

for compensation to not result from “impermissible financial incentives or payments to generate calls” pursuant to Section 225 of the Communications Act and the Commission's rules and orders.

BIS Demonstration of Compliance: BIS affirmatively acknowledges its obligation and commitment to, and affirms that it will, certify through its Chief Executive Officer that each and every request for compensation submitted by BIS is truthful, accurate, and does not result from any impermissible financial incentives or payments to generate calls or contain any fraudulent information or data.

Standard (6): Audits. The fund administrator and the Commission, including the Office of Inspector General, shall have the authority to examine and verify TRS provider data as necessary to assure the accuracy and integrity of TRS Fund payments. TRS providers must submit to audits annually or at times determined appropriate by the Commission, the fund administrator, or by an entity approved by the Commission for such purpose. A TRS provider that fails to submit to a requested audit, or fails to provide documentation necessary for verification upon reasonable request, will be subject to an automatic suspension of payment until it submits to the requested audit or provides sufficient documentation.

BIS Demonstration of Compliance: BIS affirmatively acknowledges its obligation to, and affirms that it will, submit annually or at such times as determined by the auditing entity, to audits required by the Fund administrator and/or the Commission, including the Office of Inspector General. BIS commits to provide

all such data and documentation as requested by the auditing entity in relation to such audits for examination and verification of the data submitted by BIS as necessary to assure the accuracy and integrity of TRS Fund payments and such data submitted by BIS.

Standard (7): *Call data record retention.* Internet-based TRS providers shall retain the data required to be submitted by this section, and all other call detail records, other records that support their claims for payment from the TRS Fund, and records used to substantiate the costs and expense data submitted in the annual relay service data request form, in an electronic format that is easily retrievable, for a minimum of five years

BIS Demonstration of Compliance: BIS affirmatively acknowledges its obligation to, and affirms that it will, retain the data required to be submitted by this section, and to retain all other call detail records, as well as other records that support its claims for payment from the TRS Fund, and all records used to substantiate the costs and expense data submitted in the annual relay service data request form, in an electronic format that is easily retrievable, for a minimum of five years.

d. information filed with the administrator. (47 C.F.R. 64.604(c)(5)(iii)(I))³⁶

³⁶ Sections 64.604(c)(5)(iii)(D)(Reserved), 64.604(c)(5)(iii)(E), *Payments to TRS providers*, 64.604(c)(5)(iii)(F), *TRS providers eligible for receiving payments from the TRS Fund*, 64.604(c)(5)(iii)(G) *Notification the Fund Administrator of intent to participate in the Fund*, 64.604(c)(5)(iii)(H) *Administrator reporting, monitoring, and filing requirements*, 64.604(c)(5)(iii)(J)

BIS Demonstration of Compliance:

BIS affirmatively acknowledges

the obligation of its Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO"), or other senior executive to, in each instance, certify, under penalty of perjury, that the minutes for which Fund compensation is requested by BIS are in compliance with section 225 and all applicable Commission rules and orders, and are not the result of impermissible financial incentives or payments to generate calls. The CEO, CFO, or other senior executive will certify under penalty of perjury to the TRS Fund administrator that such information is true and correct.

- e. **Procedures for the suspension/withholding of payment.** (47 C.F.R. 64.604(c)(5)(iii)(L))

Standard (1): The Fund administrator will continue the current practice of reviewing monthly requests for compensation of TRS minutes of use within two months after they are filed with the Fund administrator.

Standard (2): If the Fund administrator in consultation with the Commission, or the Commission on its own accord, determines that payments for certain minutes should be withheld, a TRS provider will be notified within two months from the date for the request for compensation was filed, as to why its claim for compensation has been withheld in whole or in part. TRS providers then will be

The administrator's performance and this plan shall be reviewed by the Commission after two years, and 64.604(c)(5)(iii)(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules, require no response, and are acknowledged by Applicant.

given two additional months from the date of notification to provide additional justification for payment of such minutes of use. Such justification should be sufficiently detailed to provide the Fund administrator and the Commission the information needed to evaluate whether the minutes of use in dispute are compensable. If a TRS provider does not respond, or does not respond with sufficiently detailed information within two months after notification that payment for minutes of use is being withheld, payment for the minutes of use in dispute will be denied permanently.

