

State of Washington  
Telecommunications Relay Services



Certification Application  
DA 12-1187

Submitted by  
Department of Social and Health Services  
through the  
Office of the Deaf and Hard of Hearing  
Eric Raff, Director  
PO BOX 45300  
Olympia, WA 98504-5300  
(360) 902-8000 V/TTY



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
P.O. Box 45010, Olympia, Washington 98504-5010

October 1, 2012

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

RE: CG Docket No. 03-123  
Application for Renewal of State of Washington TRS Certification

Dear Ms. Dortch:

The Office of the Deaf and Hard of Hearing (ODHH), within the Department of Social and Health Services (DSHS), requests renewal of its certification for Telecommunications Relay Services (TRS) starting July 26, 2013 pursuant to FCC Public Notice DA-12-1187 issued on July 25, 2012. As prescribed in 47 CFR 64.606 (a)(1), this application is to be delivered to the Chief of the Consumer & Government Affairs Bureau.

ODHH maintains and oversees the operation of the TRS program in Washington pursuant to authority granted by the Legislature and the Department. Before its last certification was granted for the period beginning July 2008, DSHS contracted with Sprint to operate the TRS program in the state of Washington. Sprint is presently under a contract to operate the TRS program effective December 1, 2010 through June 30, 2013. The State has the option of two one-year renewal options, which if exercised, would extend Sprint's provision of TRS until June 30, 2015. The Department will issue a Request for Qualifications and Quotations for a new relay provider in 2014, if not earlier and will take all steps to ensure that the awarded bidder meets all mandatory requirements established by the Federal Communications Commission.

We are pleased to inform the FCC that the Washington (WA) TRS program meets the following federal requirements:

- (1) The WA TRS program meets all operational, technical and functional minimum standards contained in 47 C.F.R. §64.604 and §64.606.
- (2) The WA TRS program provides adequate procedures and remedies for enforcing the requirements of the state program; and

- (3) The WA TRS program has met or exceeded mandatory minimum standards in several areas and does not conflict with federal law in any respect.

The WA TRS program has averaged 28,631 calls per month for the 2012 fiscal year ending June 30, 2012, with 95% of the daily calls answered in less than 10 seconds and a 1.3 second average answer time.

The WA TRS provides ten dialing numbers for relay users. They are as follows:

1. 711 for Voice and TTY users
2. 1-800-833-6388 for TTY, ASCII, and HCO users
3. 1-800-833-6384 for Voice users
4. 1-800-833-6386 for VCO and 2-Line VCO users
5. 1-877-833-6341 for Speech-to-Speech and STS-VCO users
6. 1-877-833-6398 and -6399 for Spanish Voice and TTY users, respectively
7. 1-800-833-6385 for Telebraille users
8. 1-900-646-3323 for 900 service users
9. 1-877-243-2823 to reach 1-Line CTS users

Sprint also provides customer service numbers for both English and Spanish language users of WATRS as well as outreach services to promote awareness of TRS services.

If you have any questions related to the contents of this filing, which is being submitted electronically through the FCC's ECFS service, please contact Eric Raff, Director of ODHH, who can be reached at 360-915-5835. He may alternatively be reached at his email address: [ericraff@dshs.wa.gov](mailto:ericraff@dshs.wa.gov).

Sincerely,

  
Robin Arnold-Williams  
Secretary

cc: Tracy Guerin, Chief of Staff, DSHS  
Eric Raff, Director, ODHH  
Dave Danner, Executive Director, Washington Utilities and Transportation Commission



## Washington Telecommunication Relay Service (WATRS) State FCC Certification Renewal and Supporting Documents

### Introduction

WATRS, a program under Washington State Department of Social Health Services (DSHS), has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the **FCC Public Notice DA 12-1187, CG Docket No. 03-123** released on July 25, 2012. Included in the Public Notice are the minimum mandatory FCC TRS requirements under **47 C.F.R. §64.604 and §64.606**. A copy of this Public Notice and these mandatory requirements is attached as **Appendix A**. WATRS prepared this TRS Certification Renewal Application with the assistance of Sprint Relay.

