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September 21, 2011

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Chief, Consumer & Governmental Affairs Bureau
TRS Certification Program
445 12th Street, SW
Washington, DC 20554

Re: **Internet-Based TRS Certification Application of Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Axess Ability Group**

CG Docket No. 10-51

Dear Ms. Dortch:

Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Axess Ability Group ("CAAG"), by its attorneys, pursuant to the Commission's *Certification Order*,¹ submits a redacted copy of its "Application of Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Axess Ability Group for Certification as an Eligible Provider of Video Relay Service" ("Certification Application"). Pursuant to Section 0.459 of the Commission's Rules,² CAAG has forwarded by overnight delivery for filing with the Secretary's office a request for confidential treatment with a complete copy of its Application, including confidential exhibits.

If you have any questions or require additional information concerning this Application, kindly contact the undersigned counsel for CAAG.

Very truly yours,

Kathleen M. LaValle

KML:dc
Attachments

¹ *Structure and Practices of the Video Relay Service Program*, Report and Order and Order Rulemaking, CG Docket No. 10-51, FCC 11-118, released July 28, 2011 (the "*Certification Order*").

² 47 CFR § 0.459.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

IN THE MATTER OF

STRUCTURE AND
PRACTICES OF THE VIDEO RELAY
SERVICE PROGRAM

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CG Docket No. 10-51

INTERNET-BASED TRS CERTIFICATION APPLICATION OF
HANCOCK, JAHN, LEE & PUCKETT, LLC d/b/a
COMMUNICATION AXESS ABILITY GROUP'S (CAAG)

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AXESS ABILITY GROUP

Dated September 21, 2011

EXECUTIVE SUMMARY

In accordance with Section 64.606 (a)(2) of the Commission's rules,¹ as amended, and the Commission's *Structure and Practices of the Video Relay Program*, CG Docket No. 10-51, FCC 11-118, Second Report and Order, 26 FCC Rcd 10898 (2011) ("Certification Order"), Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Access Ability Group ("CAAG") respectfully submits its Application for Certification as a provider of Internet-based Video Relay Service ("VRS") eligible to receive reimbursement directly from the federal Telecommunications Relay Service ("TRS") Fund. CAAG currently acts as a subcontractor to CSDVRS, LLC d/b/a ZVRS ("ZVRS") and has done so since 2003. If this Application is granted, CAAG will provide VRS services directly to the deaf and hard of hearing under its own brand and in complete compliance with all requirements applicable to VRS providers under the Commission's regulations and orders, as recently amended.²

In order to avoid any interruption of service to the deaf and hard of hearing, CAAG requests that its Application be granted on or before October 1, 2011. Alternatively, CAAG requests that the Commission extend the current stay of the effective date of Section 64.604 (c)(5)(iii)(N)(I)(iii) of the Commission's Rules.³ CAAG further requests that it be granted a provisional certification if the Commission determines that an on-site visit is required prior to granting the full relief requested in CAAG's Application.

¹ 47 C.F.R. § 64.606(a) (2).

² If those provisions of the amended rules regarding information collection requirements have not been approved by the Office of Management and Budget ("OMB") as of the date this Application is submitted, CAAG requests that the Commission not consider its Application premature and instead grant the relief requested on the date the Commission publishes the OMB's approval.

³ *Structure and Practices of the Video Relay Service Program, Order Suspending Effective Date*, FCC 11-86 (rel. May 31, 2011). See Gallaudet University's Motion to Extend Stay, CG Docket No. 10-51 (filed Sept. 9, 2011).

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INTERNET-BASED TRS CERTIFICATION APPLICATION

Pursuant to Section 64.606 (a)(2) of the Federal Communication Commission's ("Commission") rules,⁴ as amended, and the Commission's *Structure and Practices of the Video Relay Program*, CG Docket No. 10-51, FCC 11-118, Second Report and Order, 26 FCC Rcd 10898 (2011) ("Certification Order"), Hancock, Jahn, Lee & Puckett, LLC *d/b/a* Communication Access Ability Group ("CAAG") respectfully submits its Application for Certification as a provider of Internet-based Video Relay Service ("VRS") eligible to receive reimbursement directly from the federal Telecommunications Relay Service ("TRS") Fund. CAAG's Application, including supporting documentation and officer certification, demonstrates that CAAG meets all applicable Commission requirements necessary to become a certified VRS provider. In support of its Application, CAAG states as follows:

I. **BACKGROUND**

CAAG is a privately-held, small business. Since 2001, CAAG has provided primarily on-site, community-based interpreting services that have included high-quality, in-person sign language interpretation, video remote interpreting ("VRI"), interpreter staffing for video relay services ("VRS"), interpreter training and management services, CART, advocacy and support services for the deaf and hard of hearing, and coordination of conference and event access services. CAAG is actively involved in and encourages its Communications Assistants ("CAs") to participate in ongoing professional development and mentoring programs that are open to all interpreters. CAAG offers workshops and training for employees and internship programs for students soon to graduate from interpreter training programs. We believe CAAG is one of the

⁴ 47 C.F.R. § 64.606(a) (2).

few interpreter agencies that offers both full and part-time employment, health, vision and dental plans, paid time off, retirement plans, and a FSA, HSA, Life, and Short Term Disability/Long Term Disability Insurance.

In 2010, CAAG provided 49,481 hours of on-site community interpreting, processed 19,960 hours of video interpreting including VRS and VRI services, and 20,653 hours of advocacy, information and referral, and other deaf and hard of hearing support services. CAAG interpreters have provided their interpreting services to such major customers as: (i) the State of Texas DARS Deaf and Hard of Hearing services office, (ii) 24 hours, 7 days a week legal interpreting services for the Harris County Courts and other Harris County Program Offices in Houston, Texas, (iii) three of Texas' largest institutions of higher learning — Houston Community College System, Lone Star Community College System, and the University of Houston, (iv) the Texas Medical Center, and numerous other clients throughout the Houston metropolitan area and surrounding counties. CAAG offers services in five of the eleven Health and Human Services regions of the state of Texas and CAAG has an office within each of those regions. Regionally-based specialists assist consumers in obtaining the services they need from state and local government, service organizations, employers and private entities, while advocating in the communities to remove communication barriers. Finally, CAAG offers programs that address attitudinal and cultural barriers which may hinder successful service delivery; provides information and referral services; and offers training geared toward educating deaf and hard of hearing persons about the laws that support and protect them.

