

**FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
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Structure and Practices of the Video Relay Service) CG Docket No. 10-51
Program)
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Application for VRS Certification Renewal)
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TO: Chief, Consumer and Governmental Affairs Bureau
Internet-Based TRS Certification Program

**APPLICATION OF SNAP TELECOMMUNICATIONS, INC. FOR CERTIFICATION
RENEWAL AS AN INTERNET-BASED VIDEO RELAY SERVICE PROVIDER**

Snap Telecommunications, Inc.
2 Blue Hill Plaza, 3rd Floor
Pearl River, NY 10965

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Snap Telecommunications, Inc. (d/b/a “Snap!VRS”) hereby submits its application to the Federal Communications Commission (“Commission”) for certificate renewal as a Internet-based Video Relay Services (“VRS”) provider eligible to receive cost reimbursement from the Interstate Telecommunications Relay Service Fund (“TRS Fund”) pursuant to the Commission’s rules.¹

As evidenced in this application, Snap!VRS as a Commission-certified provider, demonstrates that it has and continues to meet or exceed the Commission’s non-waived mandatory minimum standards (“MMS”) and that it possesses the management experience, technical capabilities and human resources for the continued provision of high quality VRS services that benefit the public interest.

I. INTRODUCTION

Snap Telecommunications, Inc. (“Snap!VRS”) is a wholly-owned subsidiary of Aequus Technologies Corporation (“Aequus”), a privately-held company founded in 2001 that remains committed to removing barriers and enabling access for individuals with disabilities. [REDACTED]

[REDACTED]

Snap!VRS is a competitive local exchange carrier (“CLEC”), certified by the South Carolina Public Service Commission in 2005 for the authority to operate as a common carrier and provide local exchange

¹ 47 C.F.R. §64.606.

and intrastate long distance services.² Snap!VRS notes that the Commission, in its most recent *Certification Order*, no longer requires common carrier status for those applying to become an eligible TRS provider.³ Even so, Snap!VRS will maintain said status as such remains a beneficial asset.

Snap!VRS received initial Commission certification in May 2006 for the provision of Video Relay Services (“VRS”).⁴ Snap!VRS began providing VRS in January 2007. At the time Snap!VRS began serving deaf and hard of hearing consumers, it was the first VRS provider to offer a SIP/H.323-based compatible videophone and call center platform with the use of its proprietary Ojo customer premises equipment (“CPE”). This offering marked the beginning of a new era in the VRS industry and also demonstrated the commitment of Snap!VRS in continually investing in its technology and supporting infrastructure to promote a growing and ever-varying range of endpoints and call traffic.

Last spring, Snap!VRS filed *pro forma* its application for certification renewal as a VRS provider eligible for reimbursement from the TRS Fund.⁵ The Commission subsequently issued final rules updating certification application requirements for Internet-based TRS providers, subject to Office of Management and Budget (“OMB”) approval of information collection requirements under the Paperwork Reduction Act.⁶ Given pending OMB approval, Snap!VRS filed a notice informing the Commission of its intent to apply for certification renewal as an Internet-based TRS provider.⁷ The Federal Register has

² *Application of USA Video Relay, Inc. to the Public Service Commission of South Carolina for a Certificate of Public Convenience and Necessity to Provide Video Relay Service under Title IV of the Americans with Disabilities Act*, Order Approving Name Change (to Snap Telecommunications, Inc.), Docket No. 2004-320-C, Order No. 2006-434, (July 26, 2006).

³ *Structure and Practices of the Video Relay Service Program*, Second Report and Order (*iTRS Certification Order*), CG Docket No. 10-51, page 7, (released July 28, 2011).

⁴ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Notice of Certification of Snap Telecommunications, Inc. as a Provider of Video Relay Service (VRS) Eligible for Compensation From the Interstate Telecommunications Relay Service (TRS) Fund, CG Docket No. 03-123 (May 8, 2006).

⁵ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Application of Snap Telecommunications, Inc. for Certification Renewal, CG Docket 03-123 (February 7, 2011).

⁶ See generally *iTRS Certification Order*.

⁷ *Structure and Practices of the Video Relay Service Program*, Notice of Snap Telecommunications, Inc. Intent to Apply for Certification Renewal, CG Docket No. 10-51 (October 4, 2011).

since published the Commission's announcement of OMB approval of certification-related information collection requirements.⁸

Snap!VRS remains committed today to the delivery of VRS with focus on high quality certified professional interpreters, robust technological infrastructure, regulatory integrity and customer service excellence. Snap!VRS is proud to be respected by the Commission, the industry and relay consumers alike for providing ethical, high quality VRS services with attention to the Commission's focus on elimination of fraud, waste and abuse. Of key importance to Snap!VRS has been consistent vigilance in compliance with the Commission's rules and TRS Fund administrator requirements, genuine respect for the Commission's obligation to efficiently manage the TRS Fund with attention to elimination of waste, fraud and abuse, and record of engaging in proactive dialogue with the Commission and the TRS Fund administrator on pertinent issues as these arise.

This application demonstrates the eligibility and fitness of Snap!VRS for certification renewal by the Commission as an Internet-based TRS provider eligible to receive cost reimbursement from the TRS Fund. The requisite Snap!VRS information detail and documentation is provided herein for each of the specific areas that the Commission requires of all applicants seeking Internet-based TRS certification.

II. COMPLIANCE WITH INTERNET-BASED TRS PROVIDER AND TRS PROGRAM CERTIFICATION REQUIREMENTS

A. A description of the forms of Internet-based TRS to be provided

Internet-based TRS is defined as "a telecommunications relay service ("TRS") in which an individual with a hearing or a speech disability connects to a TRS communications assistant using an Internet Protocol-enabled device via the Internet, rather than the public switched telephone network ("PSTN"). Internet-based TRS does not include the use of a text telephone ("TTY") over an interconnected voice over Internet Protocol service ("VOIP")."⁹

⁸ *Structure and Practices of the Video Relay Service Program*, Interim Rule; Announcement of Effective Date, 76 Fed. Reg. 68116-68117 (November 3, 2011).

⁹ 47 C.F.R. §64.601(a)(11).

Video Relay Service (“VRS”) is defined as “a telecommunications relay service that allows people with hearing or speech disabilities who use sign language to communicate with voice telephone users through video equipment. The video link allows the communications assistant to view and interpret the party’s signed conversation and relay the conversation back and forth with a voice caller.”¹⁰

In accordance with the above definitions, Snap!VRS submits this application for Commission certification renewal as an Internet-based VRS provider eligible to receive cost reimbursement from the Interstate TRS Fund.¹¹

- 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...**

A full description of how Snap!VRS meets or exceeds all non-waived mandatory minimum standards are provided hereunder, and in greater detail within **Section III**, below.¹²

Snap!VRS has retained the services of experienced regulatory and compliance personnel to ensure ongoing adherence to Commission rules, including but not limited to reporting, operational, functional and technical requirements (see declaration statement of Snap!VRS, attached as **Exhibit A**).

- 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.**

Snap!VRS operates [REDACTED] call centers within the United States,¹³ as follows: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁰ 47 C.F.R. §64.601(a)(26).

¹¹ 47 C.F.R. §64.606(a)(2)(i).

¹² 47 C.F.R. §64.604, §64.605, §64.611 and §64.613.

¹³ 47 C.F.R. §64.606(a)(2)(ii)(A)(1).

[REDACTED]

[REDACTED]

Copies of lease documentation for each of the three call centers operated by Snap!VRS are attached as **Exhibit B**.

- 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 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).**

Inapplicable. Snap!VRS operates less than five call centers,¹⁴ all located within the geographical boundaries of the United States.

- 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.**

Inapplicable. Snap!VRS call centers are located within the geographical boundaries of the United States.¹⁵

- 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 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).**

This section has several sub-sections, each of which describes technology and equipment used to support call center functions,¹⁶ as follows:

Centralized Data Center and Networked Call Centers

Snap!VRS has a lease agreement with [REDACTED], a SAS70 Type II audited data center located in the globally recognized [REDACTED] [REDACTED] to serve as the central base for Snap!VRS telecommunications and data warehouse (storage) systems. [REDACTED], with its access to multiple

¹⁴ 47 C.F.R. §64.606(a)(2)(ii)(A)(2).

¹⁵ 47 C.F.R. §64.606(a)(2)(ii)(A)(3).

¹⁶ 47 C.F.R. §64.606(a)(2)(ii)(A)(4).

Internet backbones, provides advanced Information Technology (“IT”) and network infrastructure solutions configured to Snap!VRS performance and network requirements.

In addition to a physical presence of over [REDACTED] fiber providers and cross connections to over 100 carriers through [REDACTED], power redundancy for the Snap!VRS data center is ensured for the most demanding applications, with independent energy substation feeders and six in-building main switchgear rooms that also allow for environmental controls. Within this structure, Snap!VRS built its data center environment to include multiple network and equipment redundancy with a high-available enterprise class server for the phone switch and an on-site, hot (continuously running, capable of automatic switch to) back-up server for both the phone switch and automatic call distributor (“ACD”, described below) infrastructure in the event of a catastrophic equipment failure.