Washington State Department of Social Health Services (DSHS) contracted with Sprint to provide Telecommunications Relay Service effective in December 1, 2010 in accordance with operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the Request for Qualification and Quotations (RFQQ) that was issued in December 2009. All of the minimum mandatory TRS requirements are listed in the RFQQ and is attached as Appendix L. Please note that although Sprint Relay provides web-based Internet Protocol (IP) Relay and Captioned telephone services, WATRS does not contract to provide these services in Washington, nor is WATRS responsible for oversight of IP and VRS or other web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state TRS programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

## Table of Contents

WATRS FCC Certification Renewal and Supporting Document.....	1
Table of Contents.....	2
<b>Operational Standards</b> .....	3
A.1 Communication Assistants (CAs) .....	3
A.2 Confidentiality and Conversation Context.....	9
A.3 Types of Calls.....	12
A.4 Handling of Emergency Calls.....	17
A.5 STS Called Numbers .....	20
<b>Technical Standards</b> .....	20
B.1 ASCII and Baudot.....	20
B.2 Speed of Answer .....	21
B.3 Equal Access to Interexchange Carriers.....	23
B.4 TRS Facilities.....	25
B.5 Technology .....	26
B.6 Caller ID.....	28
<b>Functional Standards</b> .....	30
C.1 Consumer Complaint Logs .....	30
C.2 Contact Persons .....	32
C.3 Public Access to Information .....	32
C.4 Rates .....	35
C.5 Jurisdictional Separation of Costs .....	35
C.6 Complaints.....	36
C.7 Treatment of TRS Customer Info.....	37
§64.606 State Certification.....	37

## Appendices

Appendix A: FCC TRS Public Notice, July 25, 2012 .....	39
Appendix B: Sprint TRS, STS, CapTel Training Outlines.....	44
Appendix C: TRS Pledge of Confidentiality.....	54
Appendix D: Sprint Carrier of Choice Letter of Invitation.....	58
Appendix E: Disaster Recovery Plan .....	62
Appendix F: TRS Information in Telephone Directories .....	77
Appendix G: Copies of Newsletters.....	93
Appendix H: Copies of Annual Report or Other.....	126
Appendix I: Copies of Relay Brochures or Other Advertisements .....	146
Appendix J: Copy of Legislation or Other Establishing TRS in the State .....	174
Appendix K: Copies of Complaint Logs from 2008-2012.....	180
Appendix L: Copy of TRS RFQQ .....	236
Appendix M: Copy of Phone Bill with Surcharge Rate or Legislative Order .....	317
Appendix N: Copy of the 2008 TRS Recertification Renewal Letter from the FCC .....	319

## **Operational Standards**

### **A.1 Communication Assistants (CAs)**

***§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***

#### **CA Employment Standards**

WATRS contracts with Sprint to provide the hiring, training and oversight of Communication Assistants for WATRS. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a twelfth-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language, or experience working with individuals who are deaf, hard of hearing or have a speech disability.

All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history.

After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements.

A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment.

Sprint TRS CA applicants are required to pass a valid and unbiased 12th grade level spelling test to be considered for employment.

Sprint TRS CA applicants must pass a valid and unbiased 12th grade level grammar test to be considered for employment.

Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality.

If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

This process ensures that only qualified applicants are hired to work at Sprint Relay centers as a CA.

Sprint provides an enhanced VCO service called Captioned Telephone (CapTel) Services. Sprint requires that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint ensures that all CapTel Operators are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. CapTel Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel Operator Trainees spend 2 to 3 weeks training in a classroom setting.
- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel Operators are scheduled for one-week of transition training, while being monitored and supported by another CapTel Operator or an Instructor.
- All CapTel Operators must continue to qualify for live call handling each month.
- Sprint CapTel Operators are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel Operator is evaluated on a minimum of one call each shift.
- There is also a monthly test that each CapTel Operator must pass in order to remain qualified to caption live calls.

### **Communication Assistant Training Program**

***§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.***

WATRS, through their contract with Sprint, has shown that that Sprint CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint requires all CAs to possess clear and articulate voice communications. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. Sprint CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Sprint CAs must type 60 WPM prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Sprint's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and

communication needs. Sprint's diversified culture program incorporates training includes the characteristics and of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.

- Demonstrate a professional and courteous phone image
- Process calls using live training terminals in an efficient and knowledgeable manner
- Role-play scenarios written in varying levels of ASL

Sprint provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA
- Recommendation and/or approval from supervisor or manager
- Attend and complete speech to speech specialized Speech to Speech training program including a written evaluation.
- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on Speech-to-Speech Services. Sprint's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy.