In 2003, CAAG was hired as a subcontractor by VRS provider ZVRS to help ZVRS meet the Commission's requirement that VRS providers have an appropriate number of staff available

to reduce the wait times for VRS callers.⁵ For the past eight years, CAAG has provided ZVRS with additional back-up VRS staffing and call center management services. During that time, and unlike the “white label” VRS providers the Commission has expressed concern about, CAAG did not market itself as a VRS provider, did not offer VRS under the name of CAAG, and did not conduct marketing for ZVRS. Instead, CAAG consistently provided VRS as a supplement and back-up support for ZVRS when its staff experienced higher than normal demand for VRS.

CAAG now submits this Application to obtain certification as an eligible provider of VRS. CAAG’s historic role as a ZVRS contractor is noted in order to highlight the importance of prompt action on CAAG’s Application for certification so that CAAG’s transition from a contractor to a primary provider may be seamless and so that it may continue to provide VRS services using its existing employees. As detailed below, CAAG has the ability and the willingness to make the financial commitment necessary to comply with the Commission’s regulations and orders, as recently amended, and approval of its Application is in the public interest.

II. APPLICATION SUPPORT⁶

A. Forms of TRS to be Provided⁷

CAAG will provide Video Relay Services (“VRS”) to deaf and hard of hearing individuals in compliance with all non-waived mandatory minimum standards for VRS.

⁵ See 47 C.F.R. § 64.604(b)(2)(i).

⁶ 47 C.F.R. § 64.606 (a) (2).

⁷ 47 C.F.R. § 64.606(a) (2) (i).

B. Compliance with All Non-Waived Mandatory Minimum Standards Applicable to Each Form of TRS Offered— § 64.604⁸

To obtain VRS certification, VRS providers are required to show how they comply with or exceed each of the non-waived operational, technological, and functional mandatory minimum standards contained in § 64.604.⁹ Although the Commission has waived certain mandatory minimum standards until July 1, 2012,¹⁰ CAAG acknowledges that VRS providers claiming the waiver must file a status report detailing the progress made in complying with the waived standards on April 16, 2012.

1. Operational Standards

a. Sufficiently Trained and Competent Communications Assistants¹¹

CAAG only hires state and/or nationally certified interpreters. These certifications not only test the interpreters' skill set but also measure their knowledge and familiarity with the deaf and hard of hearing cultures and language. Additionally, applicants are required to pass an expressive and receptive skills assessment prior to employment to validate they are able to effectively and accurately interpret the calls they will receive in the VRS setting.

CAAG ensures that each of its CAs is well trained to effectively meet the specialized communications needs of hearing and speech impaired individuals by requiring that they successfully complete the rigorous training referenced in the CAAG Training Manual and

⁸ 47 C.F.R. § 64.606(a) (2) (ii).

⁹ 47 C.F.R. § 64.606(a) (2) (ii). Other narrative and documentary support required by 47 C.F.R. § 64.606 is addressed in **Section C. VRS Provider Certification Statements and Documentation, below.**

¹⁰ On June 30, 2011 the Commission extended the waiver of certain minimum mandatory minimum standards for VRS providers from July 1, 2011 until July 1, 2012. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123 and WC Docket No. 05-195, Order, DA 11-1159, June 30, 2011 (“*2011 VRS & IP Relay Waiver Extension Order*”).

¹¹ 47 C.F.R. § 64.604(a) (1). Subsection (iii), which requires “a typing speed of a minimum of 60 words per minute,” is waived as to VRS providers who provide interpretive services via live video not type-written translations.

Policies.¹² In addition to completing the training, each CA must complete a sufficient number of practice calls and pass an exit evaluation, to confirm that each is well-prepared to take the variety of calls encountered in a VRS call center. CAAG CAs have competent skills in interpretation and are familiar with hearing and speech disability cultures, languages, and etiquette that they continue honing even after they are hired.¹³ CAAG commits to the development of its CAs by providing each of them with ongoing training and development through in house training and continuing education and through other resources such as conferences, workshops, and higher education institutes.

CAAG CAs answering and placing VRS calls must, in accordance with 47 C.F.R. § 64.604 (a)(1)(v) and the official CAAG policy, stay with a call for a minimum of ten minutes unless the CA finds that he/she is not communicating effectively given the nature of the call.¹⁴ If communication is ineffective, the CA will transfer the call to another CA to handle the call. In the event that a caller requests a specific gender, CAAG CAs will check their platform for availability, and if the requested gender is available, the CA will transfer the call.

b. Confidentiality and Conversation Content¹⁵

All of CAAG's CAs are bound by a strict code of professional conduct which includes maintaining the utmost confidentiality with regard to every assignment or call. These requirements include faithfully rendering the content and spirit of the message communicated using language most readily understood by consumers and correcting errors discreetly and expeditiously. CAAG CAs also must adhere to CAAG's confidentiality policy which states that

¹² A copy of CAAG's Training Manual and Policies is attached as confidential **Exhibit A**.

¹³ The competent skills in typing and spelling for CAs do not apply to VRS providers. See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, DA 01-3029, ¶ 1, n.8 (Dec. 31, 2001).

¹⁴ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, FCC 06-81, ¶¶ 1 & 9 (June 16, 2006).

¹⁵ 47 C.F.R. § 64.604(a) (2).

all call content shall remain strictly confidential and warns that policy violations may be reported to the appropriate certifying agency which may result in the revocation of an individual CA's certification. Further, CAAG also requires that each CA sign a confidentiality form before they are permitted to begin employment in a CAAG call center.

c. Types of Calls¹⁶

CAAG will handle all non-waived call types.¹⁷ As required by 47 C.F.R. § 64.604 (a) (3) (i), CAAG CAs do not, and will not, refuse any single or sequential calls or attempt to limit the length of calls utilizing relay services. CAAG does not charge the user for any calls, including long distance calls, and, therefore, does not conduct credit checks or authorizations. The Platform has three-way calling, speed dialing functionality, as well as transfers and video mail capabilities. For three party calls, the user calls a CAAG CA who then calls back on a given phone number, providing both video and audio connection to that party. This enables Voice Carry Over ("VCO") and Hearing Carry Over ("VCO") calls to be processed. The CA then makes another call to a third person to relay the call. Also, the platform can store a contact list (with images) for speed dialing. The end-user or the interpreter can store personal contacts or the administrator can add common contacts such as family members, doctors or any other number that is often called.

