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BISRelay

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September 26, 2011

Via Electronic and Overnight Delivery and ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Attn: Joel Gurin, Chief, Consumer & Governmental
Affairs Bureau, TRS Certification Program

RE: Internet-based TRS Certification Application of BIS Relay, LLC.
In the Matter of Structure and Practices of the Video Relay
Service Program, CG Docket No. 10-51

Dear Secretary Dortch and Chief Gurin:

Pursuant to Section 64.606(a)(2) of the Commission's rules, as amended, BIS Relay, LLC ("**BIS**"), hereby submits the attached Internet-based TRS Certification Application of BIS Relay, LLC ("**Application**"), in the Matter of Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51.

By this Application, BIS seeks certification to continue its provision of video relay services by becoming a Telecommunications Relay Service ("**TRS**") Fund reimbursement eligible provider. In support of this request, BIS herein has demonstrated conclusively that it meets - or exceeds - the entirety of the Commission's Mandatory Minimum Standards, those Mandatory Minimum Standards that are currently waived by the Commission to the extent applicable, as noted in DA 11-1159 adopted: June 30, 2011,

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as well as those Commission Orders and policies governing the provision of federal Telecommunications Relay Service Fund video relay services (“VRS”) and IP-Relay Services, as amended as of the date first written above.

BIS respectfully requests that its Application be granted on or before October 1, 2011 to ensure that BIS’s provision of TRS services to the public not be interrupted, or, alternatively, that BIS be granted provisional certification on or before October 1, 2011 while the Commission reviews the application submitted herewith.

BIS understands that certain rules adopted by the Commission's recent VRS Practices Second Report and Order (76 FCC Rcd 47469), which require the collection of information by the Commission, may not yet be effective. BIS understands specifically that the Office of Management and Budget (“OMB”) may not yet have approved certain rules (including the rule that governs the attached application, Commission Rule 64.606(a)(2)¹) and must have done so before they can be effective.

BIS files the attached Application so as to ensure its complete and timely compliance with the VRS Second Report and Order. BIS respectfully requests that to the extent that Commission consideration of this Application cannot be conducted prior to the completion of any OMB rule approval process, this Application be held in abeyance pending such approval, and conditional certification of BIS be granted during such time as this application is so held. To the extent the OMB rule approval process has been completed, BIS respectfully requests immediate consideration.

As portions of the Application contain highly confidential and proprietary

¹ See OMB Control Number: 3060-114, Dated September 16, 2011

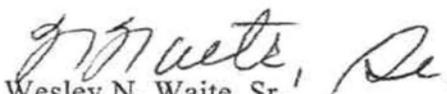
Ms. Marlene Dortch
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information, a Request for Confidential Treatment has also been enclosed, and the confidential portions of the Application (EXHIBITs A, B, C, E, F, G, H and I) have been submitted under seal.

An original and four (4) copies of the redacted version of this Application and BIS' Request for Confidential Treatment are enclosed in the overnight courier copy hereof, along with one (1) original copy of the redacted confidential information provided under seal. Redacted and unredacted copies of the Application have also been made available electronically in links provided in the email in which this has also been transmitted to all addresses.

We respectfully request that you please date-stamp and return the enclosed extra copy of this filing in the enclosed self-addressed stamped envelope. Thank you for your attention to this matter. Any questions may be directed to the undersigned.

Respectfully submitted,


Wesley N. Waite, Sr.
CEO
BIS Relay, LLC

Enclosure

cc: Mr. Joel Gurin (via electronic delivery, Joel.Gurin@fcc.gov)
Mr. Greg Hlibok (via electronic delivery, Gregory.Hlibok@fcc.gov)
Mr. David S. Birnbaum (via electronic delivery,
David.Birnbaum@BISVRS.com)

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

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September 26, 2011

SUMMARY

Pursuant to Section 64.606(a)(2) of the Commission's rules,² as amended, BIS Relay, LLC (referred to herein as "**BIS**," "**Company**," or "**Applicant**"), hereby submits to the Federal Communications Commission ("**FCC**" or "**Commission**") its Application for certification that BIS is eligible to receive reimbursement directly from the federal Telecommunications Relay Service ("**TRS**") Fund ("**Fund**") as a provider of Internet-based Video Relay Service ("**VRS**").