Standard (3): If, the VRS provider submits additional justification for payment of the minutes of use in dispute within two months after being notified that its initial justification was insufficient, the Fund administrator or the Commission will review such additional justification documentation, and may ask further questions or conduct further investigation to evaluate whether to pay the TRS provider for the minutes of use in dispute, within eight months after submission of such additional justification.

Standard (4): If the provider meets its burden to establish that the minutes in question are compensable under the Commission's rules, the Fund administrator will compensate the provider for such minutes of use. Any payment by the Commission will not preclude any future action by either the Commission or the U.S. Department of Justice to recover past payments (regardless of whether the payment was the subject of withholding) if it is determined at any time that such

payment was for minutes billed to the Commission in violation of the Commission's rules or any other civil or criminal law.

Standard (5): If the Commission determines that the provider has not met its burden to demonstrate that the minutes of use in dispute are compensable under the Commission's rules, payment will be permanently denied. The Fund administrator or the Commission will notify the provider of this decision within one year of the initial request for payment.

BIS Demonstration of Compliance: BIS affirmatively acknowledges, and commits hereby to comply with the above and all subsequently promulgated procedures and standards regarding the suspension and/or withholding of payment under Rules of the Commission, as amended.

f. Whistleblower protections. (47 C.F.R. 64.604(c)(5)(iii)(M))

Standard: Providers shall not take any reprisal in the form of a personnel action against any current or former employee or contractor who discloses to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity, any information that the reporting person reasonably believes evidences known or suspected violations of the Communications Act or TRS regulations, or any other activity that the reporting person reasonably believes constitutes waste, fraud, or abuse, or that otherwise could result in the improper billing of minutes of use to the TRS Fund and discloses that information to a designated manager of the provider, the Commission, the TRS Fund administrator

or to any federal or state law enforcement entity. Providers shall provide an accurate and complete description of these TRS whistleblower protections, including the right to notify the FCC's Office of Inspector General or its Enforcement Bureau, to all employees and contractors, in writing. Providers that already disseminate their internal business policies to its employees in writing (e.g. in employee handbooks, policies and procedures manuals, or bulletin board postings - either online or in hard copy) must include an accurate and complete description of these TRS whistleblower protections in those written materials.

BIS Demonstration of Compliance: BIS affirmatively acknowledges its obligations under, and agrees to comply with the spirit and the letter of the Whistleblower protections promulgated under the amended Commission rules. BIS further commits that it shall not take any reprisal in the form of a personnel action, or in any other form, against any current or former employee or contractor who discloses to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity, any information that the reporting person reasonably believes evidences known or suspected violations of the Communications Act or TRS regulations, or any other activity that the reporting person reasonably believes constitutes waste, fraud, or abuse, or that otherwise could result in the improper billing of minutes of use to the TRS Fund and discloses that information to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity.

BIS commits to provide an accurate and complete description of the above whistleblower protections, including the right to notify the FCC's Office of the Inspector General or its Enforcement Bureau of any suspect activity, to all employees and contractors,

in writing.

To such end, BIS commits to provide all employees and contractors with the following information, either in the Company's Employee Handbook, or under separate cover: A copy of the Company's Employee Handbook, as well as certain training materials, is attached hereto under seal as confidential **EXHIBIT H**.

BIS Whistleblower Policy:

BIS will not at any time advance any reprisal, discrimination, or punitive action against any current or former employee or contractor who discloses to BIS management or owners, a violation of this Code of Ethics or discloses conduct that is reasonably believed to result in waste, fraud, or abuse or otherwise may result in the improper submission of minutes for reimbursement to the TRS Fund Administrator. Further, this Whistleblower Policy extends these same employment protections to those who report allegations of violations to law enforcement or regulators in regard to those policies, procedures, rules, laws, and orders implemented by local, state, the Federal Communications Commission, the FCC's Office of Inspector General or its Enforcement Bureau or other federal authorities. Current or former employees and contractors have the ability to make disclosures either anonymously or by identifying themselves to Company management or to local, state, or federal authorities. All reports will be handled confidentially in the effort to completely investigate accusations of wrongdoing.

g. Additional Obligations. (47 C.F.R. 64.604(c)(5)(iii)(N))

1. Eligibility for reimbursement from the TRS Fund.

Standard (i): Only an eligible VRS provider, as defined in subsection (c)(5)(iii)(F), may hold itself out to the general public as providing VRS.