The STS training outline is displayed in the following figure:

<b>STS TRAINING OUTLINE</b>	
<b>Sprint Values and Goals</b>	
<b>Training Agenda</b>	<b>Sprint Values and Goals</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>	<b>Sprint Values and Goals</b>

<b>STS TRAINING OUTLINE</b>	
<b>Sprint Values and Goals</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>
<ul style="list-style-type: none"> <li>• <b>Participation</b></li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<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>
<ul style="list-style-type: none"> <li>• <b>Confidentiality and Transparency</b></li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<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>
<ul style="list-style-type: none"> <li>• <b>Scheduling</b></li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

All CapTel Operators are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel Operator training provides familiarity with hearing, deaf, and speech-disabled cultures.

Personnel supporting CapTel have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Services in a professional manner. CapTel Operator Trainees are screened on several skill-sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary
- Error Recognition - CapTel Operators must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during CapTel calls; therefore it is not necessary for the Operator to interpret typewritten ASL.

Please review the Sprint TRS, STS and CapTel Training outlines in Appendix B for more information on CA training requirements.

### **CA Quality Assurance Programs**

Sprint Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss

concerns and how to address them. The training team is located in ten (10) Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customers' feedback and takes proactive steps to implement suggestions and feedback. Sprint Relay does not develop training and consumer education programs for the telecommunications Relay service alone. Sprint Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training on all TRS programs.

***§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.***

### **Transmission of 60 WPM**

WATRS contracts with Sprint to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint's CAs typed an average of 83.9 words per minute (wpm), with at least 95% accuracy. In fact almost a third of Sprint's CAs type over 90 wpm!

***§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.***

### **In-Call Replacement of CAs**

Through their contract with Sprint, WATRS exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken-over unless it is absolutely necessary to do so. Sprint 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 TRS (15 minutes with STS) inbound customer, 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 of ten minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA
- Call requires a specialist (STS, Spanish, etc)
- CA illness
- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum

standard of ten or fifteen minutes (for STS calls). These include:

Shift change, and/or

- 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.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
  - Sprint attempts to honor any requests for a specific gender during call transitions.
  - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing 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.***

*As stated in the section above (§64.604 (a)(1) (v)) WATRS honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.*

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

All conversations relayed between voice and TTY callers are transmitted in real-time. WATRS uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer
- CA-initiated macros (44 macros)
- Function Keys (85 separate function keys)
- System-initiated macros
- On-line help panel
- Tone of voice pre-approved descriptions (almost 100)
- Automatic Error Correction Library (615 words)
- Background descriptions (over 250)

All of these features are available in all languages including English and Spanish.

*CapTel* is a transparent service. *CapTel* 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.

## A.2 Confidentiality and Conversation Context

***§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.***

### Confidentiality Policies and Procedures

As stated earlier, WATRS contracts with Sprint to oversee all TRS CAs, including *CapTel* CAs for the State of Washington.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain 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.

WATRS's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- 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.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All 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.

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.

WATRS CapTel CAs must comply with the same rules that TRS follows regarding confidentiality. The CapTel confidentiality form is similar to the TRS form. Below is an explanation of confidentiality as it pertains to CapTel CAs.

Information obtained during a *CapTel* call must 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 the call. The CapTel CA may ask to speak to a supervisor or other member of management 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 CapTel CAs understand and abide by the confidentiality policy. Any CapTel CA who breaks this policy will be disciplined, up to and including termination. Please see Appendix C for the TRS pledge of confidentiality.

### **STS Limited Exception of Retention of Information**

At the request of a caller, WATRS Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may 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. Please see Appendix C for the TRS Pledge of Confidentiality form.

The only exception to this policy relates to STS calls. WATRS STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

***§64.604 (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 and the Translation of ASL**

WATRS 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.

**STS and TRS Training:** Sprint puts control of the call with the users.

- 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.

At the request of the relay user, WATRS CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten American Sign Language (“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 manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

WATRS CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Washington does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

### **STS Facilitation of Communication**

WATRS STS CAs will facilitate communication without interfering with a caller’s independence. They do not counsel, advise or interject personal opinions. WATRS STS CAs have received

training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands that each STS user may also find one technique to be most comfortable. WATRS STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

WATRS STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

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 many 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 clarify unsure including the following:

- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask “yes” or “no” questions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user 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 a development area 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.

### **A.3 Types of Calls**

***§64.604 (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.***

WATRS provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. WATRS also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing WATRS retain full control of the length and number of calls placed anytime through relay.

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

WATRS 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 to call.