The Snap!VRS data center includes NEBS Level 3 features and support:

- 24 hour/7 days a week onsite staffing of Network Operations Center
- Secure entrance with check-in station and man-trap
- Pre-approved control access list with ID check-in
- Redundant power via UPS, ATS and diesel generator backup
- Cooling and humidity control via redundant, multi-zone HVAC
- Abundant chilled water capacity at 2(N) redundancy
- Pre-action dry pipe fire detection and chemical fire suppression
- High-performance mesh of redundant, multi-homed Tier-1 backbone carriers
- Cross-connection to all major carriers
- Multiple fiber entrance facilities
- One (1) Mb to 10 Gig E fiber support

Specifically, NEBS Level 3 involves strict specifications for fire suppression, thermal margin testing, vibration resistance (earthquakes), airflow patterns, acoustic limits, failover and partial

operational requirements (such as chassis fan failures), failure severity levels, radio frequency emissions and tolerances, and testing/certification requirements.

[REDACTED] provides Snap!VRS with comprehensive support that includes a 24/7 on-site network operations center. That is, Snap!VRS has the ability to view and control operations remotely, with access to onsite engineers and technical support staff as needed. Further, Snap!VRS has secure access to [REDACTED] portal that provides the ability to monitor network bandwidth and view real-time usage reports [to ensure maximum operational effectiveness]. Snap!VRS employs continuous quality assurance testing and software integration analysis to prevent unplanned internal and external service outages.

Network providers for each of the [REDACTED] Snap!VRS call centers are linked to the [REDACTED] data center both for redundancy and infrastructure management purposes.

Network, Provisioning and Related Agreements

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As illustrated in the Snap!VRS network diagram attached as **Exhibit C**, the data center and interconnected call centers are outfitted with the requisite technologies and equipment for the successful provision of VRS operations.

Specifically, Snap!VRS owns all equipment associated with centralized data center and interconnected call centers (routers, switches and servers), including Communication Assistant (“CA”) workstations and other workstations used by Customer Service and Technical Support personnel, CA managers and supervisors, and non-call center personnel involved with TRS operations.

Automatic Call Distribution and Workstation Systems

Snap!VRS uses a sophisticated Automatic Call Distribution (“ACD”) system under licensing agreement [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] installed on redundant server hardware/operating

systems owned by Snap!VRS. The Snap!VRS ACD infrastructure is housed in its data center in [REDACTED]

[REDACTED], which includes a secondary ACD for back up purposes, and a third ACD for quality assurance,

features development and diagnostics. Snap!VRS licenses [REDACTED]

[REDACTED] software, which is installed on standalone PC-based workstations owned by Snap!VRS and

used by Communication Agents (“CAs”) at the [REDACTED] aforementioned call centers [REDACTED]

[REDACTED] The [REDACTED] software on each workstation is integrated with the Snap!VRS ACD

infrastructure and provides a variety of call processing features.

Snap!VRS provides first-line support through oversight by its Vice President of Technical Services (delineated on pages 12-13). The Snap!VRS license agreement with [REDACTED] includes a maintenance and service agreement for technical support as needed. The contractual response time from [REDACTED] for any service affecting issue is no more than two hours. Calling services, service monitoring and access to web based support services are provided on a 24/7 basis. Snap!VRS also has access to additional [REDACTED] support as needed for desired enhancements, including upgrades to its standard features.

The Snap!VRS ACD is widely compatible with most industry standard video and audio devices, employing voice, video and [REDACTED] as its core communications protocols. Optimally designed

for the VRS environment, the ACD supports industry standard SIP protocol allowing communication with an extensive range of videophones, set-top boxes, soft phones and SIP telephone handsets. Further, the ACD includes an H.323 gateway option to ensure compatibility with legacy video communications equipment, making it capable of transcoding between multiple standards.

Call Routing and Call Handling Features

Call traffic to the ACD is routed through a single uniform resource locator (“URL”), which is labeled “call.snapvrs.com”. This URL can be accessed by other VRS providers’ videophones to reach the Snap!VRS ACD. For each customer choosing Snap!VRS as their preferred provider, Snap!VRS publishes a ten-digit telephone number (“TDN”) in the TRS database. Such TDNs allow customers to dial videophone users for point to point calls or to be connected to Snap!VRS for video relay calls.

The Snap!VRS ACD, with its flexible inbound routing architecture, has standard as well as customized call handling features, as follows:

- Call routing and queuing,
- Interactive voice and video response
- Skills-based routing
- Geo-location-based routing
- Priority queuing for emergency calls
- Real time status on communications agents (“CAs”) online
- Calls in queue
- Average speed of answer (“ASA”) from the last 15 minutes to the last 30 days
- Calls abandoned
- Call duration, hold time, service level and performance
- Call monitoring and intervention
- Call reporting

The management portion of the Snap!VRS ACD includes modules for [REDACTED]

[REDACTED]. Technical specifications for the ACD are delineated in **Exhibit D**.

[REDACTED] software installed on individual Snap!VRS CA workstations is optimized specifically for video relay purposes by providing increased video frame rates that enable the use of sign language. In addition to high quality video, audio and [REDACTED], call handling features of the [REDACTED] include:

- CA login, including to multiple queues
- Call hold
- Call type reports
- CA call transfer

The [REDACTED] also transmits technical statistics for each call and stores this information on the primary ACD in a secure manner that enables detailed analysis and billing (see “Billing Processes” section below). Technical specifications for the [REDACTED] are delineated in **Exhibit D**.

The Snap!VRS Information Technology (“IT”) department manages the above infrastructure on a 24/7 basis including an engineer whose primary responsibilities are focused on management of the ACD itself, including oversight of modules for [REDACTED].

Specifically, the Vice President of Technical Services, who reports to the Snap!VRS Chief Technology Officer (and the Snap!VRS Chief Executive Officer), handles ACD management with primary duties as follows:

Manage Corporate ACD Server Environment

- [REDACTED]
- [REDACTED]
- [REDACTED]

Design, Build and Maintain Corporate Billing System

- [REDACTED]

█ [REDACTED]

█ [REDACTED]

Design, Build and Maintain Corporate Data Warehouse

█ [REDACTED]

█ [REDACTED]

Design and Build Customer Facing and Internal Systems

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

[REDACTED]

█ [REDACTED]

Call Processes

The Snap!VRS ACD infrastructure facilitates call flow processing as depicted in the diagram attached as **Exhibit E**. Specific call handling processes, including the aforementioned call mapping functions, are described below.

Call Verification and Mapping

Regardless of what videophone equipment is used to originate a call into Snap!VRS, the caller's ten-digit number ("TDN") is first automatically verified by Snap!VRS to ensure that it is a valid, registered telephone number. This is accomplished by querying the iTRS database through an integrated module within the Snap!VRS ACD. If the TDN is not registered in the iTRS database, the call is then routed to Snap!VRS Customer Service to either assist the customer with TDN registration or to provide other assistance. Snap!VRS partners with [REDACTED] to provision TDNs to its customers. In so doing, Snap!VRS populates the iTRS database with the TDN for each registered customer. Once a caller's TDN is verified, the call is then routed to and queued on the primary ACD and then sent either to another videophone number for point-to-point calls, or to a Snap!VRS CA for processing of calls to voice-based

TDNs. (Further specifics are delineated under Emergency Call Processes on page 15-16 and Registration Processes on page 19-20).

Call Set Up and Call Types

This section describes briefly the manner in which Snap!VRS sets up all incoming videophone and voice calls that are routed through its ACD. As required by the Commission, Snap!VRS also supports the needs of videophone callers who express the desire to use either two-line voice carry over (“VCO”) or two-line hearing carry over (“HCO”) capabilities.

- *Voice Call to Videophone* -- Incoming voice calls are placed first through a voice server provider (“VSP”) and then routed to the Snap!VRS ACD. The call is queued and presented to a CA who makes an outbound call to the TDN requested by the inbound voice caller. The ACD sends a setup message through the Internet to the called videophone. When the videophone call recipient answers, the CA then facilitates dialogue between the voice and videophone parties.

- *Snap!VRS Videophone to Voice Call* – Registered customers using Snap!VRS hosted videophones make a call to a voice-based TDN. The Snap!VRS host system then receives and recognizes the Snap!VRS hosted videophone and routes the call to the Snap!VRS ACD. The incoming videophone call is queued and presented to a CA who places the requested outbound call to the voice-based TDN. When the voice call recipient answers, the CA then facilitates dialogue between the voice and videophone parties.

- *Non-Snap!VRS Videophone to Voice Call* – Customers registered with other providers and using their videophones may “dial-around” by using the Snap!VRS toll-free number. The incoming videophone call is received by the Snap!VRS ACD, queued and then presented to a CA who requests the TDN for the voice-based call and places the call to that TDN. When the voice call recipient answers, the CA then facilitates dialogue between the voice and videophone parties.

Emergency Call Processes

In accordance with 47 C.F.R. §64.605 as amended, Snap!VRS incoming emergency callers are immediately routed through the ACD to a designated phone queue which ensures that their call is prioritized as the next call answered by a CA. All CAs who are not already facilitating other VRS calls will both hear their phone ring and see a red “emergency” flashing alert message appear on their monitor. The first available CA then accepts the emergency 9-1-1 call. Upon connection, the CA immediately verifies that the call constitutes an emergency and obtains the caller’s name and registered information – that is, they confirm the caller’s automatic number identification (“ANI”) and automatic location identification (“ALI”) that appears on their monitor as registered Snap!VRS customers and maintained in the iTRS database. If ANI/ALI information does not automatically appear on the CA’s monitor, the CA obtains such information manually. The CA promptly connects the call [REDACTED] [REDACTED] to the nearest PSAP (designated statewide answering point or appropriate local emergency authority). Once connected to the PSAP, the CA verbally transmits their CA identification number, name of the relay provider, name of the VRS user and location of the emergency along with the VRS user’s call back number. If the selective router responds that no match is found in the iTRS database, the call is automatically routed to [REDACTED] emergency call center. The [REDACTED] agent (with the Snap!VRS CA who remains on the line) works with the VRS user to obtain updated location information and then the call is manually routed to the appropriate PSAP. The [REDACTED] agent remains on the line in conference until it has been established that the 9-1-1 caller and the Snap!VRS CA are connected to the correct PSAP. Should any in-progress emergency calls become disconnected, Snap!VRS ensures automatic priority queuing of all call backs to the VRS user’s ten-digit number for a period of 30 minutes following the VRS user’s initial 9-1-1 call.

