, para. 16.

²² *Id.*; 47 C.F.R. § 64.605 (setting forth additional operational standards applicable to Internet-based TRS).

²³ See, e.g. *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 No. 03-123 and WC Docket No. 05-196, *Report and Order and Further Notice of Proposed Rulemaking*, [FCC 08-151](#) (Rel. June 24, 2008) [“*Report and Order and Further Notice of Proposed Rulemaking*”].

²⁴ “We note that, as amended by the *Interim Emergency Call Handling Order*, section 64.604(a)(4) now applies exclusively to TTY-based TRS providers. The emergency call handling requirements applicable to Internet-based TRS providers are now set forth in section 64.605 of the Commission’s rules. See *Interim Emergency Call Handling Order*, 23 FCC Rcd at 5275–76, Appendix B.” *Report and Order and Further Notice of Proposed Rulemaking* footnote 36.

²⁵ 47 C.F.R. §64.611.

²⁶ 47 C.F.R. §52.34.

has been designed to comply with section 64.605(b) for emergency call handling in conjunction with its Voxitas 911 emergency routing service. In 2010, Healinc handled ten emergency 911 calls without incident.

The platform coupled with the Voxitas 911 emergency routing service has the capability to determine callers' physical location through access to the Neustar Registered Location database and verified independently by the Voxitas 911 emergency routing service,²⁷ and route emergency 911 calls to the Public Safety Answering Point responsible for serving each caller, through arrangements with other carriers, including incumbent local exchange carriers. Healinc receives ten digit North American Number Plan telephone number assignments for subscribers through its arrangement with a numbering partner, pursuant to Section 64.611, promulgated under the Commission's June 24, 2008 *Report and Order and Further Notice of Proposed Rulemaking* governing assignment of uniform, conventional ten-digit telephone numbers by all Internet based telecommunications relay service providers.

Further, Healinc is informing subscribers of the process for placing emergency VRS 911 calls through promotional materials, Healinc's website, and when users access Healinc's VRS and IP Relay platform via the Internet. Further, Healinc confirms that any entity seeking to become a Healinc partner strictly complies with all 911 requirements through verification of prospective partner platforms and CA training.²⁸

With respect to the specific requirements specifically set forth in Section 64.605, Healinc provides the following statement of compliance.

²⁷ The terms Registered Location database and TRS Numbering Directory are used synonymously herein.

²⁸ Please also refer to Exhibit 1.

§64.605 Emergency Calling Requirements

(a) Pursuant to 47 C.F.R. §64.605(a)(1), “(a) Additional Emergency Calling Requirements Applicable to Internet-based TRS Providers. (1) As of December 31, 2008, the requirements of paragraphs (a)(2)(i) and (a)(2)(iv) of this section shall not apply to providers of VRS and IP Relay to which §64.605(b) applies.

(2) Each provider of Internet-based TRS shall:

(ii) Implement a system that ensures that the provider answers an incoming emergency call before other non-emergency calls (i.e., prioritize emergency calls and move them to the top of the queue);

Healinc Compliance: Healinc’s Au Pix VRS platform detects “911” dialed emergency calls and directs these calls to the 911 call queue for immediate processing.

(iii) Request, at the beginning of each emergency call, the caller's name and location information, unless the Internet-based TRS provider already has, or has access to, a Registered Location for the caller;

Healinc Compliance: Healinc has implemented procedures for ensuring that CAs obtain emergency caller name, verify contact information from its registered subscribers, and verify the caller’s registered location.²⁹ When “911” is dialed by the caller, the CA implements the verification procedures, and forwards the caller’s ANI to the Voxitas ERS for routing to the caller’s serving PSAP. Voxitas’s ERS includes a national automatic location information database that provides an additional verification of the user’s location to the appropriate PSAP when 911 is dialed.

²⁹ Please also refer to Exhibit 3.

(v) In the event one or both legs of an emergency call are disconnected (i.e. , either the call between the TRS user and the CA, or the outbound voice telephone call between the CA and the PSAP, designated statewide default answering point, or appropriate local emergency authority), immediately re-establish contact with the TRS user and/or the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority and resume handling the call;

Healinc Compliance: Although all required information will be transmitted under the Voxitas ERS 911 platform, Healinc’s standard operating procedure directs CAs to obtain PSAP contact information immediately, verify location, and establish the CAs identity to ensure that in the event that the call is disconnected, the call can immediately be reestablished.

(vi) Ensure that information obtained as a result of this section is limited to that needed to facilitate 911 services, is made available only to emergency call handlers and emergency response or law enforcement personnel, and is used for the sole purpose of ascertaining a customer’s location in an emergency situation or for other emergency or law enforcement purposes.

Healinc Compliance: Healinc avers to strictly protect the confidentiality of all customer proprietary information pursuant the requirements set forth in this section, Section 64.604(a)(2)(i), and to be voluntarily bound by the provisions of the Commission’s Customer Proprietary Network Information rules, at Section 64.2001 *et seq.*³⁰

(b) E911 Service for VRS and IP Relay

(1) Scope. The following requirements are only applicable to providers of VRS or IP Relay. Further, the following requirements apply only to 911 calls placed by users whose Registered Location is in a geographic area served by a Wireline E911 Network.

(2) E911 Service. As of December 31, 2008:

(i) VRS or IP Relay providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

³⁰ 47 C.F.R §64.2001 *et seq.*

(ii) VRS or IP Relay providers must transmit all 911 calls, as well as ANI, the caller's Registered Location, the name of the VRS or IP Relay provider, and the CAs identification number for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §64.3001 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by a VRS or IP Relay user dialing 911";

Healinc Compliance: Healinc coordinates with other industry representatives in developing procedures for population of Neustar, Inc.'s Registered Location numbering assignment administrator's database. The data base is being populated with assigned ten digit numbers that reflect the user's physical location in support of routing of emergency calls to the local public safety access point emergency authority that corresponds to the caller's location. Healinc is registered with Neustar, Inc. for access to the numbering database.

Registered location information is requested as part of the subscriber registration process.³¹ CAs confirm the registered location on each 911 emergency call before directing the call to the appropriate PSAP through via the Voxitas 911 ERS as a matter of policy.

As noted, the Voxitas 911 ERS automatically transmits both the caller's name and Registered Location to the PSAP. The platform will also identify Healinc as the VRS provider and the CAs identification and call back numbers with the data transmitted to the PSAP.

(iii) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; and

Healinc Compliance: Healinc's platform will transmit ANI based on the assigned ten-digit number established in the Registered Location database for Healinc's subscribers. ANI data will be transmitted to the serving PSAP through dedicated 911 routing facilities via the Au Pix, LTD VRS platform, Voxitas 911 ERS's arrangements with interconnecting carriers.

³¹ See, <http://www.lifelinks.net/account.html>.

(iv) The Registered Location, the name of the VRS or IP Relay provider, and the CAs identification number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

Healinc Compliance: Healinc's platform is configured to automatically identify Healinc and the CAs identification number to the PSAP, in conjunction with ANI information obtained through Neustar's Registered Location database, via the Voxitas 911 ERS.

(3) *Service Level Obligation.* Notwithstanding the provisions in paragraph (b)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a VRS or IP Relay provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (c) of this section of a VRS or IP Relay provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §64.3001 of this chapter.

Healinc Compliance: Healinc has incorporated this requirement into its policies and CA training procedures.³²

(4) *Registered Location Requirement.* As of December 31, 2008, VRS and IP Relay providers must:

(i) Obtain from each Registered Internet-based TRS User, prior to the initiation of service, the physical location at which the service will first be utilized; and

(ii) If the VRS or IP Relay is capable of being used from more than one location, provide their Registered Internet-based TRS Users one or more methods of updating their Registered Location, including at least one option that requires use only of the CPE necessary to access the VRS or IP Relay. Any method utilized must allow a Registered Internet-based TRS User to update the Registered Location at will and in a timely manner.

Healinc Compliance: In order for subscribers to select Healinc as a preferred (default) provider and access Healinc's platform, subscribers are required to affirmatively register with Healinc.

³² Please refer to Exhibit 4.

Through this registration process, subscribers are required to provide necessary contact information, including physical location, needed to populate the Registered Location database. Subscribers are able to register and update information over a secure Internet web site, <http://www.lifelinks.net/account.html>, via email, or by contacting Healinc's customer service in writing or telephonically, with proper verification of identity. Further, Healinc's operating procedures dictate that CAs verify Registered Location information on all emergency calls, as noted *supra*. Healinc provides users with specific information on the use of customer proprietary network information to be collected for complying with 911 access requirements.

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

Standard: “Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.”³³

Healinc Compliance: Healinc's VRS platform has the ability to process STS calls, but does not currently have the capability of maintaining a list of names and telephone numbers which STS users might call. Healinc's platform does enable subscribers to maintain a list of frequently contacted individuals and telephone numbers which enable the subscriber to initiate a call to the individual by clicking the option on the screen. The subscriber's personal list is maintained through the platform's user software obviating the need for maintaining a separate listing at the relay center. This creates an additional level of security for the user.

