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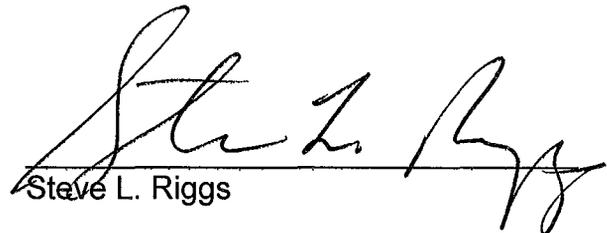
 MERITAS LAW FIRMS WORLDWIDE

October 11, 2012

I made the Arkansas Recertification filing on September 21, 2012. Post filing, we discovered that the June 2011 and 2011 FCC Consumer Complaint Log Summaries were omitted from the filing.

I thought of three options: 1) Send you a substituted FCC Recertification filing, identical to the one timely filed, with the sole exception that the 2011 and 2012 Consumer Complaint Log Summaries are **now** included; 2) Send only the two Consumer Complaint Log Summaries as an addendum (only problem is this would make the FCC Recertification filing in two pieces); 3) Do nothing.

I am sending option 1, the substituted FCC Recertification filing, and if you prefer one of the other two options, you can ignore this attachment and let me know. My contact information is above.


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Arkansas TRS State Certification Application CG Docket No. 03-123

Introduction

Arkansas Relay Service is the program administered by the Arkansas Deaf and Hearing Impaired Telecommunications Service Corporation ("ADHITS"), which was created by the Arkansas Legislature for that purpose. The following narrative and attached appendices have been prepared 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**. ADHITS prepared this TRS Certification Renewal Application with the assistance of Sprint Relay.

ADHITS contracted with Sprint to provide Telecommunications Relay Service effective January 1, 2009, to provide 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 RFP that was issued in July, 2008. All of the minimum mandatory TRS requirements are listed in the RFP and is attached as **Appendix K**. Please note that although Sprint Relay provides Internet Protocol (IP) and Captioned telephone web-based services, Arkansas Relay Service does not contract to provide these services in Arkansas, nor is Arkansas Relay Service responsible for oversight of IP and VRS or other Internet or 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 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.

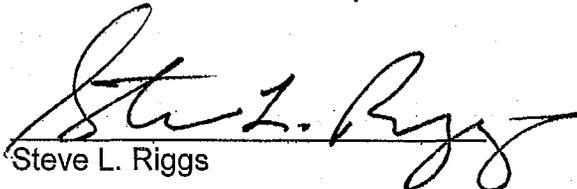

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Operational Standards

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

Arkansas Relay Service contracts with Sprint to provide the hiring, training and oversight of Communication Assistants for Arkansas Relay Service. 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 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.

§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.

Arkansas Relay Service, 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 provides 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:

STS TRAINING OUTLINE	
Sprint Values and Goals	
Training Agenda	
<ul style="list-style-type: none"> ▪ Objectives / Training Outline ▪ Introduction and History ▪ Video ▪ Service Description ▪ Characteristics of Customers ▪ Stereotypes 	<ul style="list-style-type: none"> ▪ Speech-Disabilities ▪ Attributes of Speech-to-Speech Relay CAs ▪ Speech-to-Speech versus Traditional Relay ▪ FCC Requirements ▪ Speech-to-Speech Variations ▪ Assessment
Work Performance Components	
<ul style="list-style-type: none"> ▪ Basic Call Processing 	<ul style="list-style-type: none"> ▪ Confidentiality

STS TRAINING OUTLINE	
Sprint Values and Goals	
<ul style="list-style-type: none"> ▪ Call set up ▪ Customer Database ▪ Frequently Dialed Numbers ▪ Customer Requests ▪ Emergency Call Processing 	<ul style="list-style-type: none"> ▪ Transparency ▪ Personal Conversations ▪ Developmental Skill Practice ▪ Audio ▪ Observation
Participation	
<ul style="list-style-type: none"> ▪ CA training ▪ Taking over calls – 15 minute ▪ CA work performance 	<ul style="list-style-type: none"> ▪ Call Focus ▪ Teamwork – support peer
Confidentiality and Transparency	
<ul style="list-style-type: none"> ▪ Discuss call speech patterns ▪ Discuss techniques customer uses ▪ Have two CAs on one call, if necessary or customer requests. 	<ul style="list-style-type: none"> ▪ Unacceptable to: ▪ Have conversation regarding information discussed on calls ▪ Discuss customers in general
Scheduling	

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 seven (7) 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 customer's 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 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

Arkansas Relay Service 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)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

Arkansas Relay Service does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, Sprint no longer provides VRS services.

§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, Arkansas Relay Service (i.e. ARS) 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)) Arkansas Relay Service 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. Arkansas Relay Service 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, Spanish and *CapTel* is a transparent service. *CapTel* CAs transmits 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, Arkansas Relay Service contracts with Sprint to oversee all TRS CAs, including *CapTel* CAs for the State of Arkansas.

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.

The only exception to this policy relates to STS calls. Arkansas Relay Service 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.

Arkansas Relay Service 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.

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

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

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

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionist understand and abide by the confidentiality policy. Any Captionist 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, Arkansas Relay Service 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.

§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

Arkansas Relay Service 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 accepts their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understands the relay user is to remain in control of the call.
- CAs does 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, Arkansas Relay Service 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.

Arkansas Relay Service CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Arkansas 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

Arkansas Relay Service STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Arkansas Relay Service STS CAs has 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. Sprint STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

Arkansas Relay Service 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.

Arkansas Relay Service 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. Arkansas Relay Service 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 Arkansas Relay Service retain full control of the length and number of calls placed anytime through relay.

Arkansas Relay Service 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.

Arkansas Relay Service CapTel CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. Please see Appendix K for more information on these waivers.

§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.

Arkansas Relay Service, 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. Arkansas Relay Service will also process calls to or from restricted lines e.g. hotel rooms and pays 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. Arkansas Relay Service gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Arkansas Relay Service 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 Arkansas Relay Service 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 was dialed directly from the originating user's telephone. Currently, Arkansas Relay Service users may make 900 calls through 1-900-230-3131.

Because 900 blocking information is not available with 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, and HCO-to-HCO.

Arkansas Relay Service 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 Arkansas Relay Service:

- 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, Arkansas Relay Service *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

Arkansas Relay Service'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 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

Arkansas Relay Service speed dialing functionality (also known as 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 translate 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 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

Arkansas Relay Service 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 Arkansas Relay Service. 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.

Arkansas Relay Service 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.

Arkansas Relay Service 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, Spanish.

Arkansas Relay Service 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.

Arkansas Relay Service 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-watts line so the end user is not imposed charges for additional calls.

Arkansas Relay Service 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

Arkansas Relay Service 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 TTY messages for voice users.

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 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, Arkansas Relay Service 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, Arkansas Relay Service CapTel users can retrieve answering machine messages from an answering machine that is near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users including the following:

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

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.

Arkansas Relay Service accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Arkansas Relay Service 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 API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

Arkansas Relay Service uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call.

1.	Arkansas Relay Service 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 E-911 center which is closest to the caller's rate 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 Florida 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 the PSAP (TTY).
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, Arkansas Relay Service 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 most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

Arkansas Relay Service CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures.

Supervisors or Operations Administrators are available 24/7/365 to assist CAs when an emergency call occurs. CAs also has immediate access to call processing steps via an online help screen and position reference guide.

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 Centers

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, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint ALWAYS connects the caller to the POLICE. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls

If a voice customer misdials 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.

Arkansas Relay Service offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Arkansas Relay Service 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.

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

Arkansas Relay Service does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an

accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Arkansas Relay Service does not provide, contract to provide, or oversee VRS services and is exempt from this section.

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.

Arkansas Relay Service 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.

Arkansas Relay Service 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) (iii) 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 Arkansas Relay Service 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. Arkansas Relay Service CapTel speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within ten (10) seconds.

Arkansas Relay Service 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.

Arkansas Relay Service 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, Arkansas Relay Service 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 Arkansas Relay Service on a monthly basis.

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

Arkansas Relay Service, 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 Arkansas 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.

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

Arkansas Relay Service does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

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.

Arkansas Relay Service 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-in 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.

Arkansas Relay Service 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:

- Sprint Relay 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 Arkansas is dependent on whether carrier is authorized to provide service in Arkansas and connectivity to the Sprint Access Tandem.

10-10-321 Telecom USA
10-10-502 WorldxChange
10-10-636 Clear Choice
10-10-811 Vartec
10-10-834 WorldxChange
10-10-987
AT&T
Adelphia
All Others
Alltel
CP Telecom
Century LD
CenturyLink
CenturyTel Long Distance
CenturyTel Solutions
Comcast
EXCEL
Global Crossing
LDDS
Lavaca Telephone Co.
MCIWorldCom
McLeod USA
OPEX LD
QWest
SBC Long Distance
Sprint
Suddenlink
TCG Minnesota Inc.
TDS Telecom
Telecomm USA
The Phone Co.
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.

Arkansas Relay Service and Sprint Relay Customer Service are both available 24 hours a day, every day of the year for all TRS services. Arkansas Relay Service, 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.

Arkansas Relay Service 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. Arkansas Relay Service 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.

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

Arkansas Relay Service does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

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

Arkansas Relay Service does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

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.

Arkansas Relay Service 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, Arkansas Relay Service 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. Arkansas Relay Service 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 Arkansas, 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

- Customer Profile
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

Wireless Access – STS (*787)

Sprint is excited to announce the first wireless short-code solution for STS users. Beginning in early 2012, Sprint wireless customers will be able to dial *STS (i.e., *787) to reach a Speech to Speech CA quickly and easily from anywhere in the nation. All callers who are physically located within the state will automatically be connected to a Speech-to-Speech CA. This service is available to both callers with and without a speech disability, who need to place a STS call. Voice callers needing to place a call to a STS user may also use this service.

When Arkansas TRS customers travel outside of the state, callers will automatically be connected to STS based on their physical location. If they are in a state where Sprint is the Relay provider, the caller is connected to the State's STS Service. If not, callers are automatically transferred to Sprint's interstate STS Service, where they will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

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
1	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>
5	<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.*

Arkansas Relay Service, 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.

Arkansas Relay Service 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.

Arkansas Relay Service 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 Arkansas 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. Arkansas Relay Service reviews the log and then passed the complaint log to the FCC by July 1st of each year.

See Appendix: K for copies of the last five years of Arkansas Relay Service complaints and commendations 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.