[REDACTED]

[REDACTED] . [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Emergency call processes in flowchart format are attached as **Exhibit F**.

[REDACTED]

[REDACTED]

[REDACTED]

Given that the customer premises equipment (“CPE”) issued by Snap!VRS to registered customers are capable of being used from more than one location, Snap!VRS therefore provides registered users with one or more methods of updating their Registered Location. These options include either contacting the Snap!VRS Customer Service department via their Snap!VRS issued CPE or accessing their customer account through the Snap!VRS website. Either of these methods enable Snap!VRS users to update their Registered Location at will and in a timely manner.

Billing Processes

Preparing the Snap!VRS billing report and data feed to the TRS Fund administrator for each month-end remittance involves several processing steps:

- [REDACTED]

█ [REDACTED]

[REDACTED]

█ [REDACTED]

█ [REDACTED]

[REDACTED]

[REDACTED]

Billing Detail

[REDACTED]

█ [REDACTED]

█ [REDACTED]

[REDACTED]

Applicants wishing to receive a new TDN and who choose Snap!VRS as their default provider are required to provide their U.S. address, certify by signing their application as well as confirm directly via videophone with Snap!VRS Customer Service Representatives (“CSRs”) that they are qualified as a deaf or hard of hearing applicant and that their information is correct. CSRs are directed to accept one of three current items to verify an applicant’s physical residency: a) driver’s license, b) utility bill or c) bank statement. CSRs are expected to review and obtain acknowledgment that the TDN applicant understands Snap!VRS’ terms and conditions as well as the general limitations regarding access to 911 services when using VRS. CSRs do verify whether or not the applicant’s physical residence is E911 serviceable (if E911 is available or not in their geographic location) and advise applicants accordingly. CSRs also retain applicant records in the Snap!VRS internal database and, once approved, provisions the new TDN and the applicant’s current routing information to the iTRS database. Snap!VRS also advises TDN applicants on the importance of and how to make timely updates to their registered location for emergency purposes.¹⁹

Porting Processes

New customers who wish to port their existing ten-digit numbers (“TDNs”) to Snap!VRS as their default provider must complete and sign a Snap!VRS standard Letter of Agency (“LOA”) form which, authorizes ██████████, the numbering partner for Snap!VRS, to complete their TDN porting process.²⁰

Existing Snap!VRS customers who wish to port their existing TDN away from Snap!VRS to another VRS provider must likewise fill out and sign a standard LOA form with that provider, which authorizes their numbering partner to complete the TDN transfer process.

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.

Copies of proofs of purchase, lease or license agreements for technology and equipment used by Snap!VRS to support its call center functions are attached as **Exhibit J**.²¹

¹⁹ 47 C.F.R. §64.605(4).

²⁰ 47 C.F.R. §52.34.

²¹ 47 C.F.R. §64.606(a)(2)(ii)(A)(5).

6. 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)

Snap!VRS details herein its response to the foregoing request.²² [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The Board members of Aequus Technologies, the Snap!VRS parent company, are: Thomas W. Kielty, President and Chief Executive Officer; 2 Blue Hill Plaza, 3rd Floor, Pearl River, NY 10965; Barry Fingerhut, Wheatley Partners, 80 Cuttermill Road, Great Neck, NY 11021; Ronald M. Schreiber, SoftBank Capital, 50 Fountain Plaza, Buffalo, NY 14202; and John D. Kemp, Abilities!, 201 I.U. Willets Road, Albertson, NY 11507.

Corporate officers of Aequus Technologies are: Thomas W. Kielty, President and Chief Executive Officer and Aida Marranzini, Controller. The business address of both Aequus and Snap!VRS is 2 Blue Hill Plaza, 3rd Floor, Pearl River, NY 10965. The above officers of Aequus also hold the same positions at Snap!VRS. Senior management of Snap!VRS are: Nancy J. Bloch, Chief Regulatory Liaison and Advisor; Stephanie Buell, Chief Compliance Officer; Mark Goff, Chief Technology Officer; Keith Podgorny, Vice President of Information Services; Joseph Bartoloni, Vice President of Planning and Development; Fabio Campagna, Senior Director of Customer Operations; Meredith DeLeon, Director of Interpreter Operations; and Aida Marranzini, Controller.

²² 47 C.F.R. §64.606(a)(2)(ii)(B).

The functional organization structure of Snap!VRS is delineated in the attached **Exhibit K**.

7. **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.**

The quantity of full- and part-time employees of Snap!VRS involved in iTRS operations are delineated in the attached **Exhibit L**. Snap!VRS has a total workforce of [REDACTED] employees ([REDACTED] full-time and [REDACTED] part-time) and [REDACTED] contractual personnel ([REDACTED] full-time and [REDACTED] part-time).²³

8. **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.**

The names of full- and part-time employees of Snap!VRS involved in iTRS operations²⁴ are delineated in the attached **Exhibit L**. Snap!VRS affirmatively acknowledges its obligation to maintain copies of employment agreements and employment records for all personnel directly involved in iTRS operations, for the required minimum of five years from the date of this application. Snap!VRS also maintains copies of employment agreements not directly involved in iTRS operations. Documentation of such employment records shall be provided during on-site Commission visits, upon request.

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

Snap!VRS reviews sponsorship solicitations on a case by case basis, and does not have a practice of establishing recurring sponsorship agreements with any single entity.²⁵ Sponsorships, when granted, are tied largely to brand visibility, and often include opportunities to exhibit and/or give presentations that are focused on consumer education and outreach, similar to those in which Snap!VRS engages for non-sponsored events. Snap!VRS sponsored events (excluding non-sponsored events) over the past three years are listed in the attached **Exhibit M**.

²³ 47 C.F.R. §64.606(a)(2)(ii)(C).

²⁴ 47 C.F.R. §64.606(a)(2)(ii)(D).

²⁵ 47 C.F.R. §64.606(a)(2)(ii)(E).

10. A description of the provider's complaint procedures

Snap!VRS ensures compliance with complaint procedures and remedies in accordance with §64.606(b)(2)(ii) and non-waived mandatory minimum standards, and ensures that VRS users have access to informational materials on its complaint procedures, as described herein.²⁶

Specifically, Snap!VRS is committed to the availability of Customer Service Representatives (“CSRs”) to address questions, comments and complaints. On its website, Snap!VRS has links for “Support” and “Contact & Feedback”. The main page for “Support” offers frequently asked questions including those that deal with trouble shooting or technical support, with the opportunity to submit questions directly to Customer Service via an online form. The main page for “Contact & Feedback” provides toll-free customer service phone numbers, as well as email, fax and postal mail contact information. The main page for “Contact & Feedback” offers online forms to request information and/or provide feedback. Snap!VRS CSRs are trained and knowledgeable regarding the handling of customer requests in a timely manner.

Customer complaints are taken seriously at all levels; these are addressed promptly and corrected as expeditiously, courteously and thoroughly as possible. Complaints that involve broadband service providers are referred to the provider directly. Records are retained on all customer contacts including complaints. Additionally, Snap!VRS CAs report any and all VRS user complaints and/or compliments received on the production floor to an internal database, which are then forwarded to Customer Service for follow up. Snap!VRS call center Operations Managers as well as Customer Service Managers constantly monitor the database for any unresolved questions or issues, which are then either assigned to the appropriate Customer Service or Technical personnel, or followed up on by Customer Service Managers themselves. Such questions or issues are resolved within a timely manner.

██████████ is the contact management system licensed by Snap!VRS (from ██████████ ██████████, documentation for which is attached as **Exhibit J**). This integrated system is used by

²⁶ 47 C.F.R. §64.606(a)(2)(iii)

Snap!VRS Customer Service and Technical Support personnel to create and manage VRS customer incident records in a organized and time sensitive manner. [REDACTED] is also able to create incident records whenever customers inquire through the Snap!VRS web site or through the [REDACTED] application. Additionally, the [REDACTED] system includes a fully integrated "knowledge base" of common questions and problem resolutions available for customers on the Snap!VRS web site as well as internally by Snap!VRS Customer Service or Technical Support personnel who respond to customer issues.

Snap!VRS is committed to the requisite filing of annual complaint log summary reports demonstrating compliance with the Commission's rules, detailing the nature and the resolution of each complaint.²⁷ The 2011 annual complaint log summary report that Snap!VRS filed with the Commission is attached as **Exhibit G**; prior year filings are on the Commission's docket and readily available upon request. Snap!VRS also responds in a timely manner to informal and formal complaints that are filed with the Commission.

Snap!VRS regularly updates its information on the FCC TRS Providers webpage (www.fcc.gov/encyclopedia/trs-providers) designating contact specifics for appropriate individuals who handle VRS complaints, grievances, inquiries and suggestions, including the mailing address of its corporate headquarters, as follows:

Snap!VRS Telecommunications, Inc.
2 Blue Hill Plaza, 3rd Floor
PO Box 1626
Pearl River, NY 10965
www.snapvrs.com

Nancy Bloch, Chief Regulatory Liaison and Advisor
Email: nbloch@snapvrs.com
Voice/VP: 443-438-1321; Fax: 443-478-4293

Steph Buell, Chief Compliance Officer
Email: sbuell@snapvrs.com
Voice/VP: 604-852-8242; Fax: 877-619-3876

²⁷ 47 C.F.R. §64.606(a)(2)(iii).

