number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

BIS Demonstration of Compliance: Upon contacting it, the registered location, the name of the VRS provider, and the CA's identification number is conveyed to the appropriate PSAP, or appropriate local emergency authority via the automatic location information ("**ALI**") database, as further detailed and illustrated in BIS' 911 Call Handling Flow and Process set forth under seal in confidential **EXHIBIT F**.

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

default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §64.3001 of this chapter.

BIS Demonstration of Compliance: When an E911 call is presented to the BIS platform and in turn a CA, before contacting the PSAP, the interpreter attempts to collect and verify the registered VRS caller's name and location. After doing so, the second leg of the call is placed to 911 whereupon the caller's identification and location information is in all cases automatically conveyed, as information embedded in the call string, or with an endpoint identifier containing data or Automatic Numbering Information ("**ANI**") that references an address already provisioned in the Neustar database.

If the PSAP, statewide answering point or local emergency authority is not capable of automatically receiving ANI or location information, the CA has already collected and verified the caller's name and location information and is prepared to relay that information by voice to the PSAP. As discussed above and in **EXHIBIT F**, such identification and location information is, regardless of whether or not it is capable of being received, transmitted automatically by the platform as 911 calls are delivered via the Wireline E911 to the PSAP, statewide answering point or local

emergency authority that services the callers registered location.

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

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

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

BIS Demonstration of Compliance: Subscribers may register with BIS so as to select BIS as a preferred (default) provider, and access BIS' platform and proprietary calling clients,. In order to successfully complete this registration process, which can be initiated via the BIS website or by contacting BIS Customer Support, potential, subscribers are required to provide all necessary information, including physical location, needed to populate the Neustar Registered

Location database.

Subscribers are able to initially register and update their information, as well as access other proprietary BIS functionality, by accessing a secure Internet web site (located at http://www.bisrelay.net), via email, or by contacting BIS' customer service in writing or by video phone. Proper verification of a subscriber's identity is required before any profile changes may be made on their behalf. ,

BIS' policy and training require that when answering an emergency call BIS CAs verify the Registered Location information presented to them by the Neustar database, before contacting the appropriate PSAP, as noted above.

BIS provides users with specific information, available in the BIS website, on the use of customer proprietary network information to be collected for complying with 911 access requirements (See http://bisrelay.net/small-print/)

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

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

STS provider." [30]

BIS Demonstration of Compliance: Regardless of the fact that this requirement is waived for VRS., BIS' VRS platform has the capability to process STS calls. While it does not currently maintain a list of names and telephone numbers that STS users might call, this functionality is in development.

6. Visual privacy screens/idle calls (47 C.F.R. §64.604(a)(6)).

Standard: A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9-1-1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

BIS Demonstration of Compliance: As a matter of policy,

[30] The requirement has been waived indefinitely with regard to VRS. *See 2004 TRS Report & Order,* 19 FCC Rcd at 12594 (Appendix E: Summary of IP Relay and VRS waivers).

BIS' CAs are not allowed to enable a visual privacy screen or any such feature as may hide the CA's identity, and CAs are trained accordingly. Furthermore, as a mater of policy, CAs are trained to announce their intent to terminate, and then terminate a call if the caller enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9-1-1 emergency call or the caller or called party is legitimately placed on hold and is clearly present on the call and waiting for active communications to resume.

7. International Calls (47 C.F.R. §64.604(a)(7)).

Standard: VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

BIS Demonstration of Compliance: BIS monitors the originating IP address of each incoming call. The company affirmatively

acknowledges that calls originating from an IP address that indicates that the individual initiating the call is located outside the United States are not compensable, and commits that that such calls shall not be submitted for compensation, unless it is first verified that such call is made by a U.S. resident who has pre-registered with his or her registered default VRSS provider prior to leaving the U.S., informing that provider that they will be traveling to a specific location during specified periods of time , and it is further accurately verified that the caller is indeed in the region they indicate they will be at the time indicated.

The BIS platform verifies upon the initiation of a call that user registration information and the inbound IP address for such call indicate that the call has originated within United States and its territories. All VRS that do not pass this check are directed to Customer Service, which is trained to inform the caller that they may not place a call from outside the U.S. unless they have pre-registered with their provider as indicated above. For those calls made by callers who have correctly pre-registered, calls are completed, but the associated Call Data Record is flagged for reconciliation. .Only after it is verified by management that the originating IP address and time of the call match the caller's pre-registered travel plans may a flagged CDR be submitted for compensation. If the CDR is not capable of being so verified, remains flagged, may not be and is not submitted for compensation and any associated costs are absorbed by BIS.