BIS Demonstration of Compliance: The Company commits to comply fully with the above, and applies herein to become such an eligible provider.

Standard (ii): VRS service must be offered under the name by which the eligible VRS provider offering such service became certified and in a manner that clearly identifies that provider of the service. Where a TRS provider also utilizes sub-brands to identify its VRS, each sub-brand must clearly identify the eligible VRS provider. Providers must route all VRS calls through a single URL address used for each name or sub-brand used.

BIS Demonstration of Compliance: BIS affirmatively acknowledges and shall comply with its obligation hereunder to identify itself to the public as the Fund eligible certified entity, which in this case is BIS Relay, LLC.

As of the date first written above, BIS has ceased to provide interpreting services for any third parties, or to utilize or provide any

interpreting services, except that the Company continues to utilize its affiliate SkyVRS brand for its Spanish language specific interpreting.³⁷

The Company may, with the Commissions consent and prior notice utilize multiple URL accesses to address BIS branded services for specific language/skill needs such as, for example, DB.BISVRS.COM for Deaf/blind/low vision consumers.

When BIS branded services or sub- brands are to be used, BIS will comply with its obligations to clearly identify each skill or language specific a sub-brand as a sub-brand of "BIS Relay, LLC" the certificated entity, to ensure that the public recognizes "BIS Relay, LLC" as the certified provider. Further, BIS has created a single URL address for each sub-brand used.

Current BIS URLs are included in confidential **EXHIBIT G**, submitted under seal.

Standard (iii): An eligible VRS provider may not contract with or otherwise authorize any third party to provide interpretation services or call center functions (including call distribution, call routing, call setup, mapping, call features, billing, and registration) on its behalf, unless that authorized third party also is an eligible provider.

BIS Demonstration of Compliance: Since each of their inception, at present, and until grant of this Application, it has

³⁷Only so far as may be done so in compliance with . (47 C.F.R. 64.604(c)(5)(iii)(N)

been necessary for BIS and its predecessors to bill for reimbursement by working under the aegis of a certified provider. While it remains unclear if such practice remains permissible, BIS commits to remain compliant at all times, and if necessary shall absorb any unreimbursable costs it may incur until the grant of its certification hereunder or until such time as an applicable waiver or similar action is promulgated. BIS does not now, nor will it, contract with or otherwise authorize any third party that is not an eligible provider or ineligible provider to provide interpretation services or call center functions (including call distribution, call routing, call setup, mapping, call features, billing, and registration) on its behalf.

Standard (iv): To the extent that an eligible VRS provider contracts with or otherwise authorizes a third party to provide any other services or functions related to the provision of VRS other than interpretation services or call center functions, that third party must not hold itself out as a provider of VRS, and must clearly identify the eligible VRS provider to the public. To the extent an eligible VRS provider contracts with or authorizes a third party to provide any services or functions related to marketing or outreach, and such services utilize VRS, those VRS minutes are not compensable on a per minute basis from the TRS fund.

BIS Demonstration of Compliance: Except as follows, BIS does not contract for any services or functions related to the provision of

VRS, as may be verified by the Commission through a review of the entirety of BIS' contracts. SKYVRS, an affiliate of BIS which BIS utilizes for the provision of Spanish language interpreting, at all times after BIS is granted certification shall clearly identify BIS as the eligible VRS provider to the public, so long SKYVRS does not possess its own certification.

To the extent, when eligible BIS, currently at any point in the future contracts with or authorizes a third party to provide any services or functions related to marketing or outreach, and such services utilize VRS, BIS acknowledges that such VRS minutes are and shall not be compensable on a per minute basis from the TRS fund, and commits to not submit any such minutes for reimbursement.