11. A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

Snap!VRS is committed to the requisite filing of annual compliance reports and declaration statements to demonstrate its ongoing compliance with Commission rules governing the provision of VRS.^{28, 29} Further, Snap!VRS acknowledges that such reports shall provide updated documentation and a summary of updates, or certify that there are no changes to the information and documentation submitted with the application for certification, application for renewal of certification, or the most recent annual report, as applicable.

A copy of the 2011 annual compliance report and statement that Snap!VRS filed with the Commission is attached as **Exhibit N**; prior year filings are on the Commission's docket and readily available on request.

12. Assessment of Internet-based Provider Certification Application

Snap!VRS welcomes on-site visits to its premises by Commission representatives to assess the merits of its application for Commission certification renewal.³⁰ Snap!VRS remains committed to provision of requisite documentation to demonstrate the representations made herein, including evidence of compliance with Commission requirements.

13. Substantive Changes

Snap!VRS acknowledges its obligation as a certified iTRS provider to notify the Commission of substantive changes in its programs, services and features within 60 days of when such changes occur, with certification of compliance with federal minimum standards after implementation of the substantive change.³¹ Specifically, substantive changes include, but are not limited to: 1) the use of new equipment or technologies to facilitate the manner in which relay services are provided, 2) provision of services from a new facility not previously identified to the Commission or the Fund administrator, and 3) discontinuation of service from any facility.

²⁸ 47 C.F.R. §64.606(a)(2)(iv).

²⁹ 47 C.F.R. §64.606(a)(2)(v).

³⁰ 47 C.F.R. §64.606(a)(3).

³¹ 47 C.F.R. §64.606(f)(2).

Snap!VRS fully complies with this rule as evidenced by a substantive changes report filed with the Commission earlier this year.

14. Annual Reports

Snap!VRS acknowledges its obligation as a certified Internet-based TRS provider to file annual reports with the Commission demonstrating compliance with 47 C.F.R. §64.604.³² Further, Snap!VRS acknowledges that such reports shall update information as required by 47 C.F.R. §64.606(a)(2) and include updated documentation and a summary of the updates, or certify that there are no changes to the information and documentation submitted with the application for certification, application for renewal of certification, or the most recent annual report, if applicable.³³

Such annual reports, as evidenced by yearly Snap!VRS filings with the Commission, includes a declaration by the chief executive officer, chief financial officer, or other senior executive of an Internet-based TRS provider under this section with first hand knowledge of the accuracy and completeness of the information provided (see Declaration attached as **Exhibit A**).³⁴

15. Unauthorized Service Interruptions

Snap!VRS acknowledges its obligation as a certified provider to provide Internet-based TRS without unauthorized voluntary service interruptions.³⁵

In the event of a service interruption for a period of 30 minutes or more in duration, Snap!VRS is committed to submission of a written request to the Consumer and Governmental Affairs Bureau (“CGB”) at least 60 days prior to any planned service interruption with detailed information as follows:

(i) Its justification for such interruption; (ii) Its plan to notify customers about the impending interruption; and (iii) Its plans for resuming service so as to minimize the impact of such disruption on consumers

³² 47 C.F.R. §64.606(g).

³³ 47 C.F.R. §64.606(g)(1).

³⁴ 47 C.F.R. §64.606(g)(2).

³⁵ 47 C.F.R. §64.606(h)(1).

through a smooth transition of temporary service to another provider, and restoration of its service after the completion of such interruption.³⁶

Further, in the event of unforeseen service interruptions due to circumstances beyond its control, or if a voluntary service interruption is less than 30 minutes in duration, Snap!VRS will send written notification to the CGB within two business days of the commencement of the service interruption with an explanation of when and how Snap!VRS has restored service or plans to do so imminently. In the event Snap!VRS is not able to restore service at the time that notification is filed, Snap!VRS is committed to submission of a second report within two business days of the restoration of service with an explanation of when and how Snap!VRS restored service. Snap!VRS fully complies with requirements for notification of service outages to its customers on an accessible website, and acknowledges that such notification of service status must be updated in a timely manner.³⁷

Compliance with this rule is evidenced by the fact Snap!VRS has filed unforeseen service interruption reports this year with the Commission and placed notice of said interruptions on its website for its customers.

III. COMPLIANCE WITH MANDATORY MINIMUM STANDARDS

As set forth in 47 C.F.R. §64.604(a), (b) and (c), as amended, the Commission has established operational, technical, and functional mandatory minimum standards governing the provision of Internet-based relay services.

Specifics as to how Snap!VRS meets or exceeds *operational* mandatory minimum standards are described herein.³⁸

A. Operational Standards

1. Communications Assistants (“CAs”)

- a. **TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.**³⁹

³⁶ 47 C.F.R. §64.606(h)(2)

³⁷ 47 C.F.R. §64.606(h)(3).

³⁸ 47 C.F.R. §64.604(a).

- b. CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.⁴⁰**
- c. CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.⁴¹**
- d. TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A “qualified interpreter” is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.⁴²**

Snap!VRS believes that the exceptional skills and professionalism of its Communication Assistants (“CAs”), known as Video Interpreters (“VIs”) within the company, in combination with optimized staffing and strong service levels are critical for overall success. This is achieved through a workplace culture that emphasizes quality performance and adherence to the NAD-RID Code of Professional Conduct established jointly by the National Association of the Deaf (“NAD”) and the Registry of Interpreters of the Deaf (“RID”).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

³⁹ 47 C.F.R. §64.604(a)(1)(i).
⁴⁰ 47 C.F.R. §64.604(a)(1)(ii).
⁴¹ 47 C.F.R. §64.604(a)(1)(iii).
⁴² 47 C.F.R. §64.604(a)(1)(iv).

Another important measure of customer satisfaction is the number of customer complaints reported to Snap!VRS and then filed by Snap!VRS with the Commission. Specifically, Snap!VRS reported an average of 3.3 complaints per month during the annual reporting period ending June 30, 2011 (as reflected by the Snap!VRS Annual Complaint Log Summary Report in **Exhibit N**). Complaints at this level are statistically insignificant as related to the total volume of calls processed each month.

Snap!VRS maintains extremely high standards for new CA hires. When considering a new CA applicant, the primary concern of Snap!VRS is that the applicant possesses the abilities to not only carry out, but to exceed, the requirements set forth by the Commission. Snap!VRS reviews candidate credentials, professional experience, availability and a host of additional criteria critical to the hiring process – which in itself is quite lengthy and is divided into several parts in order to assure complete vetting of each candidate by the managerial staff.

[REDACTED]

Requirements for all Snap!VRS CA hires are as follows:

- Highly accurate receptive American Sign Language (“ASL”) skills, with appropriate English voicing skills.
- Experienced and highly skilled at adjusting the appropriate expressive vocabulary and inflection to match source intent;
- Minimum of three (3) years of post-certification interpreting experience;
- Customer-focused service qualities;

- Experience in the deaf and hard of hearing community using ASL and various forms of English based sign, including signed English, and finger spelling;
- Familiarity with various dialects and regional differences in sign language;
- Ability to understand individuals with limited English proficiency;
- Strong understanding of the history, culture, and language of the American deaf community; and
- Ability to use clear and accurate English pronunciation that is free of dialect.

[REDACTED]

Newly hired CAs are placed on a 90-day probationary period during which they are routinely monitored for quality assurance. [REDACTED]

[REDACTED]

[REDACTED] Merit increases are offered depending on the level of performance that CAs demonstrate. Termination occurs when CAs do not consistently demonstrate the requisite skills for the demands of their position.

Snap!VRS continually reviews the progress of CAs and provides continuing education for skill sets specific both to individualized developmental needs and overall compliance requirements applicable to the VRS environment. This includes ensuring that all CAs are sufficiently trained to effectively meet the specialized communications needs of individuals who are deaf and hard of hearing, and to quickly and efficiently facilitate communication during a call. While typing speed is not a required skill in the VRS environment, CAs are nonetheless expected to facilitate call dialogue with fluency and in a manner that optimizes effective conversational flow.

CAs employed by Snap!VRS are bound by the tenets of the NAD-RID Code of Professional Conduct (“CPC”), which includes strict standards for confidential communication within interpreting situations. Specifically the CPC states “Interpreters hold a position of trust in their role as linguistic and cultural facilitators of communication. Confidentiality is highly valued by consumers and is essential to protecting all involved...” Accordingly, Snap!VRS expects CAs to adhere to CPC standards at all times. While ethical practices are always observed, confidentiality is of utmost importance in adherence to Commission rules and regulations. No information regarding consumers or conversation content is shared or discussed outside of the call center. All Snap!VRS CAs are bound by the confidentiality agreement that they sign prior to the commencement of training.

Snap!VRS interpreting operations are led by an experienced management team with an intense focus on quality of service. Only highly qualified and credentialed personnel are hired as operational supervisors and managers. Snap!VRS utilizes sophisticated mathematical models and regular demand planning and scheduling exercises are instituted for optimizing CA staffing levels that result in high levels of customer satisfaction. Snap!VRS believes that the CA, as the primary contact between the company

and its customers, is a critical component of VRS. Because of the nature of this role, Snap!VRS remains committed to establishing and adhering to the rigorous standards in the hiring, training, and retention of CAs, as described above.