³³ The requirement has been waived indefinitely for VRS. See *2004 TRS Report & Order*, 19 FCC Rcd at 12594 (Appendix E: Summary of IP Relay and VRS waivers) and *2010 MMS Waiver Extension Order* at para. 1.

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.

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’s growth caused the Company to reevaluate staffing per call volume ratios. Engagement of experienced supervisory personnel and enhancements to call processing data analysis enabled Healinc to recalibrate staffing levels to more accurately ensure full coverage and to stay within call answer time metrics. Healinc continues to closely monitor call levels to determine staffing adjustments by time of day, in accordance with actual calling volumes. The relay center supervisors maintain contact with on call CAs, and have the ability to contact all available CAs and bring them online within minutes, if unusually high call volumes are experienced. Further, Healinc’s partner relationships enable the Company to engage partner CAs to further augment and enhance CA availability as needed during periods of heavy calling volumes. This flexibility ensures that Healinc maintains sufficient staffing to exceed service quality standards, even under exceptional instances of heavy call volumes.

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 is in current compliance of the speed of answer requirements for VRS providers, and has adopted procedures to ensure that it remains compliant on a going forward basis.

In 2010 average speed of answer metrics reflected that 88 percent of all calls were answered within 10 seconds including abandoned calls. Speed of answer time is projected to go to average under seven seconds in 2011 and under five seconds in 2012. Healinc has had to contend with external challenges outside of its control that at times did result in limited call delays and in some instances, abandonment. In early 2010 Healinc experienced several “SIP Attacks” from computer hackers. These attacks raised the Company’s abandoned called ratio to

36 percent for a limited period of time. The attacks were quickly traced to several specific locations. Healinc immediately installed preventative measures to preclude such attacks in the future. In late 2010, Healinc implemented a Quality Assurance Program to specifically deal with call abandonment, despite significant improvements in call abandonment abatement. As of February 2011 abandoned calls dropped to 5.41 percent of calls received. Healinc continues pursue a zero call abandonment metric.

3. Equal access to interexchange carriers. (47 C.F.R. §64.604(b)(3)).³⁴

Standard: “TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.”

Healinc Compliance: To the extent that registered subscribers now rely exclusively on Healinc or other IP-based providers as their default service provider, subscribers should not, as a practical matter, require access to a wireline interexchange or local exchange carrier. Healinc continues to provide local, domestic intrastate, interstate and international long distance services at no cost to callers. Nevertheless, Healinc retains the technical capability to route interexchange calls to the subscriber’s interexchange carrier of choice and place calling card calls to carriers using the subscriber’s calling card, in the unlikely event requested by callers.

³⁴ Waived through July 1, 2011. *2010 MMS Waiver Extension Order*

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.”³⁵

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

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

Healinc Compliance: Healinc’s basis for compliance remains unchanged. Uninterruptible power supplies (“UPS”) are available for CA work stations, regardless of location. 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 corporate relay centers are housed in commercial buildings that meet applicable codes for fire suppression. Multiple broadband facilities are used to provide diversity routing. Independent broadband facilities are connected directly to all CAs, supporting continued operations in the event of facility outages to any singular location.

Healinc maintains a checklist of items to ensure that each CA is properly equipped to provide compliant support. CAs must *inter alia* have the capability to physically secure work sites exclusively through a pass code locking device. Remote location CAs check in with the Manager on Duty who first verifies that the CA’s computer and the web cam positioning and photo-back ground will enable callers to receive quality video, and to ensure that each CA maintains a professional appearance and is prepared to begin serving callers. Healinc takes pride

³⁵ 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.

in its extreme professionalism and this is conveyed in the way the interpreters present themselves.

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 has pursued development of an advanced, unified call processing VRS platform, robust in functionality, scalable, and capable of supporting mobile access. Future developments in Healinc’s VRS platform will maximize current video, voice, and transmission processing technology to provide an unequaled calling experience, consistent with Commission’s policy.

Specifically, Healinc has been engaged in evaluating advanced technology applications for VRS and IP-Relay in addition to conducting interviews with users to ensure caller considerations are fully addressed. Healinc is planning to introduce mobile solutions for Android Phones including the Samsung Epic 4G, HTC Evo, HTC Evo (Shift), HTC Thunderbolt, T-Mobile myTouch 4G, Samsung Galaxy Tab, Dell Streak 5, Nexus S from Google, and in the near future, the iPhone 4, iPod Touch (4 and 5th Generations), iPad 2, iPhone 5 (Next Year). Healinc is also working on advanced instant messaging solutions i.e., iChat for Mac OSX, Web-Based Browser i.e., Internet Explorer, and Mozilla Firefox, and is considering incorporating flexible solutions including H.323, H.264 and SIP-based applications; and evaluating deployment of its own interoperable LifeLinks Video Phone (Wired) and LifeLinks Video Phone (Wireless) devices.

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 Au Pix VRS platform passes through the number of the center from which the CA is placing the call and the registered subscriber’s assigned ten digit telephone number.

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 currently maintains, and submits, a complaint log to the Commission associated with its VRS service.³⁶ Users have, and will continue to have, the ability to initiate complaints to a CA or CA supervisor, via electronic mail to the Company’s customer service address, and via the Company’s web site, www.lifelinksvrs.com. Complaints are logged into Healinc’s complaint tracking system. The CA who received the complaint, or an assigned CA 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 the complaint log. A supervisor will monitor complaint status and will ensure that action is taken within the specified period.

³⁶ See, e.g. Healinc Telecom, LLC Annual Consumer Complaint Log Submission, Docket No. 03-123.

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 who then communicates with the complainant, and the result is documented.

Healinc maintains a complaint response time of between 4 and 6 hours for complaints requiring research. Following the addition of two experienced Deaf individuals to serve as dedicated customer service representatives 96% of the issues are resolved immediately. Further, Healinc has pursued a proactive customer education initiative to assist customers in better understanding how to use Healinc's service and minimize inquiries.

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 avers to submit complaint logs annually, as it has, 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:

Dr. Stanley Schoenbach
Healinc Telecom, LLC
3333 Henry Hudson Parkway, Suite 1A,
Riverdale, NY 10643
Telephone: 718.543.4100
E-Mail: s.schoenmd@lifelinks.net or complaints@lifelinks.net

All CAs are immediately responsible for receipt of complaints they receive, pursuing timely resolution, responding to the complainant, and for documentation, subject to supervisory review. Specialized CA customer care representatives are also available if the CA cannot immediately respond to a complaint or inquiry. Healinc avers to timely inform the Commission any changes in contact information for the senior individual responsible for complaints.

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

Healinc Compliance: Healinc maintains multiple contact points based on the caller’s preference for communicating with the Company:

Voice telephone: 212.714.2900 or 1-VRS-744-6111 (1.877.744.6111)
TTY Telephone: 212.714.9TTY (9889)
Spanish Speaking Callers: 1-VRS-SIGN-526 (1.877.744.6526)
Fax number: 718.601.5400
Deaf callers to video phone:
Hearing Callers to video phone: 877.774.6111 Callers then give the interpreter the IP address 173.8.92.30
E-Mail Address: techsupport@lifelinks.net
Web Address: <http://www.lifelinksvrs.com>
Video Phone Access: LLVRS.tv

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

Healinc Compliance: Correspondence should be sent to:

Healinc Telecom, LLC
3333 Henry Hudson Parkway, Suite 1A,
Riverdale, NY 10643

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 will continue to pursue its outreach program entailing active marketing and targeted educational services targeted to the Deaf community. Healinc has employed a host of media to encourage and promote public access including: Social Networking – Twitter, YouTube, Facebook, MySpace; Trade Shows - Deaf Expo, ASL Expo, Deaf Nation; Vlogsphere World - Deaf Video, DeafCube, DeafRead; Deaf News - iDeaf News, Deaf Newspaper, Deaf Digest, NAD.org, Deaf News Today, Ohsoez, Deaf Spot, Deaf Times, Rocky Mountain Deaf News, Deaf Nyc, All Deaf; E-mails distribution; Mass Mailings; Search Engines Google, Yahoo, Bing; Deaf Forums - All Deaf, Deaf Notes, Deaf Freedom, Deaf Online 2, Deaf X; Education - Deaf Schools, Colleges with DSS Services, Deaf and Hard of Hearing Programs, and Independent Living Centers

Healinc is investing heavily in the Deaf community through the Company’s “Community Payback Projects.” Current and planned projects include:

- Scholarship for Deaf College Students
- News Center for Deaf and Hard of Hearing Adults/Kids Vlogs/Blogs
- Laptop/Desktop For Middle School and High School Students
- Supporting Deaf Animals (Deaf Dogs) Donations of Food, Towels, Blankets, Leash and Collars
- Deaf Elderly Visitation Programs/Elder Services
- Free Mentoring Program for Candidate Interpreters who want to work in the VRS Industry.
- Support Deaf Non-Profit Organizations (Between \$500.00 to \$2,500.00) 4 to 6 times a year.
- Support Deaf Child Today
- Provide Free Tutoring Progrms in the U.S. (Year Round)
- Assistance to Hearing/Deaf parents who cannot afford to buy hearing aids for deaf/hard of hearing children. (Two times a year)
- Provide VRI Equipment and support thirty days free of charge to any organization wishing to see how VRI works.
- Deaf Children/Adults in Juvenile and Prison Settings (providing VRI Services and ensuring provision of VRS equipment for accessibility)
- Release from Jail/Providing assistance to transition back into the Community.
- Free Standalone Equipment at various public places i.e., Airports
- Social Networking (DEAF) to include Video Conference Programs which include our Tutoring component, good for Middle School, High School and College Students.
- Employer Tuition Assistance
- Implementation of Electronic Newsletter for Hispanic Population throughout the United States. Establishing more awareness for the need and provision of VRS services with qualified Trilingual translations.