Arkansas Relay Service callers may file intrastate complaints and commendations regarding Arkansas Relay Service services through the following contacts:

Jeffrey L. Prail
900 South Shackleford Road, Suite 300, Little Rock, AR 72211
www.arkansasrelay.com
Jeffrey.Prail@sprint.com
TTY: 501.221.3279
Fax: 501.221.3241
Voice: 501.221.1285
VP: 501.246.8227

Arkansas Deaf and Hearing-Impaired Telecommunication Services
1220 West Sixth Street, Little Rock, AR, 72201
Cheryl@cei.net
Web Address: www.ataweb.org
Fax: 501.375.7230
Voice: 501.375.0086

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.

Arkansas Relay Outreach continues the tradition to bringing awareness about Relay service, “Do Not Hang Up on Relay” and Arkansas Relay CapTel campaign to the general population, and rural communities in such events as Health and Wellness, Senior Expo, Vocational Rehabilitation Service, Arkansas School for the Deaf, and local Deaf Organization.

Arkansas Relay receives feedback from a variety of stakeholders who are relay users as well as other community individuals with disabilities through Arkansas Deaf and Hearing Impaired Telecommunication Service. Additional input on the Relay Service is also provided by ARK TAP, PCI Publication, and Arkansas Time. Here are the lists of publications which are currently advertising Arkansas Relay Service ads.

Peekaboo Magazines

- Front Porch Magazine
- Savvy for Kids Magazine
- Mature Arkansas Magazine
- Arkansas Family Physician Magazine
- Arkansas Board of Certified Nursing Magazine
- Arkansas Hospital Administration Magazine
- Magnolia Medical Regional Center Magazine
- Arkansas Travelers Game Day Magazine
- Arkansas Senior Resource Directory

Arkansas Relay Service has partnered with several organizations that enable us to have an exhibition booth to educate and create awareness about Arkansas Relay, Do not Hang Up, and CapTel. Please see below for organization partnership.

- Windsor Medicare Extra
- Champion for Kids
- Arkansas Travelers Baseball Organization
- Arkansas Natural Baseball Organization
- Brave Fire Department, (White Hall, Arkansas)

Please see below of 2012 Outreach Activities Report:

FY - 2012 Arkansas Relay Outreach					
Event	City	Date	Attendance	Presentation (P), Outreach (O), Booth (B)	Cost
		Jan-12			
ASD Basketball Homecoming	Little Rock	1/7/2012	75	B	NA
Searcy Police Department	Searcy	1/10/2012	12	P	NA
Minority Health Fair	Camden	1/21/2012	200	B	NA
PCI Publishing Company	Little Rock	1/24/2012	8	P	NA
Helen Tyson Middle School	Little Rock	1/24/2012	15	P	NA
Charleston Health Fair	Charleston	1/28/2012	1	O	NA
		Feb. 2012			
Sprint Store	Little Rock	2/1/2012	8	P	NA
Hands and Voices Organization	Little Rock	2/4/2012	4	O	NA
Little Rock Black Deaf Advocate	Little Rock	2/4/2012	8	O	NA
LRAD	Little Rock	2/5/2012	60	O	NA
Conway Chamber of	Conway	2/7/2012	16	P	NA

Commerce					
Wilson Senior Center	Perryville	2/8/2012	55	P	NA
Larry's Pizza	White Hall	2/9/2012	60	P	NA
Dardanelle Senior Activity Center	Dardanelle	2/9/2012	60	O	NA
Home Show	Hot Springs	2/10-11/2012	2,500	B	\$295
Arkansas RV Show	Little Rock	2/17-19/2012	3,500	B	\$350
		Mar-12			
Wal-Mart	West Memphis	3/3/2012	57	B	NA
Women's Living Expo	Conway	3/10-11/2012	500	B	
Senior Expo	Benton	3/13/2012	250	B	\$367
Orchards of Mabelvale	Mabelvale	3/19/2012	25	B	NA
Madison Heights	Little Rock	3/23/2012	25	B	NA
Cumberland Manor	Little Rock	2/23/2012	25	B	NA
Hearing Aid Specialist	Jonesboro	3/26/2012	1	O	NA
Frank Pamplin Audiology	Pine Bluff	3/26/2012	1	O	NA
Dr. William Bulkey	Paragould	3/26/2012	1	O	NA
Hearing Group	Jonesboro	3/26/2012	1	O	NA
Jonesboro Hearing Aid Service	Jonesboro	3/26/2012	1	O	NA
Dr. Bryan Lansford	Jonesboro	3/26/2012	1	O	NA
Dr. William Young	Jonesboro	3/26/2012	1	O	NA

Otolaryngology and Facial Surgery Center	Jonesboro	3/26/2012	1	O	NA
Dr. Mark Clemons	West Memphis	3/26/2012	1	O	NA
Health South Rehab Hospital	Jonesboro	3/28/2012	1	O	NA
VA Outpatient Clinic	Paragould	3/28/2012	1	O	NA
Jonesboro VA Outpatient	Jonesboro	3/28/2012	1	O	NA
VA Outpatient Clinic	Paragould	3/28/2012	1	O	NA
St. Bernards Medical Center	Jonesboro	3/28/2012	1	O	NA
NEA Baptist Memorial Hospital	Jonesboro	3/28/2012	1	O	NA
Arkansas Gerontological Society	Little Rock	3/28-29/2012	150	B	\$100
		Apr-12			
National Social Workers Conference	Hot Springs	4/4-5/ 2012	200	B	\$250
Advanced Care Hospital	Searcy	4/9/2012	1	O	NA
White County Medical Center	Searcy	4/9/2012	1	O	NA
Arkansas Methodist Medical Center	Paragould	4/9/2012	1	O	NA
Baptist Health Medical Center	Stuttgart	4/9/2012	1	O	NA
Chambers Memorial Hospital	Danville	4/9/2012	1	O	NA
Drew Memorial Hospital	Monticello	4/9/2012	1	O	NA

Five Rivers Medical Center	Pocahontas	4/9/2012	1	O	NA
Forrest City Medical Center	Forrest City	4/9/2012	1	O	NA
Great River Medical Center	Blytheville	4/9/2012	1	O	NA
Harris Hospital	Newport	4/9/2012	1	O	NA
Helena Regional Medical Center	Helena	4/9/2012	1	O	NA
HSC Medical Center	Malvern	4/9/2012	1	O	NA
Johnson Regional Medical Center	Clarksville	4/9/2012	1	O	NA
Medical Center of South Arkansas	El Dorado	4/9/2012	1	O	NA
Magnolia Hospital	Magnolia	4/9/2012	1	O	NA
Ouachita County Medical Center	Camden	4/9/2012	1	O	NA
St Mary Regional Medical Center	Russellville	4/9/2012	1	O	NA
Levi Towers	Hot Springs	4/12/2012	46	B	NA
Quality Conference	Hot Springs	4/17-18/2012	75	B	\$600
Dardanelle Senior Health Fair	Dardanelle	4/19/2012	85	B	\$10
Razorfest	Fayetteville	4/21/2012	50,000	B	\$3,500
Glenwood Senior Center	Glennwood	4/26/2012	75	P	NA
Hot Springs Village Business Expo	Hot Springs Village	4/27/2012	350	B	
		May-12			

Arkansas Public Health Association	Hot Springs	5/9-10/2012	150	B	\$600
Senior Health Fair	Fayetteville	5/10/2012	150	B	\$100
Naturals Baseball Game	Fayetteville	5/11/2012	2,000	B	
Campus Towers	North Little Rock	5/14/2012	40	B	NA
Revive Hearing Center	Benton	5/15/2012	1	O	NA
Curves Women's Health Fair	Benton	5/15/2012	25	B	NA
Heber Springs Chamber of Commerce	Heber Springs	5/18/2012	18	P	NA
Senior Expo	Searcy	5/22/2012	200	B	\$367
Arkansas Rehabilitation Association	Hot Springs	5/23-24/2012	150	B	\$250
		Jun-12			
Mini Health Fair	Little Rock	6/8/2012	11	B	NA
Senior Expo	Hot Springs Village	6/12/2012	150	B	\$367
Mini Health Fair	Heber Springs	6/13/2012	2	B	NA
Mini Health Fair	Searcy	6/13/2012	2	B	NA
UAMS Palliative Care Conference	Little Rock	6/15-16/2012	300	B	\$300
Grand Prairie Health & Wellness Expo	Stuttgart	6/28/2012	150	B	\$50
Meals on Wheels mailout	Pulaski County	6/30/2012	800	O	NA

		Jul-12			
Travelers Game	Little Rock	7/4/2012	3,000	B	
Miller County Senior Center	Texarkana	7/10/2012	35	P	NA
J & L Hearing Center	Texarkana	7/10/2012	1	O	NA
Jones Hearing Center	Texarkana, TX	7/10/2012	1	O	NA
Senior Center on Aging	Texarkana	7/10/2012	3	O	NA
Arkansas Hearing Society	Little Rock	7/13-14/2012	90	B	\$650
Searcy Senior Center	Searcy	7/20/2012	100	B	NA
Wild About Wellness Health Fair	Texarkana	7/28/2012	400	B	\$295
		Aug-12			
Senior Health Fair	Star City	8/1/2012	35	B	NA
Country Club Village	Hot Springs	8/1/2012	2	P	NA
Russellville Business Expo	Russellville	8/7-8/2012	3,000	B	\$250
Blossom Hill Assisted Care	Springdale	8/13/2012	1	O	NA
Fayetteville Assisted Living	Fayetteville	8/13/2012	1	O	NA
Culpepper Place of Springdale	Springdale	8/13/2012	1	O	NA
Culpepper Place of Jonesboro	Jonesboro	8/13/2012	1	O	NA
BrookStone Assisted	Fayetteville	8/13/2012	1	O	NA

Living Residence	e				
Homestyle Assisted Living	Springdale	8/13/2012	1	O	NA
Pennsylvania Life Senior	Springdale	8/13/2012	1	O	NA
Grandwood Assisted Living	Farmington	8/13/2012	1	O	NA
Care Network	Rogers	8/13/2012	1	O	NA
Countryside Assisted Living	Huntsville	8/13/2012	1	O	NA
Concordia Retirement Center	Bella Vista	8/13/2012	1	O	NA
Green Acres Easy Living	Rogers	8/13/2012	1	O	NA
Legacy Village Green House	Bentonville	8/13/2012	1	O	NA
New Adams House	Bentonville	8/13/2012	1	O	NA
Rocking Chair Inn	Springdale	8/13/2012	1	O	NA
Oak Ridge Village	Pea Ridge	8/13/2012	1	O	NA
Rogers Chateau	Rogers	8/13/2012	1	O	NA
Rogers Townhouse	Rogers	8/13/2012	1	O	NA
Shiloh Inn	Springdale	8/13/2012	1	O	NA
The Gardens at Osage Terrace	Bentonville	8/13/2012	1	O	NA
The Golden Girls Retirement Manor	Siloam Springs	8/13/2012	1	O	NA
The Meadows	Bentonville	8/13/2012	1	O	NA
Valley Springs Residential	Siloam Springs	8/13/2012	1	O	NA

Bryant Senior Health Fair	Bryant	8/14/2012	75	O	NA
Braves Fire Department	White Hall	8/15/2012	4	P	NA
Senior Expo	Conway	8/24/2012	350	B	\$367
		Sep-12			
Senior Health Fair	Russellville	9/11/2012		B	\$20
Hospice and Palliative Care Association	North Little Rock	9/20-21/2012		B	
		Oct-12			
Health Expo	Little Rock	10/4/2012		B	
ArkSHA	Little Rock	10/10-12/2012		B	\$75
Senior Networking	Russellville	10/17/2012		P	NA
		Nov-12			
Asian Festival	Little Rock	11/3/2012		B	\$305
Arkansas Council for Exceptional Children	Hot Springs	11/7-8/2012		B	\$125

Mt Sequoyah Health Fair	Fayetteville	11/8/2012		B	
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As part of the ongoing outreach to connect to the community members by advertisement and website here are the following materials that are distributed.

