



State of Wyoming
Application for Renewal of Current Certification
For Telecommunications Relay Service

Submitted to:

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
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Submitted by:

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Provider of Service:

August 1, 2011 – Present
June 1992 – July 31, 2004
Sprint Communications Company, L.P.
12502 Sunrise Valley Drive
Reston, VA 20196
866.540.4657

August 1, 2004 – July 31, 2011
Hamilton Telephone Company
d/b/a Hamilton Telecommunications
1001 Twelfth Street
Aurora, NE 68818



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 October 5, 2012

Marlene H. Dortch
 Office of the Secretary
 Federal Communications Commission
 445 12th Street, SW, Room TW-A325
 Washington, DC 20554

Reference: **TRS State Certification Application**

Ladies and Gentlemen:

Pursuant to Federal Communications Commission's (FCC's) rules 47 C.F.R § 64.606(c)(1), the State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation, Wyoming Relay Program submits the enclosed application in narrative form for the renewal of the State's Telecommunications Relay Service (TRS) program certification. This application was prepared with the assistance of Sprint Relay, the current Wyoming Relay provider. A copy of Public Notice DA 12-1187, CG Docket No. 03-123, released by the FCC on July 25, 2012, is included in Appendix A.

The Wyoming Division of Vocational Rehabilitation is authorized by legislation passed by the Fifty-First Legislature of the State of Wyoming, 1991 General Session, to provide Telecommunications Relay Service for the State of Wyoming. House Bill No. 377, the Enrolled Act creating W.S. §§ 16-9-201-210, was signed by Governor Mike Sullivan on February 28, 1991. A copy of Wyoming's Telecommunications Relay Service statutes is provided in Appendix B.

Wyoming Relay provides telecommunications relay service that is functionally equivalent to voice telephone service. As required by the FCC, Wyoming Relay provides: traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech relay (STS) service. Wyoming is proud to also offer captioned telephone relay service (CTS). Detailed information on the aforementioned services which demonstrates that the provision of these services is consistent with the FCC rules and that Wyoming is exercising responsibility for oversight of these services is included in the body of the enclosed application, as well as in Appendix C: TRS Provider Contract. Please note that although Sprint Relay provides Internet Protocol (IP) and captioned telephone web-based services, Wyoming Relay does not contract to provide these services in Wyoming, nor is Wyoming Relay responsible for oversight of IP and VRS or other Internet or web-based relay services.

The enclosed application provides historical, statistical, and illustrative evidence demonstrating Wyoming Relay's compliance with the Federal Communications Commission's TRS rules. This



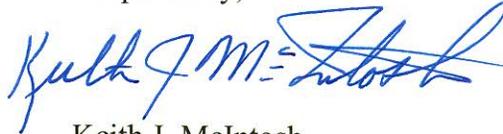
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application includes documentation demonstrating that Wyoming Relay meets or exceeds all operational, technical, and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules. The standards of Wyoming Relay do not conflict with federal law. Additionally, this application includes documentation that Wyoming Relay makes available adequate procedures and remedies for enforcing the program's requirements. The application also includes documentation that Wyoming Relay makes available to TRS users informational materials on State and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.

For further information regarding this application, please contact Lori Cielinski, TRS Consultant, via phone (800.452.1408 TTY/Voice) or email: lori.cielinski@wyo.gov.

Respectfully,



Keith J. McIntosh
Administrator

LPC/js

Enclosures: Application for the renewal of Wyoming's TRS program certification



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Wyoming Relay Overview

The Wyoming Division of Vocational Rehabilitation certifies that it has complied with, and will continue to comply with, the Americans with Disabilities Act (ADA) of 1990, Title IV, Pub. L. No. 101-336, § 401, 104 Stat.327, 366-69 (adding Section 225 to the Communications Act of 1934, as amended, 47 U.S.C. § 225). The Wyoming Division of Vocational Rehabilitation also certifies that it has overseen its previous TRS provider (Hamilton Telecommunications) and that it will continue to oversee its current TRS provider (Sprint Communications Company, L.P., hereinafter known as Sprint), as well as any future TRS providers, to ensure that all requirements are met. For the FCC's convenience, we have enclosed Wyoming Statutes 16-9-201 through 16-9-210 with an effective date of July 1, 1991, as Appendix B: State Legislation. We have also enclosed the TRS Provider Contract as Appendix C.

Historical Information

A Telecommunications For The Communications Impaired program was established by the Fifty-First Legislature of the State of Wyoming 1991 General Session by enactment of House Bill No. 377, Section 1. W.S. 16-9-201 through 16-9-210. This program is also known as Wyoming Relay, or Wyoming Telecommunications Relay Service (TRS). House Bill No. 377 called for Wyoming to provide a 24-hour-per-day, seven-day-per-week telecommunications relay service to relay conversations between communications impaired persons who use specialized telecommunications equipment and noncommunications impaired persons whose telephone is not equipped with specialized telecommunications equipment.

In response to the Americans with Disabilities Act, the Wyoming Legislature gave the Division of Vocational Rehabilitation (DVR) administrative authority over Wyoming TRS, established a special fee as the method of funding, and mandated that the service begin by July 1, 1992, and be fully operational by July 2, 1993. (See Appendix B: State Legislation.