A Deaf-owned company, Stuart B. Consultants, Inc., a Maryland corporation d/b/a Birnbaum Interpreting Services ("**Birnbaum**") was formed in the Washington, DC area in 1995, and since then has grown to provide thousands of hours per month of sign language interpreting services to the Deaf and Hard of Hearing community, serving government agencies, healthcare providers, legal and courtroom situations, religious settings, businesses small and large, counseling and psychiatry sessions, theater and entertainment performances, and many other environments. In 2002, recognizing the evolving needs of the Deaf community, Birnbaum began to provide VRS to the public, and has since developed a strong following of dedicated consumers who appreciate the quality oriented approach takes to VRS, which is strongly influenced by the presence of Deaf ownership and management in the company.

Birnbaum recently combined its VRS offerings with those of Interpretel LLC ("**Interpretel**"), itself formed in 2010 by well experienced VRS managers with the intent of providing quality VRS to the public. Interpretel, which since its formation has joined

² 47 C.F.R. §64.606(a)(2).

with multiple successful VRS companies, including CallVRS and TRUVRS, and which was previously involved in the formation of NorthStar Relay, from which it has since withdrawn, combined with Birnbaum, and together, today, they are known as BIS Relay, LLC, and will continue, as a combined company with Deaf ownership, to provide second-to-none VRS to the Deaf community via the website BISVRS.COM.

By the enclosed Application and supporting documentation, as well as the attached officer certifications and assertions made under penalty of perjury, BIS establishes and attests that it meets or exceeds the Mandatory Minimum Standards, pursuant to Section 64.604 of the Commission's rules,³ complies with all other applicable Commission regulations, Commission orders, and policies, and as such warrants the grant of certification by the Commission to provide compensable VRS to the Public as a Fund eligible provider.

BIS respectfully seeks certification on or before October 1, 2011 so as to provide uninterrupted service to its subscribers and to the Deaf and Hard of Hearing community and public at large, or, alternatively, requests that the Commission grant BIS provisional certification on or prior to that date while this Application is under review.

³ 47 C.F.R. §64.604.

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

In the Matter of)
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Structure and Practices of the) CG Docket No. 10-51
Video Relay Service Program)
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To: Joel Gurin, Chief, Consumer and Governmental Affairs Bureau, TRS Certification Program,
Federal Communications Commission, Washington, DC 20554

Internet-Based TRS Certification Application

of

BIS RELAY, LLC

Pursuant to Section 64.606(a)(2) of the Commission's rules,⁴ as amended, BIS Relay, LLC (referred to herein as “BIS,” the “Company,” or “Applicant”), hereby submits to the Federal Communications Commission (“FCC” or “Commission”) this Application for certification that BIS is eligible to receive reimbursement directly from the federal Telecommunications Relay Service (“TRS”) Fund (“Fund”) as a provider of Internet-based Video Relay Service (“VRS”).

By this Application BIS conclusively demonstrates that it meets or exceeds the entirety of the Commission’s Mandatory Minimum Standards (“MMS”) for VRS pursuant to Sections 64.604,⁵ as amended,⁶ all other applicable Commission regulations, principally including Sections 64.605⁷

⁴ 47 C.F.R. §64.606(a)(2).

⁵ 47 C.F.R. §64.604.

⁶ Structure and Practices of the Video Relay Service Program, Report and Order and Further Notice of

and 64.606⁸, as amended⁹, of the Commission's rules, all applicable Commission orders, as well as those waived MMS for the provision of Fund-compensable VRS.

Given the foregoing, BIS respectfully requests that it be certified as a Fund eligible VRS provider.

In support of its Application, BIS Relay, LLC states as follows:

I. INTRODUCTION

A privately held Delaware limited liability company with substantial Deaf ownership and extensive experience providing Internet-based VRS services to the public, BIS is the result of the combination of the VRS offerings of Stuart B. Consultants, Inc., a Maryland corporation d/b/a Birnbaum Interpreting Services (“**Birnbaum**”), which has been providing interpreting services for the Deaf and Hard of Hearing since 1995, and VRS since 2002, and Interpretel LLC, a Delaware limited liability company (“**Interpretel**”), which was formed in 2010 by individuals extensively experienced in the VRS industry.