Snap!VRS hires and promotes from within whenever feasible. Whenever CAs express the desire to expand their skill set, Snap!VRS offers the opportunity for CAs to become floor supervisors, schedulers, trainers, and to serve as interview panel members.

- e. CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.**

Snap!VRS CAs normally stay with calls for at a minimum of 20 minutes prior to transferring to a different CA. The Commission did conclude, however, that in circumstances when effective communication is not occurring, the 10-minute in-call replacement rule is not violated if the VRS provider has another CA take over the call.⁴³ Additionally, CAs may ask the VRS user questions during the call setup in order to better facilitate effective communication.⁴⁴ However, the FCC has made clear that this clarification/exception is very narrow in scope and may not be used by VRS providers or particular CAs to justify transfers of VRS calls for reasons unrelated to the ability to effectively communicate in sign language. For example, VRS providers may not switch CAs within the 10-minute time period simply because the CA might *prefer* not to handle a call with a particular subject matter or a call made by a particular consumer.⁴⁵ Snap!VRS fully complies with these rules.

- f. TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.**

Although VRS users may not reserve or request a specific CA, VRS users may, under this rule, request a specific CA gender.⁴⁶ Snap!VRS makes every effort to accommodate such requests. If a CA

⁴³ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 21 FCC Rcd 6733 ¶ 9 (2006) (“*Call Time Order*”).

⁴⁴ *Id.* ¶ 10.

⁴⁵ *Id.* fn. 30.

⁴⁶ 47 C.F.R. §64.604(a)(1)(vi)

transfer is necessary during a call in which a gender preference has been accommodated, such preference will also be considered for the CA transfer but may not always be possible to satisfy.

Pertinent to this matter is also the Commission's clarification regarding VRS calls during which at some point, the party using sign language, the CA, or both, find that they are unable to communicate effectively because of regional dialects, technical or complex subject matter, or other reasons, it is then permissible for providers to allow another CA to take over the call. In such situations, the replacement CA may or may not be the originally requested gender.

g. TRS CAs shall transmit conversations between TTY and voice callers in real time.

This rule is applicable to traditional forms of TRS involving the use of TTYs.⁴⁷ Even so, Snap!VRS adheres to this in spirit; all VRS calls are conducted in real time and provide for greater functional equivalency than those involving the use of TTYs.

2. Confidentiality and Conversation Content

a. Confidentiality

Confidentiality of callers' identity and call content is of paramount importance to Snap!VRS. Subject to Commission rules and applicable provisions of federal, state and local law, all Snap!VRS calls are treated with the utmost confidentiality.⁴⁸ No written, electronic or any other type of record regarding call content are retained beyond the duration of non-emergency calls (except for 911 calls, where the Commission has made specific exception, as noted on pages 34-35).

[REDACTED]

[REDACTED]

[REDACTED]

CAs and all personnel who may be exposed to the Snap!VRS call handling area are required to sign a pledge of confidentiality which expressly forbids disclosure of any VRS participants or information

⁴⁷ 47 C.F.R. §64.604(a)(1)(vii).

⁴⁸ 47 C.F.R. §64.604(a)(2)(i).

that they may accidentally overhear or witness during the course of relaying calls or during their presence in the call center environment (e.g., by technical personnel resolving a CA workstation functionality problem). The non-disclosure agreement applies to employees both during and after their employment.

[REDACTED]

[REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Should a VRS call be in excess of 20 minutes or are of a complex nature and require one or more CA transfers, the transferring CA provides only the minimum, essential information necessary to facilitate the handover process and to properly facilitate the VRS call (e.g., topic of discussion, technical terms, relationships of parties on the call).

The monitoring of actual Snap!VRS calls by anyone other than CA managerial personnel is strictly prohibited and even managers only monitor for purposes of training or quality assurance.

[REDACTED]

[REDACTED]

[REDACTED] Snap!VRS policy

states that “employees who, after investigation, are found to have violated confidentiality are immediately terminated and not considered again for future Snap!VRS employment.”

Special Note Regarding Emergency Calls. In addition to the general confidentiality guidelines above, it is important to note that pursuant to the Commission’s E911 call handling rules, background

visual and auditory information regarding an emergency that a CA may see and hear during a VRS call is not considered part of the “conversation” and may therefore be relayed to emergency personnel.⁴⁹

Accordingly, the Commission has clarified that a CA may relay background visual and auditory information regarding an ongoing emergency to assist emergency personnel in responding to an emergency VRS call. Moreover, because of the importance of quick action during an ongoing emergency, the Commission has also clarified that “VRS CAs may retain a record of background visual and auditory information regarding an emergency for a reasonable time after an emergency call has terminated for the sole purpose of providing that information to emergency personnel should they call back” or require such for further investigation.⁵⁰ Snap!VRS compliance policies are in line with these requirements.

a. Conversation Content

Snap!VRS CAs are prohibited from intentionally altering a relayed conversation; further, CAs are expected to relay all VRS conversations verbatim in the spirit and tone conveyed by all call participants. CAs provide, when necessary and to the best of their abilities, inflection and other verbal or non-manual cues to the parties on the call. CAs are committed to keeping the VRS user informed about the status of the call, including but not limited to such information as dialing, ringing, busy, disconnected, on hold, gender of the person speaking or discernible background noise. CAs also remain on the line until both parties have terminated the call. If a call originator lingers and for some reason does not disconnect for 30 seconds beyond completion of the call (for example, if the call originator forgets to hang up), the CA will first query, and then, if no response, disconnect the call. Snap!VRS CAs are expected to report any and all VRS user complaints and/or compliments to an internal database. Snap!VRS call center Operations Managers as well as Customer Service Managers are constantly monitoring the database for any unresolved questions or issues, which are either assigned to the appropriate Customer Service

⁴⁹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers, Second Report & Order & Order on Reconsideration*, CG Dckt No. 03-123, 24 FCC Rcd 791, ¶ 16-17 (2008) (*Second 10-Digit Numbering Order*).

⁵⁰ *Ibid*, ¶ 17.

personnel or followed up on by Customer Service Managers themselves. CAs are trained that it is not within their legal role to counsel, advise or interject personal opinions or additional information into any call. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Types of Calls

- a. **Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls limiting the length of calls utilizing relay services.**

Snap!VRS CAs are thoroughly trained not to refuse single or sequential calls or to limit the length of VRS calls.⁵¹

- b. **Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.**

Snap!VRS routinely handles, in compliance with Commission rules, all types of VRS calls other than those waived by the Commission due to infeasibility.⁵² Snap!VRS acknowledges that it has the burden of proving the infeasibility of handling any specific type of call through its annual reports on progress toward meeting waived requirements.

⁵¹ 47 C.F.R. §64.604(a)(3)(i).

⁵² 47 C.F.R. §64.604(a)(3)(ii).

c. Relay services are permitted to decline to complete a call because credit card authorization is denied.

The Commission has waived this requirement for VRS and IP Relay providers until July 1, 2012 as long as Snap!VRS and other providers continue to allow VRS calls to be placed using calling cards and/or provide free long distance calls.^{53, 54}

d. Relay services shall be capable of handling pay-per-call (900) calls.

The Commission has waived the pay-per-call calls requirement for VRS and IP Relay providers until July 1, 2012, given that Snap!VRS and other providers' annual waiver reports reflected the inability to develop a billing mechanism that would accurately process charges associated with handling of pay-per-call calls.^{55, 56}

e. TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

The Commission has waived the one-line VCO, VCO-to-TTY, and VCO-to-VCO requirement for VRS and IP Relay providers until July 1, 2012, noting that the most recent annual waiver reports filed by providers reflect that although the quality of the voice component of the Internet continues to improve, VRS and IP Relay providers cannot adequately provide these services because the technology is not universally available that would enable providers to simultaneously process voice and data information on the same Internet connection in order to provide reliable one-line VCO service. Further, the Commission has waived the one-line HCO, HCO-to-TTY, and HCO-to-HCO requirement until July 1, 2012, noting that the most recent annual waiver reports, VRS and IP Relay providers cannot provide these services because of the same technological shortcomings that are present with VCO functions.^{57, 58}

⁵³ 47 C.F.R. §64.604(a)(3)(iii).

⁵⁴ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Order (2011 TRS Waiver Order), ¶ 16-17 (Released June 30, 2011).

⁵⁵ 47 C.F.R. §64.604(a)(3)(iv).

⁵⁶ 2011 TRS Waiver Order, ¶¶ 14-15.

⁵⁷ 47 C.F.R. §64.604(a)(3)(v).

⁵⁸ 2011 TRS Waiver Order, ¶¶ 9-11.

Even with the above waivers in place, Snap!VRS is able to provide one and two-line VCO as well as one and two-line HCO for its VRS users who make use of Snap!VRS customer premises equipment (“CPE”).

- f. TRS providers are required to provide the following features: (1) call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.**

The Commission has waived the call release functionality requirement for VRS and IP Relay providers until July 1, 2012, given that the most recent providers’ annual waiver reports reflect that the Internet leg of the call (via video or text) cannot support this functionality.⁵⁹ Apart from this waived call release functionality requirement, Snap!VRS routinely provides speed dialing functionality for VRS customers who use Snap!VRS-provided CPE, as well as three-way calling functionality.⁶⁰

- g. Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA’s terminal.**

Although the specific requirements of this rule (*e.g.*, use of a “hot key”) are not technically applicable to VRS providers, Snap!VRS CAs as standard practice immediately alert VRS users as to the presence of recorded messages and interactive menus, keeping them informed of auditory prompts and messages, interpreting verbatim each step in the process and ensuring the engagement of VRS users throughout.⁶¹ If either of these recordings or menus time out, CAs work with and support VRS users to ensure his or her desired intent is completed, whether this involves retrieval of information or leaving a message. Snap!VRS CAs may also receive preliminary direction about prompts and actions to take from VRS users who are familiar with the automated menus of the number they are calling.

