Presentation to Kris Monteith

Chief, Consumer and Governmental Affairs Bureau

Serving the unmet needs of deaf and hard of hearing consumers while protecting the integrity of the TRS program

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What is the InnoCaption service?

InnoCaption brings captioned telephone service to a Smart phone screen

- Supported Devices: iPhone, Android Phones.
- Carrier Networks: 3G & Above with AT&T, T-Mobile, Verizon, Sprint and more.
- No need to talk thru agency.
- No more complicated connections.
- Hear voices and read text of calls at same time.
- See **word-for-word captions** of everything the other person says on the mobile phone screen.
- Voice is heard through the mobile phone by using a headset/bluetooth earpiece, the speakerphone, or relying on only the text or the audio if the user so chooses.

InnoCaption solves user issues

Industry Major Issues	INNO CAPTION
Complicated To Use	Simple & Easy
Long Connection Time	Short Connection Time, same as normal phone call
Slow Caption Speed (5~8 seconds)	Real Time Caption Speed (within 1~2 seconds)
Low Caption Accuracy (wrong spelling, mistyping)	High Caption Accuracy (Court report level)

InnoCaption Features

The Uniqueness of InnoCaption

- **Optimized Caption Service**
  - Easy to make/receive calls the same as a hearing user.
  - No need to ask for agent's assistance for the caption service.
  - No need to change the phone if the user has a smart-phone with Android/iOS.

- **Fast Speed and High Accuracy Guaranteed**
  - Real time captioning (within 1 to 2 seconds, other competitors : 5 to 8seconds)
  - Stenography captioning provides top-level accuracy and speed (accuracy greater than 95 percent)

InnoCaption Features

The Uniqueness of InnoCaption

- **No limitation of Network Conditions**
  - Supports all US network carriers using 3G and 4G networks.
  - Provides a captioned service on 3G and 4G network as well as on WiFi.

- **Convenient Call Functions**
  - Provides a captioned voice mail service in case the user is unavailable.
  - Provides Caller ID.
  - Able to sync to the user's Phone Book.
  - Supports 3-way calling.
  - Supports e911 call with a caption.

Consumer Acceptance of InnoCaption

Consumers Voice Support for InnoCaption's Service

- **S. George Ghorpade, Ph.D., Board President, Adult Loss of Hearing Association**
  - "Captions come on very quickly and the quality of captions is much superior."
  - "A seamless mobile communications experience that the hearing community takes for granted and is denied to us deaf/HOH individuals."
  - "Innocap would just be the app that can 'unchain' us from landline phones and set us free."

- **Ed O'Brien, Local Board Member, HLAA**
  - "I'm seeing captions about 1 second delayed and extremely accurate. I noticed your captioners can backspace resulting in corrected and very readable transcriptions."
  - "I have used a few caption options but they have two major short comings. The captions are delayed which makes it difficult for me to converse naturally. An even bigger problem is my friends and business associates can't simply call my cell phone. I have to call them back to get captions. I have tested an application from Miracom called Innocaption. It solves both shortcomings. I am anxiously waiting for Innocaption to be available as it means I can utilize a cell phone just like the normally hearing."

Consumer Acceptance of InnoCaption

Consumers Voice Support for InnoCaption's Service

- **Liz Hupp, President of the North Shore Chapter of HLAA**

  - "I have really enjoyed being part of this beta testing. It's exciting, and I know I am benefitting many people who will eventually use this product. Having captions on my cellphone is definitely a huge advantage."

- **Ron Moe**

  - "I have experimented with several products and services over the years and for the most part I find existing Captioning phones and services to be just short of useless."
  - "With the addition of InnoCaptions I would be able to hear most of what is being said and be able to read fast and accurately. This is the missing piece of the puzzle for me. It is what I have been asking other existing companies to provide. "
  - "I am convinced that if you were to match all the phone services available today you would chose InnoCaptions because it works the way it is supposed to work. Nothing else compares. "

Consumer Acceptance of InnoCaption

Consumers Voice Support for InnoCaption's Service

- **Louis A. Touchette, Volunteer and member, Adult Loss of Hearing Association**

  - "We who are deaf/HOH need a way to be able to use a wireless phone such as a smart phone while we are mobile. I firmly believe the Innocaption product is the breakthrough I and others like myself so desperately need in order to live a reasonably enjoyable life."

  - "I sincerely believe that Innocap would just be the app that can "unchain" those of us with profound hearing loss or deafness to be free from the ball and chains of land line telephones. But, we desperately need FCC to approve the Innocaption product speedily so that we can begin using it. I strongly urge the Commission to grant quick approval to this product for our sake. Please, please don't leave us behind!"

- **Luke Emberlin, B.S., Doctor of Audiology, Graduate Student, Arizona State University**

  - "I had a friend who stopped by … and he is also hearing impaired. Because I wanted to show him your app, I did not use my iCom (bluetooth) device that streams the phone signal to both of my hearing aids, simultaneously. He was definitely impressed with it, as was I."