Combined under the BIS banner, and providing service to the public via Birnbaum’s long standing URLs (www.bisvrs.com, www.bisvrs.tv, as well as www.bisrelay.net) the combined entity is fortunate to possess an exceptionally well experienced nationally certified interpreter corps with an extensively experienced and qualified professional management team, as well as with the unique perspective on the provision of VRS afforded by Deaf ownership. This unique perspective

Proposed Rulemaking, 26 FCC Rcd 5545 (2011) (VRS Practices R&O).

⁷ 47 C.F.R. §64.605.

⁸ 47 C.F.R. §64.606.

⁹ Structure and Practices of the Video Relay Service Program, Second Report and Order, 76 FCC Rcd 47469 (2011)(“VRS Practices Second R&O”)

means that BIS is not just another VRS provider, but rather a provider that is part of the community that VRS is primarily intended to serve.

Birnbaum, owned by David S. Birnbaum, a Deaf individual, has been in the business of integrating hearing communicators and Deaf communicators for well over 15 years. Since 2002 Birnbaum has worked to provide the Deaf and Hard of Hearing communities and the public at large the "human side" of VRS and, partnering with Fund eligible providers, to provide technology and billing functions. Appreciating the fact that there are two sides to communication, whether it is face-to-face or via the internet or a video phone, both sides are equally important. Birnbaum's highly skilled interpreters strive to act as bicultural conduits, professionally conveying meaningful communication to each side of the conversation. Conversations have are been treated with the utmost respect and kept in stringent confidence.

Recognizing the compelling interest the Commission has in regulating reimbursement by the fund and the TRS/VRS industries as a whole, and desiring to take full responsibility as a certified provider regulated directly by the FCC, Birnbaum submitted a VRS AND IP RELAY CERTIFICATION APPLICATION to the Commission on January 14, 2010, under the then-current rules for certification. Since that date the Commission has not acted on that application despite the fact that Birnbaum met all then-current regulatory requirements and therefor believes that it should have been found eligible for certification. As a result of the fact that its previous application remained under Commission review without any action, Birnbaum had no choice but to continue to provide VRS to its subscribers and users through a partnership with an eligible provider.

Determining that the Commission's April 6, 2011 Report and Order and Further Notice of Proposed Rulemaking in this proceeding inter alia established a prohibition on a Fund eligible certified provider entering into any form of arrangement with a Fund ineligible provider (Section

64.604(c)(5)(iii)(N)(1)(iii) of the Commission's rules), yet, conversely, explicitly accorded Fund ineligible providers, such as Birnbaum, who were pursuing Fund eligibility certification, to request a temporary rule waiver, supported by documentation demonstrating the entity's plan and ability to come into compliance with applicable Commission-relay services requirements, Birnbaum submitted such a PETITION FOR WAIVER in May, 2011. To BIS' knowledge, that PETITION FOR WAIVER remains pending before the Commission and has not yet been acted upon. In a subsequent ORDER SUSPENDING EFFECTIVE DATE issued and adopted May 31, 2011, the Commission suspended the effectiveness of Section 64.604(c)(5)(iii)(N)(1)(iii) of the Commission's rules until October 1, 2011, creating a need for action on the petition contained herein by that date, and effectively mooted Birnbaum's PETITION FOR WAIVER, which the Commission confirmed in their ORDER DA 11-1542, dated September 13, 2011 (and effective immediately (the "NorthStar Order")), in which they denied NorthStar Relay's petition for waiver of Section 64.604(c)(5)(iii)(N)(1)(ii) of the Commission's rules (the "NorthStar Waiver Request"), and confirmed that the May 31, 2011 order rendered all companies' requests for waiver of Section 64.604(c)(5)(iii)(N)(1)(iii) of the Commission's rules moot (at least until October 1, 2011).