***§64.604 (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.***

WATRS, through Sprint, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. WATRS will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and CapTel users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. WATRS gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. WATRS works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

***§64.604 (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, Sprint will relay the message verbatim to the relay user and follow the user's instructions.

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

Sprint was the first provider to process pay-per-calls, beginning in 1996. Callers to WATRS access 900 services by dialing a free 900 number to access Relay. 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 had been dialed directly from the originating user's telephone. Currently, WATRS users may make 900 calls through 1-900-646-3323.

Because 900 blocking information is not available with 1-line CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

**§64.604 (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.**

WATRS provides access to all available relay call types. Through the state's contact with Sprint, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of standard services that are provided by WATRS:

- 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, WATRS *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

**§64.604(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**

WATRS's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in 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.

WATRS 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 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

### **Speed Dialing Functionality**

WATRS speed dialing functionality, (normally used for “frequently dialed numbers”) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translates to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the “short-hand” name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, “Please call mom,” and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The *CapTel* Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program in three selected phone numbers for speed-dialing, and up to 10 recently dialed numbers.

### **Three-Way Calling**

WATRS provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) 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. Relay users who have purchased Three-Way calling or conference calling capability from his/her Local Exchange Carriers (LECs) can use this feature when placing a call through WATRS. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

WATRS provides three-way calling for *CapTel* users that is in full compliance with FCC requirements. Two-line *CapTel* users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. 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. *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

***§64.604(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.***

WATRS, through Sprint, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a “hot key” to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint’s hot key sends text to the user which says “(RECORDING).” Sprint’s hot keys are available in all supported languages, including English and Spanish.

WATRS has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA’s screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

WATRS does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint’s sophisticated Phoenix feature 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 using Sprint’s recording functionality. 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-Wide Area Telephone Service (WATS) line so the end user is not imposed charges for additional calls.

WATRS CapTel users are able to 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.

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. This is requested by the user directly. 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.***

### **Retrieving Answering Machine and Voice Mail Messages**

WATRS has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint’s Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and leave TTY translated voice messages for voice users to retrieve from their answering machines and voice mail systems.

When a 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. Sprint will use the touch-tone capability embedded in Sprint's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, WATRS CAs uses advanced recording technology to slow down the playback of the messages. 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 so the end user is not imposed charges for additional calls. If the CA needs to redial local calls are free. If the call is long distance, the customer is only charged long distance calls for the first call.
- Sprint's 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.

Like TRS users, WATRS CapTel users can retrieve voice messages from an answering machine that is near the CapTel phone. Below are instructions how a CapTel user may retrieve messages from an answering machine:

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- 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, simply hang up the handset and the phone will be ready for the next call.

With 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.

#### **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.***

WATRS accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, WATRS has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call
- A web interface with complete Application Programming Interface (API) and a branded end-user portal for address changes for internet calls.

**Call Processing Procedures**

Through Sprint, WATRS uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call.

1.	WATRS CAs act upon the word “emergency”. Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key (i.e., “hot key”) which designates the call as an Emergency. This key also prompts the system to use the caller’s NPA/NXX to automatically route the call to the appropriate PSAP or the E-911 call center. This 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 911 Center.
3.	Simultaneously, the CA presses a key to notify the 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.
4.	The caller’s Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: “This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Washington Relay Service. They are calling from (caller’s telephone number). This is CA # 1234, one moment please.”
6.	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 911 operator answered the phone.
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to a TTY at the PSAP, if available.
9.	The CA fills out an “Emergency Incident Form” which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical “trouble ticket” for additional investigation.

**Back up Procedures**

Through their contract with Sprint, WATRS has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two 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.

## CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

- The CapTel phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone will display the typed responses from the PSAP and the caller will use their voice to communicate with the PSAP.
- The user will be connected to the proper 911 Center in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 Center.
- The 911 system renders the appropriate emergency response.

## 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 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the nearest 911 Center every time, with a reliable voice grade connection and with full speed captions.

## Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these “variations” to guide CAs and the Call Center staff on how to proceed:

### ***Caller Disconnects Before Connecting to 911 Center***

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. 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 center in resolving the emergency.

If a customer calls into the TRS center, types “HELP GA” and hangs up, Sprint will continue to treat this as an Emergency call. The relay operator will press a function key (i.e., “hot key”) which designates the call as an Emergency. This emergency hot-key also “freezes” the screen with an emergency banner so that the call information remains displayed. If a customer hangs up, the caller’s information is available to be shared with the 911 Center. When ready to connect to an emergency agency the relay operator will press a dial key that uses the caller’s NPA/NXX to automatically route the call to the E-911 call center which is closest to the caller’s rate center or wire center when a rate center overlaps PSAP boundaries. The relay operator will notify a supervisor who, in turn, will assist as needed with passing on all known information about the call to the answering party at the 911 center. The 911 center will make the determination as to what kind of emergency it is and will dispatch the required emergency service. The relay operator or supervisor will complete an Emergency Incident Form as a record.

