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September 28, 2012

Office of the Secretary  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room TW-A325  
Washington, D.C. 20554

Re: Telecommunications Relay Services State Certification Application  
CG Docket No. 03-123

Dear Ms. Dortch,

The Minnesota Department of Commerce-Telecommunications Access Minnesota (DOC-TAM) submits the enclosed application for renewal of the certification for Minnesota's Telecommunications Relay Services (TRS) program by the Federal Communications Commission.

This application will establish, as required by 47 C.F.R. § 64.606 (b) (1), that Minnesota's TRS program (1) "meets or exceeds all operational, technical, and functional minimum standards contained in § 64.604"; (2) "makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints"; and (3) where the program "exceeds the mandatory minimum standards contained in § 64.604, the state establishes that its program in no way conflicts with federal law."

DOC-TAM certifies that it has complied, and will continue to comply, with the Americans with Disabilities Act (ADA) standard relay guidelines, and will oversee its current TRS provider, CSD, to ensure that all requirements are met.

If you have any questions, or require additional documentation, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Rochelle Renee Garrow". The signature is written in a cursive, flowing style.

Rochelle Renee Garrow, Administrator  
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Minnesota Department of Commerce  
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Minnesota Department of Commerce

# Telecommunications Relay Services State Certification Application

CG Docket No. 03-123

*September 28, 2012*



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## Telecommunications Access Minnesota History

In 1987, the Minnesota Legislature passed legislation creating the Telecommunications Access for Communication Impaired Persons (TACIP) Board for the purpose of enabling people who have difficulty hearing or speaking on the telephone to talk to standard voice telephone users. Minnesota Relay, which began service on March 1, 1989, was established to accomplish this goal.

The state procedures and requirements regulating Minnesota Relay and the Telecommunications Access Minnesota (TAM) fund fall under Minnesota Statute §§ 237.50 through 237.56. (See [Appendix A](#). Note: In 2012, the Minnesota legislature passed a bill that amended this statute. The changes were primarily to modernize language. The revised statute has not been published to date, but a copy of the bill language is also provided in [Appendix A](#).)

There have been significant changes and improvements to Minnesota Relay since its early years of operation. In 1995, the Minnesota Legislature eliminated the TACIP Board and transferred the responsibility for Minnesota Relay to the Department of Public Service (DPS). [DPS merged with the Department of Commerce (DOC) in 1999. In 2002, the name of the TACIP program changed to Telecommunications Access Minnesota (TAM).]

In 1996, after careful consideration of the needs of Minnesota Relay users, the state recognized that it was in the best interest of relay users, telephone ratepayers, and the legislature to relieve the state of the burden of owning and maintaining TRS equipment. It was apparent that the Minnesota Relay facility and its equipment had become severely outdated and beyond the point of overhaul. The state was faced with two options: spend millions of dollars for the purchase of new equipment, or contract with a qualified TRS vendor that would furnish continually upgraded equipment and software as well as specially trained call center staff to provide Minnesota Relay services. It was decided that the best way to provide quality and cost effective relay services in Minnesota was to contract with a highly qualified TRS vendor.

On July 1, 1996, the state contracted with Communication Service for the Deaf (CSD) and Sprint Communications Company, LP (Sprint) for TRS. CSD's contract was for the provision of management, human resources, and outreach components for Minnesota Relay. Sprint's contract was for the provision of the call center facility, equipment and maintenance, and access to Sprint's fiber optic telecommunications network. The Minnesota Relay center, located in Moorhead, began processing calls on December 16, 1996.

Under a separate subcontract, the state and CSD established a Minnesota Relay Consumer Relations Office (CRO) located in St. Paul, MN. CRO staff, consisting of both deaf and hearing outreach specialists, provided presentations, demonstrations and training to any individual, group or organization in Minnesota. CRO staff were also responsible for taking and resolving consumer complaints, answering questions regarding relay services, and meeting with relay users to gather information on the quality of available services.

The TRS contracts with CSD and Sprint, as well as the subcontract with CSD for the provision of the CRO, expired on June 30, 2006.

On April 1, 2003, the state contracted with Sprint for a ten-month captioned telephone relay service (CapTel) trial. The purpose of this trial was to evaluate CapTel technology for potential use as an additional form for providing TRS in Minnesota.

After reviewing the positive consumer response during the CapTel trial, the state determined it was in the best interest of Minnesotans with hearing loss to continue providing CapTel services. In February 2004, the state contracted with Sprint for the provision of captioned telephone relay services on a full-time basis. The CapTel contract with Sprint expired on June 30, 2006.

On October 17, 2005, the Minnesota Department of Administration (Admin), on behalf of DOC-TAM, released a Request for Proposals for the provision of statewide Telecommunications Relay Services and associated outreach services. The only proposal received in response to the RFP was from CSD (with Sprint as a subcontractor). Receiving a single proposal may have been due to Minnesota's statutory requirement that the TRS provider "shall operate the relay service within the state of Minnesota." The proposal was evaluated and the contract was awarded to CSD.

The initial contract term was effective from July 1, 2006, through June 30, 2011, with the option to renew up to an additional 60 months. Effective July 1, 2011, the state extended the basic relay and captioned telephone relay services components of the TRS contract with CSD through June 30, 2014. The Minnesota Relay outreach component was not included in the contract extension.

On July 1, 2011, DOC-TAM began contracting with the Minnesota Department of Human Services - Telephone Equipment Distribution Program (TED Program) for the provision of Minnesota Relay outreach services. With this transition, outreach is provided from five regional Deaf and Hard of Hearing Services office (in the past, Minnesota Relay outreach was provided from one office located in St. Paul), and TAM has greater oversight of staff and program objectives.

## General Minnesota TRS Information

### Minnesota Relay Telephone Numbers

7-1-1 (Voice, TTY, ASCII)  
1-800-627-3529 (Voice, TTY, ASCII)  
1-877-627-3848 (STS)  
1-877-627-3024 (VCO Direct)  
1-866-855-4611 (Two-Line VCO)  
1-877-627-5448 (Spanish)  
1-900-230-3324 (900 Pay-Per-Call)  
1-877-243-2823 (to call a single-line CapTel relay user)

### Contact Information for Minnesota's TRS Administrator

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85 Seventh Place East, Suite 600  
St. Paul, MN 55101-3165  
Phone: 651-297-8941 / 1-800-657-3599  
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### TRS State Certification

Minnesota's TRS program was first certified by the FCC in 1993, and was recertified in 1998, 2003, and 2008. Minnesota's current TRS certification is effective July 26, 2008, through July 25, 2013. Please see [Appendix B](#) for a copy of the July 16, 2008, notification letter from the FCC granting approval of Minnesota's TRS program.

### In-State Center Requirement

Minnesota has a statutory requirement for an in-state TRS center. The Minnesota Relay center is located in Moorhead.

Minnesota's current TRS contract requires CSD to process 80 percent of traditional relay calls (TTY, ASCII, Voice, VCO, HCO) at the in-state center. The Moorhead center handles relay calls for other states in which CSD and Sprint are the contracted TRS Providers.

Minnesota's TRS contract allows CSD to process Spanish, Speech-to-Speech, and captioned telephone (CapTel) relay calls from centers located outside of the state of Minnesota. Currently, Minnesota Spanish relay calls are handled primarily at the CSD/Sprint center located in Lubbock, Speech-to-Speech relay calls are handled primarily at the CSD/Sprint center located in Dayton, OH, and CapTel calls are handled primarily at the Ultratec centers located in Madison and Milwaukee, WI.

### Minnesota Relay Call Volumes

In the past five years, Minnesota's traditional relay calls have declined approximately fifty-eight percent, while CapTel calls have increase roughly fifty-four percent. Speech-to-Speech calls can fluctuate greatly from month to month, but overall they have shown a moderate increase during this period.

Minnesota Relay call volume charts are provided in [Appendix C](#).

## 47 C.F.R. § 64.604 – Mandatory Minimum Standards

### 47 C.F.R. § 64.604 (a) Operational Standards

#### §64.604 (a)(1) Communications Assistant (CA)

*§64.604 (a)(1)(i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.*

Initial training for CAs consists of 80 hours of curriculum, workshops, and exercises to train CAs to effectively meet the specialized communications needs of relay users who are deaf, hard of hearing, late deafened, and speech disabled. Training in the operation of TRS equipment includes both simulated on-line call handling, as well as assisted live call handling.

During initial training, CAs are educated and evaluated on accurately reflecting the TTY user's intent, and on what the CA's role is in the relay process. New hires also receive training in Deaf Culture, ASL translation, and sensitivity to the needs of persons with speech disabilities. This training is conducted by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area.

CAs receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. Stress can be a factor in maintaining confidentiality. CAs receive three hours of training on healthy detachment.

CAs are taught to process all call types through a combination of lecture, workbook activities, role-playing activities, and examinations. There are five written examinations administered during training, which cover the steps of call processing and ensure that the CA has learned these steps in the proper order. Additionally, three side-by-side examinations are administered in which two trainees act as the deaf and hearing customer respectively, and the third trainee processes the call while the trainer observes and grades to ensure the trainee can process the call correctly. Because of the role-playing aspect of training, not only can CAs process calls at the highest possible level of customer satisfaction, but they can also understand and can use all of the types of telecommunications equipment used by persons who are deaf, hard of hearing, or speech disabled.

Trainees attend a workshop on the translation of written ASL into conversational English. In addition to this workshop there are also two workbooks that new CAs are required to complete. The workbooks are corrected by the CA's Team Leader.

## CA's Training Module Outline

TRS TRAINING SCHEDULE		
<b>DAY 1</b>	Welcome Packet/Important Numbers/Confidentiality Forms Building Tour, Lockers, Keycard, Login Numbers Training Goals and Expectations What is Relay? Video: Making the Right Connection How We Got Here – Orientation - Why we're here. Contract Information Introduction of Training Workbooks TTY Overview/Abbreviations, Descriptive Words/Background Noises	ASL Introduction – ASL Workbooks Overview of System and Equipment Skills: typing, talking, listening, reading Enter Tour Preferences: Admin Presentation Connecting to Relay Headset Orientation Basic Call Processing Procedures (TTY - Voice) Observe Calls *Typing Practice/Tests if necessary
<b>DAY 2</b>	(TTY – Voice) – continued Role Play Introduction Review (TTY - Voice) TTY - VOICE PRACTICE Phone Image/Rudeness Detachment Expressive Typing Variations Deaf Culture: Quiz about Deafness	Observe Calls Continue Call Processing (Voice - TTY) Administer Spelling Test VOICE - TTY PRACTICE HR – Orientation presentation Review for Test #1 *Typing Practice/Tests if necessary
<b>DAY 3</b>	Review – Variations Branding Recording Feature Answering Machines/Answering Machine Retrieval Control D Feature/ Pagers Voice Mail	Pagers/Beepers Deaf Culture: Deaf Timeline Practice Role Plays Observe Administer Test #1 *Typing Practice/Tests if necessary
<b>DAY 4</b>	VCO - Non-Branded VCO - Branded Practice Role Plays Privacy Feature (VCO) VCO Answering Machines Voice to VCO & Two Line VCO	Variations Practice Role Plays Desensitization Observe Review for Test #2 Typing Practice/Tests if necessary
<b>DAY 5</b>	Review Surveys (TTY - Voice and Voice- TTY)/ Observe Billing/ Immediate Credit Prepaid Calling Cards Roaming	Deaf Culture: ASL Worksheets ASL Workbook Practice Role Plays Administer Test #2 *Typing Practice/Tests if necessary
<b>DAY 6</b>	Review Changing CAs - Video and Call Takeover Process Directory Assistance/Sprint International/ 900 calls HCO - Non Branded HCO - Branded Voice - HCO HCO Answering Machines	Practice Role Plays ASL Translation – Presentation by staff interpreter or individual with experience Observe - Type Review for Test #3 HR - Benefits *Typing Practice/Tests if necessary
<b>Day 7</b>	Review Practice Role Plays Customer Service Operator Services for the Deaf (OSD)	Device to Device Administer Test #3 Observe - Talk *Typing Practice/Tests if necessary
<b>DAY 8</b>	Review Practice Role Plays - VCO Final - VCO Surveys/ Observe ASL Translation Customer Database (CDB) Features	Emergency/ Threats Help Screen Review Take Calls - assisted Review for Test #4 *Typing Practice/Tests if necessary
<b>DAY 9</b>	Review Variations Practice Role Plays Return ASL Workbooks and Discussion Adherence/Trades/OT - OA Presentation	Administer Test #4 Overview of Federal Relay Take FRS Calls - assisted Review for Test #5 *Typing Practice/Tests if necessary
<b>DAY 10</b>	Administer Test #5 Final Review/ Questions & Answers Detachment Life After Training Complete Typing Tests if necessary	Graduation Take Calls Take digital pictures for ID Badge

## Topics Covered During Training

TRAINING TOPICS		
Orientation	<p>Welcome and Introductions            Introduction to Each Other            Long Distance            Local Telecommunications            PCS (Personal Communications Service)</p>	<p>Internet Services            Product Distribution            Telecommunications Relay Service            What is Relay?            Relay Agent Training            Relay Video: Connect to Your Future            Observation Guidelines            How a Call Reaches CSD/Sprint Relay Centers</p>
Connecting to Relay	<p>The Role of a Relay Agent            Connecting to Relay            7-1-1            Dedicated Toll-Free Numbers            Equipment            TTY            TTY Basics            TTY Etiquette            Closing a Conversation            Agent Responsibility            Call Set Up            Call Closing            TTY to Voice Closing a Conversation            Operator Role Closure            Operator Close Protocol Guide:            Disallowed Calls            Glossary of Abbreviations and Terms            TTY Practice Session            Auto-Corrected Abbreviations            Standard Abbreviations            Typing Variations            Internet Characters            Non-Baudot Supported Characters            Verbatim - Style            Contraction Spelling            Punctuation            CA Role            SKSK            Background Noises While TTY User is Typing            Typing Monetary Units            TTY Garble During Typing            XXX to Correct Typing Error            Other Communication Devices            Data Transmission Speed            Turbo Code            Turbo Code Interrupt            Enhanced Turbo Dial Through - (ETurbo)            Disable Turbo Code Mode            ASCII - American Standard Code Information Interchange            ASCII Interrupts            Sprint IP - Internet Relay            Sprint IP Call Processing            Internet Relay Variations            Sprint IP Relay: Internet &amp; IM access            'GA' is optional            Sprint IP Standard Service Explanation            Text Flow            Interruptions Without Garble            Conversational Flow            ASL Emoticons – Smileys – Text Message Abbreviations            IP Acronyms            Sprint IP Variations            9-1-1 Emergency Calls</p>	<p>Sprint IP User Connects to Agent But Wants Customer Service            Sprint IP Two Line VCO            FRSO- Federal Relay Service Online            FRSO Call Processing            FRSO Reporting            FRSO Variations            Sprint IP/FRSO International Calling            Sprint IP/FRSO Variations            Sprint IP/FRSO Fast Busy            Sprint IP/FRSO Two Line VCO            Sprint IP/FRSO Conversation Lag Time            Sprint IP/FRSO Interrupts            Voice to AIM (AOL)            Voice Mail Greeting            Voice to AIM Procedures            Voice to AIM Variations            Blocked Screen Names - Suspect International Locations.            Cellular and Wireless Phones            Video Relay Service            Blackberry Devices and Pagers            TTY Public Payphone            Sprint National Relay            Sprint International (SI)            Inbound International Calling            Sprint International Variations            Non-Standard TTY            Outbound International Calling            Transfer Menu            Reseller Call Processing            CapTel            Relay to CapTel            CapTel to Relay            CapTel Transfers            Dedicated State CapTel Transfer            Alternate Languages            Spanish Language Customer Service            Relay Caller ID            True Caller ID            Per Call Block            Per Line Block            Permanent Call Blocking            Caller ID Blocking - True Caller ID – SS7            Connecting Variations            Misdialed Relay Phrase            Dialed 7-1-1 Instead of 9-1-1            7-1-1 Spanish            Request for Relay Numbers            Cellular Problem Reaching 7-1-1            6-1-1/8-1-1 (LEC Service Access)            700            900 Numbers and Call Processing            Correctional Facility/Prison Calls            FAQs on the Use of Relay Through</p>