7-1-1 brochure

ARS CapTel brochure (newly revised)

ARS advertisement (general public)

Web-banner for website

Speech-to-Speech on ARS website

All of the brochures and advertisement can be found: Appendix: H

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

Arkansas Relay Service 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 Arkansas Relay Service 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
Day (7 AM – 6:59 PM)	50%	50%
Evening (7 PM – 10:59 PM)	50%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	50%	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 Arkansas Relay Service 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.

Arkansas Legislation creating ADHITS, please see Appendix: I

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)(M) does not pertain to State programs. However, the state of Arkansas Relay Service contracts with Sprint who contributes and collects interstate funds through RLSA. It is the State's understanding that Sprint complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. The State of Arkansas Relay Service does not provide VRS services, does not contract to provide VRS services and is exempt from 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.

Arkansas Relay Service 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. Arkansas customers also have the option of calling Sprint's 24-hour Customer Service department (1-800-676-3777), the Sprint Relay Program Manager or the ADHITS (Arkansas Deaf and Hearing Impaired Telecommunication Service) to file complaints or commendations.

Arkansas Relay Service 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. Arkansas Relay Service submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline. To see copies of the Complaint Log Summaries from 2008 through 2012, please refer to Appendix J.

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.

Arkansas Relay Service, 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 be selling, 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.

Arkansas Relay Service was approved for TRS Certification Renewal by the FCC in 2008. For a copy of this letter, please see 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.

ADHITS has opted to extend the second extension of final year agreement which expires on December 31, 2013 with Sprint Relay. ADHITS will release RFP in 2013. Sprint Relay continues to provide, meet, and exceed all FCC requirements.



PUBLIC NOTICE

Federal Communications Commission
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Washington, D.C. 20554

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TTY: 1-888-835-5322

DA 12-1187
July 25, 2012

CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION

CG Docket No. 03-123

This Public Notice alerts states and territories that the certifications that they now hold for the provision of telecommunications relay services (TRS) will expire on July 26, 2013.¹ Under the Federal Communications Commission's (Commission's) TRS regulations, each state or territory may file an application for "renewal" of its certification one year prior to expiration, *i.e.*, beginning on July 26, 2012.² Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2012, to give the Commission sufficient time to review and rule on the applications prior to the expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),³ codified at Section 225 of the Communications Act of 1934, as amended (Act).⁴ TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals.⁵ Under the Act, the Commission must ensure the provision of TRS that is functionally

¹ As amended by Section 103(a) of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), TRS is defined as "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." Pub. L. No. 111-260, 124 Stat. 2751, *technical amendments*, Pub. L. No. 111-265, 124 Stat. 2795 (Oct. 8, 2010) § 103(a), codified at 47 U.S.C. § 225(a)(3). *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, ¶ 3 n.18 (2004) (describing how a traditional TRS call works).

² 47 C.F.R. § 64.606(c)(1). Since 1993, the Commission has granted states certification to operate their own TRS programs in five year increments. The Consumer and Governmental Affairs Bureau, under delegated authority, issued its last round of certification grants in July 2008.

³ Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

⁴ 47 U.S.C. § 225.

⁵ 47 U.S.C. § 225(a)(3).

equivalent to voice telephone service.⁶ The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.⁷

Under Section 225, states wishing to establish their own TRS programs for the provision of intrastate and interstate TRS over the public switched telephone network may receive Commission certification to do so.⁸ All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech relay (STS) service.⁹ States may also offer captioned telephone relay service (CTS). States seeking renewal of their certification must include information about each of these services in their applications so that the Commission can ensure that the provision of these services is consistent with its rules and that the state is exercising responsibility for oversight of these services.¹⁰

Specifically, in order to obtain certification, a state must submit documentation to the Commission that describes its relay program and include its procedures and remedies for enforcing any requirements that the program may impose.¹¹ In addition, a state must establish that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.¹² The Commission's TRS regulations explain that documentation should be submitted in narrative form, and that the Commission shall give the public notice of such applications.¹³

The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. Applications for certification will be reviewed to determine whether each state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules.¹⁴ If the program exceeds the mandatory minimum standards, the state must establish

⁶ 47 U.S.C. § 225(a)(3).

⁷ See 47 C.F.R. § 64.604.

⁸ Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. See 47 U.S.C. § 225(d)(3). States with certified TRS programs may allow TRS providers operating under their programs to recover such costs by a method consistent with the jurisdictional separation of costs requirements of Section 225. See *id.* Costs associated with the provision of interstate TRS are recovered from subscribers of interstate and Voice over Internet Protocol (VoIP) service, and such providers are reimbursed through the TRS Interstate Fund. *Id.* In October 2011, the Commission adopted rules to implement Section 103(b) of the CVAA, requiring interconnected and non-interconnected VoIP service providers to participate in and contribute to the TRS Fund. See CVAA § 715; 47 U.S.C. § 616; *Contributions to the Telecommunications Relay Service Fund*, CG Docket No. 11-47, Report and Order, 26 FCC Rcd 14532 (2011).

⁹ See 47 C.F.R. § 64.603.

¹⁰ Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Declaratory Ruling, 18 FCC Rcd 16121 (2003). If a state does not offer CTS, it need not submit documentation in its certification application pertaining to this service.

¹¹ 47 U.S.C. § 225(f); 47 C.F.R. § 64.606(a).

¹² 47 C.F.R. § 64.606(b)(1)(ii).

¹³ 47 C.F.R. § 64.606(a).

¹⁴ 47 U.S.C. § 225(f)(2)(A). See 47 C.F.R. § 64.604.

that the program does not conflict with federal law.¹⁵ In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program.¹⁶

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned "TRS State Certification Application."

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission's electronic comment filing system (ECFS): <http://apps.fcc.gov/ecfs/>. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and **CG Docket No. 03-123**.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov. Parties should also submit electronic disk copies of their certification filing. The electronic media should be submitted in "read-only" mode and must be clearly labeled with the state's name, the filing date and captioned "TRS Certification Application."

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission. All hand-delivered or messenger-delivered paper filing for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.

Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

¹⁵ See 47 C.F.R. § 64.606(b)(1)(iii).

¹⁶ 47 U.S.C. § 225(f)(2)(B).

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	ITEM	FCC ACTION
Beginning July 2012	Commission issues Public Notices seeking comment on state TRS applications that have been filed.	Comments are due within 30 days of release of the Public Notices; reply comments are due within 15 days thereafter.
July 2012 – May 2013	Commission reviews applications for TRS recertification for compliance with 47 C.F.R. §§ 64.604 and 64.606.	If necessary, Commission sends deficiency letters requesting additional information from states to confirm compliance with the TRS mandatory minimum standards and other certification requirements.
May - July 2013		Commission issues Public Notices and Letter Orders of certification renewals.

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. These documents also may be purchased from the Commission’s duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their web site: www.bcpiweb.com or by calling (202) 488-5300. Filings also may be found by searching on the Commission’s Electronic Comment Filing System (ECFS) at <http://apps.fcc.gov/ecfs/> (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: <http://transition.fcc.gov/cgb/dro/trs.html>.

For further information regarding this *Public Notice*, please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice), (202) 418-2297 (TTY), or e-mail at Dana.Wilson@fcc.gov.

Appendix B: Sprint Training of CAs

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

TRS TRAINING SCHEDULE		
DAY 9	Review Variations Practice Role Plays Return ASL Workbooks and Discussion Adherence/Trades/OT - OA Presentation	Administer Test #4 Overview of Federal Relay Take FRS Calls - assisted Review for Test #5 *Typing Practice/Tests if necessary
DAY 10	Administer Test #5 Final Review/ Questions & Answers Detachment Life After Training Complete Typing Tests if necessary	Graduation Take Calls Take digital pictures for Sprint ID Badge

Figure 1 - TRS CA Training Schedule

Topics Covered During Training

The following is a comprehensive list of all training topics covered by Sprint during initial training.

TRAINING TOPICS		
Orientation	Welcome and Introductions Introduction to Each Other Sprint Nextel Corporation (or Vendor Company) Sprint ahead Values Sprint Nextel Overview History of Sprint Corporation Founders Long Distance Local Telecommunications PCS	Internet Services Product Distribution The Sprint Campus The Sprint Nextel Merger Telecommunications Relay Service What is Relay? Relay Agent Training Relay- Connect to Your Future Video Observation Guidelines How a Call Reaches Sprint Nextel Relay
Connecting to Relay	The Role of a Relay Agent Connecting to Relay 711 Dedicated Toll-Free Numbers Equipment TTY TTY Basics TTY Etiquette Closing a Conversation Agent Responsibility Call Set Up Call Closing TTY to Voice Closing a Conversation Operator Role Closure Operator Close Protocol Guide: Disallowed Calls Glossary of Abbreviations and Terms TTY Practice Session Auto-Corrected Abbreviations Standard Abbreviations Typing Variations Internet Characters Non-Baudot Supported Characters Verbatim - Style Contraction Spelling Punctuation Agent/Operator Role SKSK Background Noises While TTY user is Typing Typing Monetary Units	Sprint IP User Connects to Agent but wants Customer Service Sprint IP Two Line VCO FRSO- Federal Relay Service Online FRSO call processing FRSO Reporting FRSO variations Sprint IP/FRSO International Calling Sprint IP/FRSO Variations Sprint IP/FRSO Fast Busy Sprint IP/FRSO Two Line VCO Sprint IP/FRSO Conversation Lag Time Sprint IP/FRSO Interrupts Voice to AIM (AOL) VM Greeting Voice to AIM procedures Voice to AIM variations Blocked screen names - suspect international locations Cellular and Wireless Phones Video Relay Service Blackberry Devices and Pagers TTY Public Payphone Sprint National Relay Sprint International (SI) Inbound international calling Sprint International Variations Non-Standard TTY Outbound International calling Transfer Menu