Advisory Committee and Cost Recovery

Wyoming Statute 16-9-202 created a committee on telecommunications services for the communications impaired. The seven (7) members of the Committee are appointed by the Governor to serve three-year terms. While there are no specific statutory requirements that the membership of the Advisory Committee be from different user groups, the Governor has appointed individuals to the Committee who are deaf, hard-of-hearing, late deafened, speech-impaired, children of deaf adults, parents of deaf children, service providers to individuals with hearing and speech impairments, and staff of telecommunications providers. The Committee's duties are to advise the Division of Vocational Rehabilitation on the administration of the Wyoming Telecommunications Relay Service. The Committee has taken an active role in advising on and providing education and outreach on Wyoming Relay service. The Committee also has the responsibility of annually determining the amount of a special fee, which is the cost recovery method that Wyoming uses for the provision of intrastate relay service. Currently, the special fee is three cents (\$0.03) per access line per month for up to 100 access lines per customer account for the local exchange companies. In the case of radio common carriers, no customer is required to pay the special fee on more than one hundred radio communication service numbers per account in Wyoming. The Advisory Committee voted on September 21, 2012, to reduce the special fee to \$0.02 per access line, effective January 1, 2013. Since the last application for recertification, Wyoming Telecommunications Relay Service has been able to reduce the special fee from six cents (\$0.06) to two cents (\$0.02) per access line while providing continuous high quality service. (See Appendix B: State Legislation and Appendix L: Cost Recovery Mechanism)

Equipment Distribution

The same legislation that established relay service in Wyoming (House Bill No. 377) also contained provisions for the distribution of specialized telecommunications equipment. This program has been in operation since

December 1992. Funding for the distribution of equipment comes from the special fee collected for Wyoming Relay services. The inventory of equipment the program currently distributes includes, but is not limited to: TTYs, captioned telephones, amplified telephones (landline-based and cellular), an in-line amplifier, and signaling devices. The program also provides specialized telephone equipment for individuals who are deaf-blind or speech-impaired; this equipment is special ordered based upon the needs of the end consumer. Wyoming Relay is also a collaborative partner with the University of Wyoming, Wyoming Institute for Disabilities, which is the FCC-certified entity for the National Deaf-Blind Equipment Distribution Program.

To be eligible to receive equipment free of charge from Wyoming Relay, an individual must meet the following requirements: 1) have a communication impairment; 2) be a resident of Wyoming; 3) be able to demonstrate his/her ability to understand the nature and use of the equipment; and 4) meet the income eligibility requirement for the household (currently below 190% of the federal poverty level and excluding any disability income). Additionally, individuals, businesses, and organizations who do not qualify to receive free devices are provided with information on selecting and obtaining equipment.

Terminology Adopted

Although original legislation establishing Wyoming TRS and its funding uses the term "message relay system," Wyoming uses "Telecommunications Relay Service" in DVR documents to be consistent with FCC regulation terminology. As defined in the original legislation establishing Wyoming TRS, "message relay system" "means a statewide service through which a communications impaired person, using specialized telecommunications equipment, may send and receive messages to and from a noncommunications impaired person whose telephone is not equipped with specialized telecommunications equipment, and through which a noncommunications impaired person may, by using voice communication, send and receive messages to and from a communications impaired person." By current standards, this definition is limited. However, the legislation also says, "The division shall award the contract for this service to the provider based upon price, the interests of the communications impaired community in having access to a high-quality and technologically advanced telecommunications system, and all other factors listed in the committee's request for proposal including proposals for a specialized telecommunications equipment distribution program." The legislation also requires, "The system conform to any standards established by applicable state or federal laws or regulations." Therefore, the division uses a definition of Telecommunications Relay Service consistent with the FCC definition as well as the intent of the State legislation.

Although original state documents use the term "Relay Agent," Wyoming TRS uses the term "Communications Assistant (CA)" in DVR documents to be consistent with FCC regulation terminology. Wyoming TRS has also used the term Relay Operator synonymously with Communications Assistant to increase understanding and awareness in the general public who may know what an operator is but have no idea what a Communications Assistant is.

All printed publications, correspondence, or other forms of media used to promote Wyoming TRS produced by DVR or Wyoming Relay's provider reflect the use of the term "Text Telephone (TTY)" which supersedes the terms "Telecommunications Device for the Deaf (TDD)," "TT," and "Teletypewriter."

TRS Provider Contract Status

Sprint Communications Company, L.P., is operating the Wyoming Relay Service under contract with the State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation. The term of the current Contract is from August 1, 2011, through July 31, 2013. The Contract may be renewed under the same terms and conditions with the exception of any new purchased features by agreement of both parties in writing and subject to the required approvals for four (4) successive terms of one (1) year each.

Hamilton Telephone Company, d/b/a Hamilton Telecommunications, provided Wyoming Relay Service under contract with the State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation from August 1, 2004, through July 31, 2011. This Contract and Amendments One, Two, and Three were included in the 2007 application for recertification. Amendment Four to the Contract was executed on July 29, 2008. Amendment Four extended the Contract one year to July 31, 2009, and increased the total dollar amount of the Contract. Amendment Five to the Contract was executed on March 26, 2009. Amendment Five extended the term of the Contract by one year to July 31, 2010; increased the Contract's total dollar amount; and deleted in its entirety Section 7, Video Relay Service, pages 136-142 of Exhibit A in the Contractor's Technical Proposal. Amendment Six to the Contract was executed on July 30, 2010. Amendment Six extended the Contract six (6) months to January 31, 2011, and increased the total dollar amount of the Contract. Amendment Seven to the Contract was executed on December 1, 2010. Amendment Seven extended the Contract three (3) months to April 30, 2011, and increased the total dollar amount of the Contract. The final Amendment to the Contract, Amendment Eight, was executed on April 15, 2011. Amendment Eight extended the Contract to August 1, 2011; increased the session price per minute for TRS; changed the unit of measure for CTS from conversation minutes to session minutes; changed the price of CTS; and increased the Contract's total dollar amount.