## **Training and Support Materials**

WATRS 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 in performing Emergency processes and procedures.

Supervisors or Operations Administrators are available 24/7/365 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.

### ***Voice Emergency Calls***

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: ***“You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 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 online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, " I am connecting your call to Emergency Services, one moment please."

### **A.5 STS Called 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.***

WATRS offers the ability for STS users to maintain a record of regularly called names and telephone numbers. WATRS's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated ten-digit telephone number without delay.

## **Technical Standards**

### **B.1 ASCII and Baudot**

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

WATRS contracts with Sprint to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (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, Turbocode 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.

## **B.2 Speed of Answer**

***§64.604 (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.***

WATRS contracts with Sprint, who currently has ten (10) 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 center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and 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.**

A requirement of the WATRS contract with Sprint is that 85% of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. WATRS's CapTel speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within ten (10) seconds.

WATRS expects that Sprint will continue to review 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.

**§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.**

WATRS 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.

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. 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.**

Through its contract with Sprint, WATRS includes abandoned calls in its daily speed-of-answer performance calculations. **§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.**

Sprint measures its compliance with average speed-of-answer times on a daily basis and reports this information to WATRS on a monthly basis.

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

WATRS, through its TRS contract with Sprint, ensures that all 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) (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 Washington relay 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 available to the state.

### **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.**

WATRS TRS and CapTel users have equal access to their chosen inter-exchange carrier through Relay to the same extent access is provided to voice users.

TRS and CapTel users are encouraged to register their preferred Carrier-of-Choice with Customer Service. Users who have not registered their preferred Carrier-of-Choice are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a Carrier-of-Choice card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their Carrier-of-Choice preferences for CapTel calls.

Voice inbound users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

WATRS relies on Sprint to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

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.

Sprint encourages all Carriers to participate in its Carrier of Choice ("COC") program. When the requested Carrier is not a COC participant, Sprint Relay has established a procedure where the Carrier is notified, verbally and in writing, of its obligation to provide access to relay users and encourage their participation.

Outlined below is the process used by CAs to process Carrier-of-Choice calls and subsequent instructions to relay callers:

- WATRS CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase:

"I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."

- The user may choose to have another Carrier handle the call. Sprint Relay then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint currently has 240 carriers participating in the Sprint Relay's TRS Carrier-of-Choice program. Participation of Carriers in Washington is dependent on whether carrier is authorized to provide service in Washington and connectivity to the Sprint Access Tandem.

The current participating members of the Sprint Carrier of Choice program are:

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  
AT&T

All Others  
Broadwing Communications  
Broadwing Telecom  
CP Telecom  
CenturyLink  
CenturyTel Long Distance  
CenturyTel Solutions  
Charter Communications  
Comcast  
Global Crossing  
LDDS  
MCIWorldCom  
McLeod USA  
Metromedia  
OPEX LD  
QWest  
SBC Long Distance  
Simcom  
Sprint  
TCG Minnesota Inc.  
TDS Telecom  
Touch America  
Verizon LD  
Wiltel  
Working Assets  
WorldCom

Please see Appendix D for a copy of the COC invitational letter sent to carriers.

#### **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.***

WATRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year for all TRS services. WATRS, through Sprint, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. CapTel Relay Services are also available 24 hours a day, seven days a week.

***§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.***

WATRS contracts with Sprint's Relay centers, which are equipped with an Uninterruptible Power Supply (UPS), generator, and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available.

Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Relay system and routes the calls to other operating call centers. WATRS Relay customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. 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.

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities.

Please see Sprint's Disaster Recovery Plan and the Network Support Plan in Attachment E.

## **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.***

WATRS through Sprint, 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, WATRS will continue to provide 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. WATRS receives calling party identifying information including blocking information, from all 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 711 or the number of the Relay Center)

### **State-of-the-Art Technology**

As the provider of relay services for the State of Washington, Sprint offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)

### **STS Message Retention**

In addition, Sprint has expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

### **STS Called Numbers**

Sprint will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that 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.