Standard (v): All third-party contracts or agreements entered into by an eligible provider must be in writing. Copies of such agreements shall be made available to the Commission and to the TRS Fund administrator upon request.

BIS Demonstration of Compliance: BIS acknowledges its obligation under this standard. It is BIS' standard practice to enter into all third party agreements in writing, BIS is and at all times shall remain prepared to provide all such contracts or agreements to the Commission or its designated auditor upon request

2. ***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.

BIS Demonstration of Compliance: BIS affirmatively acknowledges its responsibility to, and commits that it shall, make semi-annual call center reports to the Commission and Fund Administrator on or before April 1 and October 1 of each year, or at such other time as the Commission and Fund Administrator may require.

3. ***Compensation of CAs.*** VRS providers may not compensate, give a preferential work schedule or otherwise benefit a CA in any manner that is based upon the number of VRS minutes or calls that the CA relays, either individually or as part of a group.

BIS Demonstration of Compliance: BIS has never in the past, nor does it now, compensate, give a preferential work schedule or otherwise offer any benefit to any CA in any manner that is based upon the number,

volume or length of VRS minutes or calls that the CA relays, either individually or as part of a group. BIS agrees and acknowledges that any such practice would be improper, and shall not engage in any such or any similar practice at any time in the future.

4. ***Remote training session calls.*** VRS calls to a remote training session or a comparable activity will not be compensable from the TRS Fund when the provider submitting minutes for such a call has been involved, in any manner, with such a training session. Such prohibited involvement includes training programs or comparable activities in which the provider or any affiliate or related party thereto, including but not limited to its subcontractors, partners, employees or sponsoring organizations or entities, has any role in arranging, scheduling, sponsoring, hosting, conducting or promoting such programs or activities.

BIS Demonstration of Compliance: BIS affirmatively acknowledges that no BIS employee VRS calls of any kind, including those involving remote training session or a similar or comparable activity, are compensable, and commits that such calls shall not be submitted for reimbursement from the TRS Fund. BIS further affirms that neither it nor its predecessors have at any time in the past sought Fund compensation for such calls, nor shall they.

IV. COMPLIANCE WITH CERTAIN WAIVED MANDATORY MINIMUM
STANDARDS FOR THE PROVISION OF FEDERALLY-FUNDED VRS (47

C.F.R. § 64.606(a)(2)(ii))³⁸

BIS continues to, and shall continue to, comply with the majority of those MMS that have been waived for VRS subscribers, as follows:

a. *One-line VCO, and VCO-to-VCO.*

BIS Demonstration of Compliance: BIS has complied with the *One-line VCO, and VCO-to-VCO* requirement since its inception, as have its predecessors. BIS has the capability of providing VRS for all call types, including *One-line VCO, and VCO-to-VCO* calls.

b. *One-line HCO, and HCO-to-HCO*

BIS Demonstration of Compliance: BIS has complied with the *One-line HCO, and HCO-to-HCO* requirements since their inception, as have its predecessors.

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

BIS Demonstration of Compliance: BIS has complied with the Call Release requirement since its inception, as have its predecessors. Although BIS maintains this capability through call bridging, it has never had to process a TTY- to-

³⁸ See 2011 VRS Waiver Extension Order.

TTY call.

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

BIS Demonstration of Compliance: BIS has processed no such calls, but has the capability to do so in the event such calls are placed in the future.

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

BIS Demonstration of Compliance: BIS maintains procedures that enable use of operator assisted calling through the caller's preferred carrier or BIS' default presubscribed carrier's operator services, and the ability to pass along caller credit card information for purposes of billing pay-per-call calls. Since its inception, BIS has not billed callers for long distance services, consistent with Equal Access obligations.

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

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

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

BIS Demonstration of Compliance: As is the case with TTY-to-TTY calls, BIS maintains the technical capability to process such calls, though in BIS' experience, demand for such calls minimal.