BIS notes that a number of VRS users who may place calls that originate outside of the U.S. and its territories cannot be correctly identified as being outside the U.S. and its territories by reference to the call's originating IP address, as the device they are using to place their call is registered with one of the several VRS providers who employ gateways that may present IP addresses that represent callers as being within the U.S. BIS does not employ such an inaccurately reporting gateway.

When a CA identifies such a call that presents a U.S. IP address and/or registration information, but that appears to originate outside the U.S., the CA is trained to notify management, which flags the call as not compensable, and ensures that the call not submitted for reimbursement.

b. Technical Standards

1. ASCII and Baudot. (47 C.F.R. §64.604(b)(l)).

Standard: "TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

BIS Demonstration of Compliance: Text messaging is supported by the BIS Platform, and may be accessible by way of other forms of conventional text/data transmissions, including the ASCII and Baudot formats which are generated by most TRS equipment

2. **Speed of Answer. (47 C.F.R. §64.604(b)(2)).**

Standard (i): "TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network."

BIS Demonstration of Compliance: Utilizing the data collected by its ACD Platform, BIS monitors call volume on an ongoing basis, comparing past call volume and monitoring current volume in order to apply call volume analysis modeling techniques, and utilizes such techniques in forecasting future needs and ensuring that current staffing is at such a level that it meets current and predicted need. CA staffing is at all times maintained at such a level to ensure that that calls are answered in compliance with the ASA requirements.

Additional qualified interpreters are available on call should volume exceed expectations, further ensuring ASA compliance. Call center supervisors, managers, trainers and executives are interpreters and are ready to handle calls when call volume from time to time exceeds expectations.

BIS maintains and commits that 85% of all calls are/will be answered within 10 seconds or less, well exceeding the speed of answer requirement set forth in Standards (ii) and (iii) below.

Standard (ii): "TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call

immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request."

BIS Demonstration of Compliance: BIS commits and affirms that it does and shall, except during network failure, answer 85% of all calls within 10 seconds of the time the call is delivered to its network by a method that results in the caller's call immediately being placed, not put in a queue or on hold. BIS further commits and affirms that it possesses adequate network facilities for use conjunction

with its provision of TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to or less than what a voice caller would experience in attempting to reach a party through the voice telephone network.

The scalable nature of the network facilities that BIS employs, details of which are set forth in Confidential **EXHIBIT B, attached hereto** under seal, are specifically designed so that the probability of a busy response due to loop trunk congestion is less than what a voice caller would experience in attempting to reach a party through the voice telephone network.

Standard (iii): "Speed of answer requirements for VRS providers are phased-in as follows: ...by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

BIS Demonstration of Compliance: BIS has been in compliance with the current speed of answer requirements for VRS providers since they first became applicable in 2007., and employs the technology discussed in EXHIBIT B and the procedures discussed above so as to ensure that it is able to remain compliant at all times. .

In 2010 Birnbaum's average speed of answer metrics reflected that on average all calls were answered within 15 seconds of their being delivered to the BIS network, including abandoned calls. ASA time is projected to average less than 15 seconds in 2011, continuing to meet or exceed the requirement that it be

functionally equivalent to or less than what a voice caller experiences, and demonstrating a continuing trend of improvement.

3. **Equal access to interexchange carriers.** (47 C.F.R. §64.604{b)(3))[31]

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

BIS Demonstration of Compliance: BIS acknowledges that to the extent that a registered subscriber may now or in the future rely exclusively on BIS or another IP-based provider as their default or registered service provider, such subscriber should not, as a practical matter, require access to a Wireline interexchange or local exchange carrier. Should such a subscriber, or any dial around caller for that matter request, however, BIS possesses technical capability allowing it to route interexchange calls to the subscriber's interexchange carrier of choice and place calling card calls to carriers using the subscriber's calling card. CAs are trained to pass such requests to Customer Service, which is in turn trained to handle such calls.