CAAG does not impose any charges for additional calls made by the user in order to complete calls involving recorded or interactive messages. CAAG CAs are trained to provide

¹⁶ 47 C.F.R. § 64.604(a) (3).

¹⁷ Technical detail regarding the platform CAAG has licensed to handle all non-waived call types (the "Platform" or the "CAAG Platform") is included in confidential **Exhibit B**. The Platform also has the capability to handle certain call types currently waived. For example, the Platform supports each of 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; Pay Per (900) Call, and Call Release.

answering machine and voice mail retrieval services to callers. Additionally, audio callers may leave an interpreted video mail when the call is unanswered for registered users.

*d. Emergency Call Handling*¹⁸

CAAG does not provide TTY-based TRS services and therefore, the provisions governing TTY-based TRS services do not apply to CAAG's VRS services.¹⁹ CAAG's statements of compliance focus on the provisions of Section 64.605(b), governing emergency call handling requirements for VRS providers, and related requirements of Internet-based TRS Registration under 47 C.F.R. § 64.611, as amended, and § 52.34, as applicable to iTRS providers,²⁰ and are addressed in Section II, C., below. CAAG's calling platform has been designed to comply with § 64.605 (b) for emergency calls.

*e. Speech-to-Speech ("STS") Called Numbers*²¹

CAAG does not provide STS calls. The Commission has waived the requirement for CAs of a VRS provider to maintain a list of names and telephone numbers for STS user calls.²²

*f. Visual privacy screens/idle calls*²³

CAAG CAs are trained not to enable the visual privacy feature during a VRS call. If the caller should enable their privacy screen for more than five minutes, the CA is trained to first announce to both parties the CA's intent to end the call due to the enabling of the visual privacy

¹⁸ 47 C.F.R. § 64.604(a) (4).

¹⁹ 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 5175-76, Appendix B." *Report and Order and Further Notice of Proposed Rulemaking* n.36.

²⁰ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123 and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, FCC 08-151, 23 FCC Rcd. 11591 (Released June 24, 2008).

²¹ 47 C.F.R. § 64.604(a) (5).

²² See *2011 VRS & IP Relay Waiver Extension Order*, par. 1.

²³ 47 C.F.R. § 64.604(a) (6).

screen unless they are on a legitimate hold or have called 911. If there is no response, the CA will then disconnect the call. At the time of the disconnect, the CA must document the call information in the customer management database.

*g. International calls*²⁴

CAAG CAs are able to determine if the international call is being made by a pre-registered U.S. resident. Callers traveling outside of the US may pre-register with CAAG prior to leaving the country. The user account is then allowed to make calls even though the registered individual is traveling abroad. Unauthorized calls or callers who have not pre-registered will not be processed.

2. Technical Standards

*a. ASCII (“American Standard Code for Information Interexchange”) and Baudot*²⁵

VRS providers like CAAG, are not required to have the capability to communicate with ASCII and Baudot format at a certain speed.²⁶

*b. Speed of Answer*²⁷

CAAG provides callers with efficient access based upon projected calling volumes to reduce the probability of a busy response by staffing two call centers with twenty-five CAs and two managers who are both qualified CAs. CAAG policy requires CAs to answer incoming calls ringing in their station within a specific time (10 seconds).²⁸ CAAG further ensures that 80 percent of all calls are answered within 120 seconds.²⁹ Call volume and speed of answer is

²⁴ 47 C.F.R. § 64.604(a) (7).

²⁵ 47 C.F.R. § 64.604(b) (1).

²⁶ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, DA 01-3029, ¶ 1, n.8 (Dec. 31, 2001).

²⁷ 47 C.F.R. § 64.604(c) (5) (iii) (C) (3)-(4) and 47 C.F.R. § 64.604(b) (2).

²⁸ See confidential **Exhibit A**.

²⁹ 47 C.F.R. § 64.604(b) (2) (iii) (VRS providers).

monitored daily by the management team to determine the need for increased staffing. It is also measured from a report generated on a monthly basis. If call volumes approach CAAG's current load capability, CAAG will expand by hiring more CAs and opening additional call centers as necessary. CAAG has the ability to open additional call centers in its other existing locations in an expeditious manner. CAAG will comply with all requirements regarding submission of speed of answer data.

c. Equal Access to Interexchange Carriers³⁰

Although this standard is waived until July 1, 2012,³¹ CAAG's platform is compatible with all interexchange carriers and all other operator services that VRS callers may choose.

d. 24 Hour Operation and Other TRS Facility Requirements³²

CAAG's VRS will operate and be provided twenty-four hours per day, everyday.³³ CAAG's VRS has redundancy features that are functionally equivalent to the equipment in normal central offices, including uninterruptible power in case of emergency.³⁴ Particularly, CAAG's Platform uses a hosted environment with redundant power while each call center is located in a building that maintains back-up generators as well as battery back-up equipment at each call station.

CAAG's CAs are prohibited from relaying calls from their home. CAAG only provides VRS services through our established commercial offices and on specific computers and equipment which are not available to CAs at home or in any other environment which is not an

³⁰ 47 C.F.R. § 64.604(b) (3).

³¹ 2011 VRS & IP Relay Waiver Extension Order, DA 11-1159 at 9, ¶¶ 18-19.

³² 47 C.F.R. § 64.604(b) (4).

³³ 47 C.F.R. § 64.604(b) (4) (i). CAAG also will comply with the Commission's rules regarding unauthorized service interruptions. 47 C.F.R. § 64.606 (h).

³⁴ 47 C.F.R. § 64.604(b) (4) (ii).

approved CAAG call center.³⁵ CAAG has leased an automatic call distribution (ACD) platform pursuant to a licensing agreement which is attached as confidential **Exhibit C**.

*e. Technology*³⁶

CAAG acknowledges that the regulations are not intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to disabled persons and that it is permitted to use SS7 or similar technology to enhance the functional equivalency and quality of TRS and that any use of SS7 will subject it to the Calling party Telephone Number rules set forth at 47 C.F.R. § 64.1600 *et seq.*

*f. Caller ID*³⁷

The CAAG Platform relays Caller ID to the called party, indicating the caller's ten digit number.