In 2010, Healinc employed a new senior management team with established, long-standing experience and ties to the Deaf community to better integrate its operations with the needs and interests of its Deaf community subscribers.

Advertising. Healinc's outreach program strategy continues to rely upon a combination of press releases, co-marketing with Deaf organizations via the Internet, as well as general and targeted advertising. The Company engages in direct marketing to the Deaf Community, and

through continued advertising in Deaf Community expositions, seminars, and trade conferences, and through sponsorship opportunities. Healinc also advertises indirectly through the production of self-help video programs developed for the Deaf Community.

Partnerships and Affiliations. Healinc is working to broaden its partnerships and affiliations with state and national organizations devoted to serving the Deaf Community to make information concerning the Company's VRS services widely available. Additionally, Healinc will consider longer-term sponsorship opportunities to broaden company name and service recognition in the State. Healinc has also expanded its outreach to the underserved Hispanic community through engagement of certified trilingual CAs in Spanish, ASL, and English, and generally expanded outreach via development of a community newsletter, a Facebook, and Twitter presence on the Internet.

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)), *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 data collection forms to the National Exchange Carriers Association each year of its eligibility certification, and responded to all applicable data requests.

IV. HEALINC'S VRS CONTINUES TO COMPLY WITH THE WAIVED MANDATORY MINIMUM STANDARDS FOR THE PROVISION OF FEDERALLY FUNDED VRS (47 C.F.R. §64.606(a)(2)(ii))

As has been demonstrated in Healinc's annual waived MMS compliance reporting, Healinc continues to comply with those MMS that have been waived for VRS (and IP Relay) subscribers, as follows.

1. *One-line VCO, VCO-to-TTY, and VCO-to-VCO.*

Healinc Compliance: Healinc has complied with the *One-line VCO, VCO-to-TTY, and VCO-to-VCO* requirement since its inception. Healinc has the capability of providing VRS for all call types.

2. *One-line HCO, HCO-to-TTY, and HCO-to-HCO.*

Healinc Compliance: Healinc has complied with the *One-line HCO, HCO-to-TTY, and HCO-to-HCO* requirement since its inception.

3. *Call Release.* Call release allows a CA to set up a TTY-to-TTY call that, once established, does not require the CA to relay the conversation.

Healinc Compliance: Healinc has complied with the *Call Release* requirement since its inception. Although Healinc maintains this capability through call bridging, it has never had to process a TTY-to-TTY call.

4. *Pay-Per-Call (900) calls.* Pay-per-call (900) calls are calls that the person making the call pays for at a charge greater than the basic cost of the call.

Healinc Compliance: Healinc has processed no such calls, but has the capability to do so in the event such calls are placed.

5. *Types of Calls (Operated Assisted Calls and Long Distance Calls).* Commission rules require TRS providers to handle any type of call normally handled by common carriers.

Healinc Compliance: Healinc maintains 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. Since its inception, Healinc has not billed callers for long distance services, consistent with Equal Access obligations.

6. *Equal Access to Interexchange Carriers.* The TRS rules require that providers offer TRS users their interexchange carrier of choice to the same extent that such access is provided to voice users. Providers should specifically address the effect of the numbering and registered location requirements on the continuing need for this waiver.

Healinc Compliance: Healinc has complied with the *Equal Access to Interexchange Carriers* requirement since its inception, by not charging callers to place long distance calls. Healinc maintains that the new numbering and registered location requirements adopted in 2009 moot the very need to maintain this exemption. Subscribers are effectively presubscribed to each VRS provider. It is virtually inconceivable that a subscriber would request to be routed to an interexchange carrier. The Deaf community has come to expect that interexchange calls placed via VRS will not be subject to separate charges. Those subscribers who may also maintain separate interexchange services are otherwise not impacted. Healinc has not experienced an instance where a caller has requested to be routed over a specific interexchange carrier before or after implementation of the numbering and registered location requirements. Nevertheless, Healinc urges the Commission to solicit public comment before removal of the waiver to build a record supporting a decision to terminate the waiver.

7. *Speech-to-Speech.* In the 2000 TRS Report & Order, the Commission recognized STS as a form of TRS and required that it be offered as a mandatory service. The Commission waived this requirement indefinitely for VRS, noting that STS is a speech-based service, whereas VRS is a visual service using interpreters to interpret in sign language over a video connection.

Healinc Compliance: As is the case with TTY-to-TTY calls, Healinc maintains the technical capability to process such calls, though its experience with such calls is virtually non-existent.

V. HEALINC MAINTAINS STRICT PROCEDURES ENSURING COMPLIANCE WITH ALL APPLICABLE TRS RULES (47 C.F.R. §64.606(a)(2)(iii))

Healinc has over the course of the past five years of eligibility certification – and prior to certification – complied with the Commission’s MMS and applicable orders through a regiment of policies, procedures, training and active oversight designed to ensure compliance, subject to constant refinement. The Company’s policies, procedures, training have been developed and documented in accordance with Commission rules as a template.

New, unanticipated circumstances have been reviewed and evaluated in accordance with established policies, procedures, and training. In limited instances where there has been uncertainty regarding interpretation, the Company has sought clarification from the Commission. Subscriber feedback and participation in industry *fora* have also enabled the Company to ensure that it remains in compliance. Additionally, Healinc has retained experienced consultants who provide guidance in compliance and operational matters. And Healinc has developed and maintains a close working relationship with the Fund Administrator to ensure a full understanding of changed conditions or interpretations regarding submission of conversation minutes and related policies.

Company policies, procedures, and training have remained subject to managerial oversight and adjustment as conditions have required. Healinc has also expanded its management team to include capable individuals who are either Deaf or have extensive Deaf

Community ties, as well as experience in the industry. These individuals play a critical part in ensuring compliance and continual improvements in calling experience.

The Company's compliance with MMS and waived MMS as demonstrated through annual reports to the Commission underscore the effectiveness of the Company's policies, procedures, training and active oversight in ensuring ongoing compliance, as highlighted in the Company's training program.

VI. HEALINC COMPLAINT PROCEDURES REMAIN FULLY COMPLIANT (47 C.F.R. §64.606(a)(2)(iv))

Healinc has addressed its compliance procedures under the discussion of the Company's compliance with the Commission's Functional Standards MMS, *supra*.

VII. HEALINC'S SERVICE DOES NOT DIFFER FROM APPLICABLE MMS (47 C.F.R. §§64.606(a)(2)(v) and (vi))

As has been addressed, Healinc's provision of VRS and anticipated provision of IP-Relay Services is compliant with, and does not differ from, the MMS. Further, as discussed *supra*, Healinc's service complies with currently waived MMS.

VIII. HEALINC MAINTAINS ITS STATUS AS A COMMON CARRIER (47 C.F.R. §§64.606(a)(2)(vii))

Healinc maintains a Certificate of Public Convenience and Necessity from the New York Public Service Commission, "to operate in New York State as a reseller of telephone service, with authority to provide local exchange service."³⁷ Healinc's Certificate of Public Convenience and Necessity, and its provision of the services described herein, establish Healinc's status as a

³⁷ See Case No. 04-C-1451, Letter from Robert H. Mayer, Director, NY PSC Office of Telecommunications, to Stanley Schoen, President, Healinc Telecom, issued January 10, 2005, attached hereto as Exhibit 6.

“common carrier.”³⁸ Healinc continues to comply with all applicable New York rules and reporting obligations.