As a matter of policy and practicality, BIS provides local, domestic intrastate, interstate and international long distance services at no cost to callers, absorbing such costs itself.

[31] Waived until July 1, 2012. *See 2011 MMS Waiver Extension Order.*

4. **TRS facilities. (47 C.F.R. §64.604(b)(4)).**

Standard (i): "TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not to be provided every day, 24 hours a day."[32]

BIS Demonstration of Compliance: BIS' principal call centers, located in Louisiana and Maryland work together to schedule CAs to be on duty 24 hours per day, 7 days per week, every day of the year. Additionally, BIS provides system and center redundancy via its call center integration and ability to add additional call center capability, which it has detailed plans to do as demand increases. BIS commits to update this application with additional required and relevant information as additional call centers are added.

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

BIS Demonstration of Compliance: BIS VRS ensures at all times that it maintains the appropriate redundant equipment and capability for all of its core components (ACDs, internet service, electrical power, 911 emergency call handling,

[32] Amended by the FCC's *Report and Order* in CG Docket No. 03-123 and CC Docket No. 98-67, as discussed below. The *2004 TRS Report and Order* notes that pursuant to 47 C.F.R. §64.604(b)(4), "Relay services that are not mandated by this Commission are not required to be provided every day, 24 hours a day." The FCC goes on to state that "VRS is not a mandatory TRS service" and therefore not subject to perpetual staffing requirements.

VoIP services, etc.) These redundant systems and safeguards are designed so that, should they be required, they will fail over seamlessly, ensuring continuity of service.

Standard (iii): "A VRS CA may not relay calls from a location primarily used as his or her home."

BIS Demonstration of Compliance: BIS does not employ or otherwise utilize in any way CAs who relay calls from any home location. All CAs are employed in the BIS call centers set forth in **EXHIBIT A** hereto. Interpretel, a predecessor to BIS, previously employed at-home CAs, but ceased to do so prior to the effectiveness of this Standard.

Standard (iv): "A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform."

BIS Demonstration of Compliance: BIS licenses its ACD platform from a third party that is not a provider of VRS, eligible or otherwise. The ACD platform is licensed on an established fee basis that is in no way based on revenue sharing or

compensated upon call usage. The ACD platform is physically located in BIS' leased data center and its call center locations, and is primarily accessed and managed by the Company's employees, with occasional extraordinary support by the ACD vendor. The underlying license agreement and additional evidence of BIS' compliance is attached hereto as confidential **EXHIBIT C**.

5. Technology. (47 C.F.R.§64.604(b)(S)).

Standard: "No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq."

BIS Demonstration of Compliance: BIS platform-agnostic philosophy means that it is constantly committed to technological improvement and innovation. Its telecommunications providers are capable of employing SS7 technology in accordance with the Calling Party Telephone Number requirements set forth at 47 CFR 64.1600 *et seq.*[33]

6. Caller ID. (47 C.F.R.§64.604(b)(6)).

Standard: "When a TRS facility is able to transmit any calling party identifying

[33] 47 C.F.R. §§64.1600 *et seq.*

information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party."

BIS Demonstration of Compliance: To meet this requirement BIS transmits the 10-digit number of the calling party to the public network.

c. Functional Standards

1. Consumer Complaint Logs. (47 C.F.R §64.604(c)(l)).

Standard (i): "States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution."

BIS Demonstration of Compliance: As required by this section of the regulations, BIS maintains a continuous log of any consumer complaints received, with information on the date of the complaint, the nature of the complaint, an explanations the resolution, and the date resolved, as well as other relevant information. Complaint logs are reviewed by the Company on a regular basis to identify areas for improvement, so avoidable complaints are not repeated. Via Applicant's online complaint ticketing system, separate logs are kept for VRS and IP Relay Services, when IP relay service offerings are commenced.

Users may initiate complaints with the Company by communicating with A CA or CA supervisor, via the complaint submission portion of the company's website, via electronic mail to the Company's customer service address, or by communicating with any employee of the Company. Upon their initiation, all complaints are logged into BIS' online complaint ticketing system.

A CA supervisor (who is not the subject of the complaint) is responsible for investigating the issue, reporting it to appropriate management, and responding within 24 hours. All complaint responses and subsequent communications regarding the complaint are recorded in the complaint ticketing system. Management monitors complaints on an ongoing basis, and intervenes where appropriate.