Please see the graphic below for the written Customer Profile form, which encourages STS users to register speed dial entries.

**Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):**  
*Note: Limit 30 characters per name*

	Name	Area Code & Phone Number
<b>1</b>	<input type="text"/>	<input type="text"/>
<b>2</b>	<input type="text"/>	<input type="text"/>
<b>3</b>	<input type="text"/>	<input type="text"/>
<b>4</b>	<input type="text"/>	<input type="text"/>
<b>5</b>	<input type="text"/>	<input type="text"/>

*If you need to add more information, go to the **Additional Information** section on the page 3.*

**STS with Privacy Option**

Sprint offers STS users 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 users' preference.

**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 simply 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.

**Emergency Numbers**

In most emergency situations, STS callers dial 9-1-1 first for emergency help. However, this may be especially challenging for STS users. STS users also 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.

**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.*

WATRS, through their contract with Sprint, provides true 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 will receive calling party identifying information including blocking information, from all TRS users.

### **Customer Control**

With Sprint's TRS Caller ID, the Relay user is in control. Relay users with this feature 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.

The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen.

With Sprint's Caller ID, there are numerous benefits for TRS users, including:

- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen
- Phone numbers of hang-up callers
- Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

### **Technology**

Sprint Relay offers 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. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

### **Caller ID Enhancements**

Many Caller ID enhancements are compatible with the Relay service and can be accessed by TRS users.

### **Selective Call Acceptance**

Selective Call Acceptance allows a user to create a list of phone numbers so that the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by Relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

## **Selective Call Rejection**

Selective Call Rejection enables the user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by Relay, it will be typed or spoken to the inbound caller.

## **Selective Call Forward**

Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

## **Privacy ID (Anonymous Call Rejection)**

Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as:

“The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected.”

This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voice mail. Realizing that not all users will be able to hear this recording by the calling party, some companies have implemented additional enhancements outlined below:

## **Instant Access List (Preferred Caller List)**

Users may designate a list of up to 10 numbers that can bypass the Sprint Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

## **Caller's Access Code**

Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

## **Functional Standards**

### **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. (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.***

WATRS has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

WATRS works closely with their TRS provider (Sprint) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice or Speech-to-Speech), customer contact information (when given), CA identification numbers, the call handling center and over forty-five contact categories including: complaints, inquires and unsolicited commendations.

Sprint submits reports detailing the information above. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint's customer contact database.

### **Customer Contacts Online Database (CCOD)**

To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts.

The CCOD will automatically notify the TRS Sprint program manager assigned to the State of Washington via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC

By approximately June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators. WATRS reviews the log and then passed the complaint log to the FCC by July 1<sup>st</sup> of each year.

See Appendix K for copies of the last five years of WATRS complaints that have been submitted to the FCC.

## 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.**

WATRS callers may file intrastate complaints and commendations regarding WATRS services through the following contacts:

Liz D'Anna, Relay Program Manager  
12657 Alcosta Blvd, Suite 300  
San Ramon, CA 94583  
E-mail: [liz.danna@sprint.com](mailto:liz.danna@sprint.com)  
Fax: 913-523-0269  
Voice: 925-380-2539

Steve Peck, TRS Program Manager  
1115 Washington St. SE  
PO BOX 45301  
Olympia, WA 98504-5301  
E-mail: [pecksc@dshs.wa.gov](mailto:pecksc@dshs.wa.gov)  
CapTel: 360-586-8912\*  
Fax: 360-902-0855  
V/TTY: 360-902-8000  
Toll Free V/TTY: 1-800-422-7930  
VP: 360-339-7762

\*Note: 1-line CapTel. Please dial 1-877-243-2823 and follow recorded instructions.

## C.3 Public Access to Information

**§64.604 (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.**

WATRS works closely with the telecommunications industry to ensure that the public is informed about the availability of Relay services available in Washington State. Public information in phone directories contain information about WATRS and phone numbers to reach WATRS services including CapTel and 911 emergency assistance for TTY users. For examples of WATRS telephone directory advertisements, see Appendix F.

WATRS is committed to providing a comprehensive outreach program on all WATRS services. Each year funding is designated towards ensuring that specific populations are given information regarding the TRS programs. The Sprint Account Manager and the WATRS Program Manager determine how funds are designated to adequately outreach to Washington Relay users.