⁵⁹ 2011 TRS Waiver Order, ¶ 12.

⁶⁰ 47 C.F.R. §64.604(a)(3)(vi).

⁶¹ 47 C.F.R. §64.604(a)(3)(vii).

h. TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Snap!VRS CAs routinely assist VRS users wishing to access messages left on their answering machines and/or voice mail systems.⁶²

4. Emergency Call Handling Requirements

This Commission rule applies specifically to TTY-based TRS providers.⁶³ Snap!VRS fully complies with similar rules in place for Internet-based TRS providers, detailed in this application (please refer to pages 52-53 within the “Additional Compliance Requirements” section).

5. STS Called Numbers

The Commission has waived the STS Called Numbers requirement⁶⁴ indefinitely for VRS providers, 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.⁶⁵

6. Visual Privacy Screens/Idle Calls

Snap!VRS CAs are prohibited from enabling visual privacy screens or similar features while handling a VRS call. Further, CAs are expected to adhere to company policy which reflects Commission rules in handling of calls involving visual privacy screens and idle calls.⁶⁶

Specifically, CAs will disconnect a VRS call if the caller or the called party enables a privacy screen or similar feature that blocks them from the CA’s view for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes. This Commission rule does not apply to 9-1-1 emergency calls or situations when 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 first queries each party for a response that they are still there and if there is no reply, the CA announces to both parties the intent to terminate the call.

⁶² 47 C.F.R. §64.604(a)(3)(viii).

⁶³ 47 C.F.R. §64.604(a)(4).

⁶⁴ 47 C.F.R. §64.604(a)(5).

⁶⁵ *2011 TRS Waiver Order*, ¶¶ 20-21.

⁶⁶ 47 C.F.R. §64.604(a)(6).

Snap!VRS policies clearly delineate situations in which CAs are required to disconnect a call, including: 1) inattentive or absent callers (in any situation); and 2) callers utilizing privacy screens prohibiting the CA from seeing them. Snap!VRS CAs do understand that Commission rules permit individual callers to be inattentive or to institute a privacy screen or equivalent for “a brief time not to exceed five minutes” with the exception of calls that are of an emergency nature.

7. International Calls

Snap!VRS Customer Service Representatives (“CSRs”) are trained to assist customers on registration requirements for upcoming international travel. They record the date of initial contact, and gather the following:⁶⁷

- U.S. residency
- Valid (registered) TDN which has been provided by Snap!VRS
- TDN that the customer plans to use during travel
- Travel dates and locations - if to multiple destinations then one date set is obtained for each.

Further, CSRs explain to customers that current Commission rules allow international travel registration for up to 30 days at one time. If a longer international travel agenda is planned, the customer is advised to re-register with Snap!VRS Customer Service prior to the expiration of the initial 30 day travel period, also in accordance with Commission rules.

From a technical perspective, as of June 1, 2011, Snap!VRS servers were enabled to obtain real-time data capture of the geo-location information for all inbound video calls. For outbound video calls, geo-location and IP address information is captured on a real-time basis. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁶⁷ 47 C.F.R. §64.604(a)(7).

[REDACTED]

[REDACTED]

B. Technical Standards

1. ASCII and Baudot

ASCII and Baudot technical standards contained in this rule are waived for VRS providers.⁶⁸

2. Speed of Answer

Snap!VRS is committed to equipping and staffing its facilities and resources to provide callers with effective speed of answer (“SOA”) access, in compliance with Commission rules,⁶⁹ which is to answer 80% of all calls within 120 seconds, measured on a monthly basis and including abandoned calls in the SOA calculation. Historically, Snap!VRS has consistently met or exceeded SOA benchmarks as set forth by the Commission by using state-of-the art equipment to monitor VRS call traffic and developing accurate projections for CA staffing at different times of the day and week.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Snap!VRS will continue to be vigilant to ensure that all VRS calls are answered and processed promptly and to maintain ongoing compliance with this important requirement.

3. Equal Access to Interexchange Carriers

The Commission has waived the equal access to interexchange carriers requirement for VRS providers until July 1, 2012,^{70, 71} noting that it was not possible for VRS providers to determine if a call is

⁶⁸ 47 C.F.R. §64.604(b)(1).

⁶⁹ 47 C.F.R. §64.604(b)(2).

⁷⁰ 47 C.F.R. §64.604(b)(3).

⁷¹ 2011 TRS Waiver Order, ¶¶ 18-19

long distance and, in any event, these providers could not automatically route the calls to the caller's long distance carrier of choice.

4. TRS Facilities

a. 24/7 Operation

Snap!VRS ensures, through optimal commitment of its human, facilities and technological resources, that its call centers are staffed and operational on a 24 hours/7 days a week basis.⁷²

Specifically, Snap!VRS call centers are well equipped for concurrent processing of incoming videophone and voice calls while always maintaining, and 98% of the time exceeding, the Commission's mandatory speed of answer ("SOA") requirements.

b. Redundant Facilities

Snap!VRS ensures, through optimal commitment of facilities and technological resources, network and equipment redundancy on a 24 hours/7 days a week basis.⁷³ This has been described in specific detail within the section on core call functions (technology/equipment), starting on page seven.

5. Technology

Although the SS7-specific requirements of this Commission rule⁷⁴ does not apply to VRS, Snap!VRS has embraced the overall philosophy of this rule by investing in innovative equipment and technologies that will further enhance the VRS offerings available to end users, thereby advancing the functional equivalency mandate under the ADA and this rule.

6. Caller ID

When standard caller ID information is available, Snap!VRS ensures that the ten-digit number of the calling party is transmitted to the party being called.⁷⁵ When the calling party's caller ID information is blocked, Snap!VRS passes through the label "Unknown" in the description field to the party being

⁷² 47 C.F.R. §64.604(b)(4)(i).

⁷³ 47 C.F.R. §64.604(b)(4)(i).

⁷⁴ 47 C.F.R. §64.604(b)(5).

⁷⁵ 47 C.F.R. §64.604(b)(6).

called. Further, when the calling party's caller ID information is absent, Snap!VRS transmits its own telephone number, 877-711-7627, with "Snap!VRS" in the description field to the party being called.

C. Functional Standards

1. Consumer Complaint Logs

Snap!VRS maintains records of consumer complaints including all complaints, whether filed with Snap!VRS or directly with the Commission. These records include the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. Records are retained until the next application for certification is granted.⁷⁶

Snap!VRS files annual complaint log summary reports indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year.

The 2011 annual complaint log summary report that Snap!VRS filed with the Commission is attached as **Exhibit G**; prior year filings are on the Commission's docket and readily available on request.

2. Contact Persons

Snap!VRS regularly updates its information on the FCC TRS Providers webpage (www.fcc.gov/encyclopedia/trs-providers) designating contact specifics for appropriate individuals who handle VRS complaints, grievances, inquiries and suggestions, including the mailing address of its corporate headquarters,⁷⁷ as follows:

Snap!VRS Telecommunications, Inc.
2 Blue Hill Plaza, 3rd Floor
PO Box 1626
Pearl River, NY 10965
www.snapvrs.com

Nancy Bloch, Chief Regulatory Liaison and Advisor
Email: nbloch@snapvrs.com
Voice/VP: 443-438-1321; Fax: 443-478-4293

Steph Buell, Chief Compliance Officer
Email: sbuell@snapvrs.com
Voice/VP: 604-852-8242; Fax: 877-619-3876

⁷⁶ 47 C.F.R. §64.604(c)(1).

⁷⁷ 47 C.F.R. §64.604(c)(2).

3. Public Access to Information

Snap!VRS provides public access to information via equipment demonstrations, sign language videos and written instructions to potential VRS users.⁷⁸ Snap!VRS has a community and business outreach program to educate the public about VRS, including the use of its website, social media strategies and various online resources. Outreach programs include, but are not limited to: event participation (including exhibits), media advertisements, meetings with user communities, distribution of informational pamphlets describing how to use VRS, and other similar activities. Snap!VRS produces and supervises the production of its promotional materials.

Snap!VRS users always have advisory input regarding quality of service. Service evaluations do not come only from those who are directly or indirectly involved in operating the call centers but also from a wide range of relay stakeholders and community members.

In addition, Snap!VRS conducts periodic internal and external evaluations of its service for ongoing compliance with TRS rules and for consistency with its own highly ethical internal standards.

4. Rates

Costs associated with provision of VRS are currently reimbursed entirely through the Interstate TRS Fund and therefore Snap!VRS provides services at no cost to its customers.⁷⁹

5. Jurisdictional Separation of Costs

a. Data Collection and Audits

1) True and Adequate Data

As an eligible provider, Snap!VRS fully complies with all Commission and Fund Administrator requirements in providing the Interstate TRS Fund administrator with true and adequate data, and other data as may be requested to determine TRS Fund revenue requirements and payments in accordance with Commission requirements and any additional requirements adopted by the TRS Fund administrator.^{80,81}

⁷⁸ 47 C.F.R. §64.604(c)(3).

⁷⁹ 47 C.F.R. §64.604(c)(4).

⁸⁰ 47 C.F.R. §64.604(c)(5)(iii)(C).