Complaints that are technical in nature are referred automatically by the Company's complaint ticketing system to BIS Technical Support, which takes responsibility for the complaint's resolution. After business hour technical issues are addressed immediately by an on call technician. Upon determining the next appropriate steps, or a resolution to the complaint, the assigned Support Technician will either communicate with the CA who initially took the complaint, who in turn will communicate with the consumer, or will contact the consumer directly.

BIS' unique commitment to customer service standards and consumer engagement mean that the requirements of this section of the regulations are particularly central to its mission, and as such BIS undertakes to innovate in the manner and quality of its consumer outreach and education, of the Deaf and Hard-of-Hearing and hearing communities alike. To this end, BIS will also actively engage in social media channels and other forums to proactively seek out consumer input on its

services, and employ that input in a process of constant improvement.

BIS encourages all consumer communication and inquiries of any nature, as it is central to the Company's philosophy as a provider with deaf ownership to be as proactively engaged as possible in the community it serves.

Standard (ii): "Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001."

BIS Demonstration of Compliance: BIS affirms its commitment to submit complaint logs on an annual basis, as required by this standard and the Commission.

2. Contact Persons. (47 C.F.R. §64.604(c)(2)).

"Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:"

Standard(i): "The name and address of the office that receives complaints,

grievances, inquiries, and suggestions."

BIS Demonstration of Compliance: The senior individual responsible to receive complaints, grievances, inquiries, and suggestions for BIS is:

Nancie Alcock
Vice President, Operations
BIS Relay, LLC
Email: **Nancie.Alcock@BISRelay.net**
Voice/TTY: **877-439-4992**
Fax: **210-698-0956**
Website: **www.BISRelay.net**
Twitter: **@BISRelay**

As noted above, each company employee is trained and required to immediately report any complaints they may receive, informing their supervisor, entering the complaint into the Company's online complaint ticketing system, and either pursuing such complaint to a timely solution or escalating such complaint to senior certified interpreter customer service representatives. In each case, whether or not a complaint is escalated, all individuals involved in its resolution are required to document the complaint and the steps taken to resolve it, and all complaints are subject to supervisory review.

BIS commits informing the Commission in a timely manner of any changes in contact information for the senior individual responsible for complaints.

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

BIS Demonstration of Compliance:

Please refer to Standard (i), above.

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

BIS Demonstration of Compliance:

Correspondence should be sent to:

Wesley N. Waite, Sr.
CEO
BIS Relay, LLC
8920 Fair Oaks Parkway
Fair Oaks Ranch, TX 78015

3. Public Access to Information. (47 C.F.R. §64.604(c)(3)).

Standard: "Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are Hard of Hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible."

BIS Demonstration of Compliance: Utilizing a wide array of available channels, including conventional media, social media, its website and

participation in in person events, BIS proactively engages in public outreach to educate consumers regarding how to access and use its services, as well as to promote the ongoing use of VRS by the community the system was designed to benefit. By being proactively engaged with its consumers, BIS endeavors to reach as wide as possible an audience of Deaf, Hard of Hearing and speech disabled individuals, senior citizens, and the public at large..

BIS and its predecessors have employed and will continue to employ targeted and broadcast web ads, has placed information in various related community publications and event programs. and has visited in person numerous tradeshows and expos in its efforts to reach the largest number users and potential users as possible and educate them as to the potential benefits of VRS. As a company directly linked to the community it serves, BIS finds that it is especially effective in communicating with Deaf and Hard of Hearing consumers, especially at in-person events.

In a manner similar to that employed by conventional telecom providers, online and social media are used to complement in-person consumer interaction, as well a to provide constant consumer engagement and ongoing education, in an effort to communicate with the widest array as possible of individuals who stand to benefit from VRS.

The Company provides public access to detailed information about TRS availability and use on the Company's website, and by request via mail and social media channels.

4. Rates. (47 C.F.R §64.604(c)(4)).

Standard: "TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination."

BIS Demonstration of Compliance: As none of BIS' subscribers have been or will be charged for BIS' VRS service, they do not pay rates greater than those paid for functionally equivalent voice communication services, and this standard is effectively inapplicable. For additional information please see BIS Demonstration of Compliance regarding Types of Calls (47 C.F.R. §64.604(a)(3)), above.