TRAINING TOPICS

	<p>711 TTY Garble During Typing XXX to Correct Typing Error Other Communication Devices Data Transmission Speed Turbo Code Turbo Code Interrupt Enhanced Turbo Dial Through - (ETurbo) Disable Turbo Code Mode ASCII - American Standard Code Information Interchange ASCII Interrupts Sprint IP - Internet Relay Sprint IP call processing Internet Relay variations Sprint IP RELAY: Internet & IM access 'GA' is optional Sprint IP Standard Service Explanation Text Flow Interruptions without garble Conversational flow ASL Emoticons – Smileys – Text Message Abbreviations IP Acronyms Sprint IP Variations 911 Emergency Calls Spanish and French Language Service International calling restrictions Sprint IP Correctional facilities/Jails Info Digit list</p>	<p>Reseller call processing CapTel Relay to CapTel CapTel to Relay CapTel Transfers Dedicated State CapTel Transfer Alternate Languages Spanish Language Customer Service Relay Caller ID True Caller ID Per Call Block Per Line Block Permanent Call Blocking Caller ID Blocking - True Caller ID – SS7 Connecting Variations Misdialed Relay Phrase Dialed 711 Instead of 911 711 Spanish Request for Relay Numbers Cellular/Wireless problem reaching 711 611/811 (LEC Service Access) 700 900 Numbers and Call Processing Correctional Facility/Prison Calls FAQs on the Use of Relay through Correctional Facilities: Correctional Facility Call Processing Relay Abuse</p>
<p>Overview of System and Equipment</p>	<p>System Overview Login/Logout Agent Profile The Mouse Clicking the Mouse Dragging/Dropping Copy/Paste Drop Down Boxes Lists Radio Button Scroll Bars Sliders Tables Tables Accessing a Program Screen Displays Call Handling Screen Title Bar Banner Conversation Area Disconnect Message Status Color Scheme Agent Text Transmission Cancel Key Information Bar Profile Help Call Type</p>	<p>Dial Window Scratch Pad Transfer Panel Headset Panel Status Bar Record Feature Function Keys Block Ctrl-Switch Switch The Keyboard Alpha Keys Function Keys Call Handling Keys Numeric Keys Cursor Movement Keys Arrow Keys Backspace Error Correction Function Single Word Edit Function Word Substitution Feature Macros Table Function Keys Ctrl-Function Keys Glossary of Telephony Terms Background Noises Voice Tones/Descriptive Words Standard Abbreviations</p>
<p>Phone Image</p>	<p>Professional Phone Image</p>	<p>Voice Person Speaking in 3rd Person</p>

TRAINING TOPICS

(Tone of Voice)	<p>How phone image is created Provide warm and friendly greeting Conversational Tone Voice Inflection Audibility and breath control Pitch Quality Operator Role Relay Role Relay Skills Conversational Flow Staying focused Listening skills Customer service skill Coping skills Phrases Background Noises Voice Tones/Descriptive Words Transparency and Caller Control</p>	<p>Pacing the Voice Customer Brief pacing phrases Repeating information Voice Customer does not say "GA" Handling Interruptions Voice Tone How Phone Image is Created Provide a Warm Greeting Why Conversational Tone? Transparency, Caller Control & Confidentiality Rudeness, Types of Create an Exceptional Customer Experience Greeting Announce Closing Suggested Redirect Phrases</p>
TTY to Voice and Voice to TTY	<p>TTY to Voice Introduction Connecting to the outbound customer Announcement Explanation of service Deaf or hard of hearing Explanation International Announcement TTY to Voice Procedures TTY to Voice Specific Person Request Variations Specific Person Request TTY to Voice Answered TTY Voice Person Not Available TTY to TTY Call Release TTY to Voice Ans. TTY (TTY to TTY) TTY to TTY Specific Person Request TTY to Voice No Answer Types of Busy Signals Redialing</p>	<p>TTY to Voice Busy Signals Regional 800 Voice to TTY Voice to TTY Introduction Connecting to the outbound customer Voice Greeting Vice call progress Announcement Voice to TTY call (Hearing Person Answer) Explanation of service Voice to TTY Procedures Voice to TTY Specific Person Request Voice to TTY Answered Voice Voice to TTY No Answer Voice to TTY Busy Signal</p>
Branding	<p>Inbound Answer Type Branding Database Branding</p>	<p>Branding procedures</p>
Recordings, Answering Machines, Pagers and AMR	<p>Introduction Recording Feature Information Line Recording (TTY/Voice) Touch Tone Dialing Using Touch Tones (TTY/Voice) Audio text interaction Variations for Recordings Record Feature Tips TTY-Voice Recordings TTY-Voice Recording Information TTY-Voice Answering Machine Variations: Ans Mach/Recording/Pagers Voice Mail Retrieval</p>	<p>AMR (Answering Machine Retrieval) TTY-Voice Pager/Beeper (known) TTY-Voice Pager/Beeper (unknown) Voice to TTY Pager Voice to TTY Answering Machine Other Recording Variations Voice Mail System Privacy Manager/Call Intercept Automatic Redial System Recordings Switchboards Redialing Voicemail thru Switchboard TTY-Voice Asking for Specific Person Live person On Ans Mach Redial</p>
VCO (Voice Carry Over)	<p>VCO Introduction VCO Announcement VCO Service Explanation VCO Equipment Non-Branded VCO Branded VCO VCO No Answer VCO Busy VCO Privacy</p>	<p>Reverse Two-Line VCO Intro Reverse Two-Line VCO Procedure VCO Variations VCO comes in Voice Line 2LVCO Conference Calls VCO Requests Relay to give Relay # VCO Privacy while leaving message VCO Voice Mail Retrieval 2LVCO Voice Mail Retrieval</p>

TRAINING TOPICS

	<p>VCO Answering Machine Voice to VCO Answered TTY Voice to VCO Answered VCO Two-Line VCO (2LVCO) Intro Two-Line VCO (2LVCO) Procedure</p>	<p>VCO Types and Voices Inbound Customer Requests VCO/HCO VCO Requests CA gives name in notes</p>
Billing	<p>Introduction Local call description Paid by Inbound Over Sprint Network Toll Free Calls Calls that Cannot Be Processed COC (Carrier of Choice) Paid by Inbound Paid by Inbound Alternate Carrier of Choice Alternate Billing (Intro) Billing Options Collect FONCard (Sprint) Description LEC calling card Other long distance calling card Paid by Inbound Third Party Carrier of Choice Pre-paid calling cards Billing Procedures Calling Cards Paid Billing with COC (TTY-Voice) Paid Billing with COC (Voice-TTY) TTY/Voice Pre-Paid Calling Card/800 Card Voice/TTY Pre-Paid Calling Card/800 Card Voice-TTY Collect Specific Person Request</p>	<p>Calling Card -- TTY Originated Calling Card -- Voice Originated Collect Calls Collect Call Intro TTY-Voice Collect Specific Person Requested Person-to-Person Call Person-to-Person Call Processing Collect Call -- TTY-Voice Collect Call -- Voice/TTY Third Party Billing Third Party Billing Intro 3rd Party TTY-Voice Billing Voice Number 3rd Party TTY-Voice Billing TTY Number 3rd Party Voice-TTY Billing TTY Number Immediate Credit Inbound tells wrong # Agent dials wrong # Marine Roaming Feature Restricted Roaming Unrestricted Roaming Billing Variations</p>
HCO (Hearing Carry Over)	<p>HCO Intro HCO Announcement HCO Service Explanation Speech Disabled "S" Non-Branded HCO Branded HCO HCO with Privacy HCO No Answer HCO Busy HCO-Voice Answering Machine</p>	<p>Voice-HCO Answered Voice-HCO Answered TTY (1) (2) Voice-HCO recorded message answers Two-Line HCO (2LHCO) Intro Two-Line HCO Procedure Reverse Two-Line HCO HCO Variations Inbound requests VCO/HCO HCO User Requests to Speak</p>
Customer Database	<p>Enhanced Customer Database Profile Household Profile Edit Household Profile Navigating Customer Database Household Profile Panels Notes Frequently Dialed Numbers Personal Information Preferences COC Restrictions Blocked Emergency #s Speech to Speech STS Messages</p>	<p>Customer Profile Introduction Use/Edit/New/Delete Customer Profile Verify Customer Password for Agent Verify Customer Password -- CSR Only Customer Profile Panels Personal Info Notes Frequently Dialed #s Preferences Emergency #s Speech to Speech STS Messages Database Profile Macros</p>
Directory Assistance	<p>DA Intro Interstate Directory Assistance Intrastate Directory Assistance Automated DA</p>	<p>Call Processing -- Calling from International Number Sprint International Variations Non-Standard TTY</p>

TRAINING TOPICS

	DA City & State Given; Area Code Unknown DA Variations Sprint International International Transfer Menu Call Processing -- Calling to International Number	Answered Foreign Language Transfer Menu 900 # Call Processing 211/311/511 Requests
Device to Device Calls	Device to Device Intro Function Keys and Banner Messages VCO to TTY and TTY to VCO VCO to VCO TTY to HCO and HCO to TTY	VCO to HCO and HCO to VCO HCO to HCO Device to Device Variations Alternate Call Type reaches recording
Call Processing Variations	CA information Area Code Only In From Number Conversational Flow Static or Poor Connection Profanity towards Agent Redialing Young Children Inbound Does Not Connect Inbound ASCII Charges Refused 800 Number Tone Judgments Repeating Information Restricted Calls Two calling from numbers LEC Service Office 611/811 Double Letters Call Waiting Feature Conference Calls Party Line Calls Three-Way Calling Hard of hearing Customer Ans TTY Line Spanish Calls to TX Sp Speaking Agents Request for Alternate Language Caller Types in Alternate Language Voice Customer Hangs Up During a Call Variable Time Stamp Customer Misdialed Phrase TTY Customer Hangs Up During a Call Non Standard TTY Capability Relaying Internet Characters TTY User Does Not Type GA Dispatch Calls – Pizza, Taxi, Carry-out Customer Referral Guidelines V-T Calls answered by Fax Customer Requests Holding for Inbound prior to out dial Request for Company Information Request for Information Request for M or F Agent Request Specific Agent Agent Knows Customer Request for Relay Number Customer Requests to Call Relay Service Request for Calling From Number Request Telephone Number Referral Request for Date/Time Customer Requests Agent to Modify Call	Request for Length of Call Request Long Distance Information T-V Call and V Requests Supervisor Call Backs for TTYs Multiple Calls Sensitive Topics Suicide Abuse Illegal Calls Answering Machines Hangs Up Before Message Left Do Not Type Recorded Messages Answering Machine Full Change Answering Machine Message VCO Requests Leave Message 1st out dial Leaving a Message V-TTY Ans V Retrieving Messages from TTY V Ans Mach TTY Screener Request to Leave TTY Message on Ans Mach Recordings Regional 800 TTY Requests "Dial That Number" Recording with Relay Option Alternate Call Recording Reached English/Spanish Pound Touch Tone Phone Advertisements Do Not Type Recordings Get Live Person/Rep Conversation Being Recorded Dial Number from Recorded Announcement VCO Conference Calls Leave Relay Number Voice Mail Retrieval VCO Types and Voices Prompting Data Transmission Box Prompting VCO on Hold Requests VCO/HCO HCO Requests VCO/HCO Alternate Call Type Recording Bridge Left Open