Some of the more innovative outreach projects created by WATRS include:

In 2008 the Washington Relay website [www.washingtonrelay.com](http://www.washingtonrelay.com) was upgraded. The website provides information about:

- Relay services and products
- Telecommunications Equipment Distribution (TED)
- Don't Hang Up Washington
- Saving user preferences in a Customer Database Profile
- Common questions and answers

Taste of Technology conference: In 2008 Washington Relay hosted the Taste of Technology conference at the Hilton Seattle Airport. With over 160 participants from various professions, including service providers, non-profit organizations, educators, county and state agencies, and relay consumers, the conference was a major success. In 2009 Washington Relay hosted the "Taste of Technology" conference at the Tacoma Community College. Topics included; CapTel services, Hearing aid compatibility with wireless and Telecommunications Equipment Distribution.

Washington was one of the first Relay states to have open, hands-on, forums showing and demonstrating how to use telecommunication technology for people with hearing and speech disabilities. Since then, WA Relay has organized a series of mini-taste of technology presentations geared to educate middle and high school level students who are deaf, hard of hearing, deaf-blind and speech-disabled. Washington Relay outreach services has also provided presentations to parents of deaf & hard of hearing students to assist parents towards understanding how their children can communicate through relay services. Recently this year we participated a joint event with the deaf-blind community called "Touch of Technology" which was designed to provide the deaf-blind community with information about various communication devices they could use to communicate through the relay services.

Workshops and booths focusing on WATRS, Sprint Relay, assistive devices for people with disabilities, telecommunication equipment devices and other relevant accessibility topics were provided free of charge to the community.

CapTel advertisements: CapTel ads were developed and distributed to hard of hearing community members through Hearing Loss Association of Washington (HLA-WA) which was under an outreach contract with Sprint and Washington Relay to perform outreach services. CapTel ads

were also inserted into HLA-WA & ODHH newsletters informing them of the availability of CapTel services in Washington State. Since 2009 WATRS has been advertising CapTel services in the quarterly newsletter for Hearing Loss Association-WA Sound Waves. WA Relay also conducted two public TV PSA ads on CapTel services, one during the fall of 2010 and the most recent was conducted in the summer/fall of 2012.

Educating the speech disabled population: WATRS provides STS brochures and continues to provide STS outreach services through a WA Relay outreach specialist, who is a contractor we hired through Sprint to educate speech disabled individuals on the availability of STS Relay services. In 2011 WATRS created a new brochure with a detachable mailer for organizations to request a presentation.

“Don’t Hang Up” Campaign: In an attempt to educate government agencies, regional service centers, banks and schools about not hanging up on relay calls, a packet of 100 each of “Don’t Hang Up” postcards were sent to the following organizations in 2011:

- Hearing, Speech, & Deafness Center (HSDC)–
- Seattle HSDC–Bellingham (North Sound)
- HSDC–Tacoma (South Sound)
- Southwest Washington Center of the Deaf and Hard of Hearing (SWCDHH)–Vancouver
- South Eastern Washington Service Center of the Deaf and Hard of Hearing (SEWSCDHH)–Pasco
- SEWSCDHH–Yakima
- Hearing Loss Center (HLC)–Spokane

Brochures, printed in English and Spanish, are also available to educate the public about WATRS (see Appendix I). Other examples of public awareness outreach efforts include articles in the ODHH Community Review newsletter which is published quarterly. Samples of ODHH newsletters can be found in Appendix G.

In 2011-2012 WATRS contracted a person of Native American descent to provide outreach to Native Americans who are deaf, hard of hearing or speech disabled. Introductions about Washington Relay were made to most of the federally recognized tribes in Washington.

WATRS was represented at several Elder’s Day ceremonies throughout Washington, providing captioning and interpreting services to Native Americans. WATRS focused outreach efforts on elders because of the age group of the population corresponds with those national figures, and is also related to hearing loss in aging citizens. Additionally, the hierarchy in most tribes places elders in a position of high regard, with ceremonies honoring them throughout the year. Educating elders about hearing loss ensures that they pass on this knowledge to their tribal communities.

#### **C.4 Rates**

***§64.604 (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***

**WATRS** users are not charged more for services than for those charges paid by standard “voice” telephone users. TRS users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the WATRS COC list, will be rated and invoiced by the selected interstate carrier.

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 Sprint’s Message Telephone System (MTS) rates.