3. Functional Standards

*a. Consumer Complaint Logs*³⁸

The CAAG Training Manual, attached as confidential **Exhibit A**, instructs CAAG's CAs on the handling of consumer complaints. CAs review the CAAG Training Manual, along with CAAG policies, on a quarterly basis. CAAG maintains a customer management database in which the CA record his/her name, the date and time, the caller's name and contact information, the reason for the complaint, and if the complaint is related to a particular CAAG CA, the CA's name and identification number. If the complaint is about the CA receiving the call, the complaint should be taken by another CA, manager, or customer service. If preferred, the consumer can file complaints through the CAAG website tool. The CA is required to forward

³⁵ 47 C.F.R. § 64.604(b) (4) (iii).

³⁶ 47 C.F.R. § 64.604(b) (5).

³⁷ 47 C.F.R. § 64.604(b) (6).

³⁸ 47 C.F.R. § 64.604(c) (1) (i)-(ii).

the complaint to the manager who conducts an investigation of the complaint and recommends a resolution within 24 hours. After resolving the complaint, the manager records in the database a brief description of how the complaint was resolved and the date of resolution.³⁹ If warranted, the manager will contact the consumer for follow up or resolution. If the complaint involves a violation of company policy or FCC rules, then appropriate action will be taken. Appropriate action may include escalation through management and ownership, and disciplinary action up to and including termination and reporting to the certifying agency.

CAAG will comply with annual reporting requirements regarding consumer complaints.⁴⁰

b. Contact Persons for TRS Providers⁴¹

CAAG designates Kate Johnson, VRS Manager, as its designated contact person to provide consumer information and receive consumer complaints. Ms. Johnson may be contacted at 1445 N. Loop West, Suite 910, Houston, Texas 77008, 713.807.1176 (voice and TTY telephone number), 713.807.1238 (fax), kate.johnson@caag4.com (e-mail), www.caag4.com (web address). Correspondence should be sent to the following physical address: 1445 N. Loop West, Suite 910, Houston, Texas 77008.

c. Public Access to Information⁴²

This provision is specific to carriers and, therefore, not applicable. CAAG does, however, intend to engage in activities designed to advise potential users of the availability of CAAG's VRS.

³⁹ CAAG currently is in the process of transitioning to use of a customer management software, which transition is expected to be accomplished on or before October 1, 2011 or at time of certification. This software is capable of documenting, tracking, and reporting many items, which include any complaints, customer service items, and IT tickets.

⁴⁰ 47 C.F.R. § 64.604(c) (1) (ii).

⁴¹ 47 C.F.R. § 64.604(c) (2).

⁴² 47 C.F.R. § 64.604(c) (3).

*d. Rates*⁴³

CAAG does not charge consumers for any type of call.

*e. Jurisdictional Separation of Costs*⁴⁴

CAAG acknowledges procedures governing the separation of costs, cost recovery, and TRS Fund contributions and computations and will comply with all applicable instructions in the Commission's regulations and orders.

*f. Data Collection*⁴⁵

CAAG will provide the TRS Fund administrator with true and adequate data, historical, projected, and state rate information reasonably requested to determine the TRS Fund revenue requirements and payments, as well as total TRS minutes of use, total interstate TRS minutes of use, total TRS investment in general.⁴⁶

CAAG utilizes the internal activities SQL database of its VRS system to capture required data—including the call record ID sequence; CA ID number; session and conversation start and end times to the nearest second; incoming and outbound phone number and, if applicable, IP address; total conversation and session minutes, call center ID number; and the URL address through which the call is handled—electronically, precluding any CA manual manipulation.⁴⁷ Preformatted reports are generated from the collected data elements to provide prescribed FCC reporting and TRS fund billing formats. Additional reporting requirements are satisfied through the use of SQL report writers using the same data elements recorded by the system. All data elements listed in these paragraphs are captured and recorded by the system. Database content is backed up consistently and redundantly on a pre-determined schedule. CAAG's CEO, CFO, or

⁴³ 47 C.F.R. § 64.604(c) (4).

⁴⁴ 47 C.F.R. § 64.604(c) (5).

⁴⁵ 47 C.F.R. § 64.604(c) (5) (iii) (C) (1)-(4).

⁴⁶ 47 C.F.R. § 64.604(c) (5) (iii) (C) (1).

⁴⁷ 47 C.F.R. § 64.604(c) (5) (iii) (C) (4).

other senior executive with first hand knowledge of the accuracy and completeness of the information provided, will make the certification required to be submitted with each request for compensation from the TRS Fund.⁴⁸

g. Audits & Call Data Record Retention⁴⁹

CAAG agrees to submit to the audits of the TRS Fund administrator and the Commission, including the Office of Inspector General.

As a matter of company policy, CAAG consistently maintains electronic records of all call detail data and other appropriate documentation supporting its claim for payment from the TRS Fund for a period of at least seven years.⁵⁰ Other programs CAAG currently oversees submit to Texas State agency audits and have successfully completed all such audits.

h. TRS Fund Participation⁵¹

CAAG will comply with the requirement to notify the TRS Fund administrator of its intent to participate in the fund thirty days prior to submitting reports of TRS interstate minutes of use.

i. Enforcement Provisions⁵²

CAAG acknowledges that it is subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

⁴⁸ 47 C.F.R. § 64.604(c) (5) (iii) (C) (5).

⁴⁹ 47 C.F.R. § 64.604(c) (5) (iii) (C) (6)-(7).

⁵⁰ 47 C.F.R. § 64.604(c)(7) (“Internet-based TRS providers shall retain the data . . . for a minimum of five years.”).

⁵¹ 47 C.F.R. § 64.604(c) (5) (iii) (G). Standards (c)(5)(iii): **(D)** is “[Reserved],” **(E)** “Payments to TRS Providers” is a waived standard that governs the TRS fund administrator and therefore is inapplicable to CAAG, *see Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; and *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Order, DA 11-655, ¶ 1 (Released Apr. 8, 2011); **(F)** lists the type of providers eligible for receiving payments from the TRS Fund.

⁵² 47 C.F.R. § 64.604(c) (5) (iii) (K). Standards § 64.604(c)(5)(iii): **(H)** is waived, *see Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; and *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Order, DA 11-655, ¶ 1 (Released Apr. 8, 2011); **(I)** and **(J)** apply exclusively to the TRS Fund administrator and therefore are inapplicable to CAAG.

*j. Payment Suspension/Withholding Procedures*⁵³

CAAG acknowledges the reviewing process conducted by the Fund Administrator when compensation is suspended or withheld. In the event compensation is withheld, CAAG will provide necessary documentation for justification of its requested compensation for the minutes of use in dispute. CAAG acknowledges that if it fails to provide additional documentation within two months of being notified that its initial justification was insufficient, payment for those disputed minutes will be denied. Additionally, should further investigation be necessary, CAAG acknowledges the subsequent process and acknowledges that if it fails to meet its burden to demonstrate disputed minutes are compensable, payment will be permanently denied.

