

**FEDERAL COMMUNICATIONS COMMISSION
CAPTIONED TELEPHONE - OPERATIONAL STANDARDS
Current as of September 25, 2012**

(a) Operational standards —(1) Communications assistant (CA). (i) 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.

As the current CapTel provider for the State of Arizona AT&T and its subcontractor, CTI®, require all CapTel CAs to have a minimum of a 12th grade level education or equivalency in order to qualify for the job of CapTel CA. Once hired, the applicant must successfully complete and pass a comprehensive training curriculum which includes training on the specialized needs of people with hearing or speech disabilities. Post hire assessments are provided continually throughout the term of employment to ensure CAs maintain a high level of skill and competency in completing calls for CapTel users.

(ii) 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.

Arizona CapTel CAs are tested for competency in typing, grammar, and spelling structure skills. Training also includes familiarity with hearing, hard of hearing, deaf, and speech loss community and users. Although waived by the FCC, oral-to-text tests are administered to CapTel CAs. They are assessed on their ability to interact with the voice recognition technology used for converting voice to text. This technology transmits text to the captioned telephone user at more than 100 words per minute.

CapTel CAs does not communicate directly with either party on a CapTel call. The CapTel user speaks directly to the standard telephone user in the same way that a standard telephone user speaks to the CapTel user. This is done through a direct audio connection. The CapTel CA does not directly speak or communicate with either party.

Following is the outline for the training that must be successfully completed by each CapTel CA who handles a call for the Arizona CapTel Service.

CapTel Training Outline

1.0 Training Summary Outline

- 1.1 Introduction/Tour**
- 1.2 Human Resources Overview**
- 1.3 Videos**
- 1.4 Mini Demonstration CapTel Phones**
- 1.5 Developing a Personal Voice Profile**
- 1.6 Introduction of Training Program**
- 1.7 Call Handling Tools**
- 1.8 Call Handling Skills – Pacing a Conversation**
- 1.9 Call Handling Skills – Inserting Words**
- 1.10 Calls to answering machines/automated recordings**

2.0 Introduction to Call Simulation

- 2.1 Call Simulation – Timings**
- 2.2 Review of Baseline Timings**
- 2.3 Introduction to Correction Tool**
- 2.4 Review Training Elements**

3.0 Monthly Timing Policy

- 3.1 Call Simulation – Timings**

4.0 Production Floor Orientation

(iii) 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.

The typing test has been waived for the CapTel Service since CAs are assessed on their ability to interact with the voice recognition technology used for converting voice to text. This technology transmits text to the captioned telephone user at more than 100 words per minute. CAs are trained to caption the words spoken by the hearing party (standard telephone user) as accurately as reasonably possible without intervening in the communications.

(iv) 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.

Not applicable to the Arizona CapTel Service

(v) 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.

CapTel CAs are required to continue with a call for a minimum of ten minutes.

(vi) 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.

Not applicable to Arizona CapTel Service. Both the CapTel user and the standard telephone user are able to hear each other and speak directly to each other through an audio connection and for this reason; there is no need to request a CA of a specific gender.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Although the Captioned telephone device (CapTel) is not a TTY, the captions of a CapTel call are transmitted nearly simultaneously and in real time with what is spoken by the standard telephone user. This is done through voice recognition technology.

(2) Confidentiality and conversation content. (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

All CapTel CAs are prohibited from intentionally altering any conversation and are trained to transmit captions in a manner that is verbatim to what is being spoken by the standard telephone user. CAs are trained and evaluated on maintaining privacy and confidentiality of all calls. The CAs do not maintain any records of conversation content and keep the existence and content of all calls confidential.

Following is a copy of the CapTel CA Pledge of Confidentiality which is reviewed and signed by each employee.

CapTel CA Pledge of Confidentiality

Confidentiality Policy

I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel Inc.*

I will not share any information about CapTel calls with anyone except a member of the *CapTel Inc.* management staff in order to investigate complaints, technical issues, etc.

I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel Inc.* after my employment ends.

I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel Inc.* management staff.

I will not share with anyone any technical aspect of my position with *CapTel Inc.* unless asked by a member of the *CapTel Inc.* management staff.

I will not talk about consumers or call content with any fellow Captionists.

I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at CapTel Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

Employee Name

Date

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

The Arizona CapTel Service is a transparent service whereby all conversation voiced by the standard telephone user are captioned as accurately as reasonably possible in a verbatim manner without intervening in the communications.