Prior to August 1, 2004, the Wyoming Division of Vocational Rehabilitation contracted with Sprint Communications Company to provide telecommunications relay service for Wyoming. The Contract between the Division of Vocational Rehabilitation and Sprint was included in the 2002 application for recertification. Amendment Six to the Contract with Sprint was executed on December 8, 2003, and was included in the 2007 application for recertification.

Each provider of telecommunications relay service for the State of Wyoming was selected after a comprehensive and impartial evaluation of proposals submitted in response to a Request for Proposal (RFP) released by the State. This competitive process, as well as the comprehensive Request for Proposal, and the resulting Contract, which includes liquidated damages for the failure to meet performance requirements, provide the Division of Vocational Rehabilitation a method to ensure that Wyoming's telecommunications relay service meets or exceeds all operational, technical and functional minimum standards contained in 47 C.F.R. §64.604. This method also makes available adequate procedures and remedies for enforcing the requirements of the state program, and, in instances where the program exceeds the mandatory minimum standards contained in §64.604, that Wyoming's Telecommunications Relay Service in no way conflicts with federal law. The Wyoming Division of Vocational Rehabilitation certifies that it has complied, and will continue to comply with these standards, and that it has overseen its previous TRS provider (Hamilton Telecommunications, hereinafter referred to as Hamilton) and that it oversees its current TRS provider (Sprint Communications, L.P.), as well as any future TRS provider to ensure that all requirements are met.

Copies of the current Contract, as well as Amendments Four, Five, Six, Seven and Eight to the previous Contract, are enclosed as Appendix C: TRS Provider Contract. The Contract incorporates Sprint's price proposal which contains prices for services not purchased by the State of Wyoming as well as other proprietary information and thus, has not been included in Appendix C. The price per minute that the State of Wyoming has agreed to pay for both TRS and CTS is public information and is included in the body of the Contract in Appendix C. Section 7, Video Relay Service, pages 136-142 of Exhibit A in the Contractor's Technical Proposal which was deleted in its entirety in Amendment Five to the Contract with Hamilton is also included in Appendix C as a point of reference.

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 communications needs of individuals with hearing and speech disabilities.

CA Training

Wyoming Relay requires Communication Assistants (CAs) to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities. The State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation contracts currently with Sprint Communications, L.P., and previously with Hamilton Telecommunications to provide the hiring, training and oversight of Communication Assistants for Wyoming Relay. Successful procedures to attract qualified applicants for TRS CA positions have been established which include the development of comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensure 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.

Wyoming's Contract with the TRS providers requires that they initially submit complete TRS Operator Training Manuals and Materials and then additionally submit any changes to those manuals or materials (See Appendix C: TRS Provider Contract, pg. 21-24).

Wyoming Relay provides a minimum of eighty (80) hours of initial training and addresses all areas of TRS operator competency in the TRS rules and FCC minimum standards.

Wyoming Relay provides training for TRS operators which includes, but is not limited to: information about Deaf culture; information about needs of deaf, hard-of-hearing, and speech-impaired users; diversity issues; TTYs including TTY courtesy; phone image/rudeness; specific training on all call types; billing; confidentiality; detachment; emergency/threats; and proper translation of American Sign Language (ASL) gloss into conversational English. Wyoming Relay provides CAs extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. Wyoming Relay trainers apply adult learning methodologies including explanation, demonstration, guided practice, role-playing, correction and independent practice. Training in the operation of TRS equipment includes both simulated on-line call handling as well as assisted live-call handling. Portions of in-service training for relay center employees are provided by representatives from the local Deaf organizations, relay user communities, and/or staff with appropriate experience.

A component of the overall Wyoming Relay training is the diversified culture training programs which provide Wyoming Relay staff, including all CAs, with information about understanding TRS users, including deaf users and their culture, history and communication needs. These diversified culture programs incorporate training which includes the characteristics of Deaf, hard-of-hearing, late deafened, deaf/blind, and speech disabled users.

Prior to graduation from training, CAs must demonstrate the required skill level in all aspects of call processing, including their ability to:

- Type sixty (60) words per minute (wpm) prior to taking live calls and—post training—must demonstrate the ability to maintain a minimum typing speed of sixty (60) wpm on an auditory test.

- Convey 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.

Additionally, Wyoming Relay provides on-going training for all relay operators and staff on new software, new technology, changes to call processing/handling procedures, any changes that may occur to FCC mandatory minimum standards, refresher training on Disability Awareness, and/or areas identified from the Quality Assurance Program. Wyoming 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 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, Wyoming Relay values customer feedback. We listen to each customer's feedback and take proactive steps to implement suggestions and feedback. Wyoming Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present all TRS training programs.

In addition to the training provided to all CAs as discussed above, Wyoming Relay provides qualified STS applicants a minimum of eight (8) additional hours of classroom training specifically on STS services, including but not limited to: strategies 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; characteristics of STS customers; and call processing. STS training is delivered by individuals with professional experience related to speech disabilities and/or consumer experts. The current STS training program used for Wyoming Relay was developed based on direct experience obtained during the initial STS trial and in consultation with Dr. Bob Segalman, and it reflects over eight (8) years of experience processing STS calls.

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 ▪ Call set up ▪ Customer Database ▪ Frequently Dialed Numbers ▪ Customer Requests ▪ Emergency Call Processing 	<ul style="list-style-type: none"> ▪ Confidentiality ▪ 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	

Wyoming Relay provides bilingual operators with additional specialized training after the completion of relay operator training specific to Spanish Relay services.