5. **Jurisdictional Separation of Costs.** (47 C.F.R. §64.604(c)(5)(iii)(C)).[34]

Standard (1): "*Data Collection and Audits from TRS Providers.* TRS providers seeking compensation from the TRS Fund shall provide the administrator with true and adequate data, and other historical, projected and state rate related information reasonably requested to determine the TRS Fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS investment in general in accordance with part 32 of this chapter, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements.

[34] Standards (i), (ii), (iii)(A) and (iii)(B) require no response, and are acknowledged by Applicant.

Standard (2): "*Call data required from all TRS providers.* In addition to the data requested by section 64.604(c)(5)(iii){C)(l), TRS providers seeking compensation from the TRS Fund shall submit the following specific data associated with each TRS call for which compensation is sought: (1) the call record ID sequence; (2) CA ID number; (3) session start and end times noted at a minimum to the nearest second; (4) conversation start and end times noted at a minimum to the nearest second; (5) incoming telephone number and IP address (if call originates with an IP-based device) at the time of the call; (6) outbound telephone number (if call terminates to a telephone) and IP address (if call terminates to an IP-based device) at the time of call; (7) total conversation minutes; (8) total session minutes; (9) the call center (by assigned center ID number) that handled the call; and (10) the URL address through which the call is handled.

BIS Demonstration of Compliance: BIS has applied with and thus given notice to the Fund Administrator of its desire and intention to directly participate in the Fund.

BIS affirmatively acknowledges its obligation to provide the Fund administrator with true and adequate data, and any other historical, projected and state rate related information reasonably requested to determine the TRS Fund revenue requirements and payments in accordance with the requirements set forth in 47 C.F.R. §64.604(c)(5)(iii)(C)(l) and (2), and any such additional procedures adopted by the administrator.

All BIS call data is generated and stored by the Company's ACD platform by virtue of its automated data recording functionality. CAs are not, at any time, able to

manually initiate, end, enter, or otherwise alter such data, except to the extent they are able to initiate and end calls in the normal course of their duties. Furthermore, BIS call data is at all times recorded duplicated on multiple redundant servers.

To date, BIS, and its predecessors Birnbaum and Interpretel have been providing such data to the Fund Administrator through their respective certified partner providers and BIS is extensively experienced in the reporting process.

In the event a CA believes the compensability of a call is for any reason in question, that CA can flag such call for review. The call in question is then subsequently scrutinized to determine if it is for any reason not eligible for reimbursement from the fund, and if such a determination is made, such call is not included in the data submitted to the administrator for reimbursement for the applicable period.

Standard (3): *Additional call data required from Internet-based Reilly Providers.* In addition to the data required by section 64.604(c)(5)(iii)(C)(2), Internet-based Relay Providers seeking compensation from the Fund shall submit speed of answer compliance data.

BIS Demonstration of Compliance: BIS affirmatively acknowledges its obligation to provide speed of answer compliance data to the Fund administrator and Commission, at such time and in such manner as they may determine.[35]

Standard (4): "Providers submitting call record and speed of answer data in

[35] Please refer to BIS Speed of Answer compliance, *supra.*

compliance with sections 64.604(c)(5)(iii)(C)(2) and (3) shall (i) employ an automated record keeping system to capture such data required pursuant to section 64.604(c)(5)(iii)(C)(2) for each TRS call for which minutes are submitted to the fund administrator for compensation; and (ii) submit such data electronically, in a standardized format. For purposes of this subparagraph, an automated record keeping system is a system that captures data in a computerized and electronic format that does not allow human intervention during the call session for either conversation or session time."

BIS Demonstration of Compliance: BIS affirmatively acknowledges its obligation to provide data through an automated record keeping system that does not allow human intervention during the call session for either conversation or session time, which captures all required data, that formats such data in a standardized manner for reporting, and report it as required. This obligation is met by the automatic call data record recording and processing functionality of the Company's ACD, and overseen by individuals with extensive experience in the submission of call data records gained by performing such a function for other certified and non-certified providers.

Standard (5): *Certification*. The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of a TRS provider with first hand knowledge of the accuracy and completeness of the information provided, when submitting a request for compensation from the TRS Fund must, with each such request," certify the truth and accuracy of the data and that such requests