Since late 2010, Birnbaum has been in serious discussions with Interpretel to combine the two companies' VRS offerings in a desire to provide even better service offerings to the Deaf and Hard of Hearing communities than either company provided separately. Those discussions were concluded in the combination of the two companies in September of 2011.

Interpretel, formed in 2010, was, prior to its combination with Birnbaum, a growing company whose mission is to become the first choice provider in the VRS and IP Relay market. The Company, which was run by individuals with extensive experience in the VRS industry resulting

from their previous employment in a number of roles working with other VRS providers, was formed out of the recognition of the need in the VRS industry for a provider focused more on what is in the best interests of the Deaf/Hard-of-Hearing and hearing communities than it was on its own bottom line. Interpretel's guiding principal focuses on the quality of calls it processes, rather than quantity. By utilizing advanced technology, by partnering during the time its application for certification was pending with high quality certified providers without any record of impropriety, and by employing the most experienced, professional and highly qualified video interpreters, with demonstrated records of compliance and stability, Interpretel worked to ensure the exceptionally high quality of its service.

Part of Interpretel's mission has been to partner with and combine with other like-minded VRS providers. To this end, Interpretel acquired TruVRS as a whole in December, 2010 and CallVRS from Sign Language Access, Inc., its previous owner, in April, 2011. TruVRS had been providing VRS services since January 2010, and CallVRS had been providing VRS since 2008. Recognizing, like Birnbaum, the compelling interest the Commission has in regulating reimbursement by the fund and the TRS/VRS industries as a whole, and desiring to take full responsibility as a certified provider regulated directly by the FCC, CallVRS itself applied for certification by submitting its APPLICATION OF SIGN LANGUAGE ACCESS, INC., D/B/A CALLVRS, FOR CERTIFICATION BY THE COMMISSION AS A VIDEO RELAY SERVICE PROVIDER on March 21, 2011, prior to its combination with Interpretel, under the then-current rules. CallVRS' application was has not been acted on by the Commission, and in light of its combination with Interpretel, CallVRS application may now be moot.

Like CallVRS and Birnbaum, Interpretel has previously applied to the Commission for

certification under the then-current rules, submitting its APPLICATION OF INTERPRETEL LLC FOR CERTIFICATION AS A VIDEO RELAY SERVICE AND IP RELAY SERVICE PROVIDER on April 7, 2011, which application has not been acted upon. Subsequently, Interpretel served as one of the companies constituent (which included a currently certified company that would not be eligible under the Commissions amended rules) in NorthStar Relay at the time that it filed the NorthStar waiver request. Recognizing from conversations held with the Commission even prior to the NorthStar Order that the Commission was unlikely to approve NorthStar's request for waiver of Section 64.604(c)(5)(iii)(N)(1)(ii), and recognizing as such that NorthStar's approach of combining and maintaining several legacy brands was no longer feasible, Interpretel decided not to proceed with NorthStar, and instead sought to and did complete its combination with Birnbaum, becoming part of the BISVRS.com URL and the BIS brand.

By combining the talents and resources of Birnbaum and Interpretel, the companies have ensured that going forward BIS has the Deaf perspective, the technical and operational know-how, the financial resources and the highly skilled interpreters that will ensure that it provides the highest quality VRS in a completely compliant manner. In addition to benefiting from the special perspective on the needs of the Deaf and Hard of Hearing community that is afforded BIS by Deaf ownership, BIS is comprised of talented individuals with substantial experience in working with Deaf and hearing-impaired persons, as well as in the wider telecommunications industry. These individuals form a team that has long remained committed to providing the best and highest quality VRS available, despite an often changing regulatory environment. In the instant application BIS reaffirms that commitment, as well as its commitment to helping to improve TRS as a whole by setting an example of compliance and quality.

With a management team that has a depth and diversity of experience in TRS that is second to none, and a combined track record of well over fifteen years serving the Deaf and Hard of Hearing community, BIS remains prepared to do what it takes to be a VRS provider that gives the Commission comfort as beyond reproach in its provision of VRS to the public and in its interactions with the TRS Fund.