IX. HEALINC WILL CONTINUE TO FILE ANNUAL COMPLIANCE REPORTS DEMONSTRATING CONTINUED COMPLIANCE WITH COMMISSION RULES (47 C.F.R. §§64.606(a)(2)(viii))

Healinc avers that it will continue to file – as it has on a timely basis - annual compliance reports demonstrating continued compliance with Commission regulations for the provision of VRS and, when granted corresponding authority, IP Relay service. A senior executive of Healinc remains designated as responsible for regulatory compliance responsibilities, including timely reporting and liaison with the Commission on all regulatory matters.

X. CONCLUSION

Over the course of the past five years of its Fund eligibility certification, Healinc has made vast improvements in its service, technology, operations, and organization while maintaining compliance with non-waived and waived MMS, and Commission and Fund Administrator orders and policies. Healinc continues to provide the very type of innovative, advanced-technology VRS envisioned by the Commission, consistent with the Commission’s long-standing pro-competitive policy, while constantly striving to better integrate itself with the Deaf Community and Public and improve on the quality of its services. As set forth above, Healinc demonstrates that it continues to provide desirable, functionally equivalent, VRS that meets or exceeds the MMS and waived MMS, warranting certification of its eligibility to continue drawing compensation from the federal Fund.

³⁸ See 47 U.S.C. §225, and 47 CFR §64.601.

Healinc makes this Application under the Commission's current regulatory framework, which serves as the only existing basis for evaluating the Company's recertification, and the only possible basis on which the Company's Application has been prepared. Though the Company is mindful of potential pending changes in Commission regulation and policy regarding the provision of VRS and IP Relay services, and is poised to implement such changes as needed, it is impossible for Healinc to anticipate or speculate as to the nature of such changes.

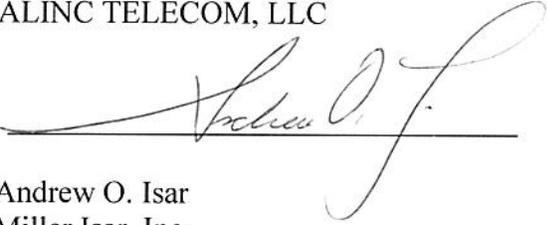
The Company has made significant investments, hired and engaged more than 200 individuals who serve the Public, serves more than 2,400 subscribers, and remains a meaningful contributor to the Deaf Community. Pending action by the Commission on relay service regulation, Healinc urges the Commission to act on the instant Application in accordance with the present regulatory framework to which the Company has necessarily been bound at the time of this filing. Any subsequent action by the Commission on this Application that is predicated on changed regulation, policy, or conditions will unfairly disadvantage Healinc, its subscribers, employees, subcontractors and partners, potentially preclude Healinc from making resultant adjustments in its operations, and ultimately undermine the Company's future operations unless sufficient time is given for Healinc to make attendant adjustments, if necessary. Healinc acknowledges that its operations may ultimately require adjustment following anticipated changes in Commission relay service regulation and policy, which the Company is prepared to undertake as a Fund-eligible provider. Nevertheless, the basis under which Healinc's compliance is evaluated should be based on the regulatory framework currently in effect. Healinc should not be effectively disadvantaged simply because of the necessary timing of its Application for recertification. Healinc urges the Commission to grant its Application under the current regulatory framework as of the date of its submission.

WHEREFORE, Healinc respectfully requests that its certification be maintained, accordingly, without a break in eligibility, to ensure a seamless provision of VRS, and to the extent now authorized by the Commission, IP-Relay service, to the Public.

Respectfully submitted this 7th day of March 2011.

HEALINC TELECOM, LLC

By: _____



Andrew O. Isar
Miller Isar, Inc.
4423 Point Fosdick Drive, NW
Suite 306
Gig Harbor, WA 98335
Telephone: 253.851.6700

Healinc Telecom, LLC's
Regulatory Consultants

AFFIDAVIT
Veracity of Statements

State of New York :
County of Bronx : ss.

Stanley Schoenbach, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He is the Managing Member of Healinc Telecom, LLC, and that he is authorized to, and does, make this affidavit for said Applicant;

That Healinc Telecom, LLC, the Applicant herein, certifies under penalty of false statement that the facts above set forth are accurate, true, and correct to the best of his knowledge, information, and belief.

Stanley F. Schoenbach MD

Stanley Schoenbach, MD

Sworn and subscribed before me this 7th day of March, 2011.

James Y. Lau
Signature of official administering oath

FRANCES LAU, Branch Manager
Print Name and Title

My commission expires July 6, 2013.

FRANCES Y. LAU
Notary Public, State of New York
No. 01LA6208436
My Commission Expires July 6, 2013

**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) Docket No. 03-123
Interstate Telecommunications Relay)
Service Fund for the Provision of Video)
Relay Service and IP Relay Services)

VRS AND IP RELAY CERTIFICATION APPLICATION

Listing of Exhibits

Exhibit	Content
1	Healinc <i>Partner Program</i> Overview
2	Operational “Blueprint”
3	Quality Assurance Program
4	Video Relay Service Interpreting Program Presentation
5	Evidence of Company Status as a Common Carrier

Exhibit 1

Healinc Telecom, LLC – Partner Program

Healinc Telecom, LLC's ("Healinc") *Partner Program* has been designed to enable new video relay service ("VRS") providers and/or smaller VRS providers who are not yet prepared to seek federal Telecommunications Relay Service Fund ("Fund") eligibility, to partner with Healinc in serving VRS callers.

Under Healinc's *Partner Program* Healinc assumes full responsibility and oversight for its partners' operations, while ensuring that only those entities capable of meeting Federal Communications Commission Mandatory Minimum Standards ("MMS") and ongoing obligations to the Fund Administrator are able to become Healinc Partners. Healinc's *Partner Program* further enables Healinc to supplement its Communications Assistant staff with qualified individuals during peak calling periods.

Prospective Partner Evaluation

Healinc verifies that prospective partner entities are capable of meeting Healinc's high partner standards by:

- Ensuring that prospective partners have explicit plans and time lines to file applications for Fund eligibility and meet all MMS, ten digit number assignment, emergency 911, data collection, and reporting obligations for the provision of VRS;
- Ensure prospective partners have necessary funding to invest in operations'
- Performing extensive interviews and corporate organizational and capabilities reviews; and
- Evaluating prospective partner performance based on a checklist of key metrics routed in the MMS.

Prospects who do not meet Healinc's evaluation standards will not be considered for the *Partner Program*.

Partner Support and Oversight

Once entities are certified as Healinc partners, Healinc performs the following functions in support of, and to oversee, partners and their operations, and to ensure that the MMS and Fund administrative obligations are met on an ongoing basis:

- Review call detail records, data collection, and verify reported data and review data consistency through a standardized Partner Information Worksheet;
- Verify call legitimacy through monitoring;
- Monitor monthly call volume and partner web site traffic to verify legitimacy of operations;
- Consult with partner senior management on operating practices, compliance, and organization;
- Maintain an in-house queue for each partner for call management, accounting, and monitoring purposes;
- Perform unannounced random visits to ensure that call centers and work locations meet MMS for security, redundancy, and operations;
- Provide training and guidance on compliance and policy issues to partner staffs;
- Conduct monthly conference calls to discuss policies and operational issues; and
- Maintain an interactive forum and in-house Vlog/ Blog for partners to consult with Healinc.

Further, Healinc retains all customer service operations in-House as a secondary method for verification of call and operational quality.

Exhibit 2

Healinc Telecom, LLC – Operational Blueprint

Healinc Telecom, LLC's video relay service operations are separated into five (5) distinct functional components, each falling under a manager's area of responsibility directly under the supervision of the Senior Vice President/Chief Operations Officer and the Chief Executive Officer. The Company has developed stand alone procedures, compliance checklists, and training under each functional component, in accordance with Commission Mandatory Minimum Standards, Orders, and policies:

I. Communications Assistant ("CA") Operations

- Recruitment
- Engagement/hiring criteria
- Competency and proficiency
- Training: Policies and procedures
- On going assessment
- Quality Assurance Program

II. Video Relay Services Technical Operations and Engineering

- VRS platform engineering and maintenance
- Server maintenance
- Secured Database System (SDS) operations
- Information Technology staff support
- Telephone system and Automatic Call Distributor operations and maintenance
- Data collection - Automatic Number Identification and call data collection
- Fund Administrator reporting operations
- 911 Operations and coordination
- Number assignment and Neustar ITRS/ENUM database coordination
- Fraud detection operations
- Advanced technology engineering

III. Customer Care Operations

- Customer care policies and procedures
- Complaint procedures and logs
- Technical support
- Account Subscription and Verification procedures

IV. Community Outreach

- Deaf Community Payback program
- Marketing Program (shows, social media, etc.)