TRAINING TOPICS		
Call Take Over Procedures	FCC Rule Protocol and process flow TTY-Voice and Voice-TTY ASCII	VCO VCO to VCO HCO VCO-TTY and TTY-VCO
Customer Service	Functions Language Services	Procedures
OSD	Operator Services for the Deaf (OSD) Functions	OSD to TRS TRS to OSD
Transparency	Non-Emergency Calls Emergency Center Evacuation	Network Failure
Emergency Call Procedures	Emergency Calls Intro Emergency Services FCC Requirements Emergency Call Processing Emergency Reporting TTY-Emergency Voice-Emergency	TTY-Emergency TTY Call Release Internet-Emergency Internet (IP) Emergency Instant Messenger (IM) Emergency Emergency Call Processing Variations Emergency Form
Federal Relay Service	FRS Intro FRS Announcement FRS Service Explanation FRS Relay Procedures Federal Relay Service call types	FRS Confidentiality Policy FRS Customer Information Requests FRS Customer Contacts FRS Reporting
STS (Speech-to-Speech)	Speech To Speech Training Outline STS Introduction and History STS Description Disabilities Characteristics of STS users Stereotypes Clarifying Phrases Phrases to Avoid STS Phone Image STS Agent Tools Consistency Patience Ask Yes or No Questions No Personal Conversation Phrases You Can Use Speech to Speech Alphabet Transparency/Call Control/Confidentiality	Ways to Reduce/Streamline Notes Standard Abbreviations (STS) STS-Voice Voice-STS STS VCO-Voice Voice to STS VCO (TTY answer r) Voice to STS VCO (VCO answer) STS VCO -- 2 Line VCO TTY-STS STS-TTY Non-branded HCO to STS STS-HCO STS Hold Message STS Call Takeover Confidentiality and Transparency Personal Conversations requests Speech to Speech Variations
Healthy Detachment	Healthy Detachment Intro Objectives Survival Skills Relay Traps	Perception Ways to Reduce Stress Hospitality Phrases
Healthy Relay	A healthy approach toward Relay Introduction Objectives Ergonomics Stretching Exercises Agent Reinforcement Ergonomic Review	Setting up Workstation GUAM - Get Up and Move Ergonomic Relief Slowing the Customer Down Overtime Relaxation
Adult Learner	Understanding the Needs of the Adult Learner The Learning Continuum Use of Different Modalities Adult Learning - Edgar Dale's Cone of Experience Elements of Lesson Design Focus The Adult Learner Objective and Purpose Input	Modeling Checking For Understanding Guided Practice Independent Practice Summary Evaluation How to Give Effective Instruction Questioning Guidelines Feedback - Training and Coaching

TRAINING TOPICS		
		Technique Trust in Management
Assessing Performance	The Assessment Process in Training Assessment Time - What is involved? Practice Time Spelling Test Written tests Side by side evaluations Typing	Acceptable Time Frame Acceptable Is Relative Ways to "Coach" Feedback Maintain Self-esteem and Motivate Pass/Fail Guidelines Introduce Assessment Form Form Set-Up
Introduction to Diversified Culture	Introduction to Diversified Culture Objectives Who Uses Relay Understanding Our Customer Special Communication Needs Pathological vs. Cultural View of Deafness Characteristics of Deafness The Deaf Community	Why is there Deaf Culture? Attachments: What Do You Know About Deafness (Q) What Do You Know About Deafness (A) Myths About Deafness Two Views of Deafness Loudness Levels
Deaf Heritage	History in Europe History in North America Alexander Graham Bell	Edward Miner Gallaudet Oral / Combined Debate
The Deaf Community	Introduction to the Deaf Community National Association of the Deaf Contributions to Society Mainstreamed Schools	American Athletic Assn. of Deaf National Theatre of the Deaf Assistive Devices Gaining Acceptance in the Deaf Community
The Deaf Community	Sign Language Interpreters Different Communication Systems Exposure to English DEAF President Now Attitude Changes toward the Deaf Community	Changes in the Deaf Community Rules for Using a Sign Language Interpreter Interpreting Standards
American Sign Language Part 1	What is ASL? History of ASL ASL Recognized as Language	Rules of ASL Five Parameters of ASL English vs. ASL Idioms
American Sign Language Part 2	Evolution of ASL ASL Syntax	Translate ASL to English and Vice Versa
TTYPhony and TTY Courtesy	First Teletypewriter Evolution of the TTY Telecommunications Laws of Accessibility	TTY Courtesy Development of Relay Service Market
Hard of hearing and Late Deafened Customers	Hard of hearing and Late Deafened Customers Characteristics of Deaf Customers Assistive Devices for Deaf Customers	Establishment of Self Help for Hard-of-Hearing People (SHHH)(Now the 'Hearing Loss Association of America' (HLAA)) Relaying for Deaf Customers
Characteristics of late-deafened Customers	Establishment of Association of late-Deafened Adults (ALDA) Relaying for late-deafened Customers	Deaf-Blind, Speech-Challenged, Spanish Speaking and Hearing Customers
Characteristics of Deaf-Blind Customers	Assistive Devices for Deaf-Blind Customers Relaying for Deaf-Blind Customers	Deaf-Blind Pacing – allows the CA to slow down the transmission to the Braille machine
Characteristics of Relaying for other users	Speech-Challenged Customers Spanish-Speaking Customers	Hearing customers
Ethics and Confidentiality	Interpreting Standards The ADA and FCC regulations for the Provision of	TRS Rules – Operator Standards Relay Center Agreement Regarding

TRAINING TOPICS

TRS
Regulations pertaining to call content

Confidential Customer Information.

Appendix C: TRS Pledge of Confidentiality

Agreement Regarding Confidential Information

SPRINT TRS RELAY CENTERS AGREEMENT REGARDING CONFIDENTIAL CUSTOMER INFORMATION

IN CONSIDERATION of: (1) my employment with Sprint/United Management Company or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation ("Sprint"), (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL. I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.
2. NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TELECOMMUNICATIONS RELAY SERVICE CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES. I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.
3. NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.
4. NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.
5. TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.
6. I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.
7. ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.

I have read and understand the Sprint Relay center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE DATE

MANAGER/SUPERVISOR SIGNATURE DATE

CAPTEL CONFIDENTIALITY

Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A Captionist may feel the need to “vent” about a call due to problems, complaints or stress from handling the call. The Captionist may ask to speak to a Supervisor or other member of management (as long as it wasn’t their call) in a private area. Clarify before the conversation you wish to “vent” about a call.

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

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the CapTel management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any CapTel call.

- I will not act upon any information received while processing a CapTel call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at CapTel Inc.
- I will not share any information about CapTel calls with anyone except a member of the CapTel Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at CapTel Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the CapTel Inc. management staff.
- I will not share with anyone any technical aspect of my position at CapTel Inc. unless asked by a member of the CapTel Inc. management staff.
- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

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

Employee Name

Date

Appendix D: Sprint Carrier of Choice Letter of Invitation



<insert date>

<insert carrier name>

<insert contact name>

<insert tel nbr or fax nbr>

<insert email address>

Re: <insert customer (end user name)>, <insert telephone number>

Thank you for your interest to complete <insert carrier name> Toll calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use <insert carrier name> LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS.

The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you are a participating member at Sprint Carrier of Choice program, please disregard.
2. If you are not a participating member at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below). You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information.

Non-facility based provider

1. If your underlying toll carrier is a participating member at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code and SS7 Transit Network Selector information. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.
2. If your underlying toll carrier is not a participating member at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below). You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information.

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

1. Your (or your underlying toll carrier) CIC codes and SS7 Transit Network Selector information associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.
2. You (or your underlying toll carrier) will need to support SS7 tandem interconnection.
3. You (or your underlying toll carrier) will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair 60, 66, and 67.
4. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

Note: For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.

Attachment B lists Sprint TRS Access Tandem Interconnection locations. The best way to provide access to your Toll network through relay service for your customers is to designate the 8 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 30 to 90 days). Information obtained from the carriers will be used solely for the purpose of providing equal access for <insert carrier name> LD customers and shall be held proprietary.

Sprint welcomes your company's participation in our TRS Carrier of Choice program at no cost to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue.

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call me at <xxx-xxx-xxxx> or email at <insert email address>

Sincerely Yours,

<insert name>

Program Manager, <insert state(s)>

Sprint Relay

CC: Michael Fingerhut, Federal Regulatory, Sprint

<insert name>, Program Manager, Sprint

Attachment E Disaster Recovery Plan and Network Support Plan

Sprint's comprehensive Disaster Recovery Plan details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, Sprint's TRS network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation is the Sprint's Relay dynamic call routing that Sprint employs. During a major or minor service disruption, the Sprint's Relay dynamic call routing network feature bypasses the failed or degraded facility and immediately directs calls to the first available Relay Operator in any of Sprint's fully inter-linked TRS Call Centers. ROs are trained in advance to provide service to other States; the transfer of calls between Centers is transparent to users.

Beyond the Sprint's Relay dynamic call routing network, Sprint's TRS Disaster Recovery Plan details the steps that will be taken to deal with any Relay problem, and restore Telecommunications Relay service to its full operating level in the shortest possible time.

STATE NOTIFICATION PROCEDURE

To provide the State with the most complete and timely information on problems affecting Relay service, the trouble reporting procedure will include three levels of response:

- An immediate report (as defined in the contract)
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the designated representative of the State within fifteen minutes if a Relay service disruption of 30 minutes or longer occurs. The report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full Relay service has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Contract Administrator within five business days of return to normal operation. Examples of Relay service disruption include:

- TRS Switching System failure or malfunction
- Major transmission facility blockage of the last-leg circuits to the Relay Call Centers
- Threat to RO safety or other RO work stoppage
- Loss of RO position capabilities

Performance at each Sprint Relay Center is monitored continuously 24-hours-a-day, seven-days-a-week from Sprint's Service Assurance Monitoring Center (SAMC) in Overland Park, KS.