This Application incorporates part of the discussion from Interpretel's previous application, in that where the then current regulations have not since been amended and the Company's compliance also remains unchanged, in addition to providing current information regarding BIS' present compliance under the certification rules as amended.

This Application demonstrates Applicant's compliance with applicable regulations, and BIS affirms that the public interest is well served by granting the application contained herein.

**II. NARRATIVE AND DOCUMENTATION DEMONSTRATING COMPLIANCE
WITH THE INTERNET-BASED TRS PROVIDER AND TRS PROGRAM
CERTIFICATION REQUIREMENTS (47 C.F.R. §64.606(a)(2); §64.606(a)(1) is
inapplicable)**

**a. A description of the forms of Internet-based TRS to be provided (i.e., VRS, IP
Relay, and/or IP captioned telephone relay service) (47 C.F.R. §64.606(a)(2)(i))**

BIS seeks certification as a Fund eligible provider of Internet-based video relay services, as well as Internet Protocol ("IP") Relay and IP Captioned Telephone Services ("IP CTS"). BIS does not intend to provide other Fund-compensable conventional telecommunications relay services, though BIS has the capability to process such calls if received. BIS affirms that it operates twenty-four hours a day, seven days a week, and three hundred sixty-five days per year.

Using H.323 and SIP-based video calling technology, BIS is able to process calls from hearing, speech disabled, Deaf and Hard of Hearing VRS callers. The platform employed by BIS for the purpose of processing these calls provides full system interoperability, as it is compatible with all VRS devices in current use by the Deaf Community regardless of provider. As a result, consumers can reach BIS' interpreters regardless of their device or software of choice, whether that device is an Android or iOS based mobile device (with front-facing camera), a PC or OSX desktop or notebook computer (using a dedicated CPE client *or* chat software such as AIM or iChat), or a legacy video phone device. BIS embraces a device- and platform-agnostic philosophy, working to ensure that the widest number of end-users can access the services it provides no matter what is their most favored mode of video communication.

b. A detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of TRS offered, including documentary and other evidence, and in the case of VRS, such documentary and other evidence shall demonstrate that the applicant leases, licenses or has acquired its own facilities and operates such facilities associated with TRS call centers and employs communications assistants, on a full or part-time basis, to staff such call centers at the date of the application. Such evidence shall include, but not be limited to: (A) In the case of VRS applicants or providers, (47 C.F.R. §64.606(a)(2)(ii)(A))¹⁰

- 1. Operating five or fewer call centers within the United States, a copy of each deed or lease for each call center operated by the applicant within the United States (47 C.F.R. §64.606(a)(2)(ii)(A)(I));**

A true and correct copy of each lease for each call center operated by BIS, and related documentation and information, is attached under seal hereto as confidential **EXHIBIT A**.

- 2. Operating more than five call centers within the United States, a copy of each deed or lease for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United**

¹⁰ Evidence of Applicant's complete compliance with the Mandatory Minimum Standards pursuant to 47 C.F.R. §64.606(a)(2)(ii) is set forth in Section III, *infra*.

States, together with a list of all other call centers that they operate that includes the information required under §64.604(c)(5)(iii)(N)(2)¹¹ (47 C.F.R. §64.606(a)(2)(ii)(A)(2));

As BIS currently maintains fewer than five call centers, all of which are within the United States, this provision is inapplicable. BIS affirms that it shall comply fully with the requirements of this provision at such time as it does become applicable. BIS' call centers operate on a redundant, 24/7/365 basis, as discussed below.

- 3. Operating call centers outside of the United States, a copy of each deed or lease for each call center operated by the applicant outside of the United States (47 C.F.R. §64.606(a)(2)(ii)(A)(3));**

As each of BIS' call centers is located within the United States, this provision is inapplicable.