V. Partner Program

- Initial Evaluation criteria
- Training
- Reporting policies and practices
- Ongoing evaluation

Exhibit 3
Quality Assurance Program
(Attached)

Healinc Telecom, LLC

Quality Assurance Program

Introduction. Service quality is one of the most critical components of Healinc Telecom, LLC's ("Healinc") operations and a hallmark of Healinc's reputation. Subscribers have a right to expect and receive exceptional service from Healinc and its partners. Exceptional service quality is an ongoing objective that demands constant attention, practice, and enhancement. It is with this exceptional service objective in mind, that Healinc's Quality Assurance Program has been designed to exceed subscriber expectations, exceed regulatory standards, and build a service platform that is the envy of competitors. The following is an overview of Healinc's Quality Assurance Program.

Communications Assistant Assessment Process.

Initial Evaluation: All Healinc Communications Assistants (CA's) must reside in the United States and be immersed in Deaf Community culture. Additionally they must be as well as the local community culture in which they reside. Healinc CAs must be Nationally Certified Interpreters possessing a State Certification, CI/CT, CSC, NIC, NIC ADVANCED, NIC MASTERS, OTC and SC:L. Because of this our expectations are higher than most and thus our evaluations are more stringent.

CAs must have at least two years proven experience in interpreting prior to being considered as a Healinc interpreter. Additional consideration is given to each candidate's education and previous training.

Healinc's stringent CA credentialing process specifically includes:

- *Overview FCC rules pertaining to VRS Services*
- *Telephone Interview*
- *Interview via webcam or Video Phone*
- *Assessment by company's C.T.O. who is also deaf.*
- *Contractor Information Worksheet completed*
- *Detailed Testing (Verbal & Written)*
- *Qualifying process via VRS/VRI manager, Sr. Vice President or MODL*
- *Internet and Computer Specs/Requirements Evaluated*
- *Verification of work area, secured lock entrance/exit, Pictures of work area submitted*
- *Independent Contractor's Agreement Completed*
- *Role of the Professional Interpreter*
- *Conduct and Procedures*
- *Code of Professional Ethics*
- *Statement of Neutrality and Confidentiality*
- *Invoicing*

Healinc Telecom, LLC

Quality Assurance Program

- *Orientation 8 hour training course by our Training Manager*
- *Continuous Evaluation*

The first three steps provide an opportunity for the CA/VRS Management Team to determine a given interpreter's initial skill set and ability to continue through the evaluation process. Developed over the last 6 years, this method of separating merely bilingual applicants from competent CAs has been found to be extremely effective. Those found to be qualified during the telephone interview receive a Contractor Information Sheet. Candidates found not to meet minimum qualifications through the Contractor Information Sheet review are not tested. Ultimately candidates are weeded through the evaluation process.

Healinc's final CA interpreter exam process was created in coordination with the Director Healinc's Language Services, Director of the International Interpretation Resource Center (IIRC) at the Monterey Institute of International Studies, in consultation with Oregon Health Science University and industry experts, including NCIHC (National Council on Interpreting in Health Care) and the Cross-Cultural Health Care Program and the Registry of Interpreters for the Deaf.

This exam is conducted telephonically and incorporates the following key components:

Medical & Social Service Terminology

- Body parts
- Equipment
- Pharmaceuticals
- Medical tests and procedures
- Basic common health conditions
- Scenarios involving child abuse, family assistance programs
- Abbreviations (e.g. ICU, qid)
- Specialties (e.g. medical, mental health, substance abuse, herbal medicine)

Language Competency

- Fluency in source and target languages
- Standard language and common colloquialisms (slang)
- Basic legal terminology

Interpreter Competency

- Interpreting skills (e.g. memory skills)
- Customer service
- Message accuracy; meaning for meaning interpretation

Healinc Telecom, LLC

Quality Assurance Program

- Interpreting in the 1st person

Professional Ethics

- Customer satisfaction
- Confidentiality
- HIPAA Compliance
- Professional conduct
- Advocacy
- Conflict of interest
- Acting as a “cultural broker”

[Would move the ongoing assessment piece here.]

Healinc Partner Standards.

Initial Evaluation: Healinc has adopted a stringent partner and subcontractor credentialing process. This process includes an evaluation of each partner's operations and understanding of compliance obligations:

- * *Overview-Introduction-Why do you want to be in the VRS industry?*
- * *Telephone Interview-(Almost like a Loan Application Interview)*
- * *Interview via Mega Meeting, webcam or Video Phone*
- * *Assessment by company's C.O.O./Senior Vice President who is also hearing impaired and a fluent signer.*
- * *Partner/ Sub-Contractor Information Worksheet completed*
- * *Detailed Financial History*
- * *Qualifying process via C.E.O., Sr. Vice President-C.O.O. and C.T.O. assessment*
- * *Outreach plan assessment;[this is more of an operations issue than a criteria for partnering]Provide initial FCC website link, ask prospective White Label partner to sign acknowledging reading the rules and agreeing to comply with all. Review minimum. Internet and Computer Specs/Requirements according to Licensed Certified Provider.*
- * *Verification of work area, secured lock entrance/exit, Pictures of work area submitted with Map along with an application for CCID.*
- * *White Label Sub-Contractor's Agreement Completed*
- * *Development of a Web-Site*
- * *Develop Call Center Policy of Conduct and Procedures*
- * *If a Call Center is opened Outline the R.I.D. Code of Professional Ethics*
- * *Statement of Neutrality and Confidentiality*
- * *Explain monthly NECA Billing requirements and expectations.*

Healinc Telecom, LLC

Quality Assurance Program

- * *Develop Splash Screen for customers on hold or for hearing incoming callers.*
- * *Orientation*

CA Standards

All Interpreters, white labels are always undergoing multiple checks, monitoring's and other related quality check points to ensure that all business is legitimate and that all Healinc, LLC policies and procedures and strict rules of professional conduct are honored and mandated.

Ongoing Evaluation:

Newly engaged CA calls are monitored for quality assurance for a minimum of 3 to 6 months. After the initial period, Healinc monitors every interpreter for quality on a monthly basis. This ongoing evaluation process monitors CA adherence to Healinc's code of ethics and standards of practice and customer service. This was recently implemented in 3 of 2011 and forms are being drafted and should be ready to implement by June 1, 2011.

Further, Healinc monitors a number of service factors daily, including time to connect to a CA and quality of interpretation. Lead CAs in management capacity, deaf management, and the executive management team randomly monitor calls to check for quality, professionalism, and accuracy of interpretation. It is of paramount importance that the key factors of both quality interpretation and time to connect are adequately monitored to assure the utmost in customer satisfaction. Healinc also monitors the "on-call" log to make certain that we have more than enough interpreters on call at any given time.

Customer Service complaints are immediately logged into a Customer Complaint Resolution file in our company-wide computer network. This applies to all types of complaints. Once a complaint is logged, an e-mail is immediately sent to all appropriate personnel. All discussions pertaining to the complaint and the resolutions are logged. This file can be accessed by the C.T.O./Quality Assurance Manager, VRS Manager, Operations Coordinator and all executive management staff. This allows for cross-departmental input, which helps to ensure that a solution designed by one department does not have negative ramifications on our operating procedures.

Complaints or concerns are addressed within 12-24 hours so long as the forms are documented by the Manager on Duty/Lead completes her task timely.

Healinc Telecom, LLC Quality Assurance Program

VIVRS Call Evaluation Review

Follow UP Action

Needed: _____

Order #		Issue:
Date		Notes:
Time		
Caller: VRSID#		
Phone:		
Interp #:		Action Taken:

Evaluator Comments: _____

Evaluator's Signature: _____

Management: _____

Exhibit 4
Video Relay Service Interpreting Program Presentation
(Attached)



LifeLinks Video Interpreting Service

“Bridging the Language Gap”

450 Seventh Avenue

Suite 502

New York, NY 10123

Video Interpreter Training



Healinc's Mission Statement

“At Healinc, we recognize the diverse communication needs of the deaf, hard of hearing, and late deafened communities and strive to provide a variety of personalized relay services that enable them to connect successfully with the hearing world. Our commitment to technological innovations, ethical practices, and investment in the community provide connections that afford our users full communication access according to individual preferences.”

Expectations

Autonomy

Mastery

Purpose

Healinc Community Purpose

“Open the VRS Experience
to the Diverse Needs of
ALL Deaf and Hard of
Hearing Individuals”

Healinic Interpreter Purpose

“Bring the VRS Experience
as Close to a Real Life
Experience as Possible”

Healinc FCC Purpose

“To Be Knowledgeable and Current on FCC Regulations. To Process Organic VRS Calls. That Every Call be in Line With the FCC Regulations and Their Intent for Relay Calls.”