DISASTER RECOVERY PROCEDURES

If the problem is within a relay center, maintenance can usually be performed by the on-site technician, with assistance from Sprint's SAMC. If the problem occurs during non-business hours and requires on-site assistance, the SAMC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

TIME FRAMES FOR SERVICE RESTORATION

Complete or Partial Loss of Service Due to Sprint Relay Equipment or Facilities

■ Sprint Relay Call Center Equipment

A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day, a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.

■ Sprint or Telco Network

Facilities or an outage of facilities directly serving incoming TRS Relay calls will immediately be routed to one of the other Centers throughout the US. No inbound calls will be lost. Repair of Interexchange and Local Exchange fiber or network facilities typically requires less than eight hours.

■ Due to Utilities or Disaster at the Center

Immediate rerouting of traffic occurs with any large-scale Relay Center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint Relay equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.

■ Due to Telco Facilities Equipment

A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the relay call center. In this case, normal Sprint Relay traffic rerouting will apply.

TROUBLE REPORTING PROCEDURES

The following information is required when a user is reporting trouble:

- ◆ Service Description
- ◆ Callers Name
- ◆ Contact Number
- ◆ Calling to/Calling from, if applicable
- ◆ Description of the trouble

Service disruptions or anomalies that are identified by users may be reported to the Sprint Relay Customer Service toll-free number at any time day or night, seven days a week. The Customer Service operator creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the SAMC will handle calls from the Customer Service RO 24 hours a day, 7 days a week. The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's twelve sites across the United States TRS call centers to respond quickly to any event, including natural disasters.

MEAN TIME TO REPAIR (MTTR)

MTTR is defined and detailed in Tables 1 and 2:

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table 1 – Time to Investigate + Time to Repair + Time to Notify

Switched Services	8 Hours
Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Table 2 – Current MTTR Objectives

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

ESCALATION PROCEDURES

If adequate results have not been achieved within two hours, the Contract Administrator or a user may escalate the report to the next level. The table below details the escalation levels.

Escalation Level	Contact	Phone
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2	Regional Maintenance Manager	Office Phone Number (913-794-1130)
3	Senior Manager, Technical Staff	Office Phone Number 913-794-3603

Network Support Plan

NETWORK DESIGN

Sprint's service is provided over an all-fiber sophisticated management control networks that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

■ Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

■ Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

■ Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

■ Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads.

Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to _____, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Southern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for the State.

NETWORK CRITERIA

■ System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

■ Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

■ Minimized "single points of failure" including:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.

- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
- Utilization of established plans to respond effectively to these outages.
- The capability to rapidly deploy network transmission facilities when needed.
- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.

The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

FIBER BACKBONE LOOP TOPOLOGY AND RECONFIGURATION

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

SPRINT ROUTE OUTAGE PREVENTION PROGRAMS

■ Call Before You Dig Program

This program uses a nationwide 1-800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

■ Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

■ Route Surveillance Program

This is a Network Operation's department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

■ Technician Program

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

■ Fiber/Switch Trending Program

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

NETWORK MANAGEMENT AND CONTROL SYSTEMS

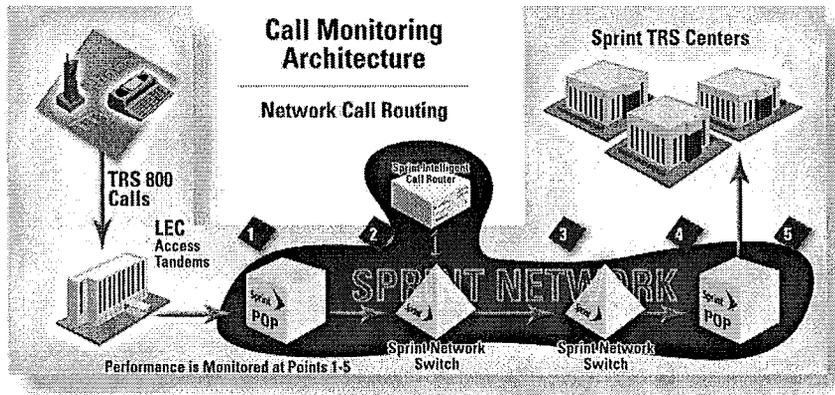
Surveillance for the Sprint network is managed by the Network Operations Center located in Overland Park Kansas. In the event of a network problem causing customer degradation of service, Network Operations will notify the Service Assurance Management Center (SAMC) of Sprint's TRS Group. SAMC will then notify the appropriate PSC with a description of the problem and an estimated time of repair.

INBOUND CALL ROUTING

Sprint incorporates a dynamic routing system that continuously monitors circuit and RO availability to ensure calls are answered within the required time frames. This includes reporting for the long distance network and equipment, which many Relay providers are unable to provide, as well as reporting for the Relay network.

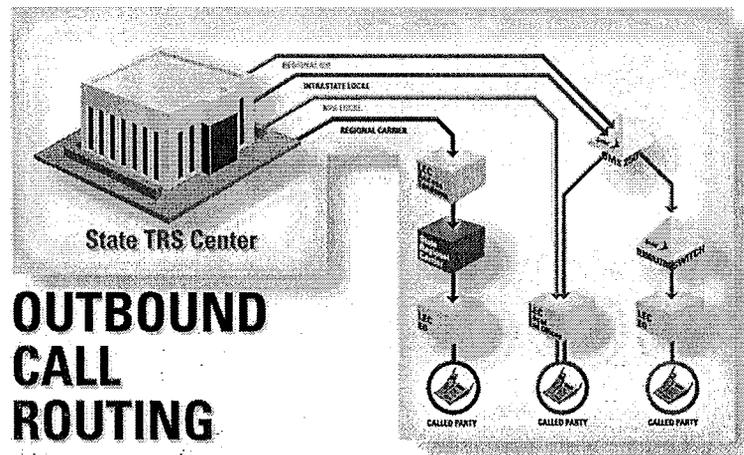
Sprint's inbound configuration ensures that if an issue is identified anywhere in the network, it will be promptly addressed and reported.

The Call Monitoring Architecture diagram in the figure below depicts the standard inbound call path to Sprint's Relay Center. Unlike other Relay providers, Sprint monitors each leg of the inbound call path at the points shown to ensure the call reaches the Relay Center with little to no blocking.



Call Monitoring Architecture Diagram

The Network Design Configuration for Outbound Calling in the figure below indicates the extensive complexity of Sprint's Relay platform, including standard call paths for local, intra-state, regional 800, and COC calls.



Outbound Routing Diagram

CapTel Disaster Recovery Plan

CAPTEL OUTAGE PREVENTION STATUS

Sprint will provide FCC compliant CapTel® service from the two CapTel call centers in Madison and Milwaukee, WI. Sprint's CapTel vendor CapTel Inc. (CTI) operates the two current CapTel and WebCapTel® call centers in the nation. These unique centers operate with enough terminals for 200 ROs each, along with support personnel, Technicians, and Supervisors.

Both CapTel call centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two CapTel call centers ensures minimum interruptions in service if something unexpectedly halts operations in one center or the other such as a flood or a tornado. In those instances, traffic from one Center can automatically be routed to the other.

SPRINT OUTAGE NOTIFICATION FROM CAPTEL CALL CENTER

Performance at the CapTel call center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the CapTel Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the CapTel Service Center, OR
- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
 - An accidental switch rebooting
 - Loss of transmission facilities through the telephone network
 - Terrorist attack
 - Bomb threat or other work stoppage
 - Sudden loss of agent position capabilities.
 - Impact to minimum ASA / Speed of Answer times
 - Acts of God

Contact from the CapTel Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

- 1.) What time did the outage happen in CENTRAL TIME?

- 2.) What caused it?
- 3.) Which customers are (or were) impacted?
- 4.) What is (was) the solution to restore service?
- 5.) What is the time that service will be (or was restored by) IN CENTRAL TIME?

Sprint will internally escalate outages in the following manner:

Level	Escalation Procedure for Outages	Point of Contact (POC)	Contact Info:
1	Sprint Product Innovation Manager	Dennis Selznick Product Innovation Manager	913-663-7278 Dennis.A.Selznick@sprint.com After Hours: getdennis@gmail.com (pager) 913-231-1386 (cell)
2	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(608) 441-8800 Pam.Frazier@captelmail.com After Hours: 608-516-7517 (cell) 608-832-6233 (home)
3	Captioned Telephone Inc.'s (CTI) Call Center Vice President	Jayne Turner Vice President	(608) 441-8800 Jayne.Turner@ultratec.com After Hours: 608-274-0598 (home)

Table 44 – Sprint CapTel Outage Escalation

SPRINT PROCEDURE FOR OUTAGE NOTIFICATION TO CONTRACT ADMINISTRATORS

Upon receiving notification from CTI, Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 904-4014 M: (925) 895-9176 H: 925-968-1418 E: John.E.Moore@sprint.com Pgr: jmoore45@sprintpcs.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Sprint Customer Notification Procedure

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable RO positions or, local area network outages, the CapTel Center on-site technician will notify CapTel Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 30 minutes will be emailed to the state Contract Administrator.

If the problem is within the CapTel call center, maintenance can usually be performed by the on-site technicians. Hardware spares are retained at the CapTel call center to allow for the most common type of repair required without the ordering of additional equipment.

DISASTER RECOVERY FOLLOW-UP

Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with CapTel Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

DISASTER RECOVERY POST-MORTEM DOCUMENTATION

Within 72 hours (3 days) after the outage is resolved, CTI will provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point-of-contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are (or were) impacted?
- 4) What is (was) the solution to restore service?
- 5) What is the time that service will be (or was restored by) IN CENTRAL TIME?
- 6) What will CapTel, Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

TIME FRAMES FOR SERVICE RESTORATION

- Complete loss of service due to equipment
 - Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.
- Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).
- Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:
 - Two hours at first level,
 - Four hours at second level
 - Eight hours at third level

These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

- Partial loss of service – Due to Equipment
 - Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
 - Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
- Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.
- Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:
 - Eight hours at first level
 - Twenty-four hours at second level

These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

TROUBLE REPORTING PROCEDURES (FOR INDIVIDUAL CUSTOMERS TO CUSTOMER SERVICE)

All calls concerning customer service issues should be placed by dialing the CapTel Customer Service at 1-888-269-7477 (800-482-2424 TTY) in English (866-670-9134 for Spanish). A Customer Service agent will take information concerning:

- Callers Name
- Contact Number
- Calling to / Calling from if applicable
- Description of the trouble
- Customer service can also be reached by emailing captel@captelmail.com.

Report service affecting trouble to Customer Service during normal business hours. Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 captel@captelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@captelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(608) 441-8800 Pam.Frazier@captelmail.com
4	Captioned Telephone Inc.'s (CTI) Call Center Vice President	Jayne Turner Vice President	(608) 441-8800 Jayne.Turner@ultratec.com

Table 46 – CapTel Customer Service Escalation Procedures

ALTERNATIVE USAGE FOR CAPTEL PHONE DURING OUTAGE FOR VCO USERS.