*k. Whistleblower Protections*⁵⁴

CAAG has a policy in place that protects its employees from reprisal or adverse personnel action if the employee reports or discloses to a designated CAAG manager, the Commission, the TRS Fund administrator, or any federal or state law enforcement entity the occurrence of a known or suspected violation of the Communications Act, TRS regulations, or any other action believed to constitute waste, fraud, or abuse that could result in improper billing of minutes used to the TRS Fund. This policy, along with a complete and accurate description of the TRS whistleblower protections, is included in the CAAG Training Manual and Policies⁵⁵ and is posted in all call centers.

⁵³ 47 C.F.R. § 64.604(c) (5) (iii) (L).

⁵⁴ 47 C.F.R. § 64.604(c) (5) (iii) (M).

⁵⁵ See pages 3-5 of CAAG's Policies included in confidential **Exhibit A**.

*L. TRS Fund Reimbursement & Call Center Reports*⁵⁶

CAAG seeks to be certified under the name “CAAG” and to clearly identify itself from other VRS service providers will only offer its VRS services and process calls under the identity of “CAAG VRS.”⁵⁷

CAAG will not contract with or authorize any non-eligible third party provider to provide interpretation services or call center functions—including call distribution, call routing, call setup, mapping call features, billing, and registration.⁵⁸ If CAAG authorizes a third party to provide any VRS or VRS functions other than interpretation services or call center functions, CAAG will require that third party to clearly identify CAAG’s name to the public.⁵⁹ In the event that CAAG employs or contracts with an eligible third party to provide marketing or outreach, and such services utilize CAAG, CAAG will not request from the TRS fund compensation for those VRS minutes used.⁶⁰ All third-party contracts or agreements entered into by an eligible provider will be in writing and kept for future reference.⁶¹ CAAG will also submit a written report to the Commission and the TRS Fund administrator on April 1st and October 1st of each year that CAAG call centers process VRS calls, which will include the complete street address of the center, the number of individual CAs and CA managers. Further, CAAG will report any change in a center's location, including the opening, closing, or relocation of any center, at least 30 days prior to any such change.⁶² As noted above, CAAG has twenty-five CAs

⁵⁶ 47 C.F.R. § 64.604(c) (5) (iii) (N) (J) - (2).

⁵⁷ 47 C.F.R. § 64.604(c) (5) (iii) (N) (J) (ii).

⁵⁸ 47 C.F.R. § 64.604(c) (5) (iii) (N) (J) (iii).

⁵⁹ 47 C.F.R. § 64.604(c) (5) (iii) (N) (J) (iv).

⁶⁰ 47 C.F.R. § 64.604(c) (5) (iii) (N) (1) (iii)-(iv).

⁶¹ 47 C.F.R. § 64.604(c) (5) (iii) (N) (1) (v).

⁶² 47 C.F.R. § 64.604(c) (5) (iii) (N) (2). The current addresses of CAAG’s call centers are included in confidential **Exhibit D**.

and two CA managers. The names and contact information (e-mail and phone) for CAAG's CA managers are included in confidential **Exhibit D**.

*m. CA Compensation*⁶³

CAAG does not, in any way, compensate, give preferential work scheduling, or otherwise provide any benefit to its CAs that is based upon the number of VRS minutes or calls that the CA relays, either individually or as part of a group.

*n. Remote Training Session Calls*⁶⁴

CAAG will not request compensation from the TRS Fund when CAAG provides a remote training session or comparable activity.

4. Procedures for Complaints Against TRS Providers⁶⁵

CAAG acknowledges its obligation to promptly satisfy or answer any informal complaint filed against it within the time specified by the Commission.⁶⁶ CAAG designates Everett Puckett as the agent whose principal responsibility it will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded to CAAG by the Commission. Mr. Puckett may be contacted at and correspondence should be sent to 1445 N. Loop West, Suite 910, Houston, Texas 77008, 713.807.1176 (voice and TTY telephone number), 713.807.1238 (fax), e.puckett@caag4.com (e-mail) and www.caag4.com.

In the event that a formal complaint against CAAG is filed with the Commission, a written answer will be submitted within the time specified in the complaint notice. CAAG agrees to fully and completely advise the parties and the Commission of the nature of its defense in its answer and further agrees to respond specifically to all material allegations of the

⁶³ 47 C.F.R. § 64.604(c) (5) (iii) (N) (3).

⁶⁴ 47 C.F.R. § 64.604(c) (5) (iii) (N) (4).

⁶⁵ 47 C.F.R. § 64.604(c) (6) (v). Standards § 64.604(c) (6) (i)-(iii) apply to state TRS programs and are, therefore, inapplicable to CAAG's private VRS.

⁶⁶ 47 C.F.R. § 64.604(c) (6) (v) (A) (3).

complaint. If the complaint alleges harm, CAAG agrees to indicate in its answer what action it has taken or is proposing be taken to stop the occurrence of such alleged harm. CAAG agrees to avoid providing collateral and/or immaterial issues in its answers and agrees to make every effort to narrow the issues. CAAG agrees to separately state and number its affirmative defenses, if any.⁶⁷

5. Treatment of Customer Information⁶⁸

In the event CAAG must transfer a customer profile to a new TRS or VRS vendor or provider, CAAG agrees to disclose the TRS customer profile data to the new vendor in a useable form at least 60 days prior to CAAG's last day of service provision to that caller. CAAG further agrees that it will not use such data for any purpose other than to connect the TRS user with the called parties desired by that TRS user. CAAG will not sell, distribute, share or reveal this data in any other way, unless compelled to do so by lawful order.

C. Emergency/911 Standards — § 64.605

1. General Capabilities⁶⁹

CAAG's statements of compliance focus on the provisions of § 64.605(b) governing emergency call handling requirements for VRS providers, and related requirements of Internet-based TRS Registration promulgated under 47 C.F.R. § 64.611, as amended, and § 52.34, as applicable to iTRS providers.⁷⁰ The CAAG Platform is designed to comply with all § 64.605 (b) requirements for emergency call handling.

⁶⁷ CAAG's procedures for tracking and resolving consumer complaints are addressed above in connection with the requirements of 47 C.F.R. § 64.604(c) (1).