TRAINING TOPICS		
	Spanish and French Language Service International Calling Restrictions Sprint IP Correctional Facilities/Jails Info Digit List	Correctional Facilities: Correctional Facility Call Processing Relay Abuse
Overview of System and Equipment	System Overview Login/Logout Agent Profile The Mouse/Clicking the Mouse Dragging/Dropping Copy/Paste Drop Down Boxes Lists Radio Button Scroll Bars Sliders Tables Tables Accessing a Program Screen Displays Call Handling Screen Title Bar Banner Conversation Area Disconnect Message Status Color Scheme Agent Text Transmission Cancel Key Information Bar Profile Help Call Type	Dial Window Scratch Pad Transfer Panel Headset Panel Status Bar Record Feature Function Keys Block Ctrl-Switch Switch The Keyboard Alpha Keys Function Keys Call Handling Keys Numeric Keys Cursor Movement Keys Arrow Keys Backspace Error Correction Function Single Word Edit Function Word Substitution Feature Macros Table Function Keys/Ctrl-Function Keys Glossary of Telephony Terms Background Noises Voice Tones/Descriptive Words Standard Abbreviations
Phone Image (Tone of Voice)	Professional Phone Image How Phone Image is Created Provide Warm and Friendly Greeting Conversational Tone Voice Inflection Audibility and Breath Control Pitch Quality Operator Role Relay Role Relay Skills Conversational Flow Staying Focused Listening Skills Customer Service Skill Coping Skills Phrases Background Noises Voice Tones/Descriptive Words Transparency and Caller Control	Voice Person Speaking in 3rd Person Pacing the Voice Customer Brief Pacing Phrases Repeating Information Voice Customer Does Not Say "GA" Handling Interruptions Voice Tone How Phone Image is Created Provide a Warm Greeting Why Conversational Tone? Transparency, Caller Control & Confidentiality Rudeness, Types of Create an Exceptional Customer Experience Greeting Announce Closing Suggested Redirect Phrases
TTY to Voice and Voice to TTY	TTY to Voice Introduction Connecting to the Outbound Customer Announcement Explanation of Service Deaf or Hard of Hearing Explanation International Announcement TTY to Voice Procedures TTY to Voice Specific Person Request Variations Specific Person Request TTY to Voice Answered TTY Voice Person Not Available TTY to TTY Call Release TTY to Voice Ans. TTY (TTY to TTY)	TTY to Voice Busy Signals Regional 800 Voice to TTY Voice to TTY Introduction Connecting to the Outbound Customer Voice Greeting Voice Call Progress Announcement Voice to TTY Call (Hearing Person Answer) Explanation of Service Voice to TTY Procedures Voice to TTY Specific Person Request Voice to TTY Answered Voice

TRAINING TOPICS		
	TTY to TTY Specific Person Request TTY to Voice No Answer Types of Busy Signals Redialing	Voice to TTY No Answer Voice to TTY Busy Signal
Branding	Inbound Answer Type Branding Database Branding	Branding procedures
Recordings, Answering Machines, Pagers, and Answering Machine Retrieval (AMR)	Introduction Recording Feature Information Line Recording (TTY/Voice) Touch Tone Dialing Using Touch Tones (TTY/Voice) Audio Text Interaction Variations for Recordings Record Feature Tips TTY-Voice Recordings TTY-Voice Recording Information TTY-Voice Answering Machine Variations: Ans Mach/Recording/Pagers Voice Mail Retrieval	AMR (Answering Machine Retrieval) TTY-Voice Pager/Beeper (known) TTY-Voice Pager/Beeper (unknown) Voice to TTY Pager Voice to TTY Answering Machine Other Recording Variations Voice Mail System Privacy Manager/Call Intercept Automatic Redial System Recordings Switchboards Redialing Voice Mail Through Switchboard TTY-Voice Asking for Specific Person Live person On Ans Mach Redial
VCO (Voice Carry Over)	VCO Introduction VCO Announcement VCO Service Explanation VCO Equipment Non-Branded VCO & Branded VCO VCO No Answer VCO Busy VCO Privacy VCO Answering Machine Voice to VCO Answered TTY Voice to VCO Answered VCO Two-Line VCO (2LVCO) Intro Two-Line VCO (2LVCO) Procedure	Reverse Two-Line VCO Intro Reverse Two-Line VCO Procedure VCO Variations VCO Comes In Voice Line Two-Line VCO Conference Calls VCO Requests Relay to Give Relay # VCO Privacy While Leaving Message VCO Voice Mail Retrieval 2LVCO Voice Mail Retrieval VCO Types and Voices Inbound Customer Requests VCO/HCO VCO Requests CA Gives Name in Notes
Billing	Introduction Local Call Description Paid By Inbound Over Sprint Network Toll Free Calls Calls That Cannot Be Processed COC (Carrier of Choice) Paid by Inbound Paid by Inbound Alternate Carrier of Choice Alternate Billing (Intro) Billing Options: Collect, FONCard (Sprint) Description, LEC Calling Card, Other Long Distance Calling Card, Paid by Inbound, Third Party, Pre-paid Calling Cards Billing Procedures Calling Cards Paid Billing with COC (TTY-Voice) Paid Billing with COC (Voice-TTY) TTY/Voice Pre-Paid Calling Card/800 Card Voice/TTY Pre-Paid Calling Card/800 Card Voice-TTY Collect Specific Person Request	Calling Card -- TTY Originated Calling Card -- Voice Originated Collect Calls & Collect Call Intro TTY-Voice Collect Specific Person Requested Person-to-Person Call Person-to-Person Call Processing Collect Call -- TTY-Voice Collect Call -- Voice/TTY Third Party Billing Third Party Billing Intro 3rd Party TTY-Voice Billing Voice Number 3rd Party TTY-Voice Billing TTY Number 3rd Party Voice-TTY Billing TTY Number Immediate Credit Inbound Tells Wrong Number Agent Dials Wrong Number Marine Roaming Feature/Restricted Roaming/Unrestricted Roaming Billing Variations
HCO (Hearing Carry Over)	HCO Intro HCO Announcement HCO Service Explanation Speech Disabled "S" Non-Branded HCO Branded HCO HCO with Privacy HCO No Answer HCO Busy HCO-Voice Answering Machine	Voice-HCO Answered Voice-HCO Answered TTY (1) (2) Voice-HCO Recorded Message Answers Two-Line HCO (2LHCO) Intro Two-Line HCO Procedure Reverse Two-Line HCO HCO Variations Inbound Requests VCO/HCO HCO User Requests to Speak
Customer Database	Enhanced Customer Database Profile Household Profile	Customer Profile Introduction Use/Edit/New/Delete Customer Profile

**TRAINING TOPICS**

	<p>Edit Household Profile          Navigating Customer Database          Household Profile Panels          Notes          Frequently Dialed Numbers          Personal Information          Preferences          COC          Restrictions          Blocked          Emergency Numbers          Speech to Speech          Speech to Speech Messages</p>	<p>Verify Customer Password for Agent          Verify Customer Password -- CSR Only          Customer Profile Panels          Personal Info          Notes          Frequently Dialed Numbers          Preferences          Emergency Numbers          Speech to Speech          Speech to Speech Messages          Database Profile Macros</p>
<p>Directory Assistance (DA)</p>	<p>DA Intro          Interstate Directory Assistance          Intrastate Directory Assistance          Automated DA          DA City &amp; State Given; Area Code Unknown          DA Variations          Sprint International          International Transfer Menu          Call Processing -- Calling to International Number</p>	<p>Call Processing -- Calling From International Number          Sprint International Variations          Non-Standard TTY          Answered Foreign Language          Transfer Menu          900 Number Call Processing          2-1-1/3-1-1/5-1-1 Requests</p>
<p>Device to Device Calls</p>	<p>Device to Device Intro          Function Keys and Banner Messages          VCO to TTY and TTY to VCO          VCO to VCO          TTY to HCO and HCO to TTY</p>	<p>VCO to HCO and HCO to VCO          HCO to HCO          Device to Device Variations          Alternate Call Type Reaches Recording</p>
<p>Call Processing Variations</p>	<p>CA Information          Area Code Only In From Number          Conversational Flow          Static or Poor Connection          Profanity Towards Agent          Redialing          Young Children          Inbound Does Not Connect          Inbound ASCII          Charges Refused 800 Number          Tone Judgments          Repeating Information          Restricted Calls          Two Calling From Numbers          LEC Service Office          6-1-1/8-1-1          Double Letters          Call Waiting Feature          Conference Calls          Party Line Calls          Three-Way Calling          Hard of Hearing Customer Ans TTY Line          Spanish Calls to TX Spanish Speaking Agents          Request for Alternate Language          Caller Types in Alternate Language          Voice Customer Hangs Up During a Call          Variable Time Stamp          Customer Misdialed Phrase          TTY Customer Hangs Up During a Call          Non Standard TTY Capability          Relaying Internet Characters          TTY User Does Not Type GA          Dispatch Calls – Pizza, Taxi, Carry-Out          Customer Referral Guidelines          V-T Calls Answered by Fax          Customer Requests          Holding for Inbound Prior to Out Dial          Request for Company Information</p>	<p>Request For Length of Call          Request Long Distance Information          T-V Call and V Requests Supervisor Call          Backs for TTYs          Multiple Calls          Sensitive Topics          Suicide          Abuse          Illegal Calls          Answering Machines          Hangs Up Before Message Left          Do Not Type Recorded Messages          Answering Machine Full          Change Answering Machine Message          VCO Requests Leave Message 1st Out Dial          Leaving a Message V-TTY Ans V          Retrieving Messages from TTY V Answering Machine          TTY Screener          Request to Leave TTY Message on Answering Machine          Recordings          Regional 800          TTY Requests “Dial That Number”          Recording with Relay Option          Alternate Call Recording Reached English/Spanish          Pound          Touch Tone Phone          Advertisements          Do Not Type Recordings          Get Live Person/Rep          Conversation Being Recorded          Dial Number From Recorded Announcement          VCO          Conference Calls          Leave Relay Number          Voice Mail Retrieval</p>

TRAINING TOPICS		
	Request for Information Request for M or F Agent Request Specific Agent Agent Knows Customer Request for Relay Number Customer Requests to Call Relay Service Request for Calling From Number Request Telephone Number Referral Request for Date/Time Customer Requests Agent to Modify Call	VCO Types and Voices Prompting Data Transmission Box Prompting VCO on Hold Requests VCO/HCO HCO Requests VCO/HCO Alternate Call Type Recording Bridge Left Open
Call Take Over Procedures	FCC Rule Protocol and Process Flow TTY-Voice and Voice-TTY ASCII	VCO VCO to VCO HCO VCO-TTY and TTY-VCO
Customer Service	Functions Language Services	Procedures
Operator Services for the Deaf (OSD)	OSD Functions	OSD to TRS TRS to OSD
Transparency	Non-Emergency Calls Emergency Center Evacuation	Network Failure
Emergency Call Procedures	Emergency Calls Intro Emergency Services FCC Requirements Emergency Call Processing Emergency Reporting TTY Emergency Voice Emergency	TTY Emergency-TTY Call Release Internet Emergency Internet (IP) Emergency Instant Messenger (IM) Emergency Emergency Call Processing Variations Emergency Form
Federal Relay Service	FRS Intro FRS Announcement FRS Service Explanation FRS Relay Procedures Federal Relay Service Call Types	FRS Confidentiality Policy FRS Customer Information Requests FRS Customer Contacts FRS Reporting
Speech-to-Speech (STS)	STS Training Outline STS Introduction and History STS Description Disabilities Characteristics of STS Users Stereotypes Clarifying Phrases Phrases to Avoid STS Phone Image STS Agent Tools Consistency Patience Ask Yes or No Questions No Personal Conversation Phrases You Can Use STS Alphabet Transparency/Call Control/Confidentiality	Ways to Reduce/Streamline Notes Standard Abbreviations (STS) STS-Voice Voice-STS STS VCO-Voice Voice to STS VCO (TTY Answer) Voice to STS VCO (VCO Answer) STS VCO – Two-Line VCO TTY-STS STS-TTY Non-Branded HCO to STS STS-HCO STS Hold Message STS Call Takeover Confidentiality and Transparency Personal Conversations Requests STS Variations
Healthy Detachment	Healthy Detachment Intro Objectives Survival Skills Relay Traps	Perception Ways to Reduce Stress Hospitality Phrases
Healthy Relay	A Healthy Approach Toward Relay Introduction Objectives Ergonomics Stretching Exercises Agent Reinforcement Ergonomic Review	Setting Up Workstation GUAM - Get Up and Move Ergonomic Relief Slowing the Customer Down Overtime Relaxation
Adult Learner	Understanding the Needs of the Adult Learner The Learning Continuum Use of Different Modalities	Modeling Checking For Understanding Guided Practice &Independent Practice