CapTel phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 7-1-1 (user must dial only 7-1-1 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call

Arkansas Deaf and Hearing Impaired

Telecommunications Services



1220 West Sixth, Little Rock, AR 72201
501-375-0086

Monthly Access Line Assessment Form

(In accordance with Act 1080 of 1997 Arkansas General Assembly)

Due Date: 20th of the month following reporting month (i.e. January is due February 20th)

Reporting Month: _____

Year: _____

Company: _____

Address: _____

Contact Person: _____ Phone#: _____

FAX#: _____ E-
mail: _____

Total Access Lines: _____ X \$0.01 = \$ _____

Adjustment: _____

Explanation: _____

Total Remitted: \$ _____

As an authorized agent or officer of _____ hereby
certify that the above is true, complete and correct to the best of my knowledge
and belief.

Signature

Date

Make check payable to and return this check to:

ADHITS, c/o ATA, 1220 West Sixth, Little Rock, AR 72201

Do Not Alter Form
Confidential

Proprietary and

Appendix: G
Copies of Annual Report or Other (Quarterly Report)

Arkansas Relay Report
June 6, 2012
By Jeff Prail

Arkansas Relay had a very busy quarter since our last meeting, we completed 37 outreach to these towns, Dardanelle, Jonesboro, Pine Bluff, West Memphis, Paragould, Searcy, Stuttgart, Danville, Monticello, Pocahontas, Forrest City, Blytheville, New Port, Helena, Malvern, Clarksville, El Dorado, Magnolia, Camden, and Russellville. A total of five presentations and 22 booths appearance were done in this quarter.

Arkansas Relay is now a member of Hot Springs Village Chamber of Commerce and Russellville Chamber of Commerce in order to gain entrance to their Business Expo Event. The Business Expo event was a success with a lot of inquiry about how Relay works and CapTel phone and is recommend to return next year event. The Business Expo in Russellville will take place this coming fall.

Update from two big events we done this quarter, RazorFest and NW Naturals Baseball Game. RazorFest was an event that took us beyond our expectations. A very successful 4 hours event, everything we had on the table was gone in 2 hours. We had a lot of families stopping by to learn more about Arkansas Relay and CapTel. We experience the same with NW Naturals Baseball Game, the baseball giveaways was a catch to get the families to our table! Again, everything we had was gone at the ball game.

The good news, each event or marketing that ARS did so far, ARK TAP's phone has been ringing off the hook. I am pleased to say the marketing campaign we did with magazines, and hosting big events is starting to pay off. My office is now receiving calls from those who saw our AR CapTel PSA on their Jumbotron at ARK Travelers game. The PSA is being run during pre-game (15 min prior to the game) and after 1st inning. As of now, the PSA had run a total of 24 times since the start of baseball season.

Arkansas Relay recently extended another six months of advertisement with Arkansas Senior Resource Directory Handbook. Arkansas Mature will run 6x monthly advertisement starting in June. This should wrap up our advertisement until our new budget begins for 2013 season.

I received two e-mails from parents of Deaf children and several parents spoken with me during ASD events about the possibilities of Arkansas Relay Service hosting a Deaf Sports Camp for Deaf and Hard of Hearing Children. They felt most sports camp that is being offered throughout the state does not benefit Deaf and Hard of Hearing children due to communication barrier. They feel Arkansas Relay is in position to make this event a reality for our future Relay users. I have gotten support from Arkansas School for the Deaf on using their gym during last week of June or first week of August 2013. I told the parents that I would bring this to your attention to see if this is something the Board would give consent to move forward on this project. I would seek partnership with other organizations to make this event a success.

ADHITS Board Report
September 5, 2012

For the past quarter, Arkansas Relay made 12 booth appearances, 28 general outreach, and three presentations. Bringing us a total of up to date of 36 booth appearances, 10 presentations, and 65 general outreach.

Here are the areas that ARS focused on:

NW area of Ark, Russellville, Texarkana, Searcy, Little Rock, Heber Springs, Jonesboro, Stuttgart, and White Hall. We made two appearances in Texarkana.

We continue to have impact with mini health fair that we had partnered with Medicare Extra. They plan to host a big health fair in October. Arkansas Relay made their first appearance with Russellville Chamber of Commerce Business Expo (day and half event) and we felt it was a success bringing information to the River Valley Area.

Arkansas Hearing Society has sent their apology for not getting back to us sooner about having ARS web-link onto their website and they assured me they will have their board approve this at their next board meeting.

Arkansas Travelers event was a success with lot of veterans and families inquiring the service and CapTel for their mom and dad. We survived a slow and hot night; however, the stadium displayed 7 CapTel PSA on their Jumbotron through the evening. We gave out 1500 baseballs that night.

The advertisement that ARS have with table ads with two Larry Pizza's location, the company had notified me that we are the second highest hit averaging 90 hits per month that linked to our website. I am currently working to have a third table ads in Mountain Home.

In the past two weeks, I have been working on FCC Recertification Filing for our state. I should have the draft done within two weeks and will send to Steve for review. FCC Recertification Filing needs to be submitted by Oct 1st.

I have already begun working on our 2013 budget and terms of whom we need to advertise with and should have the list of publications at our next Board meeting.

I need your approval for two 2013 events: Champion for Kids Razorfest event, ARS has been invited back to participate due to the response that our booth as received. The cost remains the same \$3,500.

A historical event but a first for Arkansas Relay to booth during their King Biscuit Blues Festival in West Helena, Ark. This event takes place in October and attracts over 50,000 people for 3 days event. The reason I am bringing up now is because after this October event, all new applicant has to go through their screening process with information of our services, what will our booth layout looks like, brochures, and giveaways must be pre-approved before being accepted into the event. The cost is \$3,000 (2012 event) and includes:

- Listed in The Helena World newspaper
- Listed in Official Festival Guide (50,000 printed)
- Listed on all Sponsor Board displayed throughout the Festival Grounds
- Announcements from the Main Stage as a sponsor
- VIP parking pass
- 6 Mainstage/VIP tickets
- 200 block area exhibition set up, (2 blocks from main stage)

Appendix: H Copies of Relay Brochures or Other Advertisements

What is CapTel Relay Service?

- * The service is similar to captioned television. It allows you to appear as well as hear for you to hear
- * That the person you're calling doesn't
- * Caption are provided free for every phone call
- * They are displayed on your telephone screen built-in screen for you to read as you listen to your caller's voice.
- * CapTel Relay Service is provided free of charge through Arkansas Relay.
- * CapTel users are available for live captioning during the day.

The CapTel phone is available through YAP, Read the "YAP" information on the back.

How does CapTel work?



- 1 The CapTel phone works as a speaker directly to the other party on the telephone.
- 2 The other party speaks directly to the CapTel user.
- 3 The CapTel user relays the other party's spoken message into text (captioning) using voice recognition technology.
- 4 The CapTel user reads the other party's text messages while reading captions of the conversation on a display screen.

Need Equipment?

The Telecommunications Act of 1996 provides free telephone equipment to eligible Arkansas who are:

- * Deaf, hard-of-hearing, or deaf-blind
- * Have a speech disability
- * Have a visual, mobility, or cognitive impairment that prevents them from using a standard telephone.

Who can apply?

- Anyone can apply who needs the following four things:
- * Arkansas resident
 - * Federal telecommunication service
 - * Income eligibility
 - * Disability certified by a qualified professional
- Even if you do not meet income eligibility, a shared cost option is available.

How do I apply?

- To receive an application, contact TAP:
- * (813) 493-4993 (toll-free TTY)
 - * 501-225-2211 (Arkansas Relay)
 - * 800-661-4463 (Arkansas Relay TTY)
 - * www.arkansas.gov (WebSite)
- TAP is a program of the Arkansas Department of Career Education Arkansas Rehabilitation Services Division 16 Corporate Hill Drive Little Rock, AR 72202

ARKANSAS RELAY
900 South Shaverford Road, Suite 200
Little Rock, AR 72211
Voice: 501-225-2200
TTY: 501-225-2278
Fax: 501-225-2541
Voicephone: 501-246-6227
Email: connect@arkrelay.org
Website: www.arkrelay.org
Arkansas Relay is provided by Sprint. CapTel is a registered trademark of Sprint, Inc.

Do you struggle with understanding others on the phone?
We've got a solution for you!



ARKANSAS RELAY
800-661-4463

What Can you expect that phone?

Do you...

- * Have difficulty hearing on the phone?
- * Misunderstand conversations due to background noise?

If you answered YES, you've got the solution for you. Arkansas Relay Captioned Telephone Service allows you to LISTEN, and READ captions of what the other person says.

CapTel benefits:

- * Right and easy to read display
- * Captions appear on screen, hearing and outgoing
- * Use CapTel Captioned Call for more information
- * Don't hang up your old phone and plug in the CapTel phone. There are no additional line charges associated with use of the CapTel phone.
- * Even the wall phone can be changed to meet your personal preferences.



CapTel Comparative Chart

Line or display screen	CapTel 800	CapTel 801	WebCapTel
Line or display screen	Yes - 15 lines of text depending on font size	Yes - 15 lines of text depending on font size	Yes - 15 lines of text depending on font size
Phone services supported	CapTel 800: Analog, CD, FAX, FDD, CAPTEL CAPS PHONE	CapTel 801: Analog, CD, FAX, FDD, CAPTEL CAPS PHONE	WebCapTel: One telephone is shared service to make call
Requires high-speed internet connection	CapTel 800: No	CapTel 801: Yes - requires	WebCapTel: No
Ability to view text of conversation	CapTel 800: Yes - up to 400 lines of text	CapTel 801: Yes - up to 400 lines of text	WebCapTel: Yes - Can receive and send entire conversation
Captions provided	CapTel 800: One hearing phone free	CapTel 801: One hearing phone free	WebCapTel: One hearing phone free

CapTel lets you communicate with confidence

- * Arkansas Relay Captioned Telephone Service allows anyone who uses hearing aids or who finds it difficult to hear independently to use the phone.
- * 24-hour-a-day live service. CapTel users are responsible for their own long distance charges. However, there is no charge for using Arkansas Relay Captioned Telephone Service.
- * Speech Captioning is available for 800-661-4463 toll-free calls. Hours are 7 am to 11 pm CST.



Sprint WebCapTel®

sprintcaptel.com

WebCapTel benefits:

- * No special equipment is required.
- * Any kind of telephone and computer with Internet access.
- * Font size and colors can be changed to meet your personal preferences.
- * Macintosh and Windows-based PC compatible.
- * The WebCapTel user listens to the voice user on his telephone while reading captions of the conversation on his computer monitor.
- * Visit www.sprintcaptel.com for more information.