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

2) Call Data

Snap!VRS fully complies with Commission rules by providing the following call data on a monthly basis to the TRS Fund administrator for reimbursement consideration:⁸²

- Call record identification sequence;
- CA identification number;
- Session start and end times noted at minimum to the nearest second;
- Conversation start and end times noted at minimum to the nearest second;
- Incoming telephone number and IP address (if call originates with an IP-based device) at the time of the call;
- Outbound telephone number (if call terminates to a telephone) and IP address (if call terminates to an IP-based device) at the time of the call;
- Total conversation minutes;
- Total session minutes;
- The call center (by assigned identification number) that handled the call; and
- The URL address through which the call is handled.

3) Additional Call Data

Snap!VRS fully complies with Commission rules on provision of speed of answer (“SOA”) data,⁸³ in addition to the call data required by 47 C.F.R. §64.604(c)(5)(iii)(C)(2), above. Snap!VRS compliance with SOA requirements is detailed on page 41.

4) Automated Records

Snap!VRS regularly submits call record and SOA compliance data using an automated record keeping system that captures call data using the required standardized electronic format provided by the TRS Fund administrator.⁸⁴

⁸² 47 C.F.R. §64.604(c)(5)(iii)(C)(2).

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

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

5) Certification

Snap!VRS regularly submits with its requests for compensation from the TRS Fund the required certification⁸⁵ by its chief executive officer, chief financial officer or other senior executive who has first hand knowledge of the accuracy and completeness of the information provided, as follows:

“I swear under penalty of perjury that I am (name and title), an officer of the above-named reporting entity and that I have examined the foregoing reports and that all requested information has been provided and all statements of fact, as well as all cost and demand data contained in this Relay Services Data Request, are true and accurate; and the TRS calls for which compensation is sought were handled in compliance with Section 255 of the Communications Act and the Commission’s rules and orders, and are not the result of impermissible financial incentives or payments to generate calls.”

6) Audits

Snap!VRS fully complies with audits conducted annually or at times determined appropriate by the Commission, the TRS Fund administrator, or other entity approved by the Commission for this purpose, to examine and verify TRS provider data as necessary to assure the accuracy and integrity of TRS Fund payments.⁸⁶

Snap!VRS retains all required call data, detail records, and other records that support its submissions for payment from the TRS Fund, and records used to substantiate the cost and expense data submitted in the annual relay service data request form. Such records are retained in electronic format for retrieval ease, for the required minimum of five years’ duration.⁸⁷

b. Payments to TRS Providers

Snap!VRS fully complies with the requirements of this section including submission of call data reports using the form provided by the TRS Fund administrator.⁸⁸ Further, Snap!VRS acknowledges that

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

⁸⁶ 47 C.F.R. §64.604(c)(5)(iii)(C)(6).

⁸⁷ 47 C.F.R. §64.604(c)(5)(iii)(C)(7).

⁸⁸ 47 C.F.R. §64.604(c)(5)(iii)(E).

the Commission and the TRS Fund administrator each have the authority to audit providers and have access to all data records that are collected.

c. Eligibility for Payment - TRS Fund

Snap!VRS is a common carrier certified by the Commission five years ago as an Internet-based VRS provider eligible for compensation from the TRS Fund, and Snap!VRS continues to be in full compliance with Commission rules on eligibility requirements for participation in the TRS Fund.⁸⁹

d. Eligibility Notification

Snap!VRS, as a Commission-certified iTRS provider, continues to be in full compliance with Commission rules through timely submission of call data reports for TRS Fund compensation.⁹⁰

e. Information Filed with Administrator

Snap!VRS fully complies with the requirements of this section, also pursuant to 47 C.F.R. §64.604(c)(5)(iii)(C)(5) “Certification”, covered above.⁹¹

f. Enforcement Provisions

Snap!VRS, as a Commission-certified Internet-based VRS provider receiving compensation from the TRS Fund, acknowledges that it is subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission’s rules.⁹²

g. Suspending/Withholding of Payment

Snap!VRS fully complies with Commission rules and orders governing procedures for the suspension/withholding of compensation for TRS minutes.⁹³

h. Whistleblower Protections

Snap!VRS fully complies with Commission rules and orders governing whistleblower protections and has corporate compliance policies and procedures in place for such, including the posting of notices on whistleblower protections at each of its call centers.⁹⁴

⁸⁹ 47 C.F.R. §64.604(c)(5)(iii)(F).

⁹⁰ 47 C.F.R. §64.604(c)(5)(iii)(G).

⁹¹ 47 C.F.R. §64.604(c)(5)(iii)(I).

⁹² 47 C.F.R. §64.604(c)(5)(iii)(K).

⁹³ 47 C.F.R. §64.604(c)(5)(iii)(L).

Specifically, Snap!VRS employees are notified of the Commission's rule in this regard and asked to sign a Snap!VRS whistleblower protections form acknowledging they have read and understand the following: 1) If the employee reasonably believes that a policy, practice or activity of Snap!VRS is in violation of federal or state law, especially as it relates to combating waste, fraud and abuse in relay services, he or she would either write a complaint to or request a meeting with the company's Chief Compliance Officer and further, if the employee comes into contact with former employees, the employee will share the company's whistleblower policy with them; 2) the employee understands Snap!VRS is committed to protection from reprisals should he or she, in good faith, make a complaint against some practice (or any other individual or entity with whom the company has a business relationship) and further, it is understood that it is within the employee's right to share his or her concerns, if warranted, with the Commission's Office of Inspector General or Enforcement Bureau. Lastly, the employee, by affixing his or her signature to the Snap!VRS whistleblower protections form, agrees to abide by the company's whistleblower policy and understands that Snap!VRS fully intends to adhere to all applicable laws and regulations and that the company appreciates the full support of each employee to achieve legal compliance with this policy.

i. Additional VRS Provider Provisions

In addition to the provisions set forth above, Snap!VRS is subject to and in compliance with additional VRS provisions, as follows:⁹⁵

1) Eligibility for Reimbursement from the TRS Fund

Snap!VRS holds itself out to the general public as an eligible VRS provider, pursuant to 47 C.F.R. §64.604(c)(5)(iii)(F). VRS services are offered under the name of Snap Telecommunications, Inc. ("Snap!VRS"), the name by which it became certified, also in a manner that clearly identifies Snap!VRS

⁹⁴ 47 C.F.R. §64.604(c)(5)(iii)(M).

⁹⁵ 47 C.F.R. §64.604(c)(5)(iii)(N).

as a provider of video relay services. All video relay calls handled by Snap!VRS are routed through a single URL address.⁹⁶

Snap!VRS acknowledges that as an eligible provider, it may not contract with or authorize any third party to provide interpretation services or call center functions (including call distribution, call routing, call set up, mapping, call features, billing and registration) on its behalf, unless that authorized party is also an eligible provider.

To the extent that Snap!VRS contracts with or authorizes any third party to provide any other services or functions related to the provision of VRS other than interpretation services or call center functions, Snap!VRS acknowledges any such third party must not hold itself out as a provider of VRS, but must clearly identify Snap!VRS as the eligible VRS provider to the public. To the extent that Snap!VRS contracts with or authorizes a third party to provide any services or functions related to marketing or outreach, and such services utilize VRS, it acknowledges that those VRS minutes are not compensable on a per minute basis from the TRS Fund.

Further, Snap!VRS ensures that all third party contracts or agreements that it enters into is in writing, and copies of such agreements shall be made available to the Commission and to the TRS Fund administrator upon request.

2) Call Center Reports

Snap!VRS fully complies with the requirement that 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, pursuant to the requirements of this section, including any updates thereof.⁹⁷ A copy of the 2011 call center report that Snap!VRS filed with the Commission is attached as **Exhibit N**.

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

⁹⁷ 47 C.F.R. §64.604(c)(5)(iii)(N)(2).

3) Compensation of CAs

Snap!VRS, in accordance with Commission rules, does 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.⁹⁸

4) Remote Training Session Calls

Snap!VRS fully complies with the requirement that VRS calls to a remote training session or a comparable activity shall 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.⁹⁹ Snap!VRS understands that 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.

6. Complaints

As stated elsewhere in this application, Snap!VRS responds in a timely manner to all informal, formal and amended complaints served by the Commission, in accordance with Commission requirements.¹⁰⁰

7. Treatment of TRS Consumer Information

Snap!VRS collects VRS consumer information only as necessary to relay calls in compliance with Commission rules and to justify monthly reimbursement from the TRS Fund for the provision of relay services.¹⁰¹ All customer information is maintained in a secure database and is never utilized or disclosed for any purpose other than for providing and enhancing the services and products of Snap!VRS.

Further, Snap!VRS adheres to Commission rules regarding protection of the privacy and security of Customer Proprietary Network Information (“CPNI”).

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

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

¹⁰⁰ 47 C.F.R. §64.604(c)(6).

¹⁰¹ 47 C.F.R. §64.604(c)(7).

Snap!VRS also ensures that information associated with customers' ten-digit numbers remain secure when customers initiate porting actions with another VRS provider by having no direct involvement in or the ability to control and/or prevent telephone numbers from being ported away. The new VRS default provider will typically require porting customers to complete a Letter of Authorization ("LOA") (provided to the customer by the new default provider) which then authorizes the initiation of the porting process by allowing the new default provider to act on behalf of the customer with Level 3 (with whom Snap!VRS has a service agreement) to complete the port. The LOA includes private customer information such as name, address, telephone number and the customer's authorizing signature to claim the TDN. If issues arise, Snap!VRS will fully cooperate to assist in the resolution of the porting process.

Snap!VRS will fully cooperate also in those rare instances where there are legitimate reasons that confidential customer information might be required by federal, state or local law, or to cooperate with legitimate governmental investigations.