(3) Types of calls. (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

This requirement has been waived by the FCC for outbound CapTel calls because the actual CapTel user controls all dialing for individual and sequential calls with no involvement by the CapTel CA for call setup. For inbound calls by a standard telephone user to a CapTel user, the caller can either dial the CapTel user directly or reach the captioning center first by dialing the captioned telephone access number. In either case, there is no limit to the amount of calls made or the length of calls.

(ii) 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.

With the exception of those call types waived by the Commission; the Arizona CapTel Service is capable of completing all types normally provided by common carriers. Currently waived calls types include:

- **Coin sent paid**
- **International calls**
- **VCO, HCO, STS, VRS, 2-line VCO, and TTY calls**

CapTel users also have the ability to place a call to hearing or speech disabled user who requires the assistance of other types of relay services such as VRS, STS. These calls are handled in the same manner as a standard voice originated call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

Since CapTel CAs do not directly interact with the callers, the CA is unable to decline to complete a call due to denial of credit authorization. The CapTel CA will simply transcribe any message heard on the line, for example, “Your call cannot be completed as dialed...” or “This number cannot be called from your calling area...” .

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

The Arizona CapTel Service platform allows for completion of any pay-per-call. These calls types are dialed directly from the CapTel device in the same manner as calls made by non-disabled users through the public switched telephone network.

(v) 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.

Not applicable to the Arizona CapTel Service as these call types have been waived by the Commission.

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

Call release functionality:

Not applicable to the Arizona CapTel Service as this call type has been waived by the Commission.

Speed dialing functionality:

Arizona CapTel users have the ability to store numbers on the speed dial feature of their device. Additionally, CapTel users can store frequently dialed numbers in the built in phone book.

Three-way Calling functionality:

Arizona CapTel users have the ability to participate in a three way call. Although single-line users are not able to add a third party, the outbound caller, if they have the capability, is able to utilize three way calling and add another number/party to the line without impacting the display of captions to the CapTel user. CapTel users with two-lines can utilize the conferencing feature on their primary line while the second line is connected to the captioning service.

CapTel users also have the ability to participate on conference calls with numerous parties in the same way as a standard phone user by dialing the conference bridge and access number directly from the CapTel device. The CapTel CA will transcribe what is heard on the other line.

(vii) 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. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Arizona CapTel users hear and interact directly with voice mail systems and interactive menus. The captions appear almost simultaneously with the recorded message from the voice mail system or interactive menu allowing CapTel users to understand everything that is said - either by hearing it or by reading it. The CapTel user is then able to respond directly from their device to the prompts either by pressing the appropriate keys on the CapTel key pad or speaking their choice directly through the phone as soon as they see (BEEP) on the display screen, or hear the recorded greeting end, or see the signal meter stop flashing which indicates silence after the beep.

If the voice mail system is capable of confirming that a message was left, then the Arizona CapTel user will see the confirmation message on the CapTel display.

Arizona CapTel Relay callers are only billed for one complete call. This provides a functionally equivalent billing scenario comparable to that of a direct-dialed call.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Answering machine and voice mail retrieval is provided to Arizona CapTel users. There is an option on the CapTel device, “Caption Answering Machine” that can be selected by the user. The user is then able to place the handset next to the speaker of the answering machine while being connected to the captioning service to have the messages on the answering machine captioned.

(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Arizona CapTel users can dial 9-1-1 directly on their phones to reach the most appropriate PSAP for their calling area. Calls dialed to 9-1-1 from Single line CapTel users are not routed through the captioning center. Instead, these calls are treated as Voice Carry Over (VCO) calls during which the 9-1-1 responder can hear everything that is being voiced by the CapTel user. The 9-1-1 responder then types his/her response which appears on the CapTel device.

Dialing 911 in 2-Line Mode

Arizona CapTel users who utilize 2-Line Mode and call to 911 are handled exactly the same as if call was made through a standard telephone with the addition of getting captions of the call directly from the Captioning Service.

Whether the CapTel user dials 9-1-1 in single-line or two-line mode, the PSAP responder is able to receive Automated Number Identification (ANI) and Automatic Location Information (ALI) in the same manner as a standard telephone caller.

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

This requirement is not applicable since it has been waived by the FCC for the CapTel service.

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

This requirement is not applicable to the Arizona CapTel Service as it does not provide VRS as part of its state relay program.

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

This requirement is not applicable to the Arizona CapTel Service as it does not provide VRS as part of its state relay program.