Wyoming Relay provides an enhanced VCO service called Captioned Telephone Service (CTS). CTS operators spend a minimum of two (2) weeks in initial classroom training. This training includes but is not limited to: call center policies; confidentiality requirements; how the technology works; how the CapTel® phone works; developing a personal voice profile (how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy); re-voicing techniques; call handling tools/macros; pacing a conversation; inserting words; how to handle various recordings; "live" calls to other trainees; and observation of live calls. There is a final proficiency exam that must be passed in order to move into a live call environment.

The Training Schedules are included in Appendix D and contain more information on CA training requirements.

§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.

CA Skills

Wyoming Relay CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. The TRS Provider for Wyoming Relay is able to ensure this requirement is met by maintaining rigorous and comprehensive hiring, training, and assessment/monitoring policies and procedures. The training component was discussed in the preceding section.

Wyoming's Contract initially requires the submission of the complete relay operator policies and procedures manual for TRS operators and requires the submission to the State of any changes that are made to this manual.

CAs are required to have: a high school diploma or GED, which ensures that the applicant has at least a 12th-grade level of English grammar and spelling skills; the ability to type 60 wpm on an auditory-based test; clear articulation; and an intelligible, pleasant speaking voice. Preference is given to CA applicants who have completed college-level coursework and who have TRS experience, knowledge of American Sign Language, and/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.

Wyoming Relay CA applicants are required to pass a valid and unbiased 12th grade level spelling test to be considered for employment. Prospective CAs are required to pass a written spelling test with at least ninety percent (90%) accuracy prior to the completion of training to ensure that all CAs have spelling skills at a level equivalent to or better than those used in the first year of college. Wyoming Relay also evaluates spelling skills of CAs on an ongoing basis as part of CA performance surveys and random checks performed by an independent third party.

Wyoming Relay CA applicants must pass a valid unbiased 12th grade level grammar test to be considered for employment. Additionally, Wyoming Relay ensures CAs have sufficient English language skills by conducting ongoing performance surveys which include an evaluation of appropriate grammar.

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 relay centers as a Wyoming Relay CA.

All Wyoming Relay CAs are required to possess clear and articulate voice communications and speak in an understandable manner using names, words, and pronunciations which can easily be understood by Wyoming citizens. Wyoming Relay ensures CAs have an ability to understand callers using limited English or ASL gloss and to translate limited written English or ASL gloss to conversational English. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. Wyoming Relay ensures that tests are not available to relay operators prior to testing, and that portions of the test are changed at least annually. Wyoming Relay CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Type sixty (60) wpm prior to taking live calls and—post training—must demonstrate the ability to maintain a minimum typing speed of sixty (60) wpm on an auditory test.
- Convey a professional and courteous phone image.
- Process calls using live training terminals in an efficient and knowledgeable manner.
- Handle emergency call scenarios.
- Role-play scenarios written in varying levels of ASL. Wyoming Relay also requires CA trainees to pass a valid and unbiased written test with a score of eighty percent (80%) or better to demonstrate that they can correctly interpret typewritten ASL phrases (ASL gloss) into conversational English without the assistance of the ASL translator/interpreter before being allowed to complete training and process relay calls.
- Understand Deaf culture, ethics, confidentiality and exercise professional judgment.

Wyoming Relay requires that all CTS CAs have a high school graduate equivalency as a minimum qualification for the job.

Wyoming Relay tests and ensures CTS CAs have sufficient skills in spelling, pronunciation, enunciation, reading ability, and vocabulary. Wyoming Relay also tests and ensures that CTS CAs are able to quickly identify mistakes in voice recognition and be able to appropriately correct errors while on a call.

Wyoming's Contract requires the TRS provider to ensure CTS CAs transcribe at least one hundred twenty-five (125) wpm. Accuracy is the percentage of error subtracted from one hundred percent (100%) of text received. The CTS operators are expected to demonstrate and maintain an average accuracy rate of ninety-eight percent (98%) during proficiency testing. Errors are any words that change the context of the sentence, including missing words or sentences. A CTS operator is expected to demonstrate and maintain an average error rate of two percent (2%) or less. Proficiency testing of each CTS operator shall be based on an auditory (oral-to-text) test (as opposed to written) that reflects a conversational rate of speaking. The Contract also requires the TRS

provider to ensure that each CTS operator must pass a monthly test demonstrating the ability to transcribe at one hundred thirty (130) wpm with ninety-eight percent (98%) corrected accuracy in order to remain qualified to caption live calls.

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

CTS CA performance monitoring consists of the following:

- Upon completion of classroom training, CTS CAs are scheduled for one (1) week of transition training, while being monitored and supported by another CTS CA or an Instructor.
- The Contractor shall require CTS operators to take and pass a quantifiable CTS operator proficiency test. Any CTS operator trainee who cannot pass the examination after the training period shall not be utilized as a CTS operator.
- All CTS CAs must continue to qualify for live call handling each month.
- Wyoming Relay CTS CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CTS CA is evaluated on a minimum of one (1) call each shift.
- There is also a monthly test that each CTS CA must pass in order to remain qualified to caption live calls.

The providers of Wyoming Relay have an extensive process for hiring Speech-to-Speech (STS) CAs. STS CA applicants must successfully achieve the following:

- Six (6) months of employment as a CA.
- Recommendation and/or approval from a supervisor or a manager.
- Demonstrated 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. Each potential STS relay operator shall be required to score ninety-two percent (92%) or higher in each ear using a fifty (50) word, W-22 or NU6 speech recognition test. Each STS relay operator shall be required to possess a hearing acuity of 20dB or less in each ear using a pure tone sensitivity test at 250 Hz, 500 Hz, 1000 Hz, 2000 Hz and 4000Hz.

Wyoming Relay requires CAs in STS training to pass both a written final test (which demonstrates an understanding of all aspects of STS call processing as well as the ability to understand speech patterns of people with a variety of speech disabilities) and an audio performance test.