Wireless CapTel® by Sprint®

sprint800.com/wireless-captel-sprint

Wireless CapTel by Sprint benefits:

- * Free app for select Android-powered 2.2 or higher devices.**
- * Works on 3G, 4G or WiFi.
- * Customized visual service.
- * No voice plan is required.
- **Need a check up? Start saving today by taking advantage of our special offer.

To Install Wireless CapTel by Sprint:

- * Using your device's browser, download, scan the QR code to the right and install.
- * Tap the Google Play Store link in your device's application list and search for Sprint CapTel to select their install.

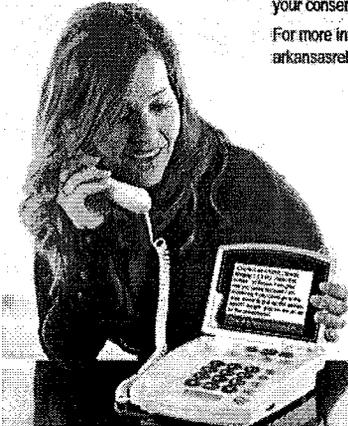
Are you tired of saying "What?" while on the phone?
Try Captioned Telephone Services!
If you answered YES, we may have the solution for you.

When you hear Arkansas Relay on the phone,
Please, Don't Hang Up.
It could be the most important call of the day.

“ Yes, I'll be
happy to
pick up. ”

Free Captioned Telephone Service by Arkansas Relay allows you to answer your calls with confidence. The CapTel® phone enables you to read what their caller says, while they speak and listen on the phone. You can relax and enjoy your conversation again!

For more information, go to arkansasrelay.com/capitel



CapTel is a registered trademark of LRI, Inc.

“ Arkansas Relay?
It must be
telemarketing! ”

Thousands of people across the entire state with hearing or speech difficulties use the Arkansas Relay, a service that makes the use of the telephone accessible. They use the relay service to schedule appointments, to purchase products, to order a pizza, to make a donation, and for many other reasons.

When you hear "Arkansas Relay" please don't hang up. It could be one of your most important calls of the day.

For more information, go to arkansasrelay.com/donthangup

Or contact:
Jeff Prail

Arkansas Relay Program Manager

Videophone - 501.221.3279

Voice - 501.221.1285

FAX - 501.221.3241

E-Mail - jeff.prail@sprint.com

Website - www.arkansasrelay.com



ARKANSAS RELAY

Building a connection between phone callers with ease!

ARKANSAS RELAY

**Dial 7-1-1 and communicate
with any caller – 24 hours a day!**

Arkansas Relay is a free service that provides full telephone accessibility to people who are deaf, hard-of-hearing, deaf-blind, and speech-disabled. This service allows TTY (text-telephone) users to communicate with standard telephone users through specially trained relay operators.

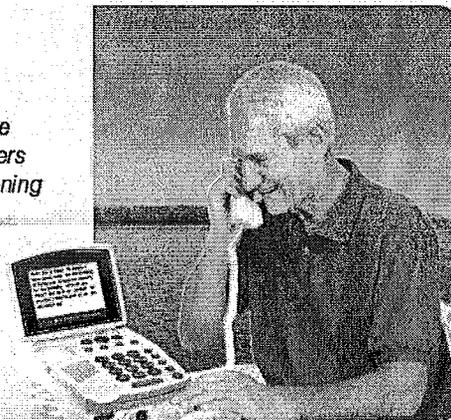
For more information, contact Jeff Prail, Account Manager
501-221-1285 (Voice)
email: jeffrey.prail@sprint.com (Email)
visit our website: www.arkansasrelay.com



**Captioned Telephone (CapTel®) Service –
Talk, listen and read!**

If a person with a hearing loss has difficulty hearing on the phone, not anymore! They can hear everything other callers say, just like a traditional call. At the same time, the captioning service transcribes everything they say into captions, which appear on the CapTel display window.

For more information,
- Visit www.arkansasrelay.com/captel
- Contact Arkansas TAP at
800-981-4463 or 501-686-9693 (TTY/Voice)



- Please, Don't Hang Up! Campaign
www.arkansasrelay.com/donthangup
- Relay Service for Spanish-Speaking Callers
www.arkansasrelay.com/spanish
- Arkansas Relay Customer Service
www.arkansasrelay.com/support
- Telecommunications Access Program (TAP)*
www.arkansasrelay.com/tap



* Offered by the Arkansas Department of Career Education/Arkansas Rehabilitation Services Division. ©2011 Arkansas Relay. All rights reserved. CapTel is a registered trademark of Ultratec, Inc. Other marks are the property of their respective owners.

Dial 7-1-1 Toll-free

Communicate with any caller 24 hours a day.



With Arkansas Relay, dialing 7-1-1 will connect you to a free service which allows effortless communication with people who are:

- deaf,
- hard-of-hearing,
- deaf-blind,
- speech-disabled,
- or hearing.

Dial 7-1-1 or use these toll free numbers...

“ 7-1-1 is so easy to remember for making a call to my deaf friends. ”



			
TTY User	Voice User	Carry-Over User	CapTel User
TTY to Voice 1-800-285-1131	Voice to TTY 1-800-285-1121	Voice Carry-Over 1-866-656-8260	Voice to CapTel 1-877-243-2823
TeleBraille 1-800-285-1131		Hearing Carry-Over 1-800-285-1131	
			
Speech-Disabled	Spanish Relay	Internet User	Customer Service
Speech-to-Speech 1-866-656-2966	Spanish Relay 1-866-656-1842	Internet Relay www.sprintip.com www.sprintvrs.com	English 1-800-676-3777 Español 1-800-676-4290

convenience

Arkansas Relay is a free service that provides the hearing or accessibility to people with hearing, vision, or speech impairments. It's available 24 hours a day, 7 days a week, 365 days a year.

Always available
 • 24 hours a day, 7 days a week, 365 days a year
 • Available in English or Spanish

Accurate and transparent
 • Hear what you hear, see what you see, and speak what you speak

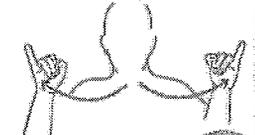
Private and confidential
 • All services are confidential and secure



Federal Relay Service • www.fedrelay.gov
 The Federal Relay Service is a national government information service, which provides telephone and computer access to federal government services. It is available 24 hours a day, 7 days a week, 365 days a year.

- 800-877-8337
- 800-877-8338
- 877-877-8338
- 877-877-8338
- 800-877-8338
- 800-877-8338

Arkansas Relay
 25 Corporate Way
 Little Rock, Arkansas 72202
 501-321-8122 • Toll-free: 1-800-255-1131
 501-321-8122 • Fax: 501-321-8122
 Website: www.arkrelay.org



www.arkrelay.org 1-800-255-1131
 Arkansas Relay



Arkansas Relay
 25 Corporate Way
 Little Rock, Arkansas 72202
 501-321-8122 • Toll-free: 1-800-255-1131
 Website: www.arkrelay.org

Don't Hang Up
 If you are having trouble with your phone, we can help. Our experts can help you troubleshoot your phone, or we can refer you to a local repair shop. We can also help you with your phone bill, or we can help you with your phone insurance. We can also help you with your phone service, or we can help you with your phone plan. We can also help you with your phone, or we can help you with your phone.

Many people don't know that they can get help with their phone. We can help you with your phone, or we can help you with your phone. We can also help you with your phone, or we can help you with your phone. We can also help you with your phone, or we can help you with your phone.



Video Relay Service • www.vrsrelay.com
 Video Relay Service (VRS) is a free service that provides the hearing or accessibility to people with hearing, vision, or speech impairments. It is available 24 hours a day, 7 days a week, 365 days a year.

Internet Relay • www.irsrelay.com
 You can place a relay call from any internet connection with a computer or mobile device that has an Internet Explorer (IE) or Netscape browser. It is available 24 hours a day, 7 days a week, 365 days a year.

TTY • 1-1-1 or 1-800-255-1131
 A person who is deaf or hard of hearing can dial 1-1-1 or 1-800-255-1131 to get a TTY line. It is available 24 hours a day, 7 days a week, 365 days a year.

Spanish Relay • 1-800-656-1827
 TTY users can get help with their phone. We can help you with your phone, or we can help you with your phone. We can also help you with your phone, or we can help you with your phone.

Captioning Services
 Captioning Services are available for people with hearing or vision impairments. We can help you with your phone, or we can help you with your phone.

Video Captioning • www.vcaptioning.com
 Video Captioning is a free service that provides the hearing or accessibility to people with hearing, vision, or speech impairments. It is available 24 hours a day, 7 days a week, 365 days a year.

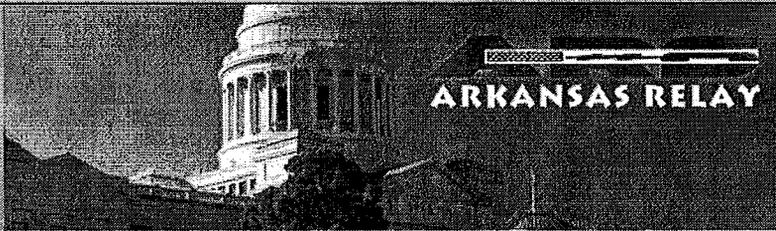
Video Relay Service • www.vrsrelay.com
 Video Relay Service (VRS) is a free service that provides the hearing or accessibility to people with hearing, vision, or speech impairments. It is available 24 hours a day, 7 days a week, 365 days a year.

Emergency
 In an emergency, you can call 911 directly. If you are having trouble with your phone, we can help you with your phone, or we can help you with your phone.

need help?
 Customer Service is available to answer your questions, make suggestions, correct or replace, and provide additional information.

Arkansas Relay Customer Service: 1-800-255-1131 Service at Client: 501-321-8122 501-321-8122

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Enhanced Speech-to-Speech Service

Dial 7-1-1 or 1-800-656-2966



[Click to My Email Set Up](#)



My Email Set Up

In order to speed up the set-up of the call, Arkansas Relay now offers STS Email Set-up. Now, STS users can email call instructions or information 2 to 24 hours prior to the call. This can include information such as the number to be dialed, the name of the person being called, any special instructions and the subject of the call, or anything that makes it easier for the STS user to complete the call. This feature cannot be used to request a specific relay operator, schedule an STS call or be used in lieu of placing a live call.



[Click here to read My Step-by-Step Instructions](#)



[My Support - 877-787-1989](#)

A dedicated customer support for STS users. This new support for STS is standing by to assist STS users or organizations serving STS users with basic information about STS, filling out customer profiles, and other Sprint Relay features designed to support STS customers and their calls.

At a Quick Glance

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ARKANSAS RELAY

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and communicate
with any caller...*

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