	Intrastate	Interstate
<b>Day</b> (7 AM – 6:59 PM)	75%	50%
<b>Evening</b> (7 PM – 10:59 PM)	75%	50%
<b>Night/weekend</b> (11 PM – 6:59 AM; all day Saturday & Sunday)	75%	50%

**C.5 Jurisdictional Separation of Costs**

**§64.604 (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 (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 §64.605, 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 WATRS relay intrastate and interstate minutes are reported separately to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate Telecommunications Relay Services (TRS) Fund (Fund) administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, states only receive a 51% deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

As stated under RCW 43.20A.720, WATRS was established as one of the telecommunication programs funded through excise tax. To cover the cost of providing the WATRS program, a telephone line subscriber surcharge is levied on all landline telephones that could access the Relay service. The surcharge funds covers WATRS expenditures and pays for intrastate calls as well as other expenditures not covered under interstate reimbursement requirements, as established by the Rolka Loube Saltzer Associates (RLSA).

On each telephone line subscriber's telephone bill under TRS excise funds, there is a line item that states "TRS Excise Funds Federal ADA Requirement at \$0.19 per access line." This informs the public of the purpose of the surcharge tax.

## Telecommunications Relay Fund

### ***§64.604 (c)(5)(iii) through §64.604 (c)(iii)(M)***

These sections do not pertain to State programs. However, the state of Washington contracts with Sprint who contribute and collect interstate funds through RLSA. It is the State's understanding that Sprint complies with the appropriate mandates under this section.

## C.6 Complaints

***§64.604 (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 §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (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.***

WATRS works in conjunction with the TRS provider, Sprint, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. WATRS customers also have the option of calling Sprint's 24-hour Customer Service department (1-800-676-3777), the Sprint Relay Program Manager or WATRS to file complaints or commendations.

WATRS has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. WATRS submits all complaints from June 1-May 31<sup>st</sup> to the FCC by the annual July 1<sup>st</sup> deadline. To see copies of the Complaint Log Summaries from 2008 through 2012, please refer to Appendix K.

### **C.7 Treatment of TRS Customer Info**

***(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.***

WATRS, through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint will not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

### **§64.606 State Certification**

***3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program 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 (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.***

WATRS has provided Relay services to Washingtonians since 1993. The Legislative mandates, that-established rules for the Relay program since 1987, are enclosed as Appendix J. Further evidence of WATRS' commitment to follow the FCC minimum mandatory Relay requirements can also be found in the mandatory items listed most recent RFQQ, released in 2010 and is enclosed as Appendix L. WATRS was approved for TRS Certification Renewal by the FCC in 2008. For a copy of this letter, please see Appendix N.

WATRS meets or exceeds all requirements mandated for Relay services required by FCC rules, including 47 C.F.R §64.604. WATRS does not provide Relay services or features that conflict or circumvent the FCC rules. Presently, WATRS provides several features through Sprint Relay that exceed the minimum mandatory rules, including but not limited to:

- Carrier of Choice—WATRS exceeds this requirement. Through Sprint Relay, WATRS works with carriers to implement them in the Carrier of Choice (COC) program, even without a request from a Relay user.
- Customized Access Numbers—WATRS provides dedicated 800 numbers (TTY, VCO, STS, Spanish Relay, ASCII, Voice, and other access numbers as requested) to assist Relay users who want to access Relay services specifically by their call type. WATRS has had this capability since it first contracted with AT&T in 1992 and continued the WATRS service with Sprint Relay since 1998.
- Two-Line VCO—WATRS has provided this service since early 2000, allowing consumers to utilize their voice and residual hearing as much as possible.
- E-Turbocode—WATRS contracts with Sprint Relay to provide E-Turbocode, which provides faster transmission of the Relay conversation for Relay users. Sprint Relay is the only Relay provider that has E-Turbocode as part of its TRS standard features package for State Relay contracts. E-Turbocode, exceeds the FCC requirement
- Captioned Telephone services (CapTel)—WATRS provides CapTel as a captioned telephone service to WA state residents with a hearing loss. Because this is not a mandated service, WATRS exceeds this requirement. WATRS has provided this as a service since April 2007.
- Non-English language Relay Service—WATRS provides Spanish to English/English to Spanish to Relay users in need of this service, and therefore exceeds this requirement. WATRS has provided this service since the late 1990's.

In addition, information is available on the Washington Utilities and Transportation Commission (WUTC) website explaining the purpose of the surcharge:

<http://www.utc.wa.gov/consumers/telephone/Pages/guidetoYourTelephoneBill.aspx>.

Copy of a phone bill example showing the surcharge rate is listed under Appendix M.

***§64.606(f) Notification 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.***

WATRS has no substantive changes to report in this recertification application.