Wyoming Relay ensures Spanish-to-Spanish and Spanish-to-English CAs are fluent in Spanish and have proficient skills in Spanish grammar and vocabulary by requiring these operators to pass an evaluation of their ability to read, write, speak, and understand Spanish. Wyoming Relay evaluates Spanish-language relay operators monthly on their abilities to accurately translate typed text of relay users who have limited written Spanish language skills.

CA Monitoring is an important component in ensuring that CAs have competent skills. Wyoming Relay supervisors and quality assurance personnel have the ability to remote silent monitor all TRS and CTS call types. Wyoming Relay evaluates each TRS operator's performance at least twice per month through an individualized performance survey conducted by supervisors while observing actual relay calls. Wyoming Relay requires all CAs to meet expectations in all areas of the performance survey. CAs who do not meet a specific expectation are offered additional training and an opportunity for improvement. CAs who do not satisfactorily improve in a reasonable time are subject to formal corrective action, up to and including termination of employment. CTS CAs are monitored and evaluated on at least one (1) call per shift. Wyoming Relay prohibits anyone from watching or listening to actual calls except CAs and supervisory staff for the purpose of relaying, assisting, in-call relay operator replacement, or monitoring the call for training purposes.

§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

Wyoming Relay CAs must type a minimum typing speed of sixty (60) wpm. Wyoming Relay exceeds this service level by requiring CAs to maintain a ninety-five percent (95%) accuracy level in addition to sixty (60) wpm typing. Wyoming's Contract requires that each CA must attain sixty (60) wpm after deducting words per minute for errors. Typing tests are not posted or distributed in advance. Technology-aided transmission is not used to test the typing speed. Wyoming Relay uses a five (5) minute oral-to-type test that simulates actual working conditions and the relay environment.

Sprint, Wyoming Relay's current TRS Provider, provides 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 (5) 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 eighty-three point nine (83.9) wpm, with at least ninety-five percent (95%) accuracy. In fact, almost one third (1/3) of Sprint's CAs type over ninety (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

Wyoming Relay does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of December 2008, Hamilton no longer provides VRS services and 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

Wyoming Relay exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint and at Hamilton, 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 ten (10) minutes with the TRS (fifteen (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 (10) 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 (10) minutes (for TRS calls) or fifteen (15) minutes (for STS calls). These include:

- Shift change
- CA fatigue normally as a result of a call in progress more than thirty (30) minutes with difficult call content or speed, or sixty (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.

Wyoming Relay honors the requests of all callers when they request a specific CA gender and will make every effort to honor any requests for a specific gender during call transfers. 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 CTS CAs.

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

Regardless of whether Wyoming Relay's provider was Hamilton or Sprint, all conversations relayed between voice and TTY callers are transmitted in real-time. Currently, Wyoming Relay uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

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

All of these features are available in all languages including English and Spanish. CTS is a transparent service. CTS CAs transmit audio and captioned text conversations from the voice caller to the CTS user in real time. Since the CTS user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Content

§64.604(a)(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

In accordance with the FCC regulations, all information provided for Wyoming Relay 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. Wyoming Relay STS CAs 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.

Wyoming Relay's TRS Providers strictly enforce confidentiality policies. Employees are expected to comply with these policies during and after their period of employment.

Sprint's confidentiality policies in the Relay Center 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.

When relaying calls or analyzing data, Hamilton follows all confidentiality practices listed below:

- All CAs are given thorough training on the significance and importance of maintaining confidentiality from both a legal perspective and a moral perspective.
- Before being allowed in the relay service center and before taking any live calls, CAs are required to sign a Pledge of Confidentiality.
- Hamilton's CA Procedure Handbook includes rules and regulations which must be followed to prevent any unintentional disclosure of confidential information. A whole section of this handbook is dedicated to the importance of confidentiality. From day one of the training program, CAs are taught how to work in a "confidential" environment.
- The actual physical facility, in which the CAs perform their specialized duties, is located in a physically separated, private room, at the offices of Hamilton at 1006 12th Street, Aurora, Nebraska 68818. The room is clearly marked, prohibiting any unauthorized access.
- When training new CAs by sharing past experiences, trainers do not reveal any of the following information:
 - Names, genders, or ages of the parties involved in the call
 - Originating or terminating points of the call
 - Specifics of the information conveyed
- Hamilton's CAs understand that they shall not discuss, even amongst themselves or their supervisors, any names or specifics of any relay call except in instances of resolving complaints. Hamilton's CAs also understand that they may discuss the general situation surrounding a call with their supervisor in order to clarify how to handle a particular type of relay call and for that limited purpose only. CAs are trained to ask questions about procedures without revealing names or specific information that will identify callers. They are also trained to recognize emergency or life-threatening situations and understand those circumstances in which the CA may disclose names and specific information in order to expeditiously address the situation.
- No one is allowed to watch or listen to actual calls other than the CA.

Any of Hamilton's CAs or supervisors who, after an investigation, are found to have violated the confidentiality rules and regulations will be terminated immediately. If a consumer would allege a violation of confidentiality and the same was reported to the relay center or to the Wyoming Division of Vocational Rehabilitation in any manner, Hamilton's policy would be to first investigate the alleged violation internally, and then make a written report both for the complaint file of the relay service as well as for the personnel file of the individual or individuals alleged to be involved.

Wyoming Relay CTS 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, per the CapTel® Confidentiality Document:

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

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

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

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

Please see Appendix E for Sprint's and Hamilton's TRS Pledge of Confidentiality and the CTS Pledge of Confidentiality.