TRAINING TOPICS		
	Adult Learning - Edgar Dale's Cone of Experience Elements of Lesson Design Focus The Adult Learner Objective and Purpose Input	Summary Evaluation How to Give Effective Instruction Questioning Guidelines Feedback - Training and Coaching Technique Trust in Management
Assessing Performance	The Assessment Process in Training Assessment Time - What is involved? Practice Time Spelling Test Written Tests Side by side evaluations Typing	Acceptable Time Frame Acceptable Is Relative Ways to "Coach" Feedback Maintain Self-esteem and Motivate Pass/Fail Guidelines Introduce Assessment Form Form Set-Up
Introduction to Diversified Culture	Introduction to Diversified Culture Objectives Who Uses Relay Understanding Our Customer Special Communication Needs Pathological vs. Cultural View of Deafness Characteristics of Deafness The Deaf Community	Why is There Deaf Culture? Attachments: What Do You Know About Deafness (Q) What Do You Know About Deafness (A) Myths About Deafness Two Views of Deafness Loudness Levels
Deaf Heritage	History in Europe History in North America Alexander Graham Bell	Edward Miner Gallaudet Oral / Combined Debate
The Deaf Community	Introduction to the Deaf Community National Association of the Deaf Contributions to Society Mainstreamed Schools	American Athletic Assn. of Deaf National Theatre of the Deaf Assistive Devices Gaining Acceptance in the Deaf Community
The Deaf Community	Sign Language Interpreters Different Communication Systems Exposure to English DEAF President Now Attitude Changes Toward the Deaf Community	Changes in the Deaf Community Rules for Using a Sign Language Interpreter Interpreting Standards
American Sign Language Part 1	What is ASL? History of ASL ASL Recognized as Language	Rules of ASL Five Parameters of ASL English vs. ASL Idioms
American Sign Language Part 2	Evolution of ASL ASL Syntax	Translate ASL to English and Vice Versa
TTYPhony and TTY Courtesy	First Teletypewriter Evolution of the TTY Telecommunications Laws of Accessibility	TTY Courtesy Development of Relay Service Market
Hard of Hearing and Late Deafened Customers	Hard of Hearing and Late Deafened Customers Characteristics of Deaf Customers Assistive Devices for Deaf Customers	Establishment of Self Help for Hard-of-Hearing People (SHHH)(Now the Hearing Loss Association of America) Relaying for Deaf Customers
Characteristics of Late-Deafened Customers	Establishment of Association of Late-Deafened Adults (ALDA) Relaying for Late-Deafened Customers	Deaf-Blind, Speech-Challenged, Spanish Speaking, and Hearing Customers
Characteristics of Deaf-Blind Customers	Assistive Devices for Deaf-Blind Customers Relaying for Deaf-Blind Customers	Deaf-Blind Pacing – Allows the CA to Slow Down the Transmission to the Braille Machine
Characteristics of Relaying for Other Users	Speech-Challenged Customers Spanish-Speaking Customers	Hearing Customers
Ethics and Confidentiality	Interpreting Standards The ADA and FCC Regulations for the Provision of TRS Regulations Pertaining to Call Content	TRS Rules – Operator Standards Relay Center Agreement Regarding Confidential Customer Information.

Once training is complete, the CA's performance is regularly evaluated through two individualized monthly surveys. Supervisors use a CA Performance Survey while observing CAs processing actual relay calls. The Performance Survey is a comprehensive assessment tool designed to evaluate CA performance on 44 aspects of relay call processing. The Performance Survey addresses, among many aspects of quality relay performance, appropriate grammar, spelling, voice clarity and articulation, typing speed and accuracy, TTY-ASL interpretation, etiquette, language, and cultural understanding.

The CA Performance Survey provides a detailed perspective on individual performance and is used as a basis for feedback to the employee to identify strengths and weaknesses, and for employment and compensation decisions. All CAs are required to meet expectations in all areas of the Performance Survey. If a CA does not meet a specific expectation, additional training and an opportunity for improvement are offered. CAs who do not satisfactorily improve in a reasonable time are subject to formal corrective action up to, and including, termination of employment.

### **Quality Assurance Test Calls**

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint staff and/or an independent third party quality testing firm retained by Sprint perform anonymous test calls monthly and quarterly. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Sprint also conducts test calls at least once per quarter to ensure CapTel quality.

### **Relay Program Management and Trainer Test Calls**

Sprint's Operations department and members of a Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results, and customer contacts. Test calls are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with management.

Supervisors use the test call data to provide continuous performance feedback to CAs and to award incentives and formal recognition for outstanding performance. If performance is less than expected, employees are provided guidance, retraining, and practice on an as-needed basis to improve their performance. If progress is not satisfactory, a formal Corrective Action Program involving progressive disciplinary steps is used to further encourage improvement. Employees who fail to achieve and maintain the expected proficiency after exhausting the corrective action steps are subject to termination of employment.

Sprint's Program Management Team also performs test calls for CapTel CAs.

### **Speech-to-Speech (STS) Specific Training Requirements**

In addition to initial training, STS CAs receive eight hours of additional training specifically on Speech-to-Speech relay services. This training is delivered by individuals with professional experience related to speech disabilities and/or by consumer experts. Two training hours are spent specifically on voicing for voice-synthesizer users.

### **Tools Available to STS CA Applicants and STS CAs**

Video and audio tapes featuring individuals with a variety of speech disabilities are used to demonstrate a wide range of speech patterns. STS users have voluntarily provided recordings in order to promote the ongoing training of STS CAs; the recordings represent a broad range of

levels of speech disabilities and include augmentative devices. This ensures that STS CAs are well equipped to meet the specialized needs of STS users.

STS CAs are provided with a training guide, which details the history of STS, the role of the STS CA, comprehension strategies, and confidentiality concerns.

### Hearing Acuity Testing

Prospective STS CAs are required to pass a hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test. Each potential STS CA is required to score 92% or higher in each ear using a 50 word, W-22 or NU6 speech recognition test. Each STS CA is required to possess a hearing acuity of 20dB or less in each ear using a pure tone sensitivity test at 250 Hz, 500 Hz, 1000 Hz, 2000 Hz, and 4000 Hz. Tests are conducted by an audiologist using calibrated equipment for the speech recognition test and pure tone test. Sprint uses state-licensed professional audiologist and/or audiologists who are certified by the American Speech-Language-Hearing Association with a certificate in Clinical Competence in Audiology (CCC-A).

### STS Training Final Test

In order to graduate STS training, trainees must demonstrate the ability to understand the speech patterns of people with a variety of speech disabilities, as well as an understanding of all aspects of STS call processing.

### STS Performance Evaluation

Once training is complete, a STS CA's performance is regularly evaluated through individualized surveys at least twice monthly. Supervisors evaluate each STS CA using the STS Performance Survey form while observing actual STS calls.

### STS Training Outline

STS TRAINING OUTLINE	
Values and Goals	
<b>Training Agenda</b>	
<ul style="list-style-type: none"> <li>▪ Objectives / Training Outline</li> <li>▪ Introduction and History</li> <li>▪ Video</li> <li>▪ Service Description</li> <li>▪ Characteristics of Customers</li> <li>▪ Stereotypes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Speech-Disabilities</li> <li>▪ Attributes of Speech-to-Speech Relay CAs</li> <li>▪ Speech-to-Speech versus Traditional Relay</li> <li>▪ FCC Requirements</li> <li>▪ Speech-to-Speech Variations</li> <li>▪ Assessment</li> </ul>
<b>Work Performance Components</b>	
<ul style="list-style-type: none"> <li>▪ Basic Call Processing</li> <li>▪ Call set up</li> <li>▪ Customer Database</li> <li>▪ Frequently Dialed Numbers</li> <li>▪ Customer Requests</li> <li>▪ Emergency Call Processing</li> </ul>	<ul style="list-style-type: none"> <li>▪ Confidentiality</li> <li>▪ Transparency</li> <li>▪ Personal Conversations</li> <li>▪ Developmental Skill Practice</li> <li>▪ Audio</li> <li>▪ Observation</li> </ul>
<b>Participation</b>	
<ul style="list-style-type: none"> <li>▪ CA training</li> <li>▪ Taking over calls – 15 minute</li> <li>▪ CA work performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ Call Focus</li> <li>▪ Teamwork – support peer</li> </ul>
<b>Confidentiality and Transparency</b>	
<ul style="list-style-type: none"> <li>▪ Discuss call speech patterns</li> <li>▪ Discuss techniques customer uses</li> <li>▪ Have two CAs on one call, if necessary or customer requests.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unacceptable to:</li> <li>▪ Have conversation regarding information discussed on calls</li> <li>▪ Discuss customers in general</li> </ul>
<b>Scheduling</b>	

## **Captioned Telephone (CapTel) Specific Training Requirements**

CapTel CA training includes comprehensive training on the CapTel service workstation equipment and other instruction, including some live call handling experience. All prospective CAs are required to meet all standards for becoming a CA. These standards include the ability to consistently meet call handling skills such as word-per-minute averages, accuracy averages, as well as attendance and attitude standards set by management. If, at any time, a prospective CA does not demonstrate the ability to achieve the expected standards they may be removed from the training group and terminated from employment.

All CapTel CAs are tested for competency in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. The CA training provides familiarity with hearing, deaf, and speech disabled cultures. As a CapTel user does not type while making a call, there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls, including:

- The CA is trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.
- The CA will not maintain any records of conversation content and will keep the existence and content of all calls confidential.
- The CA is required to meet the FCC standards for TRS minimum transcription speed.
- The CA will not limit the length of a call and will stay with the call for a minimum of ten minutes when answering and placing a call.
- The CA will pass along a CapTel caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.
- Personnel supporting CapTel will have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel services in a professional manner.

## **Training plan for Minnesota Relay CapTel CAs**

### *Introduction/Tour*

Prospective CAs meet the lead trainer, training assistant, call center director, and other administrative personnel that may be involved in the first day of training. They are given a tour of the building and the facilities and provided with a security passkey.

### *Human Resources Overview*

A Human Resource coordinator meets with each group to go over required employment paperwork, Call Center Policies, Non-Disclosure Agreement, Confidentiality Requirements, expected standards that must be met to pass out of training, and current scheduling needs.

### *Videos*

Several videos are shown to better demonstrate the job of a CA, how the technology works, and how it provides improved communication for CapTel relay users. After each video, questions are answered or clarified as needed.

### *Mini Demo On a CapTel Phone*

A brief explanation of the CapTel phone and the captioning system is given, including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using CapTel relay service. This helps individuals to

better understand what we are asking them to provide to relay users and what the relay user experiences.

#### *Introduction - Developing a Personal Voice Profile*

Developing a personal voice profile is the most important step to successfully process CapTel calls. CAs are given specific instruction as to how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy.

#### *Introduction - Training Program*

The CapTel training program allows individuals to listen to various pre-recorded scripts and “re-voice” what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

#### *Introduction - Call Handling Tools*

Macros are utilized to aid in the speed and accuracy of calls. CAs listen to pre-recorded scripts that consist mainly of macro type words and learn to utilize the macros accordingly.

#### *Introduction - Call Handling Skills - Pacing a Conversation*

CAs are introduced to further call handling skills that allow them to pace various calls in order to provide accurate captions.

#### *Introduction - Call Handling Skills - Inserting Words*

CAs are trained to insert particular words that the voice recognition is not able to caption successfully or in a consistent manner. These words include such things as people’s names and regional cities and towns.

#### *Introduction – How to Handle Various Recordings*

CAs are introduced to various types of calls and how to handle each. The importance of verbatim transcription, confidentiality, accuracy and speed are reviewed. CAs view a demonstration by the training assistant, and then each CA is assigned scripts relating to answering machines and automated recordings.

#### *Introduction & Demo of CapTel Conversation*

Each trainee observes each end of the “telephone call”(CA, CapTel user, hearing person). Each CA assists in making “live” calls to other trainees. This encourages each CA to observe and experience what CapTel users experience on every call. It also allows the CA who is captioning an opportunity to practice their learned techniques on more realistic, true to life calls.

#### *CapTel Introduction to Call Simulation*

Live call simulation allows CAs to gain exposure to real incoming calls landing on the production floor; however they do not interfere with the quality of captions going to the CapTel user. New CAs are paired with experienced CAs on the production floor to observe and listen to live calls.

### *Call Simulation - Timings*

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy. Baseline timings provide a progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

### *Review of Baseline Timings*

Training Scripts are assigned to the group. One at a time, each CA meets with the trainer to review their baseline timings. Feedback and review of standards and expectation are given.

### *Introduction to Correction Tool*

The Correction Tool is introduced to provide CAs with another opportunity to provide the highest quality captions.

### *Review Training Elements*

CAs meet as a group with the trainer to review the various elements that enable them to provide the quality of captions expected from each CA.

### *CapTel Monthly Timing Policy*

A monthly timing policy is reviewed with all CAs. The importance of successfully passing these timings is emphasized.

CAs are placed into a rotation of call simulation and receive an official timing. This second timing is a baseline timing in which re-voicing accuracy and call handling skills along with the ability to correct errors are evaluated. Each CA is unaware of when the timing will occur.

### *CapTel Production Floor Orientation*

Supervisors meet with the group of CAs to go over specific Call Floor procedures, expectations, break adherence, time clock, lockers, emergency plans, and point of contact individuals for questions and assistance.

CAs continue to progress onto the production floor and practice in the training room as needed. CAs are timed each day and progress is reviewed until a CA meets the expected standards or it is determined the individual is not suited for the position. Action is taken as necessary.

## **Spanish Relay Specific Training Requirements**

CAs who are hired to provide Spanish language relay services are required to pass an evaluation of their ability to read, write, speak, and understand Spanish. An independent vendor that specializes in the assessment of language skills conducts this evaluation.

Spanish relay CAs are evaluated monthly on their abilities to accurately translate typed text of relay users who have limited written Spanish language skills. As part of ongoing monthly evaluation, Spanish relay CAs are evaluated on their ability to translate Spanish gloss. Fully trained CAs will automatically translate limited typed Spanish to conversational Spanish.

Bilingual CAs are trained to meet the specific needs of Spanish-speaking relay users and are able to adapt to various dialects used by the Spanish-speaking community and regional variations of the Spanish language.

CAs handle dialects from all parts of Latin America and the Caribbean, including:

- Argentina
- Chile
- Colombia
- Cuba
- Dominican Republic
- Ecuador
- El Salvador
- Guatemala
- Honduras
- Mexico
- Nicaragua
- Panama
- Peru
- Puerto Rico
- Venezuela
- Standard Castilian Spanish

*§64.604 (a)(1)(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.*

In initial training, CAs are given five written and three hands-on performance evaluations. The CA must demonstrate their ability to spell, type accurately, process a call using live training terminals, and role-play scenarios written in varying levels of ASL. CAs must demonstrate relay skill level in all aspects of call processing prior to graduation from training. The CA testing involves hands on and a written assessment of knowledge.

### **Typing Tests**

Minnesota Relay uses an oral-to-type test that simulates actual working conditions and the relay environment. Testing software ensures the oral-to-type test is of a five-minute duration. The test used to assess typing speed is the same test used to assess accuracy. Specific typing tests are selected each quarter and are not posted or distributed in advance. Minnesota Relay follows all FCC guidelines in regards to typing speed requirements.