IV. ADDITIONAL COMPLIANCE REQUIREMENTS

The Commission has established additional mandatory minimum standards compliance requirements governing the provision of Internet-based relay services. Specifics as to how Snap!VRS meets or exceeds these requirements are described hereunder.

1. Emergency Calling Requirements

In accordance with Commission rules as amended,¹⁰² Snap!VRS incoming emergency callers are immediately routed through the ACD to a designated phone queue which ensures that their call is prioritized as the next call answered by a CA. All CAs who are not already facilitating other VRS calls will both hear their phone ring and see a red "emergency" flashing alert message appear on their monitor. The first available CA then accepts the emergency 9-1-1 call. Upon connection, the CA immediately verifies that the call constitutes an emergency and obtains the caller's name and registered information –

¹⁰² 47 C.F.R. §64.605.

that is, they confirm the caller’s automatic number identification (“ANI”) and automatic location identification (“ALI”) that appears on their monitor as registered Snap!VRS customers and maintained in the iTRS database.¹⁰³ If ANI/ALI information does not automatically appear on the CA’s monitor, the CA obtains such information manually. The CA promptly connects the call [REDACTED] [REDACTED] to the nearest PSAP (designated statewide answering point or appropriate local emergency authority). Once connected to the PSAP, the CA verbally transmits their CA identification number, the name of the relay provider, the name of the VRS user and the location of the emergency along with the VRS user’s call back number. If the [REDACTED] responds that no match is found in the iTRS database, the call is automatically routed to [REDACTED] emergency call center. The [REDACTED] agent (and the Snap!VRS CA who remains on the line) works with the VRS user to obtain updated location information and then the call is manually routed to the appropriate PSAP; the [REDACTED] agent remains on the line in conference until it is been established that the 9-1-1 caller and the Snap!VRS CA are connected to the correct PSAP. Should any in-progress emergency call become disconnected, Snap!VRS ensures priority queuing of call backs to the VRS user’s ten-digit number for a period of at least 30 minutes following an incoming 9-1-1 call in accordance with the Commission’s Order, which clarified that VRS providers must implement a system to ensure priority queuing of call backs.¹⁰⁴

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁰³ 47 C.F.R. §64.605(b)(2).
¹⁰⁴ 47 C.F.R. §64.605(a)(2)(iv).

[REDACTED]

[REDACTED]

[REDACTED]

Given that the customer premises equipment (“CPE”) issued by Snap!VRS to registered customers are capable of being used from more than one location, Snap!VRS therefore provides registered users with one or more methods of updating their Registered Location. These options include either contacting the Snap!VRS Customer Service department using their Snap!VRS issued CPE or accessing their customer account through the Snap!VRS website. Either of these methods enable Snap!VRS users to update their Registered Location at will and in a timely manner.¹⁰⁵

2. Internet-based TRS Registration Requirements

Snap!VRS has since December 31, 2008 complied with Internet-based TRS registration requirements¹⁰⁶ by providing VRS users with the capability to register with Snap!VRS as its “default provider.” Specifically, upon a user's registration, Snap!VRS either facilitates the user's valid number portability request as set forth in 47 CFR §52.34; or, if the user does not wish to port a number, assign that user a geographically appropriate North American Numbering Plan telephone number; and route and deliver all of that user's inbound and outbound calls unless the user chooses to place a call with, or receives a call from, an alternate provider.

Snap!VRS, as the default provider for its registered VRS users, obtains current routing information including IP addresses, provisions such information through [REDACTED] (the numbering partner for Snap!VRS) to the iTRS database, and maintains such information in its internal databases and the iTRS database.

Snap!VRS and [REDACTED] take such steps as necessary to cease acquisition of routing information from any VRS user who ports his or her number away from Snap!VRS or otherwise selects a new default

¹⁰⁵ 47 C.F.R. §64.605(b)(4).

¹⁰⁶ 47 C.F.R. §64.611.

VRS provider.¹⁰⁷ Snap!VRS fully complies with Commission expectations that only the default provider shall provision information to the central iTRS database, and that VRS providers other than the default provider are expected to query the iTRS database to obtain accurate routing information for a particular user of VRS prior to placing an call. Snap!VRS also complies with Commission rules prohibiting the assignment or issuance of proxy or alias numbers for a NANP to any user, including cessation of usage of such.¹⁰⁸

Snap!VRS ensures that all customer premises equipment (“CPE”) issued or otherwise provided to VRS users delivers routing information or other information only to the user’s default provider, except as is necessary to complete or receive “dial around” calls on a case by case basis.¹⁰⁹

Snap!VRS includes an advisory on its website and in promotional materials addressing E911 services via video relay. Such advisories address the process by which VRS users may obtain TDNs including a brief summary of the numbering assignment and administration processes described herein, numbering portability, and the process by which and importance of maintaining accurate and up-to-date registered location information with the user’s default provider in the event of emergencies. Snap!VRS also obtains and keeps a record of affirmative acknowledgment by every registered Internet-based VRS user as having received and understood the advisory described above.¹¹⁰

V. PUBLIC INTEREST SHOWING

Granting of certification renewal to Snap!VRS as an eligible VRS provider would bring important public interest benefits to deaf and hard of hearing consumers and the public throughout the nation. Snap!VRS takes very seriously the Commission’s efforts to reform the VRS program, ensure that it is efficiently managed with focus on elimination of waste, fraud and abuse. Snap!VRS has and continues to support these efforts through operational, technological and functional safeguards that are in full compliance with Commission rules and orders.

¹⁰⁷ 47 C.F.R. §64.611(c)(2).

¹⁰⁸ 47 C.F.R. §64.611(d).

¹⁰⁹ 47 C.F.R. §64.611(e).

¹¹⁰ 47 C.F.R. §64.611(f).

Snap!VRS seeks to serve the public interest by furthering the civil rights of deaf and hard of hearing individuals to accessible telecommunications services that are functionally equivalent to what is experienced by the general public, stimulating broadband deployment, access and usage through incorporation of advanced video technologies and enhanced service offerings, and ensuring high quality services through its pool of nationally certified video interpreting professionals.

VI. CONCLUSION

Snap!VRS is a trusted provider of high quality video relay services with focus on regulatory integrity, employment of nationally certified professional interpreters, reliance on a robust technological infrastructure and attention to customer service excellence.

By this application, Snap Telecommunications, Inc. demonstrates that it meets or exceeds the Commission's non-waived operational, technical and functional requirements and respectfully requests that the Commission approve and grant its application for certification renewal as an Internet-based VRS provider eligible for reimbursement from the iTRS Fund.

Should the Commission require any additional information, kindly contact the undersigned.

Respectfully submitted,

/s/
Nancy J. Bloch
Chief Regulatory Liaison and Advisor
Snap Telecommunications, Inc.
2 Blue Hill Plaza, 3rd Floor
Pearl River, NY 10965
(443) 438-1321 V/VP
nbloch@snapvrs.com

APPENDIX

- Exhibit A** Declaration of Corporate Officer
- Exhibit B** Deed or Lease for Each Call Center
- Exhibit C** Network Diagram
- Exhibit D** Automatic Call Distribution and Related Technical Specifications
- Exhibit E** Call Flow Diagram
- Exhibit F** Emergency Processes Flow Chart
- Exhibit G** Billing System Filters
- Exhibit H** Billing System Reconciliation
- Exhibit I** Billing System Flow Chart
- Exhibit J** Proofs of Purchase, Lease or License for Technology and Equipment
- Exhibit K** Corporate Functional Structure
- Exhibit L** List of Personnel Involved in Relay Operations
- Exhibit M** Sponsored Events
- Exhibit N** Annual Reports Filed with the Commission

APPENDIX

Exhibit A

**Declaration of President and Chief Executive Officer
Snap Telecommunications, Inc.**

I swear under penalty of perjury that I am Thomas W. Kielty, President and Chief Executive Officer of Snap Telecommunications, 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.



Thomas W. Kielty
President and Chief Executive Officer
Snap Telecommunications, Inc.
Two Blue Hill Plaza, Third Floor
P.O. Box 1626
Pearl River, New York 10965

October 1, 2011

APPENDIX

Exhibit B

Deed or Lease for Each Call Center

REDACTED

APPENDIX

Exhibit C

Network Diagram

REDACTED

APPENDIX

Exhibit D

Automated Call Distribution and Related Technical Specifications

REDACTED

APPENDIX

Exhibit E

Call Flow Diagram

REDACTED

APPENDIX

Exhibit F

Emergency Processes Flow Chart

REDACTED

APPENDIX

Exhibit G

Billing System Filters

REDACTED

APPENDIX

Exhibit H

Billing System Reconciliation

REDACTED

APPENDIX

Exhibit I

Billing System Flow Chart

REDACTED

APPENDIX

Exhibit J

Proofs of Purchase, Lease or License for Technology and Equipment

Part I: Technology

REDACTED

APPENDIX

Exhibit J

Proofs of Purchase, Lease or License for Technology and Equipment

Part II: Equipment

REDACTED

APPENDIX

Exhibit K

Corporate Functional Organization Chart

REDACTED

APPENDIX

Exhibit L

List of Personnel Involved in Relay Operations

REDACTED

APPENDIX

Exhibit M

Sponsored Events

REDACTED

APPENDIX

Exhibit N

Annual Reports Filed with the Commission During Calendar Year 2011

**Annual (now Semiannual) Compliance Report
Annual Report on Progress Toward Meeting Waived Requirements
Annual Complaint Log Summary Report
Semiannual Call Center Report**

FILED VIA ECFS