FCC Information

- Relay Regulations
<http://www.fcc.gov/cgb/consumerfacts/trs.html>
- History Docket
[http://www.fcc.gov/cgb/dro/trs history docket.html#2010](http://www.fcc.gov/cgb/dro/trs_history_docket.html#2010)
- Reporting
<http://www.fcc.gov/cgb/consumerfacts/videorelay.html>

New Employee Checklist

- Non-Disclosure Agreement
- Fob and Door Key Form
- LifeLinks.net Email
- Brosix User Name and Password
- APS-50 Agent and Password
- Timesheet

Desktop

- Recycle Bin
- Brosix (IM Chat)
- APS-50 (VRS Platform)



Brosix

- IM Communication Between Interpreters, Management, and the Life Links MODL and Tech Support

Username is Your Interpreter
Number Plus the Word "say"

Password is sh1234
DO NOT CHANGE



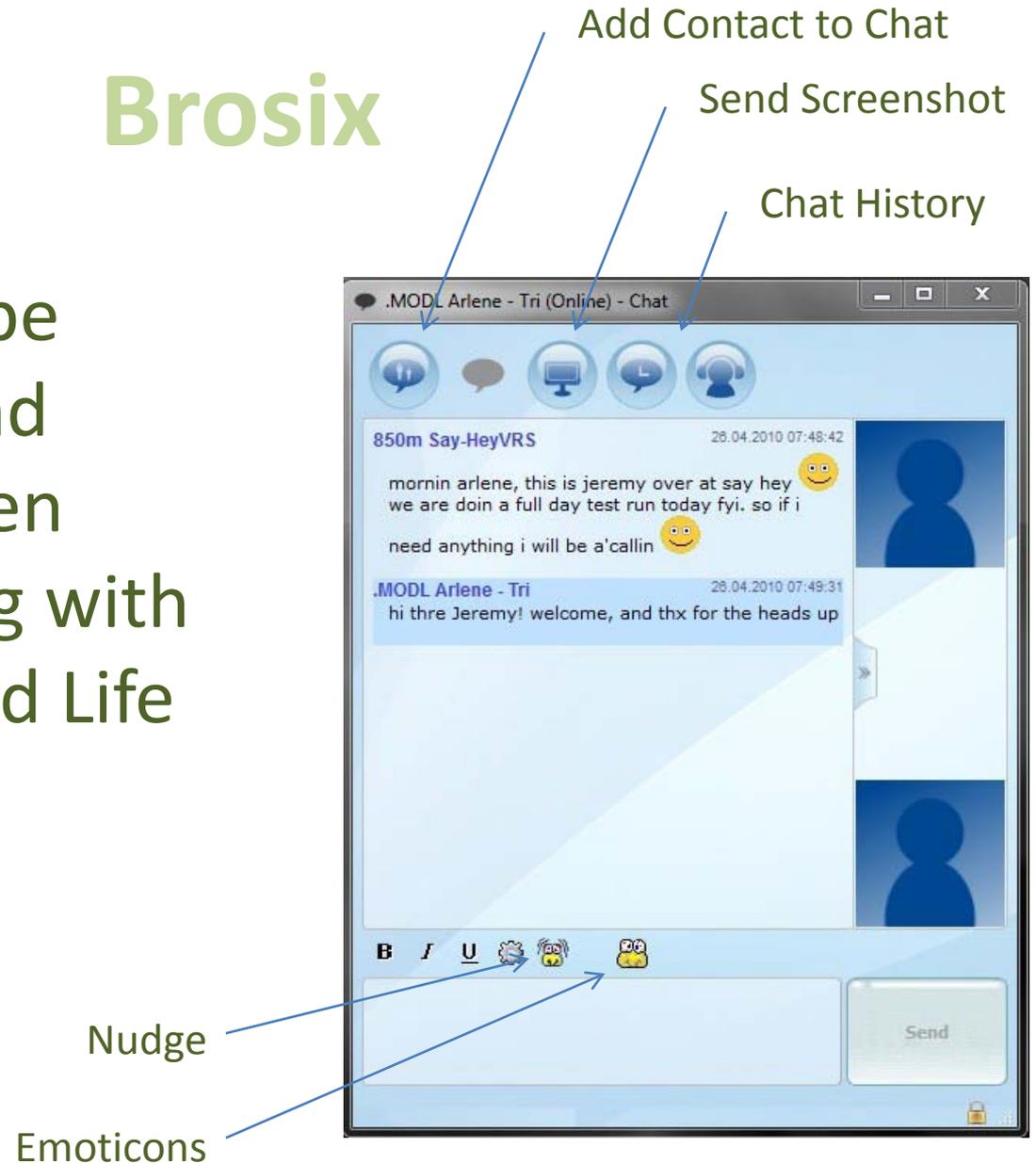
Brosix

- The Contact List Includes 4 Groups
- The MODL is Always on Top and is Your Go To Person for Any Platform Related Issues/Aid, Including Transfers
- Features and Settings



Brosix

- Remember to be Professional and Courteous When Communicating with the Say-Hey and Life Links Teams
- Features



Direct Call
(Use Offline)

Log In

APS-50 Log In



Agent Number

Password 1234
(DON'T CHANGE)

APS-50

Platform Icons

Direct Call

Call History

Log Out

Settings

The screenshot shows the APS-50 AuFix VideoPhone interface. At the top left, there are five icons: a green arrow, a document, a folder, a person with an 'X', and a speech bubble with 'Ab'. Below these are tabs for 'Conference', 'Queues', 'Agents', 'DTMF', and 'Note Pad'. The main area is a large video window showing a stylized eye graphic. At the bottom left, there are four icons: a person with a plus sign, two people, a person with a bar chart, and a person with a speech bubble. At the bottom right, there is a status box with the following text:

850m SayHeyVRS (2168)
Current Session
Total Session
Logged In 18 s

Add Call

Transfer

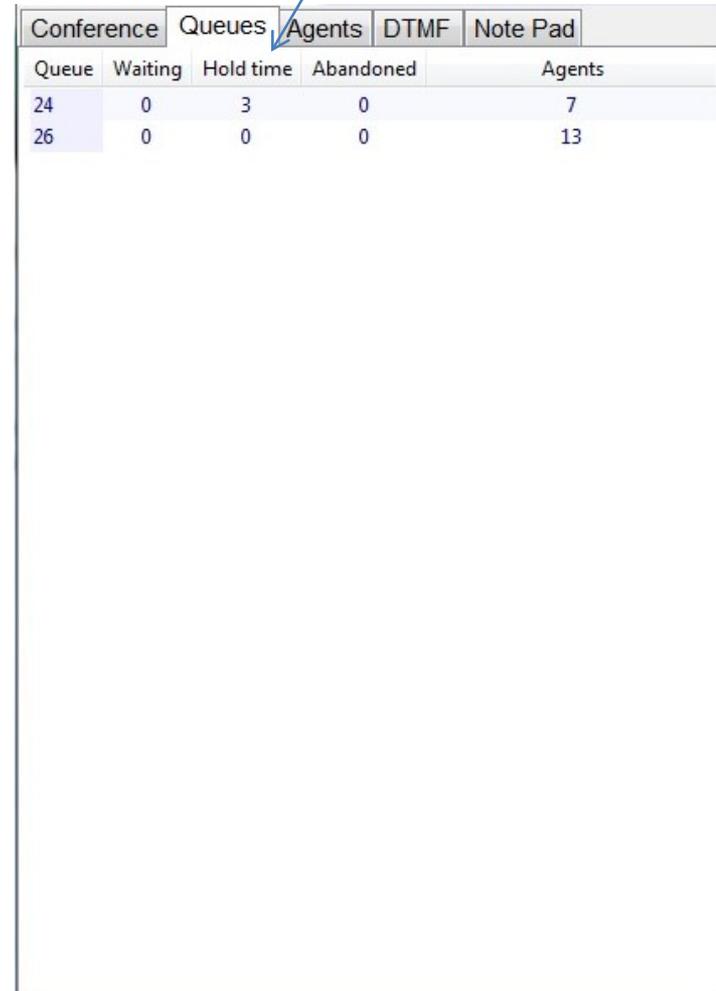
Pause (Break)

Tech Report

APS-50 Queues

ASA

- 24 is the Say-Hey Queue
(Includes Life Links Interpreters but Say-Hey Interpreters Will Always Receive Calls First)
- 26 is the 911 Queue
(All Interpreters are in this Queue)



Queue	Waiting	Hold time	Abandoned	Agents
24	0	3	0	7
26	0	0	0	13

APS-50 Agents

- All Agents Logged In

Pause (Break)