⁶⁸ 47 C.F.R. § 64.604(c) (7).

⁶⁹ 47 C.F.R. § 64.605(a)(2)(i) does not apply to VRS providers where § 64.605(b) applies because the registered caller's Registered Location is in a geographic area served by a Wireline E911 Network and is available to the VRS provider handling the call.

⁷⁰ See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123 and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, FCC 08-151, 23 FCC Rcd. 11591 (Released

CAAG's Platform is able to accept and handle emergency calls and has access through Dash, now owned by Bandwidth, to a commercially available database that will allow it to determine an appropriate public safety answering point ("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. Dash is an Emergency Routing Service ("ERS") provider. The ERS is a monthly subscription service that connects organizations to PSAPs across the US and Canada. 911 calls are routed to the ERS, which then delivers the call and precise location information to the appropriate PSAP, using data included in the Neustar Registered Location database⁷¹ and verified independently by the 911 emergency routing service.⁷² This is accomplished through ERS arrangements with other carriers, including incumbent local exchange carriers. In accordance with § 64.611, CAAG will receive ten-digit North American Number Plan telephone number assignments for subscribers from Neustar.

Many newer mobile devices are configured to incorporate global positioning satellite functionality to integrate with a variety of other applications. When an emergency 911 call is placed using a device with GPS capability and that capability is active, this same location information is readily accessible by CAAG's server.

In order to ensure that 911 callers have the ability to communicate with first responders when they arrive, CAAG CAs will stay on the call to assist. Upon the arrival of first responders, CAAG terminates the connection to the PSAP, but will remain with the caller, performing non-billable video relay interpreting for as long as is needed, to ensure the caller's safety. This is done

June 24, 2008); see also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123 and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196, Report and Order, 23 FCC Rcd. 5255, FCC 08-78, ¶ 29 (Released Mar. 19, 2008).

⁷¹ CAAG cannot become a registered user until its certification is granted, but will become a registered user immediately upon certification. CAAG has initiated contact with Neustar to expedite the registration process.

⁷² The terms Registered Location database and TRS Numbering Directory are used synonymously herein.

as a community service only. The associated interpreting time is clearly not compensable and is in no way reflected in the compensable minutes reported by CAAG to the Fund Administrator. CAAG informs subscribers of the process for placing emergency VRS 911 calls through promotional materials, CAAG's website <http://www.caag4.com/vrs>,⁷³ and when users access CAAG's VRS platform via the Internet.

2. Priority Calls⁷⁴

Emergency calls enter the system in the same way as other calls. In the Platform, they are identified as emergency calls based on the called number (911). The call is moved to the front of the queue and all CAs connected to the platform are notified. The first available CA answers the call.

3. Procedure for Handling Emergency Calls⁷⁵

Each CAAG CA is trained to request, at the beginning of each emergency call, the caller's name and location, even if CAAG already has, or has access to, a Registered Location for the caller. After obtaining or retrieving this caller information, at the start of the outbound leg of an emergency call, the CAAG CA then places the emergency call and, if a Registered Location is on file, delivers to the PSAP, designated statewide default answering point, or appropriate local emergency authority, at a minimum: the name of the relay user and location of the emergency, as well as the name of the relay provider, the CA's callback number, and the CA's identification number.⁷⁶ Providing this information upfront enables the PSAP, designated statewide default answering point, or appropriate local emergency authority to re-establish contact with the CA if the call is disconnected. In the event that the CA and caller are disconnected, the CA is trained

⁷³ This page of CAAG's website is ready to be launched upon certification.

⁷⁴ 47 C.F.R. § 64.605(a) (2) (ii).

⁷⁵ 47 C.F.R. § 64.605(a) (2) (iii)-(vi).

⁷⁶ For more detail on the 911 call flow that CAAG follows, see the "TRS/VRS 911 Call Flow – Automated/Manual" Diagram attached as confidential Exhibit E.

to 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 if 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).

As further illustrated in the diagram attached as confidential **Exhibit E**, if the end user caller ID is not a Registered Location, or has not been previously registered, the call is routed to a third party call center. The CAAG CA provides the location information to that third party call center so they can determine the 10 digit administrative number and correct PSAP to which to deliver the 911 call. Once the 911 dispatcher answers, the call center provides the location and call back number information.

CAAG does and will ensure that information obtained as a result of an emergency call 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 user's location in an emergency situation or for other emergency or law enforcement purposes.

4. 911 VIA Wireline E911 Network⁷⁷

With respect to 911 calls placed by CAAG's registered users⁷⁸ whose registered location is in a geographic area served by a Wireline E911 Network and is available to CAAG for handling the call, CAAG will provide E911 service, transmit (and make available via the automatic location information ("ALI") database) the 911 call, automatic number identification ("ANI"), the caller's registered location, CAAG's name, and the CAAG CA's identification

⁷⁷ 47 C.F.R. § 64.605(b) (2).

⁷⁸ CAAG will comply with all applicable Commission's requirements for registration of users. 47 C.F.R. § 64.611.

number to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's registered location and is designated for telecommunications carriers. CAAG will also route all 911 calls through an ANI or pseudo-ANI via the Wireline E911 Network. To obtain access to the numbering database that will give CAAG the assigned geographically appropriate ten-digit number to show the user's physical location in support of routing of emergency calls to the serving PSAP, CAAG will register with the Neustar Registered Location database.⁷⁹

5. Service Level Obligation⁸⁰

CAAG acknowledges the conditions under which a VRS provider is and is not required to provide ANI or location information and its obligations regarding the appropriate transmission of all 911 calls.

6. Registered Location⁸¹

In order for subscribers to select CAAG as a preferred (default) provider and access CAAG's platform, subscribers are required to affirmatively register with CAAG. Through this registration process, subscribers are required to provide necessary contact information, including their physical location, which is needed to populate the Registered Location database. Subscribers are able to register and update information over a secure Internet web site using the following URL: www.caag4.com/vrs,⁸² via email, or by contacting CAAG's customer service in writing or telephonically, with proper verification of identity. Further, CAAG's operating procedures dictate that CAs verify Registered Location information on all emergency calls.

⁷⁹ Because registration is limited to Commission certified VRS providers, CAAG will not be able to register until after the Commission grants its Application. Notwithstanding and in anticipation of certification, CAAG has already contacted Neustar in order to facilitate the process and is prepared to effect the necessary registration following the grant of its Application.