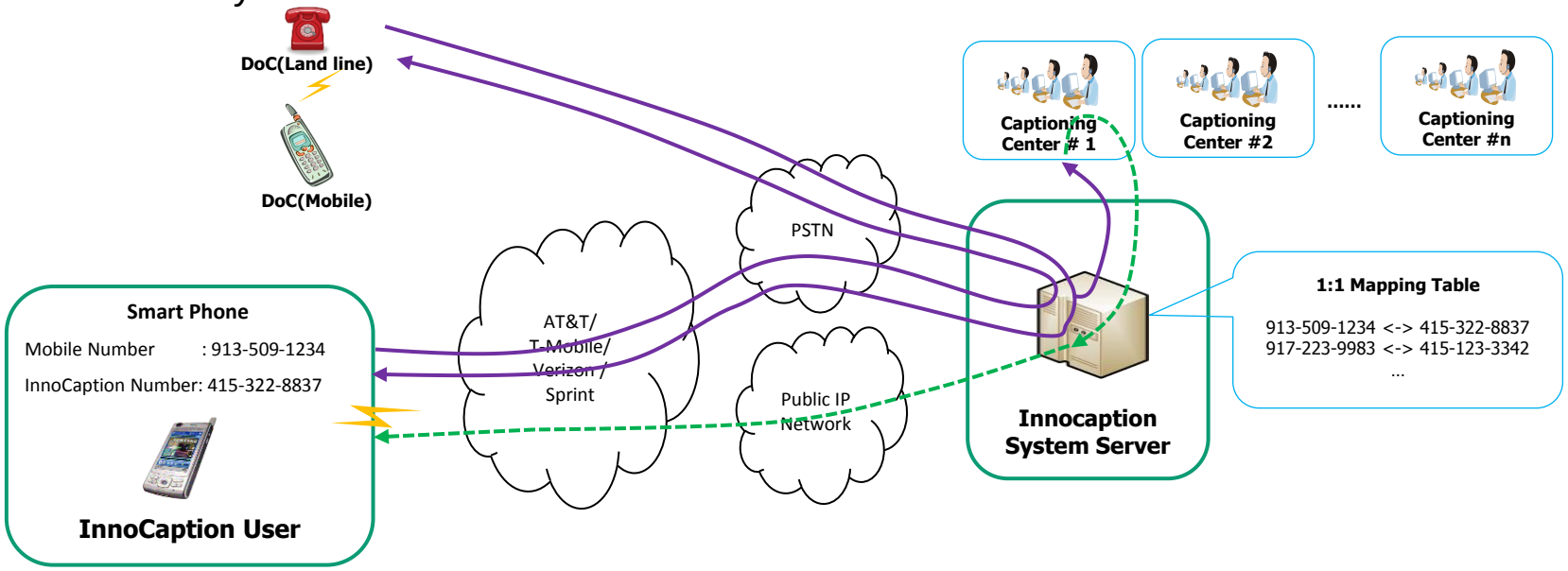
InnoCaption is Committed to Fraud Prevention

Measures Adopted to Protect the TRS Program's Integrity

- Miracom has adopted a detailed formal compliance program.
- Promotional programs and materials will undergo compliance review.
- All InnoCaption employees must undergo compliance training.
- All CAs employed by contractors must undergo compliance training.
- Subscribers must submit certification of hearing loss from a certified hearing professional.
- Miracom's network contains security features designed to protect the service from fraud and abuse.

InnoCaption System Security

- User must have a mobile phone number subscribed with a USA network carrier.
- There are two paths for each call (voice and caption) both have an independent path
- All calls and caption data path are designed to go through InnoCaption system server
- All three parties (User, Doc, Communication Assistant) must be connected to the InnoCaption system server via the voice call path.
- Confidentiality & security is assured between the Communication Assistant and User or Doc
  - ✓ No voice connection between Communication Assistant and User
  - ✓ One directional flow of captions from the Communication Assistant to User
  - ✓ One directional flow of voice from the Doc to Communication Assistant
  - ✓ The identity of User and Doc is withheld from the Communication Assistant



Management & Monitoring Process

Fraud Prevention Measures

- **Registration**
  - ✓ Must-have US mobile directory number.
  - ✓ Personal contact information required (i.e. – name, address, DOB, MDN and E-mail).
  - ✓ User Eligibility validation of a hearing loss by a certified hearing professional; user is permitted 14 days to provide hearing loss proof of eligibility to retain service.
  - ✓ Hearing Health Professionals will be allowed to access the service to demonstrate use and to educate their clients; MOU will be identified & excluded from TRS Fund submissions each month.
- **Approval**
  - ✓ 1:1 mapping of User mobile directory number with InnoCaption phone number.
  - ✓ Validity check of the registered mobile directory number for every call.
  - ✓ No caption service will be permitted in the case of no mapping.

Management & Monitoring Process

Fraud Prevention Measures

- **Contract with Multiple Caption Service Providers**
  - ✓ Automatic system assignment of the Communication Assistant.
  - ✓ No incentive based MOU programs allowed, encouraged or permitted.
- **CDR Monitoring Tool**
  - ✓ CDR shows MOU by User mobile directory number and InnoCaption number.
  - ✓ Report any abnormal MOU or trends to the Compliance officer for investigation and will remove these MOUs from monthly TRS Fund submission.
  - ✓ No outbound international calling allowed. Inbound calling permitted only if user handed out his or her number. We will never release a user's number or give access to our caption number database to anyone.
  - ✓ User voice MOU is tracked to ensure equivalence to Caption MOU per call.
  - ✓ MOU for test devices and to conduct demos will be excluded from TRS Fund monthly submission.

Appendix

InnoCaption Subscriber Registration Form