### **English Grammar and Spelling**

All CA trainees are required to pass valid and unbiased 12<sup>th</sup> grade level spelling and grammar tests to be considered for employment as a relay CA.

### **Understanding of Limited English**

CAs must demonstrate the ability to understand people with communication disabilities using limited English, and to translate limited typed English to correct spoken English.

During initial training, the CAs are trained and evaluated on how to accurately reflect the TTY user's intent and the CA's role in the relay process. Minnesota Relay uses a workbook, created by an instructor who is deaf, to train CAs in the translation of limited English to conversational English. In addition, all role-plays are written in ASL/limited English and CAs must translate these role-plays from limited typed English to correct spoken or conversational English. This area is evaluated and tested throughout training. When training is complete, CAs continue to be evaluated on limited English to spoken English translation through individualized monthly surveys. In addition, if requested, CAs will relay verbatim without translating.

### **Clear and Articulate**

As a part of initial training, CAs are educated to always use clear articulation and enunciation. Equally important, CAs are taught to be expressive and vary their tone of voice and rate of speaking by creating a verbal picture with their voice. For many customers it may be their first experience using a relay service. Hearing customers using relay rely on the tone of voice and inflection to better understand the message. How information is relayed may have a greater impression than what is said.

## **Diversified Culture and ASL Training**

All Minnesota Relay employees, including management, participate in 20 hours of Diversified Culture training during the initial training period. Representatives from local deaf organizations and/or Minnesota Relay staff with appropriate experience deliver this portion of training. Minnesota Relay works closely with the local deaf community to identify knowledgeable presenters to assist with the training.

Minnesota Relay's Diversified Culture training module represents CSD's and Sprint's commitment to ensure employees develop a sensitivity and understanding to the customers served. The training module includes information about the needs of persons who are deaf, hard of hearing, or speech disabled.

Training is provided on various levels of English/ASL during initial training, as well as throughout a CA's employment. In order to successfully complete the initial training, a CA must demonstrate competent skills in translating calls as required. Below are the topics covered in the Deaf Culture training program:

- What is ASL?
- History of ASL
- ASL's recognition as its own language
- Rules of ASL
- Parameters of ASL
- English idioms versus ASL idioms
- Evolution of ASL
- Syntax of ASL
- How to translate ASL to English
- TTY Language Samples
- TTY courtesy

CAs are tested for basic ASL skills prior to completing initial training. If the CA does not demonstrate the ability to convert basic ASL to conversational English, the CA is not allowed to take live calls. The CA will receive additional training and if the CA can not grasp the concept of converting basic ASL to conversational English, the CA will be terminated.

Throughout employment CAs continue to expand on their skills and improve their knowledge of ASL and Deaf Culture. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the supervisor. The supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this workbook for future reference. CAs are supported by supervisors who are trained and knowledgeable in Deaf Culture.

***§64.604 (a)(1)(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.***

All CA trainees typing skills are tested during new CA training. In addition, CA typing speed is tested quarterly. Specialized typing test software is used to assess typing speed in a five-minute test. The script is a voice-to-text typing test that simulates a relay call. The software counts every five characters, including spaces, as a word and divides the number of words typed by five to determine the number of words-per-minute. In addition, Minnesota Relay utilizes technological aides such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service. If a CA does not demonstrate a minimum typing speed of 60 wpm, the CA will not be allowed to process relay calls.

## CapTel Typing Tests / Typing Speeds

CapTel's voice recognition technology transmits above 100 words-per-minute. While oral-to-type tests are waived as a result of this technology, oral-to-text tests are given to all CapTel CAs.

*§64.604 (a)(1)(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; Minnesota does not contract to provide Video Relay Service.

*§64.604 (a)(1)(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.*

Minnesota Relay only changes CAs during the relay conversation when it is absolutely necessary.

In cases where a change in CAs is unavoidable, the CA will remain with the call for a minimum of 10 minutes for all relay calls (including CapTel) except for STS relay calls. STS CAs will remain with a relay call for a minimum of 15 minutes before a change in CA is allowed.

CAs are trained to use on-screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the inbound customer (15 minutes with STS), a CA may be relieved if it is appropriate.

The only situations in which a CA would transition during a call *prior to* the FCC minimum standard include:

- Customer requests a CA of the opposite gender or different CA
- End user is verbally abuse or obscene towards the CA
- Call requires a specialist (STS, Spanish, etc.)
- CA illness
- At the request of the customer for any reason
- CA becomes aware of a conflict of interest, such as identifying a caller as a friend or family member

Situations that may require a CA to transition the call to a different CA *after the CA has remained on the call longer than the FCC minimum standard*, include:

- Shift change
- CA fatigue, normally as a result of a call in progress more than 30 minutes with difficult call content or speed, or 60 minutes or more of an average call

A change of CA will not cause the new CA to lose the caller's call handling preferences, either from the caller's customer preference record or as requested by the caller during call setup, including instructions given once for sequential outbound calls. If a change in CAs is necessary, the second CA silently observes the call long enough to learn the spirit of the call as well as review any customer call handling preferences provided during the call and as a part of the Customer Profile.

***§64.604 (a)(1)(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.***

When a Minnesota Relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt is made to accommodate the previous gender request.

CapTel CAs are waived from this requirement.

***§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.***

Minnesota Relay CAs transmit and relay all conversations between the caller and the called parties in real time.

CapTel is a transparent service. CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

### **§64.604 (a)(2) Confidentiality and Conversation Content**

***§64.604 (2)(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.***

In accordance with FCC regulations, all information provided for the relay call set-up, including customer database records, remains confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

Minnesota Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. CSD/Sprint strictly enforces confidentiality policies in their relay centers, which include:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All CSD/Sprint relay centers have security key access.
- Visitors are not allowed in relay work areas.

- Supervisors are present in the work area to observe behavior.
- All relay center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

A copy of the Sprint Relay Center's Agreement Regarding Confidential Customer Information can be found in [Appendix D](#).

### **Speech-to-Speech (STS) Limited Exception of Retention of Information**

Minnesota Relay offers STS users various options to retain information in order to facilitate the completion of outbound calls.

- At the request of the STS user, the CA may retain information from one inbound call in order to facilitate the completion of consecutive outbound calls. The STS CA utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position.
- The STS user may utilize a feature called *My E-Mail Set-Up*. The STS user can e-mail call instructions or information to the relay center 2 to 24 hours prior to the call. The e-mail can include information such as the number to be dialed, the name of the person being called, the subject of the call, any special instructions, or anything that makes it easier for the STS user to complete the call.

The set up instructions provided in the e-mail is entered into the STS "retained messages" feature of the customer profile by Sprint Customer Service. Customer Service deletes the email after completing the entry. The system automatically deletes "retained messages" entries at 24 hours after the entry.

Note: STS CAs do not have access to the STS user's email. STS CAs access the set up instructions via the "retained messages" feature in the STS user's customer profile.

- The STS user may utilize a feature called *My Saved Messages*. If the STS user dictates a message to the CA to be used for a call, and the STS user is not able to complete the call due to a busy signal, the called party is not available, or so forth, the STS user can request that the STS CA copy the message onto the STS user's Customer Profile. When the STS user wants to place the call again, he or she simply redials STS and asks the CA to retrieve the saved message. After 24-hours, the message copied into the profile is automatically deleted from the system.

## CapTel

CapTel relay center employees must comply with the same rules that traditional TRS follows regarding confidentiality. A copy of the *CapTel CA Pledge of Confidentiality* form can be found in **Appendix D**. Below is an explanation of confidentiality as it pertains to CapTel relay employees.

- Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.
- Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A CapTel CA may have problems, complaints, or stress from handling a call. The CA may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of CapTel depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all CAs understand and abide by the confidentiality policy. Any CA who breaks this policy will be disciplined, up to and including termination.

*§64.604 (a)(2)(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.*

## Verbatim Relay

Minnesota Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

## Translation of ASL

At the request of the relay user, CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80% or better before being allowed to complete training and process relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the

CA and returned to the supervisor. The supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this workbook for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

### **TRS and STS Training**

- CAs accept their being involved only to the point of facilitating communication as a “human telephone wire.”
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

### **STS Facilitation of Communication**

STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise, or interject personal opinions. STS CAs receive training on many techniques to clarify the STS user's message if the meaning or context is unclear. STS CAs will not guess what the STS user is saying.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use multiple tactics to clarify a STS user's message. Many times, STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may use other methods to clarify, including asking the STS user:

- to repeat the word or phrase.
- “yes” or “no” questions.
- to use the word in another sentence.
- to provide a word that rhymes with the misunderstood word.
- to spell the word.

To ensure that STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available, and observed by supervisors who are available in the STS CA work area to monitor performance. If an issue is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

### **Confidentiality of Video Relay Service Users**

Not applicable; Minnesota Relay does not contract for Video Relay Service.

## §64.604 (a)(3) Types of Calls

*§64.604 (a)(3)(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.*

There are no restrictions on the duration or number of calls placed by any relay user. All Minnesota Relay uses retain full control of the length and number of calls placed anytime through relay.

CapTel CAs are currently waived by the FCC for outbound calls because the CapTel CA is not involved in call set up and cannot refuse the call. A CapTel user dials sequential calls directly, therefore it is not possible for a CapTel CA to refuse sequential calls or to limit length of calls.

CapTel CAs are not waived by the FCC for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse the call.

*§64.604 (a)(3)(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.*

Minnesota Relay is committed to ensuring that relay users have equal access to functionally equivalent telecommunications services, including enhanced services purchased by relay users from their local telephone company. The following call types are available through Minnesota Relay:

### **Intrastate Calling**

- Local calls.
- IntraLATA toll calls.
- IntraLATA interstate calls within the same local calling area which, if the relay center were not used, would be considered local calls (whether they originate within the state or outside the state).
- InterLATA calls that originate and terminate in Minnesota.

### **Interstate Calling**

The methods and procedures for providing interstate relay are within the jurisdiction of the FCC.

### **International Calling**

The methods and procedures for providing international relay are within the jurisdiction of the FCC.

### **Use of ANI**

Automatic Number Identification (ANI) technology will be utilized so that no caller is required to give his/her originating calling number, except in instances where ANI information is not available from the local exchange carrier (LEC) or competitive local exchange carrier (CLEC). If the CA does not receive the ANI and must ask the customer for their phone number, the CA will explain to the inbound party the reason she/he is asking for the phone number.

Sprint's ability to capture the incoming caller's ANI and cross-reference it to the called-number enables the system to automatically rate the call as either local or toll. Since this is done

automatically by Sprint's system, the result is faster call set-up as the inbound caller is not required to provide any additional information other than the called-party's information.

### **True Caller ID and Enhanced Custom Calling Services (purchased by users from their local telephone company)**

Minnesota Relay's TRS provider (CSD/Sprint) is required to be capable of providing true Caller ID services. All forms of calling line identification information and blocking features are required to be passed through with no relay intervention. With each outbound relay call placed by a CA, the inbound caller's telephone number (not the relay center's number) is automatically provided to the outbound relay called party for display on the called party's (phone or TTY) Caller ID display. The calling party's telephone number is not automatically passed on to the called party if the calling party has Caller ID blocking purchased from their local telephone company.

#### *Technology*

True Caller ID is offered for all local and long distance calls to carriers who have SS7 connectivity with Sprint. The SS7 network interfaces with all national long distance Carriers and major LECs, CLECs, and ILECs. This Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. Minnesota Relay passes through the calling party information (rather than 7-1-1 or the number of the TRS Center).

#### *Customer Control*

The relay user is in control of their relay experience. Minnesota Relay users are able to disable or block their Caller ID information from being transmitted with their LEC on either a per-call or a per-line basis.

When Caller ID information is not passed through, as with standard telecommunications, the Minnesota Relay called party will receive a message such as: "OUT OF AREA" or "CALLER UNKNOWN"

#### *Anonymous Call Rejection*

Prevents calls from ringing into customer's home if the caller's line is blocked.

#### *Call Block*

Block outgoing calls to long distance numbers, including pay-per-call and international numbers, operator assistance and directory assistance numbers.

#### *Caller ID Block*

Allows customer to block their name and telephone number from appearing on the Caller ID display of the number being called.

#### *Call Rejection*

Allows customer to block all calls from telephone numbers on a "rejection list"; if someone calls from one of these numbers, a pre-recorded message indicates that the called party is not accepting calls at this time.

#### *Last Call Return*

Allows customer to see the telephone number of their last incoming call.

### *Call Trace*

Permits the customer's local telephone company to trace the last call received by the customer, and hold the results for later use by an authorized law enforcement agency.

### *Preferred Call Forwarding*

Allows customer to create a list of telephone numbers that they want forwarded to a new telephone number. All other calls do not forward to the new number.

### *Priority Call*

Customer can program telephone numbers to ring distinctively.

## **Wireless and Personal Communications Services (PCS) Phone Calls**

In Minnesota Relay's most recent Request for Proposal for TRS the state included a clause (5.15) that stated:

"The Minnesota Relay must be capable of handling wireless and PCS phone calls. The Contract Vendor must maintain the procedure and methodology to determine the call types and document the amount of time necessary to determine call types. The Contract Vendor must be capable of billing the call appropriately."

CSD's proposal response stated:

"Wireless technology has limitations that impact all relay providers. Currently, it is not technologically possible for relay providers to determine the specific local calling area of all wireless subscribers. To overcome this limitation, CSD has implemented a solution at the Relay Center. If the incoming Wireless call is identified by the network information, CSD will process the Relay call without domestic toll charges or additional delays. If the wireless provider does not transmit the necessary network identification information, the caller may inform the CA, who will then process the call immediately. This eliminates the conflict between toll charges and customer's wireless plan.

CSD's current policy eliminates toll charges for cellular calls identified by the information digit pairs of #61, #62 and #63. CSD also eliminates toll charges when the calling-party indicates to the CA that they are calling from a cellular device."

## **Access to Regionally Directed Toll-Free Numbers**

Minnesota Relay users are able to access regionally directed toll free numbers. For example: AAA has a national toll free number. When a call arrives at the AAA call center, it is automatically rerouted to the correct state based on information in the relay user's ANI (not the relay center's ANI).

## **Access to Regionally Restricted Toll Free Numbers**

Minnesota Relay users have access to regionally restricted 800 or other toll-free prefix numbers, and calls to the business offices of local telephone companies which have special prefixes, all of which would normally be accessible to the relay user in his/her calling area. Sprint provides a VPN outbound trunk, which connects the relay center to the DMS-250 switch and is used for regional 800-calls. Since restricted 800 numbers are not used nationwide, they only work in specified LATAs; therefore, the call must be routed to Sprint's VPN trunk to the Sprint Point of Presence (POP) in the originating LATA for call completion.