- 4. A description of the technology and equipment used to support their call center functions – including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing**

¹¹ "Call center reports. VRS providers shall file a written report with the Commission and the TRS Fund administrator, on April 1 and October 1 of each year for each call center that handles VRS calls that the provider owns or controls, including centers located outside of the United States, that includes: (a) the complete street address of the center; (b) the number of individual CAs and CA managers; and (c) the name and contact information (phone number and email address) of the manager(s) at the center. VRS providers shall also file written notification with the Commission and the TRS Fund administrator of 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."

for compensation from the TRS Fund, and registration -- and for each core call center function, a statement whether such technology and equipment is owned, leased or licensed (and from whom if leased or licensed) (47 C.F.R. §64.606(a)(2)(ii)(A)(4));

A description of the technology and equipment used to support BIS call center functions – including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration is attached under seal as confidential **EXHIBIT B**. Any and all technology agreements and leases are attached under seal as confidential **EXHIBIT C**.

BIS provides the Deaf and Hard of Hearing communities, and the public as a whole with its TRS services by using a number of different methods of access, as noted in Section II(a) above.

Each of these methods of access makes use of an Automatic Call Distribution ("ACD") platform and software running on dedicated servers owned or leased by BIS and residing in secure corporate data hosting facilities (the "PLATFORM" or "BIS PLATFORM"). This customizable ACD Platform, which serves both H.323 and SIP calls, has been leased, licensed and implemented by the Company, and generates the call routing, setup, mapping, in-call features and billing data for each call placed and processed by BIS. The ACD software necessary to accommodate VRS on portable devices and chat platforms is also provided within the same ACD system.

In addition, BIS has service agreements in place with Voice over Internet Protocol ("VoIP") provider(s) to address the Platform's need to place outbound voice calls and who have relationships with incumbent local exchange carriers enabling the acquisition of local 10 digit numbers for its registered users. See confidential **EXHIBIT C** for VoIP provider Agreements.

Emergency call processing for the BIS platform is resolved by the use of services provided by an Emergency Routing Service that supports VoIP deployments according to FCC, Canadian Radio and Television Commission ("CRTC"), and National Emergency Number Association ("NENA") i2 standards and is described in detail in confidential **EXHIBIT F**. Corresponding agreements are included in confidential **EXHIBIT C**.

5. **Proofs of purchase, leases or license agreements for all technology and equipment used to support their call center functions, including a complete copy of any lease or license agreement for automatic call distribution. (47 C.F.R. §64.606(a)(2)(ii)(A)(5));**

Proofs of purchase, leases or license agreements for any and all technology and equipment used to support BIS' call center functions, including a complete copy of any applicable agreements for automatic call distribution, are included in confidential **EXHIBIT C**, filed under seal.

- c. **For all applicants, a list of individuals or entities that hold at least a 10 percent**

equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant, a description of the applicant's organizational structure, and the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company) (47 C.F.R. §64.606(a)(2)(ii)(B));

The details of BIS' ownership, organizational structure, and the names of its executives, officers, members of its board and managing members are set forth in the attached confidential **EXHIBIT E**, filed under seal.

- d. For all applicants, a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers (in the case of VRS), communications assistants, and persons involved in marketing and sponsorship activities (47 C.F.R. §64.606(a)(2)(ii)(C));**

A list of applicant's full-time and part-time employees involved in TRS operations, BIS employment figures and positions are attached hereto as part of confidential **EXHIBIT E**, filed under seal.

- e. For all applicants, copies of employment agreements for all of the provider's employees directly involved in TRS operations, executives, and communications assistants, and a list of names of employees directly involved in TRS operations, need not be submitted with the application, but must be retained by the**

applicant for five years from the date of application, and submitted to the Commission upon request (47 C.F.R. §64.606(a)(2)(ii)(D)); and

BIS currently maintains, and affirmatively acknowledges its ongoing obligation to maintain, copies of employment agreements for all of employees directly involved in TRS operations, including executives, and communications assistants, and maintains a list of names of employees directly involved in TRS operations.

As a matter of policy BIS also maintains copies of all employment agreements not directly involved in TRS operations. BIS further commits to retain copies of all employment agreements for a minimum period of five years from the date of its Application, and is prepared to provide copies of such employment agreements and a list of all employees to the Commission upon request, regardless of whether or not such employees are or were directly involved in TRS operations.

f. For all applicants, a list of all sponsorship arrangements relating to Internet-based TRS, including any associated written agreements

(47 C.F.R. §64.606(a)(2)(ii)(E));

From time to time BIS does, has, and will continue to sponsor Deaf-oriented events, and has contributed to worthy causes on an *ad hoc* basis. At this time BIS does not maintain ongoing sponsorship of any specific organizations or events relating to Internet-based TRS. Accordingly the Company has no applicable written agreements.