STS Limited Exception of Retention of Information

At the request of a caller, Wyoming Relay Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs will also repeat any information (without the Speech to Speech user having to say the same thing each time) during subsequent calls if requested to do so. No information is kept after the inbound call is released from the CA position. Sprint's STS CAs are also allowed to utilize the TRS system-designed electronic scratchpad to aid the CA during the processing of a call or subsequent calls.

§64.604(a)(2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

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

STS and TRS Training

Sprint puts control of the call with the users.

- CAs accept their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf of 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, Wyoming Relay CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate

competent skills to accurately reflect the TTY user's intent and the CA's role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of eighty percent (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.

Wyoming Relay CTS CAs are prohibited from intentionally altering a relayed conversation and will relay all conversations verbatim.

The State of Wyoming 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

Wyoming Relay STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not object to the intervention. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation.

Wyoming Relay STS CAs do not counsel, advise or interject personal opinions. Wyoming Relay STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Wyoming Relay understands that each STS user may also find one technique to be most comfortable. Wyoming Relay STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible. The STS user is able to choose, on a call-by-call basis or in their Customer Profile, whether or not the other party will be allowed to hear the speech-impaired person's voice. They are also able to choose when and how much assistance they want from the STS operator at any time during a call, such as whether the STS operator shall clarify one word or to begin to voice from the point requested on. A STS user is able to register his or her call handling preferences in the TRS Providers' Customer Profile Databases.

Wyoming Relay STS CAs do not guess what the STS user is saying and request clarification when unsure. When unsure of the meaning or context, the STS CAs 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 seek clarification by using one or more of 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(a)(3)(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Wyoming Relay, including CTS, is available at all times (twenty-four (24) hours per day, seven (7) days per week, three hundred sixty-five (365) days per year, including holidays). Wyoming Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by users through the relay center. Wyoming Relay users are able to place relay calls to and receive relay calls from all other persons in Wyoming, the nation, and the world. Wyoming Relay also processes calls to directory assistance and to toll free numbers. All relay users accessing the Wyoming Relay Service retain full control of the length and number of calls placed anytime through relay.

The FCC has waived this requirement for outbound CTS calls because when an outbound CTS call is made, a CA is not involved with call set-up and has no way to refuse the call.

The FCC has not waived this requirement for inbound CTS calls (i.e., calls made to a captioned telephone user). However, the FCC does recognize that if an inbound call is made to a CTS user via the captioned telephone access number, set-up is also automatic, and thus, there is no way for a CA to refuse the call.

§64.604(a)(3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

Wyoming Relay 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. Wyoming Relay will also process calls to or from restricted lines (e.g. hotel rooms and pay telephones). Wyoming Relay, through Sprint, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS.

All TRS and CapTel® users are billed in the same manner that a non-relay user would be billed. The relay user is only billed for conversation time (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing occurs within sixty (60) days of the call date. Wyoming Relay gives users the option of billing their calls to non-proprietary LEC (local) or IXC (long distance) calling cards. Wyoming Relay 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 also handles the rating and invoicing of toll calls placed through the relay.

Coin Sent Paid

Wyoming Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. Coin sent paid calls cannot be processed through the relay due to a lack of existing technology. The technology and networks between the common carrier network, payphones, and relay do not allow for signaling to be passed so that a Communication Assistant can determine when coins have been dropped into the payphone. The FCC ordered that coin sent paid calls are not feasible. Wyoming Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order. Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice then rates and bills any long distance

payphone calls. Once billing has been established, the call is processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

Cellular/Wireless/PCS Phone Access

Wyoming Relay is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call. The relay switch is compatible with the Public Switched Network. There is no difference in how voice or text initiated calls through relay are processed over wireless devices. Wyoming Relay treats wireless call types just the same as any other call type and processes the call identically, ensuring accurate billing by the wireless provider. Wyoming Relay has DTMF boxes at each workstation to perform dialing or access functions for relay users. DTMF boxes send tones that activate automated voice systems and pagers. Relay users can use wireless devices to call through relay, including pagers. With DTMF capability, Wyoming Relay can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic messages to the other party even when using a wireless device.

The only time Wyoming Relay has experienced difficulty with wireless services is when a call originates from a non-feature group D office (that does not forward the correct ANI information). Although the majority of the time, this is not an issue, there are occasions when a wireless switch does not transmit the necessary network identification information. To overcome the limitations, Wyoming Relay processes the relay call without domestic toll charges or additional delays. If the wireless provider does not transmit the necessary network identification information, the caller may inform the CA, who will then process the call in the same manner. This eliminates the conflict between toll charges and the customer's wireless plans.

Directory Assistance

Wyoming Relay gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests. Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained, the call is handled as a regular relay call. The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate.

Wyoming Relay will continue to meet and adhere to all FCC requirements for all types of calls.

Network Access

Wyoming Relay provides functionally-equivalent network access for Wyoming Relay users. This includes access to local, intrastate (including intralata and interlata), interstate, and international call types. Wyoming Relay's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform includes necessary information about extended area service (EAS) and optional calling plan arrangements in Wyoming so that calls made within an EAS area or optional calling area are not billed to the customer. Wyoming Relay does not charge users of Wyoming Relay for use of the relay service. Users access the relay service via toll-free numbers, which are accessible anywhere in the United States or by dialing 7-1-1. Calling and called parties bear no charges for calls originating and terminating within the same toll-free local calling area, including all EAS locations and/or local optional calling plan data. Wyoming Relay also allows access to: regionally directed toll free numbers; regionally restricted toll free numbers; and other special prefixes.

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

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

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

Wyoming Relay is capable of handling pay-per-call calls.