Available

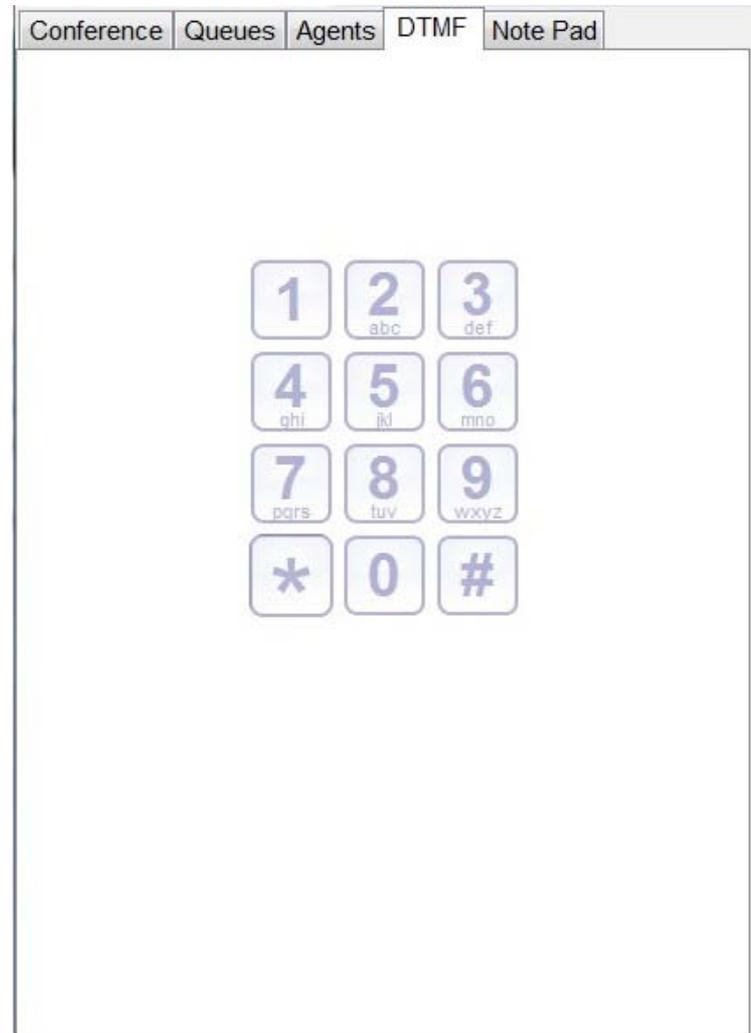
On Call

Conference	Queues	Agents	DTMF	Note Pad
	Agent	Ext.	Name	
	2006	4064	751f ACEVRS Traci Caswell	
	2015	4190	116f Aviva Ben Shitrit	
	2043	4059	108m Myron Yoder	
	2055	4016	703f TRUVRS	
	2058	4035	651f SKYVRS	
	2066	4056	766m AceVRS Ryan Strege	
	2076	1045	406f Amy Egan	
	2102	1062	Fernando Velazquez	
	2144	4008	Lifelinks CSR Jose	
	2162	4106	221M Lionell Gonzalez Aps-50	
	2168	4041	850m SayHeyVRS	
	2180	1046	601f CODAVRS Carol Halley	
	2190	4153	605f CODAVRS	
	2215	4147	418f Cinderella Branch APS-50	
	2222	1029	LifelinksTech 1 Dale	
	2224	4156	428f Amira Griffith APS-50	
	2227	4160	129m Dan Cook Tech Support APS-50	
	2234	4116	VRI - MODL	
	2283	4239	959f DSBVRS	
	2286	4237	712f TRUVRS	

APS-50

DTMF

- In Call Number Entry
- Number Pad Can be Used
- # = Shift 3
- * = Shift 8



APS-50 Note Pad

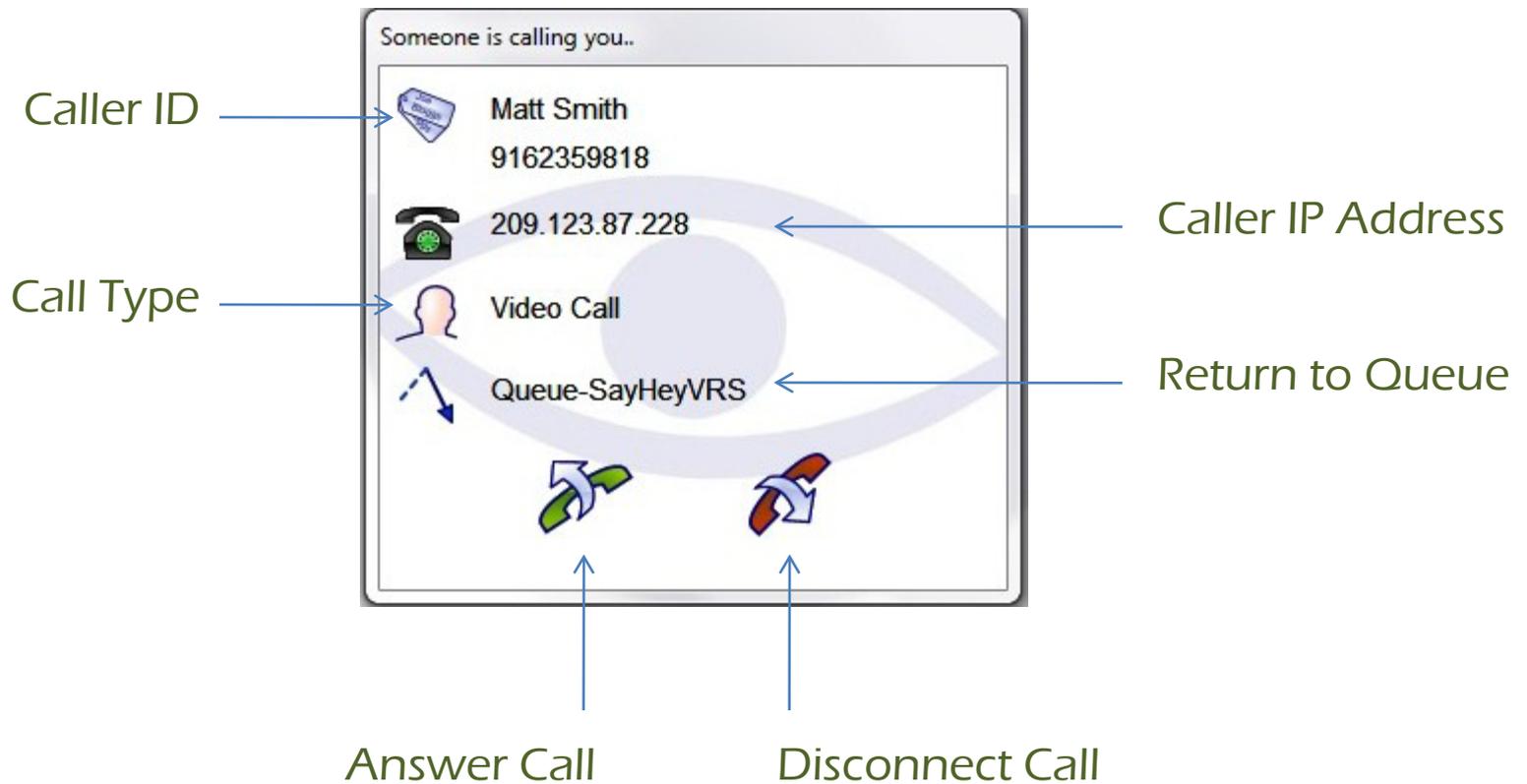
- Notes Needed During a Call
- Notes Will Automatically Delete at the End of Call



The screenshot displays a software interface with a tabbed menu at the top containing 'Conference', 'Queues', 'Agents', 'DTMF', and 'Note Pad'. The 'Note Pad' tab is active, showing a form with three input fields: 'Social Security #', 'Address', and 'Phone Number'. The 'Phone Number' field has a vertical cursor at the end of the text. A vertical scrollbar is visible on the right side of the form area.

APS-50

Incoming Call



APS-50 In Session

Hang Up Session

Caller View

Self View

Mute/Volume

APS-50 AuPix VideoPhone

Conference Queues Agents DTMF Note Pad

2168 (Agent 2168)

9162359818 (Matt Smith)

Call Legs (Up to 4)

Add Call

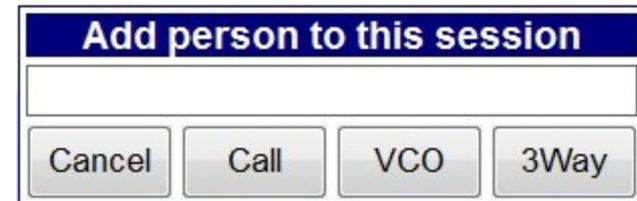
Queue-SayHeyVRS
From 9162359818 (Matt Smith) VRSID-1272295276.1600

850m SayHeyVRS (2168)

Current Session	29 s
Total Session	2 m, 6 s
Logged In	21 m, 50 s

APS-50 Calling

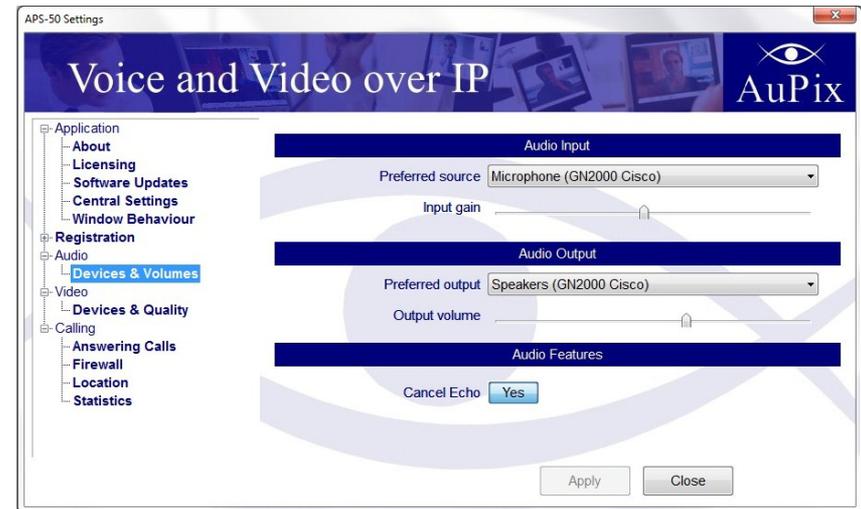
- Calls, VCO, and Three Way Calls All Done From Here!
Just Put In a Number and Click the One You Want.