At such time as BIS enters into any such arrangements BIS affirmatively

commits to maintain a list thereof, as well as to maintain any associated written agreements indefinitely, and commits to submit such agreements to the Commission upon the Commission's request.

g. A description of the provider's complaint procedures.

(47 C.F.R. §64.606(a)(2)(iii) and 64.606(b)(2)(ii));

BIS steadfastly maintains that engaged, timely and effective consumer complaint resolution is key to maintaining a high level of consumer satisfaction, which in turn is key to serving the purpose for which the TRS fund was established. Customer service is a top priority, as is being available and accessible to consumers, subscribers and members of the Public. Complaints may be registered with BIS via the following channels:

- Phone: 1-877-247-8749
- Video Phone: BISVRSHELP.tv or
BISVRS.tv
- Web: www.BISRelay.net or
support.bisrelay.net
- Email: support@BISRelay.net
- Mail: BIS Relay, LLC
P.O. Box 833
Boerne, TX 78006
- Twitter: @BISRelay

BIS has the ability to receive customer complaints via the following channels:

- Interpreters
- Customer Service
- Management
- The Company's main website
- The Company's dedicated support website
- Via Social media such as Twitter and Facebook

All complaints are logged into BIS' online complaint ticketing system, the records of which shall be forwarded as required to the FCC.

The BIS complaint handling process gathers the following complaint information, and records it in the Company's complaint ticketing system for Commission and internal reporting processes as well as so as to ensure the quick and effective resolution of complaints:

- Ticket number of complaint
- Name, of complaining party
- Email address, of complaining party
- IP Address of VP (if applicable)
- Telephone number (if applicable)
- Date and time of complaint
- Date and time of underlying incident
- Nature of complaint

- Technical information relevant to complaint
- Steps taken to produce issue
- Steps taken by consumer to resolve issue
- Name of person taking complaint or media channel of complaint (as applicable)
- Attempted steps taken to resolve issue
- Successful steps taken to resolve issue
- Date and time of complaint resolution
- Date and time of follow-up with complaining party
- Manager review
- Senior management review
- Date and time of complaint resolution
- Date and time ticket closed

As necessary, all available documentation, including interpreter schedules and Call Detail Records (CDRs) are used in reviewing and reaching resolution of the complaint. The Manager with the responsibility to investigate the complaint takes all proper and necessary steps during the investigation, which may include but are not limited to interviewing all parties involved in the incident giving rise to the complaint. If the complaint is reported to an interpreter, if necessary, the call is transferred to Customer Service or Technical Support, which creates a trouble report ticket. If the call does not need to be routed to customer service, the interpreter creates the trouble ticket. If the complaint is Technical in nature, the Company's Technical Support Team handles that complaint.

If the complaint is service-related in nature, that complaint is escalated to Management with the VP of Operations being the first contact point.

If the complaint is of a technical nature or service related then the complaint is initially handled by the company's Customer Service/Technical Support group who fill out a technical trouble ticket. Management on a daily basis reviews all new or updated trouble tickets.

If the complaint is in regard to an interpreter, the complaint is handled first by the Manager on Duty then referred to Management.

If the complaint is of a general company nature senior management handles the complaint.

Management and Customer Support document the complaint, the steps taken to reach resolution and the resolution outcome. Resolution is reported back to Management, which reviews the complaint and resolution and determines if the complaint can be closed out. Customer Support or Management will make contact with the originator of the complaint and update them on the outcome and disposition taken. Management reviews all open complaints to ensure that they are resolved in a timely manner, including response to the complainant as necessary.

- h. **A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.**(47 C.F.R. §64.606(a)(2)(iv));

BIS affirms that it will file annual compliance reports demonstrating continued compliance with Commission rules at such time and in such manner as