Pay-per-call calls currently being processed by Wyoming Relay's provider (Sprint) 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, Wyoming Relay users may make 900 calls through 1-900-230-3327.

Wyoming Relay's previous TRS provider (Hamilton) allowed relay users to access intrastate and interstate 800, 900 and 976 pay-per-call services in which the company providing the service bills the end-user directly. Hamilton established the necessary trunking to the carriers participating in relay equal access so that the carrier could bill directly for this call. A relay user simply called the TTY relay number (1-800-877-9965 or 7-1-1) and gave the 800, 900 or 976 number to the CA. The CA placed the call as usual and began relaying the call. On all 900 or 976 numbers, Wyoming Relay CAs typed the dollar amount per minute associated with the call to the TTY user and asked him/her if he/she wanted to continue the call before charges began. This was the point at which callers could disconnect without being charged. The calling party was billed for the call by the 900-service provider or the carrier, whichever was appropriate. Hamilton billed the Interstate TRS Fund and the Wyoming Division of Vocational Rehabilitation using the percentage split defined by the Interstate TRS Fund Administrator for 800, 900, and 976 calls. Customers who didn't want 976/900 calls made from their telephone line through the relay could complete a customer profile form. The customer profile contains an option that will block 900 and 976 calls made through the relay. This prevented anyone from calling a 900 or 976 from that particular telephone line. If someone tried to call a 900 or 976 number through the relay from a line that has a block on it, the CA would receive notification at the workstation that this call was blocked and would not be able to place the call.

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(a)(3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Wyoming Relay provides access to all available relay call types. Through Wyoming's Contract with the TRS providers, the State meets and exceeds this requirement. Below is a list of standard services that are provided by Wyoming Relay:

1. Text (TTY, ASCII)-to-Voice and Voice-to-Text (TTY, ASCII)
2. VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO

Wyoming Relay allows VCO users to access the service by registering a Customer Profile, requesting to use this service on a call-by-call basis, or by dialing the dedicated toll-free number. The CA honors the

VCO caller's preference regarding announcing or explaining each call. VCO users can choose to set up calls using their voice or set up calls via TTY transmission. Wyoming Relay CAs always process calls according to the VCO user's preferences and FCC guidelines. Wyoming Relay provides attribute-based routing via the designated toll-free number; CAs who demonstrate a high proficiency in handling VCO calls receive specialized VCO training and are designated targets for VCO calls. Wyoming Relay provides VCO users with the ability to request 'VCO with Privacy'. When the relay user requests 'VCO with Privacy', the CA will not listen to the VCO user's voiced messages and no "GA" is needed from the VCO user. The voice user is heard by the CA and gives the "GA" each time to alert the CA that he/she is finished speaking. Wyoming Relay allows the option for VCO users to choose to have their telephone numbers permanently branded as VCO calls. When a telephone number is branded as VCO, each call into 7-1-1 or Customer Service receives a unique greeting which allows the user to voice his/her call set-up instructions to the CA directly. Wyoming Relay offers Reverse 2-Line VCO (R2LVCO) which allows Voice users the ability to call the R2LVCO user. The R2LVCO user receives the call and connects to the CA via a standard telephone with three-way calling. The operator dials the second (TTY) telephone at the R2LVCO user's location. The R2LVCO user speaks directly to the hearing person on one (Voice) line and uses the second (TTY) telephone to receive the CA's typed responses voiced by the hearing person. Like two-line VCO, there is no need to give the "GA" or wait a turn, allowing for a smoother and more natural flow of conversation. Wyoming Relay also offers TTY-to-VCO, and VCO-to-HCO.

3. HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO

Wyoming Relay offers voice progression technology for HCO users. Voice progression technology allows the user to hear the call set-up, ringing and the called-party answering the telephone. Wyoming Relay allows HCO users the ability to request 'HCO with Privacy'. This enhancement provides the HCO caller added privacy on their call because the CA does not hear the hearing users' voiced messages. The CA is engaged only to voice the HCO user's typed message. Wyoming Relay allows HCO users the option to have their telephone numbers permanently branded as HCO. When a telephone number is branded as HCO, each call into relay receives a unique greeting, allowing the HCO user to listen directly to the CA rather than initiating contact through the TTY. Wyoming Relay CAs honor the HCO caller's preference regarding announcing or explaining each call. The CA processes the call according to the HCO user's preferences and FCC guidelines. Wyoming Relay offers Reverse 2-Line HCO (R2LHCO). Reverse 2-Line HCO allows a Voice caller the ability to initiate a call to the R2LHCO user. The R2LHCO user receives the call and connects to the CA via the standard phone with three-way calling. The CA dials the second (TTY) telephone line at the R2LHCO user's location. The R2LHCO user listens to the voice caller on one (Voice) line and uses the second (TTY) telephone line to type their responses to the CA who then voices to the hearing person. There is no need to give the "GA" or wait a turn, allowing for a smoother and more natural flow of conversation. Wyoming Relay also offers TTY-to-HCO and HCO-to-VCO.

Wyoming Relay offers CTS and 2-Line CTS. The FCC has waived the requirement that CTS must handle STS and HCO calls. The requirement to provide 7-1-1 dialing is waived by the FCC for outbound calls made from a CapTel® phone. Wyoming Relay does offer CTS users the option to call and receive calls from other TRS types (TTY, VCO, HCO, STS).

Wyoming Relay also offers STS (available in English and Spanish) to and from other TRS types (Voice, TTY, VCO, HCO, STS); Spanish-to-Spanish for all TRS call types; Spanish-to-Spanish for all CTS call types offered; and Spanish-to-English for all applicable TRS call types (excludes types requiring simultaneous translation, i.e. VCO and STS).