The Regional Calling Network uses the existing Sprint network to route the terminating portion of the relay call (the called number) back to the LATA of origin for regional calls. This permits the CA at any CSD/Sprint relay center to complete regional calls, with the function transparent to Minnesota Relay users.

### **Access to 900 or Pay-Per-Call Numbers**

See information provided under §64.604 (a)(3)(iv).

### **Access to Coin Sent-Paid Calls**

Minnesota Relay users are able to make a call from a coin-operated public pay phone. Local calls are provided at no cost to Minnesota Relay pay phone user. Toll calls can be billed Collect, Third-Party, Person-to-Person, to LEC calling cards, non-proprietary IXC calling cards (if the carrier is an available Carrier of Choice through Minnesota Relay) and debit (pre-paid) cards. On occasion, the CA may need to request that the caller provide the dialing instructions indicated on the pre-paid card. The CA will then verify the number and connect the call. The CA will inform the user of the amount of minutes/units available on the card before the relay call begins.

### **Access to Directory Assistance (DA) Services**

Minnesota Relay users have unlimited access to standard Operator and DA services, including local and long distance DA, for free or at rates no higher than those charged normally to end users by the local telephone company. Once a Minnesota Relay user makes the request, the CA contacts the appropriate DA Operator. The CA relays DA call between the relay user and the DA Operator.

### ***§64.604 (a)(3)(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.***

If a long distance provider declines to complete a call because credit authorization is denied, Minnesota Relay will relay the message verbatim to the relay user and follow the user's instructions.

### ***§64.604 (a)(3)(iv) Relay services shall be capable of handling pay-per-call calls.***

Minnesota Relay users may access 900 services by dialing a toll-free 900 number (1-900-230-3324). Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

For single-line CapTel, the default pay-per-call designation on devices is 900 call blocking. Single-line CapTel users who wish to place pay-per-call calls from their CapTel phone must notify CapTel customer service to remove the 900 call block to allow these calls. Every CapTel equipment box includes a card for the user to send in to register their CapTel phone. That form allows them to remove 900 call blocking. If the user may also contact CapTel customer service via phone, e-mail, fax, or mail to remove the 900 call blocking.

Two-line CapTel users connect directly to their called party on a line that does not connect through the CapTel service, so only their local phone service settings for 900 calls applies.

***§64.604 (a)(3)(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.***

Minnesota Relay provides access to all available relay call types; the state meets, and in some cases exceeds, this requirement. Standard services provided by Minnesota Relay include:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA
- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

Except where waived by the FCC, Minnesota Relay CapTel users are able to access all types of TRS calls. The requirement to provide 7-1-1 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

***§64.604(a)(3)(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**

Minnesota Relay's TTY Call Release, also known as TTY-to-TTY call set-up, is in full compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line.

Minnesota Relay adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a relay call and is no longer subject to the per-minute reimbursement.

With two-line CapTel service, a CapTel user can release or receive captions at any time during a call.

### **Speed Dialing Functionality**

Minnesota Relay provides Speed Dialing functionality, which allows relay users to store up to 30 frequently called numbers in their Customer Profile database, along with a name for each entry.

When initiating a call, the relay user may provide the CA with the name of a person on their frequently called number list instead of providing the 10-digit telephone number.

The CapTel phone is equipped with the ability to program three speed dial numbers into memory, and also allows the user to redial the last number dialed. The two newest CapTel devices, the CapTel 840 and 840i, allow the user to save up to 97 names and phone numbers in the devices "phone book".

### **Three-Way Calling Functionality**

Minnesota Relay users who have purchased three-way calling or conference calling capability from his or her LEC can use this feature when placing a call through relay. Minnesota Relay users can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

CapTel users are also able to participate in a three way call. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number.

For two-line CapTel users, either party can initiate a three-way call if the user purchased this option from their LEC. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

*§64.604(a)(3)(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.*

Minnesota Relay uses an advanced Phoenix platform that includes CA-generated macros (e.g. pre-programmed phrases) that allow the CS to press a "hot key" to alert a relay user of the presence of a recorded message and/or interactive menu. (The hot keys are available in all supported languages.) When the CA presses the hot-key the system sends a text to the relay user which says "(RECORDING)". The CA then utilizes technology that has the capability of recording audio information from the outbound line on the first attempt. The CA then plays back the recording at a pace that allows her or him to relay the entire message to the TTY user, and deletes the recorded message. CAs are trained to type or relay the entire recording. Hearing relay users will be informed orally of call status messages.

To ensure confidentiality of access code information, the CA is able to utilize a scratchpad that has been incorporated into the call processing software. This allows the CA to retain necessary information to complete the call. At the end of the call, all information pertaining to the call is automatically erased from the CA position.

The CA will confirm with the caller that their message has been left. Once the CA has left the message on the answering machine or voice mail, the CA will confirm orally or send a pre-programmed response to the relay user stating: (UR MSG LEFT) CA XXXX M/F GA.

Minnesota Relay does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. The Minnesota Relay platform

incorporates “function keys” allowing the CA to complete standard tasks with a combination of two keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail, and recordings which redials the call over an ultra-watts line so the relay user does not incur charges for additional calls.

CapTel users are able to hear and interact directly with the recorded message and interactive menus. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. The CapTel user interacts with the recorded message system directly. This is treated as one call.

***§64.604 (a)(3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.***

Minnesota Relay has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a relay user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes, the CA will follow the user’s instructions. The Minnesota Relay platform use the touch-tone capability to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or to delete messages (depending on customer instructions).
- If necessary, the CA will use advanced recording technology to slow down the playback of the messages. If the CA needs to redial to process the call, the CA can quickly redial using a specific redial hot key for answering machine, voice mail, and recordings, which redials the call so the relay user does not incur charges for additional calls. If the relay user is making a toll call they are only billed for the initial call.
- The Minnesota Relay platform provides the technology necessary to retrieve voice mail or answering machine messages, including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller’s personal information is automatically deleted from the CA’s position to ensure that the customer’s information is kept confidential.

CapTel relay user can access messages on an answering machine that is located near their CapTel phone by playing the message aloud. To retrieve messages, the CapTel user performs the following steps:

- With the handset hung up, press the CapTel menu button until the option, “Caption External Answering Machine Messages” is displayed.
- Press the “OK” button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the “play” button on the answering machine & view the captions on the CapTel display.
- Save, delete, or navigate to the next message using the answering machine controls.
- When done, hang up the handset.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

### §64.604 (a)(4) Handling of Emergency Calls

*§64.604 (a)(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.*

Minnesota Relay automatically and immediately transfers emergency relay calls to the appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 9-1-1 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. Minnesota Relay considers an emergency call to be one in which the relay user indicates the need for police, fire department, paramedics, or ambulance. Minnesota Relay utilizes a standard E911 database that serves all of the United States.

Minnesota Relay emergency call handling procedures are as follows:

- CAs act upon the word “emergency”. Calls placed to fire, police, ambulance, and rescue squad are considered emergency calls.
- The CA hits a function key (i.e. hot key), which designates the call as an emergency. When ready to connect to an emergency agency the agent presses a dial key that uses the caller’s NPA/NXX to automatically route the call to the PSAP center that is closest to the caller’s rate center, or wire center when a rate center overlaps PSAP boundaries. This emergency hot key also “freezes” the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller’s information is available to be shared with the PSAP.
- Simultaneously, the CA presses a key to notify the relay center supervisor. The supervisor will assist the CA in processing the call, if needed. The supervisor does not take over the CA function unless requested or necessary to complete the call.
- The caller’s Automatic Number Identification (ANI) is passed to the PSAP as Caller ID.
- The CA identifies the call to the PSAP, using the phrase: “This is an emergency. I am calling for a deaf (or hard of hearing or speech disabled) person through the Minnesota Relay service. They are calling from (caller’s telephone number). This is CA # 1234, one moment please.”
- The CA advises the inbound caller that the emergency services is on the line. For example, “(POLICE ON LINE NOW)” and then types the way the 9-1-1 operator answered the phone.
- The CA relays the call. Unlike other relay calls, CAs may step outside of their neutral role to more actively facilitate communication as needed.
- Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
- The CA fills out an Emergency Incident Form, which documents the call.
- In the rare case of an PSAP routing error, the CA will fill out a technical “trouble ticket” for additional investigation.

## **Back Up Procedure**

In many instances, two emergency telephone numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

## **Caller Disconnects Before Connecting to PSAP**

If the inbound caller disconnects prior to being connected to the PSAP, the Phoenix system will continue dialing the PSAP number. The CA or supervisor will notify the PSAP call center of the premature disconnect and will provide any customer information that may assist the PSAP in resolving the emergency.

If the inbound caller types "HELP GA" and then hangs up, Minnesota Relay treats this as an emergency call. If the inbound caller does not specify the type of emergency service needed, the CA will connect the caller to the police. The CA will notify the relay center supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

## **Voice Emergency Calls**

If a voice customer misdials 7-1-1 when actually they require assistance through 9-1-1, the CA will say to the inbound voice caller: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 9-1-1. If not, we can attempt to connect you to a 9-1-1 center near your assigned telephone number, but there could be significant delay in getting assistance."

When the voice caller does not disconnect, requests further assistance, and/or remains on the line for more than five seconds after the notification phrase is read, the CA will attempt to connect the caller to emergency services. The CA will inform the caller, " I am connecting your call to emergency services, one moment please."

When connected to the emergency service, the CA informs the outbound party that "This is an emergency . I am calling for a hearing person through the Minnesota Relay service: They are calling from (caller's telephone number). This is CA # XXXX, one moment please."

## **Single-Line CapTel Emergency Calling**

When calling 9-1-1 using a single-line CapTel phone, the call is processed in the same way as a 9-1-1 call processed when using a standard telephone.

- The CapTel phone automatically converts to a Voice Carry Over (VCO) phone and dials 9-1-1 directly. (The CapTel call center is not engaged in processing single-line 9-1-1 calls.)
- The CapTel user will be connected to the proper PSAP in the least amount of time, and the telephone number (ANI) will automatically be passed to the PSAP.
- The CapTel user speaks directly to the PSAP operator, and the CapTel phone displays the typed responses from the PSAP.

## **Two-Line CapTel Emergency Calling**

Because two-line CapTel uses separate voice and data connections, it offers the most efficient way to access emergency services via 9-1-1. The two-line CapTel user is connected directly to 9-1-1 on a standard voice connection, and the captions are connected on the second line. This procedure ensures that the call is connected in the fastest time to the most appropriate PSAP, with a reliable voice grade connection and with full speed captions.

## **Training and Support Materials**

Minnesota Relay CAs and supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where call center staff must demonstrate knowledge and proficiency of emergency processes and procedures.

Supervisors or operations administrators are available 24/7 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

### **§64.604 (a)(5) STS Caller Numbers**

*§64.604 (a)(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.*

Minnesota Relay's Customer Profile database is available to Speech-to-Speech (STS) users, and allows them to maintain a list of up to 30 frequently called names and telephone numbers. The database automatically appears on the CA's terminal screen each time the STS user dials into Minnesota Relay. When the STS user requests one of these names, the CA will repeat the name and state the telephone number to the STS user, and then place the outbound call.

The Customer Preference database helps to facilitate call set up and conversing preferences for the STS user. Information contained in the Minnesota Relay customer profile database will be transferred to any new TRS provider.

### **§64.604 (a)(6) Visual Privacy Screens/Idle Calls**

*§64.604 (a)(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.*

Not applicable; Minnesota does not contract to provide Video Relay Service.

### **§64.604 (a)(7) International Calls**

*§64.604 (a)(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.*

Not applicable; Minnesota does not contract to provide Video Relay Service.

## 47 C.F.R. § 64.604 (b) Technical Standards

### §64.604 (b)(1) ASCII and Baudot

***§64.604 (b)(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.***

Each Minnesota Relay CA position is capable of receiving and transmitting in Baudot (45.5 and 50), Turbo Code, Enhanced Turbo Code (E-Turbo), and all ASCII rates generally in use. Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbo Code, or ASCII; if ASCII, the baud rate is detected.

Outbound calls are dialed out in voice mode so that both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard, without intervention from the CA. If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

### §64.604 (b)(2) Speed of Answer

***§64.604 (b)(2)Speed of Answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.***

CSD/Sprint currently operate nine TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements, and call routing, thus ensuring exemplary service.

Sprint's workforce analysts develop staffing requirements for each relay center monthly, daily, and in 15-minute increments. These center staffing lines are a management tool, which provides workforce analysts and relay each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each 15-minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

*§64.604 (b)(2)(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.*

Minnesota requires our TRS provider to, except during network failure, answer **90%** of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. This requirement exceeds the federal minimum standard requiring 85% of all calls to be answered within 10 seconds.

Sprint reviews TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays, or technical problems. Utilizing this information, Sprint develops a network forecast for each upcoming scheduling week.

Sprint also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint ensures that total network traffic is accounted for by each of the centers.

By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment, lag time between anticipated need and actual need will be minimized.

Minnesota's TRS contract requires that Speed of Answer be measured as follows:

- The numerator is the total number of calls answered within 10 seconds of reaching the relay center's network (switch) in such a way that the call is immediately handled and the denominator is the total number of calls received by the relay switch.
- All abandoned calls shall be included in the speed-of-answer calculation.

For CapTel relay, the number of calls that arrive at the CapTel call center will be the number of calls offered. The number of calls that are answered by a CA is the number of calls answered. The time for each call between the time the call arrives at the CapTel call center and the time answered by a CA until it is abandoned is the speed of answer.

Any time spent in the voice-in telephone menu is time controlled by the user to enter the phone number of the CapTel user that they are calling. This time is subtracted out from the speed of answer time.

The total number of calls with a speed of answer of 10 seconds or less is the number of qualifying calls. Qualifying calls divided by calls offered = Service Level (x percent of calls answered within 10 seconds).

Please see **Appendix E** for Minnesota Relay's ASA and SVL statistics for September 2007 through August 2012.

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

Minnesota Relay considers the call delivered when the relay center's equipment accepts the call from the LEC and the public switched network actually delivers the call to the TRS Center.

For Minnesota Relay, Sprint furnishes the necessary telecommunications equipment, facilities, and system software for TRS operations. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

***§64.604 (b)(ii)(B) Abandoned calls shall be included in the speed-of-answer calculation.***

Please see §64.604 (b)(2)(ii) above.

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

Please see §64.604 (b)(2)(i) above.

***§64.604 (b)(ii)(D) The system shall be designed to a P.01 standard.***

Sprint ensures that all of their relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

***§64.604 (b)(2)(ii)(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.***

Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report made available to the TAM administrator.