⁸⁰ 47 C.F.R. § 64.605(b) (3).

⁸¹ 47 C.F.R. § 64.605(b) (4).

⁸² This page of CAAG's website is ready to be launched upon certification.

D. VRS Provider Certification Statements and Documentation— § 64.606⁸³

1. Forms of TRS CAAG will Provide⁸⁴

As stated above, CAAG will provide VRS to deaf and hard of hearing individuals in compliance with all non-waived mandatory minimum standards for VRS. CAAG's Platform processes calls from hearing, speech disabled, deaf, and hard of hearing VRS callers using various iterations of h.323 video technology, including MVP and P3 Software, XMeeting, VPIOO and 200, NetMeeting, Vision, Polycom PVX and CMA, and Z4, providing full system interoperability, and transparently accommodating caller's calling preferences for use of a variety of existing VRS devices, software and media.

2. Compliance with Non-Waived Mandatory Minimum Requirements for VRS

CAAG's compliance with the non-waived mandatory minimum requirements set forth in § 64.604 of the Commission's rules is provided in Section II, B., above. CAAG's compliance with the narrative and documentation requirements of § 64.606 is described here. CAAG's services will not differ from the applicable mandatory minimum standards.⁸⁵

a. Call Center Leases⁸⁶

The leases for CAAG's Beaumont, Texas call center and its Houston, Texas call center and administrative offices are included in confidential **Exhibit F**. CAAG operates no call centers outside the United States.

⁸³ 47 C.F.R. § 64.606(a) (2).

⁸⁴ 47 C.F.R. § 64.606(a) (2) (i).

⁸⁵ 47 C.F.R. § 64.606(a) (2) (v)-(vi).

⁸⁶ 47 C.F.R. § 64.606(a) (2) (ii) (A) (1).

b. Technology and Equipment⁸⁷

A copy of the licensing agreement under which CAAG is leasing the Platform⁸⁸ is attached as confidential **Exhibit C** and a copy of materials describing the features of the Platform is included as confidential **Exhibit B**. The Platform manufacturer and equipment distributor is neither a VRS provider nor affiliated with any VRS provider. The Platform will enable CAAG to support its call centers and to provide functions including automatic call distribution (“ACD”), routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration. CAAG’s license agreement does not include any minute based compensation arrangement or revenue sharing agreements between the lessor and lessee.⁸⁹

c. CAAG Ownership⁹⁰

CAAG is a limited liability company and its four managing members, David Hancock, Gerald Jahn, Rita Lee Wedgeworth and Everett Puckett, have equal ownership interests. The four managing members share control over CAAG, with Mr. Puckett acting in the role of CAAG’s chief executive officer. Two of CAAG’s principals are certified interpreters, three have over 20 years of experience in working with persons who are deaf or hard of hearing, and the fourth has more than 30 years experience in the areas of systems development and financial management. CAAG’s principals bring experience in deafness and hearing loss disability related management, systems development, and business management.

d. CAAG Employees⁹¹

Executives and Officers: 4

Communications Assistants (“CAs”): 25 CAs

⁸⁷ 47 C.F.R. § 64.606(a) (2) (ii) (A) (4).

⁸⁸ 47 C.F.R. § 64.606(a) (2) (ii) (A) (5).

⁸⁹ FCC 11-118 ¶ 19; 47 C.F.R. § 64.606(a) (2) (ii) (A) (5).

⁹⁰ 47 C.F.R. § 64.606(a) (2) (ii) (B).

⁹¹ 47 C.F.R. § 64.606(a) (2) (ii) (C).

Call Center Managers: 2

Marketing and Sponsorship Activities: 1, plus 4 principals

A total of 33 full-time and part-time employees are actively involved in TRS operations, which total includes administrative and management staff members.

*e. Employment Agreements*⁹²

CAAG will retain for five years a list of the names of employees directly involved in TRS operations, as well as copies of any employment agreements for each of CAAG's employees directly involved in TRS operations, its executives and its CAs.

*f. Sponsorship & Marketing*⁹³

CAAG understands the importance of giving back to the community through monetary and in-kind donations. In 2011, CAAG has sponsored a number of entities and made various sponsorship/marketing arrangements, including those providing financial support or in-kind interpreting or personnel service for social activities in exchange for brand marketing. A list of the sponsorship/marketing arrangements and agreements is included in confidential **Exhibit G**. CAAG's sponsorship and support ranged from providing volunteer interpreters to monetary donations. None of these sponsorships or agreements related directly to branding CAAG as an Internet-based TRS.

*g. Complaint Procedures*⁹⁴

The CAAG Training Manual, attached as confidential **Exhibit A**, instructs CAAG's CAs on the handling of consumer complaints. CAs review the CAAG Training Manual, along with CAAG policies, on a quarterly basis. CAAG maintains a customer management database in

⁹² 47 C.F.R. § 64.606(a) (2) (ii) (D).

⁹³ 47 C.F.R. § 64.606(a) (2) (ii) (E).

⁹⁴ 47 C.F.R. § 64.606(a) (2) (iii).

which the CA records his/her name, the date and time, the caller's name and contact information, the reason for the complaint, and if the complaint is related to a particular CAAG CA, the CA's name and identification number. In the case the complaint is about the CA receiving the call, the complaint should be taken by another CA, manager, or customer service. If preferred, the consumer can file complaints through the CAAG website tool. The CA is required to forward the complaint to the manager who conducts an investigation of the complaint and recommends a resolution within 24 hours. After resolving the complaint, the manager records in the customer management database a brief description of how the complaint was resolved and the date of resolution. If warranted, the manager will contact the consumer for follow up or resolution. If the complaint involves a violation of company policy or FCC rules, then appropriate action will be taken. Appropriate action may include escalation through management and ownership, and disciplinary action up to and including termination and reporting to the certifying agency.

Through its website, CAAG's TRS users will have access to informational materials on complaint procedures sufficient for users to know the available procedures for filing complaints with the Commission and lodging complaints directly with CAAG.⁹⁵ Registered TRS users also will receive information regarding procedures to filing and communicating complaints as part of the registration process. CAAG will comply with applicable requirements regarding the submission to the Commission of an annual summary of its consumer complaint records.⁹⁶

⁹⁵ 47 C.F.R. § 64.606 (b) (2) (ii).