The screenshot shows a dialog box titled "Add person to this session". It features a text input field at the top, which is currently empty. Below the input field are four buttons: "Cancel", "Call", "VCO", and "3Way". The buttons are arranged horizontally and have a light gray background with a thin border.

APS-50 Troubleshooting

- Restart APS-50
- Restart the Computer
- Check the Audio and Video Settings in “Voice and Video Over IP”
- Contact MODL



Policy and Procedure

- Maintain Code of Professional Conduct
- Healthy Interpreting
- Personal Disclosure
- Confidentiality
- IM Chatting During Call
- Interpret at All Times
- No Privacy Screen
- 10 Minute FCC Ruling
- Video Relay Service Interpreting Program

911 Calls

- If caller has a 10 digit number, dial 911 and call (process as normal VRS call)
- If no 10 digit number ask for the callers address. Google full address comma police (e.g. 3333 North Ave, Carmichael, CA, 95608, police) and call the local police station that comes up.
- Notify MODL that you are on a 911 call.

Pranks and Suicide Calls

- Notify MODL and transfer the call to them.
- Interpreters can reject such calls.

LifeLinks SPEC Program

- Standards Professionalism Excellence Consistency Program
- LifeLinks will monitor and check in with interpreters from time to time to ensure the best of service offered to our customers!

Exhibit 5
Evidence of Company Status as a Common Carrier
(Attached)

**STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350**

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

WILLIAM M. FLYNN

Chairman

THOMAS J. DUNLEAVY

LEONARD A. WEISS

NEAL N. GALVIN



DAWN JABLONSKI RYMAN

General Counsel

JACLYN A. BRILLING

Secretary

January 10, 2005

Mr. Stanley Schoenbach
President
Healinc Telecom LLC
3333 Henry Hudson Parkway, Suite 1A
Riverdale, NY 10463

Re: Case No. 04-C-1451

Dear Mr. Schoenbach:

The application by Healinc Telecom LLC on November 15, 2004, for a Certificate of Public Convenience and Necessity to operate in New York State as a reseller of telephone service, with authority to provide local exchange service, is hereby approved. This approval is based upon the accuracy of the information provided in the company's application and may be revoked if the application is found to contain false or misleading information, for failure to file or maintain current tariffs, or for violation of Commission rules and regulations.

The company must file an original tariff within 60 days of the date of this letter and may not provide telephone service to the public until the tariff is approved. Model tariffs and filing instructions are provided on the Commission's website at <http://www.dps.state.ny.us/cpcn.htm#tariffs>.

The company is not authorized to use its own operators to handle 0- (emergency or non-emergency) calls. Such calls must be routed to another telephone company or operator services provider authorized to handle such calls, until such time as an amended Certificate of Public Convenience and Necessity is obtained pursuant to Part 649.6 of the Commission's rules.

The company must comply with applicable federal laws, New York State Public Service Law and related statutes, and the Commission's rules and regulations.

Healinc Telecom LLC
January 10, 2005

The company is also required to file a Telecommunications Competition Monitoring Report and a Statement of Gross Intrastate Operating Revenues by March 31 each year. It will be notified in writing each year of the required content and format of these reports.

Finally, please forward the following information to Maria Le Boeuf of our staff within 30 days of receipt of this letter:

- The name and telephone number of a company person responsible for coordinating local service migration issues with other carriers and Department Staff.
- Responses to the enclosed, two-page questionnaire. This information will be added to the directory of telephone companies posted at our website, in order to help consumers search for companies available to meet their telecommunications needs. Any updates or changes should be promptly forwarded as well.

If you have any questions, please contact Maria Le Boeuf at (518) 474-1362.

By direction and delegation
of the Commission,

/s/ Robert H. Mayer

Robert H. Mayer
Director
Office of Telecommunications

Enclosure

cc: Maria LeBoeuf
Greg Pattenau
Judy Sylvester
Michelle Hacker
Case File (14th Fl.)

QUESTIONNAIRE

Company Name:

Case Number:

Preparer's Name:

Telephone Number:

E-mail Address:

- Consumer contact information (for use by consumers wishing to contact the company for information)

Telephone Number:

Mailing Address:

E-Mail Address:

Website Address:

- Services Offered

Indicate the telecommunications services offered by your company:

	<u>Resale</u>	<u>Facilities-Based</u>
Local Exchange Telephone Service	<input type="checkbox"/>	<input type="checkbox"/>
Lifeline	<input type="checkbox"/>	<input type="checkbox"/>
Long Distance		
IntraLATA	<input type="checkbox"/>	<input type="checkbox"/>
InterLATA Intrastate	<input type="checkbox"/>	<input type="checkbox"/>
InterLATA Interstate	<input type="checkbox"/>	<input type="checkbox"/>
Private/Leased Line	<input type="checkbox"/>	<input type="checkbox"/>
Operator Services	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>

QUESTIONNAIRE - Continued

• Service Area

Indicate if the company offers service statewide, or identify the counties where service is offered.

Statewide

- | | |
|---|---------------------------------------|
| <input type="checkbox"/> Bronx | <input type="checkbox"/> Montgomery |
| <input type="checkbox"/> Kings (Brooklyn) | <input type="checkbox"/> Nassau |
| <input type="checkbox"/> New York (Manhattan) | <input type="checkbox"/> Niagara |
| <input type="checkbox"/> Queens | <input type="checkbox"/> Oneida |
| <input type="checkbox"/> Richmond (Staten Island) | <input type="checkbox"/> Onondaga |
| <input type="checkbox"/> Albany | <input type="checkbox"/> Ontario |
| <input type="checkbox"/> Allegany | <input type="checkbox"/> Orange |
| <input type="checkbox"/> Broome | <input type="checkbox"/> Orleans |
| <input type="checkbox"/> Cattaraugus | <input type="checkbox"/> Oswego |
| <input type="checkbox"/> Cayuga | <input type="checkbox"/> Otsego |
| <input type="checkbox"/> Chautauqua | <input type="checkbox"/> Putnam |
| <input type="checkbox"/> Chemung | <input type="checkbox"/> Rensselaer |
| <input type="checkbox"/> Chenango | <input type="checkbox"/> Rockland |
| <input type="checkbox"/> Clinton | <input type="checkbox"/> St. Lawrence |
| <input type="checkbox"/> Columbia | <input type="checkbox"/> Saratoga |
| <input type="checkbox"/> Cortland | <input type="checkbox"/> Schenectady |
| <input type="checkbox"/> Delaware | <input type="checkbox"/> Schoharie |
| <input type="checkbox"/> Dutchess | <input type="checkbox"/> Schuyler |
| <input type="checkbox"/> Erie | <input type="checkbox"/> Seneca |
| <input type="checkbox"/> Essex | <input type="checkbox"/> Steuben |
| <input type="checkbox"/> Franklin | <input type="checkbox"/> Suffolk |
| <input type="checkbox"/> Fulton | <input type="checkbox"/> Sullivan |
| <input type="checkbox"/> Genesee | <input type="checkbox"/> Tioga |
| <input type="checkbox"/> Greene | <input type="checkbox"/> Tompkins |
| <input type="checkbox"/> Hamilton | <input type="checkbox"/> Ulster |
| <input type="checkbox"/> Herkimer | <input type="checkbox"/> Warren |
| <input type="checkbox"/> Jefferson | <input type="checkbox"/> Washington |
| <input type="checkbox"/> Lewis | <input type="checkbox"/> Wayne |
| <input type="checkbox"/> Livingston | <input type="checkbox"/> Westchester |
| <input type="checkbox"/> Madison | <input type="checkbox"/> Wyoming |
| <input type="checkbox"/> Monroe | <input type="checkbox"/> Yates |

If different services are offered in different areas, please attach a schedule.