***§64.604 (b)(2)(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.***

Not applicable; Minnesota Relay does not provide Video Relay Service.

### **§64.604 (b)(3) Equal Access to Interexchange Carriers**

***§64.604 (b)(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.***

Minnesota Relay endeavors to provide callers with the ability to have their intrastate, interstate, and international calls carried and billed by their Carrier of Choice (COC). Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid, and calling cards.

Sprint provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled “ATIS-0300084, Telecommunications Relay Service” (July 2006) for carriers to accurately bill and rate relay calls.

Sprint routes calls to the designated carrier in as efficient a manner as possible. Sprint includes the identification of the call as a relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone, etc.) Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the relay call.

All Minnesota Relay users (including CapTel relay users) are encouraged to register their long distance COC. Relay users may register their COC by filing a Customer Profile form (via mail, e-mail, fax, Web site, etc.), or by calling Sprint or CapTel customer service.

Minnesota Relay users may also request their COC at the time they place their call. When a caller indicates a COC preference, the CA will verify that the requested carrier is a COC for Minnesota. If the carrier is an available COC the call will be routed accordingly. If the requested carrier is not a COC in Minnesota, the CA will so inform the caller, and the caller may choose a different COC or billing method, or may choose to have their call carried and billed by Sprint.

When a requested carrier is not available as a COC, CSD and Sprint are required to provide the TAM administrator with the carrier’s name and the customer’s contact information (if given). When notified that a relay user has requested a carrier that is not available as a COC in Minnesota, Sprint or the TAM administrator will mail the carrier a letter informing them of their obligation to make their long distance services available through TRS. The carrier will also be provided with information on how to become a COC for Minnesota Relay. A copy of Minnesota Relay's COC letter is provided in **Appendix F**. Sprint and the TAM administrator work with the carrier to ensure that they complete the process to become a COC.

If a Minnesota Relay user places a long distance call through relay and does not specify their carrier of choice, the call will be carried and billed by Sprint.

Participating COCs for traditional (including STS) Minnesota Relay calls are:

- 011 Communications
- 10-10-220 Telecom USA
- 10-10-321 Telecom USA
- 10-10-502 WorldxChange
- 10-10-636 Clear Choice
- 10-10-752 EXCEL
- 10-10-811 Vartec
- 10-10-834 WorldxChange
- 10-10-987
- 702 Communications
- ACN Communications, Inc.
- ACS Connections LD
- ACS Long Distance
- ANI Networks
- AT&T
- Ace Long Distance
- Advantage Communications
- Affinity Network, Inc.
- Albany Telephone LD
- Arrowhead LD
- Barnesville LD
- Benton Telephone LD
- Birch Telecom/Ionex Comm.
- Blackduck LD

- Blueridge Telecom Systems
- Broadwing Communications
- Broadwing Telecom
- CI Long Distance
- CP Telecom
- CTC Long Distance
- CTI Long Distance
- Cannon Valley LD
- CenturyLink (formerly Qwest)
- CenturyTel Long Distance
- CenturyTel Solutions
- Charter Communications
- Christensen Communication Company
- CierraCom Systems
- Citizens Communications
- Comcast
- Comcast Business Communications
- Connections Long Distance
- Cooperative Light & Power
- Crosslake LD
- Delavan LD
- Dunnell LD
- Eagle Valley LD
- EliteView, LLC
- Emily Long Distance
- En-Tel Communications
- Eschelon Telecom, Inc.
- Exit Mobile
- Farmers LD
- Federated LD
- Felton LD
- Frontier Communications
- GTC Telecom
- Garden Valley LD
- Gardonville LD
- Global Crossing
- Granada LD
- GroveLine
- HBC Long Distance
- Halstad LD
- Hancock LD
- Harmony Telephone Company
- HickoryTech
- Home Telephone LD
- Hometown Solutions LD
- Horizon Telecom, Inc.
- HorizonOne Communications
- Hutchinson Telecommunications
- ITC Long Distance
- Integra Telecom
- Inter-Tel NetSolutions, Inc.
- International Plus
- Internet Business Association
- iVantage Network Solutions
- KMTC Long Distance
- LDDS
- Lakedale Communications
- Lightyear Network Solutions
- Lismore LD
- Lonsdale One Plus
- Loretel LD
- Lowry Long Distance
- MCIWorldCom
- Mabel Cooperative Telephone Co.
- Madelia LD
- Mainstreet Communications Long Distance
- Mainstreet LD
- McLeod USA
- Melrose LD
- Metromedia
- Midcontinent Communications
- Midwest LD
- Milaca Local Link LD
- Minnesota Valley Communications, Inc.
- NOS Communications, Inc.
- NOSVA Limited
- New Ulm LD
- Norlight Telecommunications Inc.
- North Dakota Long Distance
- Northstar Access LD
- OPEX LD
- Onvoy
- Optic Communications
- Orbit Com, Inc.
- Osakis Long Distance
- OtterCom, Inc
- Ottertail Telecom LD
- PAETEC Communications, Inc.
- POPP.com
- Park Region LD
- Peoples Long Distance
- Pine Island LD
- Pioneer Telephone

- PrairieWave Communications
- QuantumLink Communications
- Red River LD
- Reduced Rate Long Distance, LLC
- Redwood Long Distance Company
- Reliance Telephone Inc.
- Rochester Telecom System, Inc.
- Rothsay Long Distance
- Royale Comtronics, Inc.
- Runestone LD
- SBC Long Distance
- Sleepy Eye LD
- Speedway Long Distance
- Spring Grove Communications
- Sprint
- St. James LD
- Sytek Comm LD
- TCG Minnesota Inc.
- TCO Network
- TDS Telecom
- TTI National
- Telegroup
- Telephone Associates, Inc.
- Touch America
- TouchTone Communications
- Trans National Communications International, Inc.
- TransWorld Network Corp
- U.S. Telecom Long Distance, Inc.
- USL
- Unitel Long Distance
- Venture LLP
- Verizon LD
- Verizon Select Services(VSSI)
- VoIP Communications
- WCTA Long Distance
- WH Comm
- WTC Long Distance
- WilTel
- Windom Long Distance
- Woodstock LD
- Working Assets
- WorldCom
- XO Communications

### **Access to Interexchange Carriers for CapTel Relay Users**

CapTel relay users who use single-line CapTel must register their long distance carrier to ensure that their long distance CapTel calls are carried and billed through their existing long distance service or calling plan. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out and mailing the card or contacting CapTel Customer Service to register their long distance preferences for CapTel calls.

Individuals who place long distance calls to a single-line CapTel relay user must also register their long distance carrier so that their calls are carried and billed through their existing long distance service or calling plan. When a call is placed to a single-line CapTel relay user via the CapTel toll-free number, the caller receives an automated message to register his or her long distance provider for long distance calls, and is instructed to press the pound key for additional information.

If a single-line CapTel relay user does not specify their COC, their long distance calls will be carried and billed by Sprint.

Participating COCs for Minnesota CapTel relay calls are:

- 011 Communications
- 702 Communications
- Ace Long Distance
- ACN Communication Services
- ACN Communications, Inc.
- ACS Connections LD
- ACS LD
- ACS Long Distance
- Advantage Communications
- Affinity Network, Inc.
- Albany Telephone LD
- ANI Networks
- ANI Networks
- Arrowhead LD

- AT&T
- Barnesville LD
- Bell Atlantic Communications, Inc. dba Verizon LD
- Benton Telephone LD
- Birch Telecom/Ionex Comm.
- Blackduck LD
- Blueridge Telecom Systems
- Broadwing Communications
- Broadwing Telecommunications
- Cannon Valley LD
- CenturyLink (formerly Qwest)
- CenturyTel Long Distance
- CenturyTel Solutions
- Charter Communications
- Christensen Communication Company
- CI Long Distance
- CierraCom Systems
- Citizens Communications
- Comcast
- Comcast Business Communications
- Connections Long Distance
- Consolidated Network Inc.
- Cooperative Light & Power
- CP Telecom
- Crosslake LD
- CTC Long Distance
- CTI Long Distance
- Delavan LD
- Dunnell LD
- Eagle Valley LD
- EliteView, LLC
- Emily Long Distance
- En-Tel Communications
- Eschelon Telecom, Inc.
- Excel/Vartec
- Exit Mobile
- Farmers LD
- Federated LD
- Felton LD
- FONETEL
- Frontier Communications
- Garden Valley LD
- Gardonville LD
- Global Crossing
- Granada LD
- Group Long Distance
- GroveLine
- GTC Telecom
- Halstad LD
- Hancock LD
- Harmony Telephone Company
- HBC Long Distance
- HickoryTech
- Home Telephone LD
- Hometown Solutions LD
- Horizon Telecom, Inc.
- HorizonOne Communications
- Hutchinson Telecommunications
- Incomnet Communications Corporation
- Integra Telecom
- International Plus
- Internet Business Association
- Inter-Tel NetSolutions, Inc.
- ITC Long Distance
- iVantage Network Solutions
- KMTC Long Distance
- La Conexion Familiar Inc.
- Lakedale Communications
- LDDS
- LDMI
- Lightyear Network Solutions
- Lismore LD
- Lonsdale One Plus
- Loretel LD
- Lowry Long Distance
- Mabel Cooperative Telephone Co.
- Madelia LD
- Mainstreet Communications Long Distance
- Mainstreet LD
- Matrix Telcom
- MCI
- MCI/WorldXchange (Acceris Communications)
- MCI/WorldCom
- McLeod USA
- Melrose LD
- Metromedia
- Midcontinent Communications
- Midwest LD
- Milaca Local Link LD
- Minnesota Valley Communications, Inc
- MRC Communications
- New Ulm LD

- Norlight Telecommunications Inc.
- North Dakota Long Distance
- Northstar Access LD
- NOS Communications, Inc.
- NOSVA Limited
- Onvoy
- OPEX LD
- Optic Communications
- Orbit Com, Inc.
- Osakis Long Distance
- OtterCom, Inc
- Ottertail Telecom LD
- PAETEC Communications, Inc.
- Park Region LD
- Peoples Long Distance
- Pine Island LD
- Pioneer Telephone
- POPP.com
- PrairieWave Communications
- PT-1
- QuantumLink Communications
- Red River LD
- Reduced Rate Long Distance, LLC
- Redwood Long Distance Company
- Reliance Telephone Inc.
- Rochester Telecom System, Inc.
- Rothsay Long Distance
- Royale Comtronics, Inc.
- RSLCom
- Runestone LD
- SBC
- SBC Long Distance
- SBC Long Distance (Regional)
- Sleepy Eye LD
- Speedway Long Distance
- Spring Grove Communications
- Sprint
- St. James LD
- Switched Services Comm. L.L.C.
- Sytek Comm LD
- Talk America (formerly AOL Long Distance)
- TCG Minnesota Inc.
- TCO Network
- TDS Metrocom
- TDS Telecom
- Telecom Group, Inc.
- Telec Inc.
- Telecom USA
- Telegroup
- Telemanagement Consultants Corp
- Telephone Associates, Inc.
- The Furst Group, Inc
- Touch America
- TouchTone Communications
- TransNational Communications Int'l, Inc.
- TransWorld Network Corp
- TTI National
- U.S. Telecom Long Distance, Inc.
- Unitel Long Distance
- US Xchange
- USL
- Venture LLP
- Verizon Long Distance
- VoIP Communications
- WCTA - Winnebago
- WCTA Long Distance
- WH Comm
- Williams Local Network Inc.
- WilTel
- Windom Long Distance
- Winstar
- Winstar (Midcom)
- Woodstock LD
- Working Assets
- WorldCom
- WTC Long Distance
- XO Communications
- Xtracom, Inc.

#### §64.604 (b)(4) TRS Facilities

*§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.*

Minnesota Relay services (including CapTel) are available 24 hours per day, 365 days per year. Minnesota Relay does not contract to provide Video Relay Service.

*§64.604 (b)(4)(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.*

### **Service Reliability**

The Minnesota Relay center is equipped with an Uninterruptible Power System (UPS) using a combination of standard battery backup and an auxiliary generator to ensure that Minnesota Relay has uninterrupted power even in the event of a power outage. This provides uninterrupted power for all key components including:

- Switching system and its peripherals
- Switch room environment (air conditioning and heating in the computer room)
- Fire suppression systems
- Emergency lights and system alarms
- CA consoles/ terminals
- CA work site emergency lights
- Call Detail Recording (CDR)

As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored.

The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available.

Sprint's switching system includes redundant Central Processors Units (CPUs) on hot stand-by. This includes a full maintenance and administrative terminal with keyboard, screen and printer capabilities, on-line system monitoring, and real-time programming capabilities. The maintenance and administrative terminal has the ability to perform preventative maintenance without taking the system off-line. In addition, on-line and off-line diagnostic routines identify system faults or failures at the individual board level.

Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. The relay network is designed to contend with weather-related challenges, power outages, and disasters. If one core switching system must shut down, the other core switching systems in the network remain operational and available to process calls, guaranteeing that communication is accessible at times when it is most needed.

During a major or minor service disruption, Sprint's Intelligent Call Router bypasses the failed or degraded facility and immediately directs calls to the first available CA in any of CSD and Sprint's fully inter-linked TRS call centers. The transfer of calls between centers is transparent to users.

Sprint and CSD have developed a Disaster Recovery Plan and Network Support Plan (provided in [Appendix G](#)) that details the steps to be taken to deal with any problem, and restore Minnesota Relay to its full operating level in the shortest possible time.

*§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.*

Not applicable; Minnesota does not contract to provide Video Relay Service.

*§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.*

Not applicable; Minnesota does not contract to provide Video Relay Service.

### §64.604 (b)(5) Technology

*§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.*

The state and our TRS provider recognize the importance of looking to the future and continually monitor the trends and rapid advances in telecommunications technology. We strive to provide our relay users with services that advance at the same rate, have the same level of quality, and provide the same features and options as the telecommunications services available to consumers without hearing or speech disabilities.

### SS7 Technology

Minnesota's TRS subcontractor, Sprint, has stated that it is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence for Minnesota Relay users, Sprint provides Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls.

Sprint receives calling party identifying information including blocking information, from Minnesota Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 7-1-1 or the number of the relay center)

### Other Technology

Minnesota Relay technological enhancements include:

- **7-1-1:** A nationwide abbreviated dialing code for accessing all types of relay services.
- **800/877/888 Numbers:** Minnesota Relay users are able to reach regionally restricted 800, 877, and 888 toll free numbers and business offices of local telephone companies that have special prefixes, all of which would normally be accessible to consumers in their calling area.