V. ADDITIONAL COMPLIANCE REQUIREMENTS

In addition to the foregoing, BIS affirmatively acknowledges, and affirms that it shall at all times will comply with, all applicable regulations associated with the provision of VRS including but not limited to, Sections 64.611 - Internet-based TRS registration, and 64.613 - Numbering directory for Internet-Based TRS users, as amended, as well as all applicable Commission orders and policies, as they may be amended from time to time.³⁹

³⁹ Regarding newly promulgated Section 64.611(f) (redesignated from Section 64.611(e)), BIS has not ever assigned a toll free number to any subscriber. However, BIS Customer Support does accommodate subscribers in directing them on how to obtain toll free numbers for themselves as well as being prepared to associate those numbers for use with BIS VRS. Pursuant to Section 64.613, BIS assigns geographically appropriate North American Numbering Plan numbers to subscribers in accordance with the ten-digit numbering requirements. *See, e.g. In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, 911 Requirements for IP-Enabled Service Providers, Internet-Based Telecommunications Relay Service Numbering et al.*, CG Docket No. 03-123, WC Docket Nos. 05-196 and 10-191, *Report and Order*, FCC11-123 (Aug. 4, 2011).

VI. PUBLIC INTEREST SHOWING

BIS maintains that the grant of the Application contained herein is most strongly in the public interest.

As a VRS provider with substantial Deaf ownership, as well as extensive experience borne of working with a number of certified and non-certified providers in the past on a company and individual level, BIS has a unique and deep knowledge of the needs of the Deaf and Hard of Hearing communities, to whose benefit the TRS program is primarily intended. Granting BIS' certification and thereby promoting the growth of Deaf ownership within the VRS industry will not only serve to invest responsibility for and the benefits of VRS certification within the community that VRS is intended to serve, but will also serve to better the provision of VRS as a whole, by all providers, by ensuring the continued existence of and service to the Deaf and Hard of Hearing community by a VRS provider that fundamentally understands such community's needs in a manner that a provider lacking Deaf ownership simply cannot.

BIS' certification will provide the public generally, and the Deaf and Hard of Hearing communities specifically, with not just another provider, but a provider with a unique and vital perspective on and responsibility to the community that VRS is intended to serve. Conversely, failure to certify BIS in a timely manner is essentially the same as commanding BIS to close its doors, and BIS maintains that shuttering one of a very few VRS providers with substantial Deaf ownership is profoundly in opposition to the public interest, not only in the form of the lost jobs and investment that such an event would represent, but also in the statement that such an event would make to the community that VRS is intended to serve. Deaf ownership of a VRS provider is fundamentally in the interest of the health of the TRS industry as a whole, as it provides a

mechanism for the needs of the consumers to be directly expressed in the policies of a provider, BIS.

Furthermore, BIS has developed an in-depth Technology Roadmap, a summary of which is attached hereto under seal as Confidential **EXHIBIT I**. BIS understands the need for intelligent and efficient technology planning and development so as to ensure the future vitality and utility of the VRS industry and TRS as a whole, and as such this aggressive plan of development encompasses both short-term and long-term goals for ever improving technology solutions. From the offset, these in-development and to-be-developed technologies and applications will benefit from and grow out of the BIS Platform, which is to date one of the most robust and flexible in the industry. This, coupled with the extremely close relationship BIS' management has the platform manufacturer, plus the extraordinary background the BIS team has in the telecom and technology fields, will allow BIS to quickly and seamlessly work toward accomplishing its planned technology goals, as well as to meet any technological hurdles or developments that may face it or the VRS industry as a whole in the future.

The sort of proactive technology planning the BIS Technology Roadmap represents is essential to making the best possible technology investment decisions, and therefore the best use of funds that may originate in the TRS Fund, by identifying critical technologies and technology gaps and identifying the best ways to leverage R&D investments so as to achieve the goal of ever improving consumer ease of access, and therefore ever greater functional equivalency. By taking into account evolving technologies and consumer desires, BIS' Technology Roadmap is designed to keep BIS ahead of the game while maximizing dollars invested in development.

With the primary goal of ensuring that all development is focused improving the quality of communications for the Deaf and Hard of Hearing, the BIS Roadmap is representative of the sort of

provider BIS is and shall be as when certified. It is most definitely in the public interest to advance technological development while maximizing investment, as doing so represents one of the best possible uses of the TRS Fund, and at all times is in the service of the goal of functional equivalency. BIS believes that current communication offerings for the Deaf and Hard Of Hearing are adequate, but still are not at the same level and quality as that offered by the telecom industry to the general hearing public. Therefore, supporting the sort of development that BIS' technology goals represents is clearly in the interest of the public, as well as representative of the purposes for which the TRS fund was established and is maintained.