⁹⁶ 47 C.F.R. § 64.604(c) (1) (ii). CAAG currently is in the process of transitioning to the use of a customer management software, which transition is expected to be accomplished on or before October 1, 2011, or upon certification approval. This software is capable of documenting, tracking, and reporting many items, which include any complaints, customer service items, and IT tickets.

*h. Annual Compliance Statement*⁹⁷

CAAG will file annual compliance reports demonstrating its continued compliance with the Commission's rules. See Exhibit H. CAAG also agrees to notify the Commission of substantive changes in its VRS services, program or features within 60 days of when such changes occur.⁹⁸ Verification of the accuracy of this Application is included in Exhibit H.

*i. On-Site Visits*⁹⁹

CAAG acknowledges that the Commission, in order to assess the merits of its Application, may need to conduct one or more on-site visits to CAAG's premises and CAAG hereby consents to such on-site visits. As stated above, CAAG also requests that it be granted a provisional certification should the Commission determine that an on-site visit is required, but cannot be conducted prior to acting on CAAG's Application.

**III.
PUBLIC INTEREST**

Granting CAAG's Application to become a certified provider of VRS is in the public interest. The continued and uninterrupted availability of CAAG's CAs, who provide expert VRS to the deaf and hearing impaired, fulfills a critical role in facilitating the communications between the deaf and hard of hearing community and those who desire to communicate with that community.

Moreover, CAAG uses a unique dual or bifurcated interpreting model that provides pre-scheduled and emergency in-person/on-site community interpreter services at local sites as well as video interpreter services like VRI and VRS. Under its dual services model, CAAG is able to utilize highly skilled, certified interpreters within the community as well as in its video call centers. CAAG's dual service is particularly beneficial because it (1) addresses the concern

⁹⁷ 47 C.F.R. § 64.606(a) (2) (iv).

⁹⁸ 47 C.F.R. § 64.606 (f) (2).

⁹⁹ 47 C.F.R. § 64.606(a) (3).

frequently expressed by the deaf community that there is a shortage of qualified interpreters, while simultaneously (2) promoting the health and sustainability of interpreters working and continuing to work in VRS.

CAAG's dual interpretive services system counters the increased risk of fatigue and physical injury that recent research and studies have begun to link to continuous video interpreting. Both VRS call volumes and on-site community needs fluctuate. As a result, CAAG is able to schedule interpreters to serve either at the call center or in person in the community, depending on the need. CAAG alternates an interpreter's work schedule between VRI/VRS and on-site community-based interpreting. This alternating work schedule model provides interpreters with greater flexibility, while providing the physical breaks necessary to avoid the strain or injury that repetitive video interpreting can cause. Importantly, serving in person within the local community is an essential component of interpreter development. This service fosters the development of relationships with those living in the local area and provides interpreters with a cultural sensitivity and appreciation for the experiences of the local deaf community. Thus, granting CAAG certification as a VRS provider will enable CAAG to continue broadening its capacity to serve the total needs of deaf and hard of hearing individuals, the individuals with whom they seek to communicate, and CAAG's interpreters. Grant of this application can also be expected to deliver competitive choices to consumers of VRS, thereby stimulating the development of new and improved services.

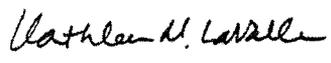
IV. CONCLUSION

CAAG has demonstrated that it meets or exceeds all requirements for certification as an Internet-based TRS Provider. Granting CAAG's Application will serve the public interest of deaf and hard of hearing individuals by ensuring that CAAG will be able to continue providing

its high quality VRS interpreter services. To the extent the Commission is unable to act on the certification Application prior to October 1, 2011, CAAG respectfully requests that the existing exemption from the sub-contractor prohibition be extended. Further, if the Commission is able to act on the Application, but is not able to conduct an on-site inspection by October 1, 2011, CAAG respectfully requests that it be granted a provisional certification to permit CAAG to operate as a qualified VRS provider pending the completion of any on-site inspection.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: 

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**ATTORNEYS FOR HANCOCK, JAHN,
LEE & PUCKETT, LLC d/b/a
COMMUNICATION AXESS ABILITY
GROUP**

EXHIBIT LIST

In support of its iTRS Certification Application, CAAG submits the exhibits listed below.

- Exhibit A: CAAG's Training Manual and Policies [CONFIDENTIAL]
- Exhibit B: Platform Product Brochure [CONFIDENTIAL]
- Exhibit C: Platform License Agreement [CONFIDENTIAL]
- Exhibit D: Call Center Managers: Names and Contact Information [CONFIDENTIAL]
- Exhibit E: 911 Call Flow Diagram [CONFIDENTIAL]
- Exhibit F: Call Center Leases [CONFIDENTIAL]
- Exhibit G: Sponsorships [CONFIDENTIAL]
- Exhibit H: Annual Compliance Statement/Verification of Application

GIVEN THE HIGHLY CONFIDENTIAL NATURE OF THE INFORMATION IN EXHIBITS A THROUGH G, CAAG REQUESTS CONFIDENTIAL TREATMENT.

Exhibit A

**CAAG Training Manual & Policies
[CONFIDENTIAL]**

Exhibit B

**Platform Product Brochure
[CONFIDENTIAL]**

Exhibit C
Platform License Agreement
[CONFIDENTIAL]

Exhibit D

**Call Center Managers:
Names and Contact Information
[CONFIDENTIAL]**

Exhibit E
911 Call Flow Diagram
[CONFIDENTIAL]

Exhibit F
Call Center Leases
[CONFIDENTIAL]

Exhibit G
Sponsorships
[CONFIDENTIAL]

Exhibit H

**Annual Report Compliance Statement and
Statement Verifying Certification
Application**

report, CAAG will update the information required in § 64.606(a)(2) by including updated documentation and a summary of the updates, or by certifying that there are no changes to the information and documentation submitted with its application for certification, application for renewal of certification, or most recent annual report, as applicable.”

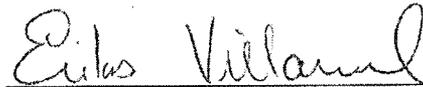
FURTHER AFFIANT SAYETH NOT.



Everett Puckett
Member Manager,
HANCOCK, JAHN, LEE & PUCKETT, LLC
CEO, Communication Access Ability Group
1445 N. Loop West, Suite 910
Houston, Texas 77008
713-807-1176 (Phone)

SWORN TO AND SUBSCRIBED before me on this 20 day of September, 2011.

My Commission Expires:



Notary Public in and for the State of Texas