- **900 Service:** allows Minnesota Relay users to access 900 number pay-per-call services.
- **Answering Machine Retrieval:** TTY users can request a CA to retrieve messages from the user's voice answering machine or voice mail.
- **American Standard Code for Information Interchange (ASCII) Split Screen:** allows high-speed ASCII computer users and CAs to type and communicate more clearly and quickly. Similar to voice-to-voice conversation, ASCII Split Screen provides interrupt capability, when appropriate, for the ASCII user and the voice party.
- **Call Release:** allows the CA to sign-off or be "released" from the telephone line after the CA has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard.
- **Caller ID:** Calls placed through Minnesota Relay will provide the originating calling party number (ANI), or caller ID information, through the local exchange carrier for all local and most long distance calls.
- **Captioned Telephone Relay Service (CapTel™):** allows individuals with hearing loss to receive word-for-word captions of what the other person on the call is saying, while also allowing them to use their residual hearing to listen to their phone conversations. The captions, which are generated through a captioning service using the latest in voice recognition technology, appear on the text display of the relay user's specialized captioned telephone.
  - **Two-Line CapTel:** Like standard CapTel relay, two-line CapTel provides live captions of everything the other party says during a phone conversation. With two-line CapTel, the conversation is carried on one telephone line and the captions are provided on a second line. This gives two-line CapTel relay users the ability to caption any phone call – incoming or outgoing – at any point in the conversation. Two-line CapTel also supports enhancements that the user has purchased from their telephone service, including call waiting.
- **Carrier of Choice (COC):** allows a relay user to choose their preferred carrier for intrastate, interstate, and international calls. This requires the user's COC to enter into a billing and collection agreement with Sprint.
- **Cellular/PCS Phone Access:** allows a cellular customer to reach Minnesota Relay's toll-free number(s) to complete relay calls.
- **Customer Profile Database:** offers relay users numerous ways to automatically expedite the initiation of custom calls. These pre-selected customer calling features include, but are not limited to, communication modes (TTY, Voice, and ASCII), carrier of choice, preferred billing method, frequently dialed numbers, emergency numbers, and customer notes for call processing.
- **Directory Assistance:** A CA will relay directory assistance (DA) calls between a relay user and the Local Exchange Carrier (LEC) DA operator. Once the caller makes a request for

directory assistance, the CA will contact a LEC DA operator. After obtaining the requested phone number, the caller may choose to place the call through the relay or dial it directly (i.e. TTY to TTY). Note: DA is often subject to charges by the caller's local telephone service provider.

- ***Deaf-Blind Transmission Speed:*** A modification of the default transmission speed for Telebraille users. Instead of the default setting at 45 words-per-minute, the transmission speed has been reduced to 15 words-per-minute, with system capability to increase or decrease transmission speed by 5 words-per-minute increments.
- ***Emergency Assistance:*** Although relay users are discouraged from placing 9-1-1 calls through the relay, calls are placed at the caller's request. Through the provider's E911 database, CAs use a "hot button" to automatically place a call to the most appropriate Public Safety Answering Point.
- ***Enhanced Turbo Code (E-Turbo™):*** allow a TTY user to automatically submit dialing and call set-up instructions when they dial into Minnesota Relay. This significantly reduces the amount of time necessary for the CA to set-up and process the outbound call. The result is that the TTY user is connected to their desired party at a speed that is more functionally equivalent to that of a non-relay call.
- ***Error Correction:*** This feature automatically corrects many typographical errors and spells out non-TTY abbreviations that may be used by the CA in voice-to-text transliteration.
- ***Flexible Billing:*** allows Minnesota Relay users to complete long distance calls using pre-paid calling cards, carrier calling cards, third party billing, or by placing collect calls.
- ***Gender ID:*** This feature automatically matches the relay user's gender with the gender of a CA. For example, the user has the option of allowing Minnesota Relay to use the caller's Customer Preference information to automatically match the CA's gender to their own.
- ***Hearing Carry Over (HCO):*** allows a hearing person who has very limited or no speech capability to make a phone call. The HCO user types his/her conversation for the CA to read to the hearing person, and listens directly to the hearing person's response.
  - **Two-line HCO:** allows a hearing person with speech difficulties to make and receive telephone calls with real-time interaction (i.e. not having to wait for the "Go Ahead" or "GA" to respond). The HCO user uses one telephone line to listen to the other party's conversation, and uses the second line to type his or her conversation for the CA to read to the other person. With two-line HCO, the relay user does not have to constantly move the telephone receiver from their ear to the TTY in order to hear the conversation and type their response. This makes for a smoother and more natural flow to the telephone conversation.
- ***Intelligent Call Router:*** Technology that automatically and seamlessly routes relay calls to the first available CA in the network.
- ***International Calls:*** allows the relay user to place and receive calls to and from anywhere in the world (using English or Spanish languages only).

- ***Last Number Redial:*** allows the relay user to call the last person dialed through the relay without having to provide the telephone number dialed to the CA.
- ***Recording Machine Capabilities:*** allows the CA to record and play back audio-text interaction messages to reduce numerous callbacks to convey entire messages to calling parties.
- ***Spanish Relay:*** the CA relays calls between a Spanish speaking person with a hearing or speech disability and a Spanish speaking hearing person.
- ***Speech-to-Speech (STS):*** allows a person who has difficulty speaking or being understood on the phone to communicate using his or her own voice or a voice synthesizer. The CA revoices the words of the person with a speech disability so the other person on the call can understand them.
- ***Telecommunications Service Priority (TSP):*** On October 31, 2005, Sprint successfully activated all of their call centers (including the Moorhead center) under the TSP program. If a national or regional emergency causes service to be disrupted and the Moorhead relay center cannot receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers will be required to restore service as rapidly as possible consistent with the priority status assigned to the Moorhead relay center.
- ***Three-Way Calling Feature:*** allows more than two parties to be on the telephone line at the same time with the CA.
- ***Transfer Gate Capabilities:*** allows the CA to transfer a caller to another form of relay service (i.e. Spanish, CapTel, Speech-to-Speech), to customer service, or to a relay center manager.
- ***Text Telephone (TTY) Operator Service:*** is available to complete a TTY to TTY call, obtain directory assistance information, or receive credit for erroneous billing.
- ***Turbo Code Capability:*** allows users to send information at the same speed it is typed, resulting in a more natural conversational flow and the ability to interrupt one another.
- ***Variable Time Stamp Macro:*** This macro enables the relay caller to know when their called party has disconnected from the call.
- ***Voice Carry Over (VCO):*** allows a person who has difficulty hearing on the phone to voice their conversations directly to the other person on the call. The CA then types the other person's response to the VCO user.
  - ***Two-Line VCO:*** allows a VCO user to use one phone line for speaking directly to the other person, while the second line is used to receive the CA's typed response from the other person. This enhanced feature provides for a more natural flow of conversation without the pauses of single-line VCO calls.
  - ***VCO Gated Calling:*** Minnesota Relay has dedicated VCO and two-line VCO toll-free phone numbers, which provide significant improvements in service by directing VCO users to specifically trained VCO and two-line VCO CAs.

- **VCO-With-Privacy-and-No-GA:** allows VCO users to use the standard VCO feature without needing to say “Go ahead” or “GA”. Additionally, the CA does not listen to the VCO user’s spoken words. Ordinarily, VCO users need to say “GA” so that the CA knows that it is the other party’s turn to speak. The responsibility for taking turns when speaking rests entirely upon the calling and called parties because the CA does not hear what the VCO user says.
- **Voice Call Progression:** allows voice or HCO callers to listen during call set-up (i.e. ringing or busy).

### **Speech to Speech Enhancements**

In 2012, Minnesota Relay launched new Speech to Speech (STS) enhancements to improve the telecommunications access of STS relay users. These enhanced features include:

- **Wireless Access – STS (\*787)**  
While 7-1-1 has been implemented across the nation, it’s often difficult or time consuming for consumers to reach STS when not at home. Sprint has implemented a national wireless short code for STS to make it easier to place or receive STS calls (this service is only available on the Sprint wireless network at this time). Sprint wireless customers are able to dial \*STS (i.e., \*787) to reach a STS CA quickly and easily from anywhere in the nation (this includes voice callers needing to place a call to a STS user).

Callers will automatically connected to STS based on their physical location. If the caller is in a state where Sprint is the TRS provider, the caller is connected to the state’s STS relay service. If not, the caller is automatically transferred to Sprint’s interstate STS relay service, where he or she is able to place interstate calls only.

- **My Support (Speech-to-Speech Customer Service)**  
A dedicated customer support for STS users. Staff is available to assist STS users or organizations serving STS users with basic information about STS, filling out Customer Profiles, and other features designed to support STS customers and their callers.

The Sprint STS *My Support* number is 1-877-787-1989 (available 24 hours a day, 7 days a week).

- **STS Contact Information**  
Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family, and others to dial 7-1-1 to reach them. Once connected, the person can provide the STS user’s name to the STS CA. The STS CA will use the STS user’s profile information provided for this purpose to connect to the STS user based on the registered STS user’s hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.
- **STS Called Numbers**  
STS relay users are able to store up to 30 frequently called telephone numbers in their Customer Profile. When the STS user calls into the center, he or she can simply provide the CA the “short-hand” name or code associated with a phone number instead of the entire 10-digit number. For example, a caller can simply request, “Please call mom,” and the STS CA will dial the associated ten-digit telephone number without delay.

STS users have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center, and the local hospital are used for this purpose.

- ***E-Mail Set-Up***

STS users can e-mail call instructions or information to the relay center 2 to 24 hours prior to the call. The e-mail can include information such as the number to be dialed, the name of the person being called, the subject of the call, any special instructions, or anything that makes it easier for the STS user to complete the call.

- ***Saved Messages***

If the STS user dictates a message to the CA to be used for a call, and the STS user is not able to complete the call due to a busy signal, the called party is not available, or so forth, the STS user can request that the STS CA copy the message onto the STS user's Customer Profile. When the STS user wants to place the call again, he or she simply redials STS and asks the CA to retrieve the saved message. After 24-hours, the message copied into the profile is automatically deleted from the system.

- ***STS with Privacy Option***

STS users have the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS user's preference.

### **§64.604 (b)(6) Caller ID**

***§64.604 (b)(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.***

Minnesota Relay provides True Caller ID for all local and long distance calls to carriers who have SS7 connectivity with Sprint. Sprint's SS7 network interfaces with all national long distance carriers and major LECs, CLECs, and ILECs.

Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number, and Originating Line Information. Minnesota Relay passes through the calling party information (rather than 7-1-1 or the number of the TRS Center). When passed through, the relay call recipient will be able to see the caller's phone number on their Caller ID display (the Caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

## 47 C.F.R. § 64.604 (c) Functional Standards

### §64.604 (c)(1) Consumer Complaint Logs

*§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.*

Minnesota Relay users are able to file a complaint or commendation regarding Minnesota Relay services with the Minnesota Relay outreach office, the TAM administrator, a relay center supervisor, or a customer service representative with Sprint or CapTel (depending on the type of relay service).

All complaints, whether received verbally or in writing, are documented on a standardized Consumer Contact form (in an electronic format) and are entered into a customer service software program. Copies of all entries into this system pertaining to Minnesota Relay are sent to the TAM administrator on a monthly basis. The TAM administrator reviews the complaints to confirm that all required information is completed and monitors complaints to ensure that they are resolved in a timely manner. The TAM administrator maintains a log of all Minnesota Relay complaints filed and submits the complaint logs to the FCC on annual basis.

Complaint documentation includes the date the complaint was filed, whom the complaint was received by, type of relay call (e.g. VCO, HCO, Spanish, STS, CapTel, etc.), customer contact information (if given), CA number (if applicable), category of complaint, nature of complaint, date of resolution, explanation of resolution, and complaint tracking number.

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

The TAM administrator maintains a summary log of all consumer complaints received. By July 1 of each year the TAM administrator submits a complaint log summary to the FCC for a 12 month period ending May 31. Please see **Appendix H** for the past five Minnesota Relay complaint log summaries filed with the FCC.

### §64.604 (c)(2) Contact Persons

*§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.*

Minnesota Relay has submitted applicable contact information to the FCC for consumer complaints. This information may be found on the FCC's Web site under TRS Points of Contact for Complaints at: [www.fcc.gov/encyclopedia/trs-points-contact-complaints](http://www.fcc.gov/encyclopedia/trs-points-contact-complaints).

## Options for Filing a Complaint or Commendation on Minnesota Relay Services

Minnesota Relay users have the following options for filing a complaint or commendation:

- The relay user may request to speak to a relay supervisor during or immediately after a call. In addition, the CA has the capability to transfer the caller directly to Sprint's Customer Service department.
- Sprint's 24-hour Customer Service:  
Voice/TTY: 1-800-676-3777  
Spanish Voice/TTY: 1-800-676-4290  
E-mail: [Sprint.TRSCustServ@sprint.com](mailto:Sprint.TRSCustServ@sprint.com)  
Online: [www.sprintrelay.com/contact\\_us/index.php](http://www.sprintrelay.com/contact_us/index.php)
- CapTel's 24-hour Customer Service (*excluding holidays*):  
Voice/CapTel/TTY: 1-888-269-7477  
Spanish: 1-866-670-9134  
E-mail: [CapTel@CapTel.com](mailto:CapTel@CapTel.com)  
Online: [www.captel.com/contact-us.php](http://www.captel.com/contact-us.php)
- Minnesota Relay Outreach Office:  
Voice: 651-602-9005 / 1-800-657-3775  
TTY: 1-888-206-6555  
VP: 651-964-1514 / 1-866-635-0082  
E-mail: [mn.relay@state.mn.us](mailto:mn.relay@state.mn.us)
- TAM Administrator  
85 7<sup>th</sup> Place East, Suite 600  
St. Paul, MN 55101-3165  
Voice: 651-296-0412 / 1-800-657-3599  
E-mail: [mn.relay@state.mn.us](mailto:mn.relay@state.mn.us)
- The Federal Communications Commission's Consumer Center:  
Voice: 1-888-CALL-FCC (1-888-225-5322)  
TTY: 1-888-TELL-FCC (1-888-835-5322)  
Fax: 1-866-418-0232  
Online: [www.fcc.gov/complaints](http://www.fcc.gov/complaints)

Information on Minnesota Relay services is available to consumers on the Minnesota Relay Web site at: [www.mnrelay.org](http://www.mnrelay.org), by contacting the TAM Administrator, or by contacting the Minnesota Relay Outreach office.

Information on Minnesota Relay services is also available to consumers on the FCC's Web site under the Minnesota TRS Page at: [http://transition.fcc.gov/cgb/dro/trs\\_minnesota.html](http://transition.fcc.gov/cgb/dro/trs_minnesota.html).