VII. CONCLUSION

BIS demonstrates by the instant Application, the Exhibits, and the statements made herein by the Company's Chief Executive Officer, under penalty of perjury, that it meets or exceeds the Commission's MMS, has met each of the Commission's certification requirements, as amended, and is otherwise in compliance with Commission orders and policies governing the provision of video relay services as a federal Telecommunications Relay Service Fund eligible certificated provider. BIS has, by way of its predecessors' multiple applications for certification under the then current rules, demonstrated an ongoing commitment to compliance, to which it adds the vital component of Deaf ownership. It has also made a commitment to not only its own excellence, but to the excellence of the TRS industry as a whole as well.

Accordingly, BIS hereby respectfully requests that the Commission grant it certification as a Telecommunications Relay Service provider eligible for reimbursement from the TRS Fund. BIS further requests that it be granted certification as a Telecommunications Relay Service Fund reimbursement eligible provider, or such provisional certification as may allow it to continue to operate and to seek compensation while this Application is reviewed by the Commission, on or before October 1, 2011, so as to ensure that it may continue to serve its subscribers and the community as a whole uninterrupted.

A Verification attesting to the truth, accuracy, and completeness of this Application under penalty of perjury, is attached.

[Signature Page Follows]

Respectfully submitted this 26th day of September, 2011

A handwritten signature in cursive script, reading "David S. Birnbaum", written over a horizontal line.

David S. Birnbaum

President

A handwritten signature in cursive script, reading "Wesley N. Waite, Sr.", written over a horizontal line.

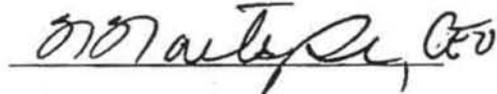
Wesley N. Waite, Sr.

CEO

STATE OF TEXAS)
) ss.
COUNTY OF KENDALL)

VERIFICATION

I swear under penalty of perjury that I am Wesley N. Waite, Sr, Chief Executive Officer BIS Relay, Inc., an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

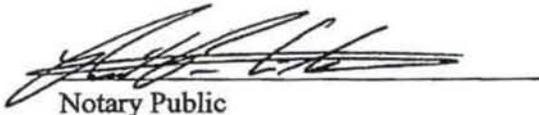


Wesley N. Waite, Sr.

CEO

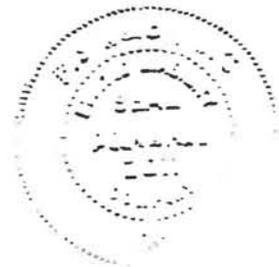
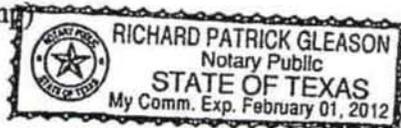
Subscribed and sworn to or affirmed before

me this 26th day of September, 2011.



Notary Public

(Affix seal or stamp)



**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

BIS RELAY LLC

LISTING OF EXHIBITS

EXHIBIT	Content
A	CONFIDENTIAL A copy of each lease for each call center operated by BIS (REDACTED)
B	CONFIDENTIAL A description of the technology and equipment used to support call center functions (REDACTED)
C	CONFIDENTIAL 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 is attached as confidential (REDACTED)
D	Statement that BIS will file annual compliance reports demonstrating continued compliance with Commission rules.

E CONFIDENTIAL Corporate Ownership and Call
Center Employment Documents **(REDACTED)**

F CONFIDENTIAL Emergency Call Procedures
(REDACTED)

G CONFIDENTIAL BIS Relay, LLC URLs
(REDACTED)

H CONFIDENTIAL BIS Relay, LLC Company
Handbook and Training Materials **(REDACTED)**

I CONFIDENTIAL BIS Relay, LLC Technology
Roadmap Summary **(REDACTED)**