## §64.604 (c)(3) Public Access to Information

*§64.604 (c)(3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

### **Telephone Directories, Bill Inserts and Newsletters**

Annually, the TAM administrator sends a letter to all telephone companies serving Minnesota consumers to remind them of their responsibility to ensure that their customers are aware of the availability and use of all forms of TRS as required by FCC 47 C.F.R. § 64.604(c)(3). DOC-TAM also requires carriers to complete and return a *Compliance Form for Annual Notices to Customers* to demonstrate compliance with the above federal regulation. Copies of the 2011 letter to telephone carriers and the compliance form are provided in **Appendix I**.

By requiring carriers to complete and return a form *as well as copies of TRS material(s) distributed to their consumers*, TAM attains a higher rate of compliance, and is able to identify which carriers are not distributing TRS materials, or are distributing incorrect and/or incomplete information to consumers. When TAM receives a copy of a carrier's directory page, newsletter, or bill insert and the item does not comply with the FCC requirement, TAM submits a letter to the carrier notifying them of their non-compliance. TAM requests that the carrier publish correct and compliant information, and that they submit a copy of this information to TAM once it is distributed to their customers.

A sample of a telephone directory page, bill insert, and newsletter information (see **Appendix I**) are available on Minnesota Relay's Web site ([www.mnrelay.org](http://www.mnrelay.org)) so that carriers have access to up-to-date information on Minnesota Relay services.

Examples of carriers' telephone directory pages, bill inserts, and newsletter information are provided in **Appendix I**.

As per Minnesota Rule 7812.1000 telephone companies are required annually to provide their customers with a "Notice of Customer Rights", which must include information on hearing-impaired programs (see **Appendix I**).

### **Minnesota Relay Outreach**

In the past, Minnesota Relay outreach services were provided by Communication Services for the Deaf (CSD), as part of the state's Telecommunications Relay Services (TRS) contract with the vendor. As of July 1, 2011, Minnesota Relay outreach services are provided by the Minnesota Department of Human Services – Telephone Equipment Distribution Program (DHS–TED Program) via an interagency agreement with DOC–TAM.

Many of the types of equipment distributed by the TED Program work in conjunction with Minnesota Relay services (TTYs, Voice-Carry-Over phones, voice amplified phones for people with speech disabilities, and captioned telephones). Because TED Program services are closely

related to Minnesota Relay services, and because the TED Program has five regional offices located throughout the state, the TED Program is well situated to provide outreach for Minnesota Relay.

Outreach staff is responsible for providing a comprehensive statewide outreach program to educate all people about, and promote Minnesota Relay services. Outreach personnel distribute informational pamphlets, train consumers and businesses, make presentations, staff exhibitions, and perform other similar forms of consumer contacts. Outreach program staff also serves as the point of contact for Minnesota consumers who have questions, concerns, complaints, commendations, etc. Outreach efforts are tailored to effectively target appropriate demographics, including consumers who are deaf, deaf-blind, hard of hearing, late deafened, speech disabled, hearing consumers, and businesses.

Outreach activities include the following:

- Contacting organizations to schedule presentations and/or to provide them with printed materials on Minnesota Relay services.
- Contacting hospitals, nursing homes, rehabilitation facilities, and other medical facilities to schedule presentations and/or to provide printed materials.
- Conducting presentations to American Sign Language I class students.
- Staffing a booth at exhibitions, seminars, and the Minnesota State Fair.
- Conducting one-on-one training sessions for individuals who are having trouble using specialized telephone equipment, such as a TTY, CapTel, or VCO telephone.
- Conducting “drop-in” visits at organizations that serve persons with hearing, speech or physical disabilities.
- Conducting Business Partner presentations (educating businesses on Minnesota Relay services and training employees on how to place and receive Minnesota Relay calls).

### **Speech-to-Speech Outreach**

Speech-to-Speech (STS) outreach activities include:

- Contacting organizations (hospitals, nursing homes, and rehabilitation facilities) to schedule presentations and/or to provide printed materials on STS.
- Performing one-on-one training with first time STS users and personal care attendants.
- Staffing a STS booth at conferences and seminars.
- Conducting training and providing information to ensure that usage of STS relay is fully incorporated in the Individual Education Plans (IEPs) of all speech-disabled persons within Minnesota’s public and private school systems.
- Conducting “drop-in” visits to speech-disability related organizations.

### **CapTel Outreach**

Outreach staff focuses efforts on late-deafened and hard-of-hearing consumers who may not be familiar with relay services, but could benefit from CapTel. Targeted demographics include seniors and their adult children/caregivers, senior living facilities, and consumer/medical organizations that offer support and services to deaf and hard-of-hearing persons.

In 2009, Minnesota Relay ran a Public Service Announcement (PSA) to increase awareness of CapTel relay service and telephone equipment. The PSA ran in September, October, and November, and aired during popular daytime shows such as Ellen and Oprah, as well as during ABC, CBS and NBC news programs. In total, the CapTel PSA aired 1,383 times.

Minnesota Relay also ran a CapTel PSA during April, May, June, November, and December 2011, and in January 2012. The CapTel PSA aired during popular shows such as The View, Jeopardy, The Price is Right, The Young and the Restless, Judge Judy, as well as during ABC, CBS and NBC news programs. In total, the CapTel PSA aired 3,047 times.

The PSA was very successful as it was able to reach a large demographic throughout Minnesota. The entire cost for the production and airtime of the CapTel PSAs were paid by Sprint.

### **Minnesota Relay Business Partner Outreach**

Business Partner outreach is designed to reduce or eliminate the hang-ups that relay users often experience when placing a call to a business.

The Business Partner outreach campaign includes educating businesses on Minnesota Relay services, training businesses and their employees on how to place and receive calls via Minnesota Relay, and providing businesses with the knowledge, awareness, and confidence to connect with consumers who are hearing or speech disabled and use Minnesota Relay to place and receive telephone calls. Outreach staff also provide businesses with information on how to recognize “scam” phone orders and how to protect their business from being defrauded.

### **Minnesota Relay Advertising**

In 2008, Minnesota Relay placed an ad in Minnesota Good Age – a magazine geared towards those ages 50 and above. An ad was also placed in Minnesota Business Magazine, which provided information on our Business Partner program, and the importance of not hanging up on a relay call. Due to financial constraints, Minnesota Relay has not placed print ads since 2008.

### **Minnesota Relay Outreach Materials**

Outreach materials include items such as:

- Minnesota Relay brochure
- Voice Carry Over brochure
- Speech-to-Speech brochure
- Hearing Carry Over brochure
- CapTel brochure
- Minnesota Relay bookmarks
- CapTel magnifier/bookmark
- Minnesota Relay Business Partner outreach folder
- Instruction Sheets for the various forms of relay services
- Form to report a business that will not accept a Minnesota Relay call

Reports containing Minnesota Relay outreach efforts are compiled monthly and forwarded to the TAM administrator. Outreach activities for September 2007 through August 2012 are provided in [Appendix J](#).

Copies of outreach materials and advertisements can be found in [Appendix K](#).

### **Minnesota Relay Web Site**

Minnesota Relay information and brochures are available on the Minnesota Relay Web site at: [www.mnrelay.org](http://www.mnrelay.org).

### Advisory Committee Meetings

The Minnesota Department of Human Services – Deaf and Hard of Hearing Services Division (DHS – DHHSD) has established six advisory committees throughout Minnesota. Each advisory committee meets quarterly and serves as an avenue to provide information to, and gather information from, the community. Advisory committee meeting minutes are provided to the TAM administrator so that issues, questions, and concerns regarding Minnesota Relay may be addressed. In addition, a Minnesota Relay Outreach staff person attends a minimum of one DHHSD Advisory Committee meeting per region, per year.

### §64.604 (c)(4) Rates

*§64.604 (c)(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.* Minnesota Relay users are charged no more for services than for those charges paid by standard “voice” telephone users. Minnesota Relay users who select their preferred carrier at the time they place a long distance relay call or via their Customer Profile, will be rated and invoiced by their selected Carrier of Choice. Minnesota Relay users who do not indicate their preferred carrier will have their long distance Minnesota Relay calls carried and billed by Sprint.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off of Sprint’s Message Telephone System (MTS) rates.

Discount Off Sprint’s Minnesota MTS Rates	
<b>Local Calls Mileage Band</b>	<b>40 miles</b>
<b>Intrastate Toll Discounts</b>	
<i>Day (7:00 am – 6:59 pm)</i>	<b>35%</b>
<i>Evening (7:00 pm – 10:59 pm)</i>	<b>25%</b>
<i>Night/Weekend (11:00 pm – 6:59 am; Sat.; Sun.)</i>	<b>10%</b>
<b>Interstate Toll Discounts</b>	
<i>Day (7:00 am – 6:59 pm)</i>	<b>50%</b>
<i>Evening (7:00 pm – 10:59 pm)</i>	<b>50%</b>
<i>Night/Weekend (11:00 pm – 6:59 am; Sat.; Sun.)</i>	<b>50%</b>

Minnesota Relay bills the originating calling party for all completed outbound relay calls within 60 days of the calling date. Uncompleted calls (busy, no answer, and network intercepted calls) are not billed to the caller. Start time for customer billing of each relay call does not begin before the calling party is actually connected to the called party or to an answering machine or recorded message of the called party and relay has begun. End time for customer billing of each relay call is when either the caller or the called party hangs up; whichever occurs first. Customer billing does not include call setup or wrap up time of either the inbound or outbound call.

## §64.604 (c)(5) Jurisdictional Separation of Costs

### *§64.604 (c)(5) Jurisdictional separation of costs.*

*(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.*

Minnesota Relay observes all jurisdictional separation of costs as required by 47 C.F.R. § 64.604 (c)(5), Section 410 of the Communications Act of 1934, Minnesota Statute § 237.10, and Minnesota Rule 7810.6400. (See **Appendix L** for a copy of the referenced Minnesota statute and rule). All Minnesota Relay intrastate and interstate minutes are reported separately and distinctly to the state on the monthly CSD invoice.

*(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.*

All Minnesota Relay local and intrastate minutes, 49% of Minnesota Relay toll free and 900 minutes, and 89% of Minnesota Relay two-line CapTel minutes are reimbursed through a fund established by the Minnesota Legislature. In accordance with Minnesota Statute § 237.52, Subd. 3, "Every telephone company or communications carrier that provides service capable of originating a telecommunications relay call, including cellular communications and other nonwire access services, in this state shall collect the charges established by the commission under subdivision 2 and transfer amounts collected to the commissioner of public safety in the same manner as provided in section 403.11, subdivision 1, paragraph (d). The commissioner of public safety must deposit the receipts in the fund established in subdivision 1." Minnesota's current TRS surcharge is \$0.06 per month, per access line.

All Minnesota Relay interstate and international minutes, 51% of Minnesota Relay toll free and 900 minutes, and 11% of Minnesota Relay two-line CapTel minutes are reimbursed through the TRS Interstate Fund, currently administered by Rolka Loubé Saltzer Associates (RLSA).

Minnesota Relay does not provide Internet-based relay services (including VRS). All costs for the provision of interstate and intrastate Internet-based relay services are recovered from the TRS Interstate Fund.

All Minnesota Relay intrastate and interstate minutes are reported separately and distinctly to the state on a monthly invoice from CSD; CSD deducts minutes that are reimbursable through the TRS Interstate Fund and submits these minutes to RLSA on a separate invoice.

## §64.604 (c)(6) Complaints

### §64.604 (c)(6)

*(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.606 is in effect, the Commission shall refer such complaint to such state expeditiously.*

Minnesota will accept, research, and endeavor to resolve any complaint forwarded to the TAM administrator by the FCC.

*(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.*

The TAM administrator and Minnesota's TRS providers strive to resolve all Minnesota Relay complaints shortly after they are received. In the event that TAM fails to take action within 180 days after a complaint is filed regarding Minnesota Relay services or personnel, TAM understands that the FCC shall exercise jurisdiction over the complaint. TAM also understands that failure to meet the deadlines for complaint resolution may adversely affect the continued certification of the Minnesota Relay.

All Minnesota Relay complaints received during this certification period were resolved within 180 days after the complaint was first filed.

## §64.604 (c)(7) Treatment of TRS Customer Information

*§64.604 (c)(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

Minnesota's current TRS contract with CSD states: "In accordance with FCC 47 C.F.R. § 64.604 (c)(7) the Contract Vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order."

## 47 C.F.R. § 64.606 – Internet-Based TRS Provider and TRS Program Certification

### 47 C.F.R. §64.606 (a) Documentation

#### §64.606 (a)(1) Certified State Program

*§64.606(a)(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “TRS State Certification Application.” All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.*

As per Minnesota Statute § 237.51, Subd. 1 “The commissioner of commerce shall . . . contract with a qualified vendor that serves communication-impaired persons to create and maintain a telecommunication relay service.” It is under this authority that DOC-TAM submits documentation for Minnesota’s TRS State Certification Application. Documentation is submitted in narrative form, clearly describes the state’s program for implementing intrastate TRS, and describes the procedures and remedies for enforcing all program requirements imposed by the state of Minnesota.

DOC-TAM is confident that Minnesota Relay meets or exceeds all operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604. In instances where Minnesota Relay exceeds certain minimum standards, to the best of our knowledge, the act of doing so does not in conflict with federal law.

A copy of Minnesota’s TRS contract is provided in [Appendix M](#).

*§64.606 (d) Method of funding. Except as provided in § 64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.*

#### **Intrastate TRS Funding Mechanism**

Minnesota Relay intrastate TRS calls are funded by a surcharge on each wired and wireless telephone access line in the state of Minnesota and are reimbursed through the Telecommunications Access Minnesota (TAM) Fund. (See Minnesota Statute § 237.52 in [Appendix A](#).)

#### **Labeling of Intrastate TRS Funding Mechanism**

In a July 14, 1993, Order the Minnesota Public Utilities Commission directed telephone companies to identify the TAM surcharge as “tele-relay” on customer bills. Minnesota Statute § 237.49 requires telephone companies to list the TAM, Telephone Assistance Plan, and 9-1-1 surcharges as one amount on a billing statement sent to a subscriber.

A copy of the Minnesota Public Utilities Commission's Order, Minnesota Statute § 237.49, and a telephone bill demonstrating how the TAM surcharge is labeled are provided in [Appendix N](#).

If alerted to an incorrect listing of the TRS funding mechanism on customer bills (we have seen labels such as "Hearing Impaired Charge" and "Deaf Surcharge"), the TAM administrator will notify the carrier of the inaccuracy and explain the legal requirement to ensure compliance.

*§64.606 (f) Notice of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.*

Minnesota Relay has had only one substantive change during this certification period. On September 4, 2008, the TAM administrator notified the FCC of a change to Minnesota Relay's 900 access telephone number (a copy of the letter is provided in [Appendix O](#)). Minnesota's TRS program continues to meet federal minimum standards after implementing the change.

# Appendices