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

1. Call Release Functionality

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

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

2. Speed Dialing Functionality

Wyoming Relay speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to thirty (30) frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer Profiles, which translates to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel® Consumer Premises Equipment (CPE, or CapTel® phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

3. Three-Way Calling

Wyoming Relay 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 Wyoming Relay. 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 (2) TTY customers and one (1) Voice customer. This process also would apply if there were two (2) voice customers and one (1) TTY user on the line.

Wyoming Relay 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 (3) or more individuals.

§64.604(a)(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Wyoming Relay CAs are trained to handle voice answering machines, TTY answering machines, dual voice/TTY answering machines, information lines, audio text, pagers and beepers. Wyoming Relay, 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)." Wyoming Relay, through Hamilton, also provided the use of a hot key on the CA's terminal which sent text to inform the relay user that a recording and/or interactive menu had been reached. The relay user can tell the CA to simply leave a message if they do not want the CA to type the entire recording. Otherwise, the CA records messages and conveys the message in its entirety. Wyoming Relay's hot keys are available in all supported languages, including English and Spanish.

Wyoming Relay 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.

Wyoming Relay does not impose charges for any additional 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 (2) keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial by 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.

Wyoming Relay 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

Wyoming Relay 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 utilizes the following process:

- The CA informs the caller that an answering machine has been reached.
- The CA obtains any necessary access codes from the user and then begins to relay any messages that have been recorded, leaves a message as requested, and/or follows any other user's instructions. CAs 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, Wyoming Relay CAs use 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 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 the caller's personal information, is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

Wyoming Relay also offers relay users the ability to retrieve messages from an answering machine at their same location. This includes the ability for TTY or VCO users to retrieve voice messages and voice users to retrieve TTY messages. Most often this is accomplished by the user placing the telephone handset near the speaker of the answering machine and playing any messages. The CA records any messages, enabling the CA to capture the information and then type or voice it back to the relay user. As described above, once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

The CTS 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. The CTS user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu.

Like TRS users, Wyoming Relay CTS users can retrieve answering machine messages from an answering machine that is near the CapTel® phone. However, the CTS user follows instructions that are slightly different than TRS users, including the following:

- Press the CapTel® menu button 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 CTS 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 is ready for the next call.

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.

Wyoming Relay accepts incoming emergency calls, and automatically and immediately transfers a call 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 9-1-1 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Promotional materials expressly discourage the use of relay for processing emergency calls if more direct means are available. Our general relay brochure states, "**Emergency Calls:** In the event of an emergency, call 911 or your local emergency services TTY number directly. Wyoming Relay will make every effort to assist you in an emergency."

State program staff provide instruction at every rotation of the Communication Basic Training at the Wyoming Law Enforcement Academy. All emergency dispatchers in the state of Wyoming are required to attend Communication Basic Training within one (1) year of hire. Wyoming Relay State program staff provides on-site training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

Wyoming's Contracts with both Sprint and Hamilton require monthly reporting of the number of calls placed to 9-1-1 via Wyoming Relay and also require that information on any problems in contacting the appropriate 9-1-1 center is included. Wyoming's Contract with Sprint requires verification of the accuracy of the list of Wyoming PSAP numbers with a report to the Agency of all PSAP phone numbers every six (6) months. Since September 1, 2007, Wyoming Relay has processed thirty-one (31) calls placed to 9-1-1 with zero (0) reports of problems contacting the appropriate 9-1-1 center.

Training and Support Materials

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

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

One-Line CTS Emergency Calling

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

- The CapTel® phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 9-1-1 directly. (The CapTel® Call Center is not engaged in processing 9-1-1 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 CTS 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 CTS 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.

Sprint's Call Processing Procedures for Wyoming Relay

Wyoming Relay uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call:

1.	Wyoming Relay CAs act upon the word "emergency" or "9-1-1". 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. When ready to connect to an emergency agency, the agent presses a dial key that uses the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center or wire center when a rate center overlaps PSAP boundaries. This emergency hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 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 Wyoming 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 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.

Sprint Back up Procedures

Wyoming's Contract with Sprint provides Wyoming Relay access to an upgraded PSAP solution that has proven extremely accurate, resulting in no instances of PSAP routing errors. Sometimes two (2) numbers are provided for each rate center. If a number fails, the other number is dialed. In the unlikely event that a valid number is not available, the CA contacts Directory Assistance for support.

Variations

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

Caller Disconnects Before Connecting to 911 Center

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, Wyoming Relay treats 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 7-1-1 when they actually 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 five (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."

Hamilton's Call Processing Procedures for Wyoming Relay

Hamilton makes use of a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency Wyoming Relay calls.

Hamilton has had great success with Intrado and follows the procedures below:

- If the Wyoming Relay caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.
- In the event that the caller does not have the access number to 9-1-1 and the emergency appears to be of such a nature that time will not permit the caller to hang up and call directly to 9-1-1, the CA will contact the Emergency Call Relay Center (ECRC) which is accomplished through one stroke on the keyboard.
- Simultaneously, the CA obtains the address from which the person is calling from and selects the "emergency call" box option on the software at the workstation. (A Supervisor assists every 9-1-1 call. When a CA makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)
- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)
- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.
- Wyoming Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.
- Wyoming Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

Hamilton Back-up Emergency Procedures

- As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Wyoming Relay has procedures in place to access its own emergency database.
- The software used by Wyoming Relay takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of towns and locations in the State of Wyoming stored in the database. Wyoming Relay has mapped each NPA/NXX in Wyoming to the appropriate PSAP. Once this search is complete (it only takes a second), the correct emergency telephone number is loaded automatically into the "outdial" box and the CA can immediately dial the appropriate emergency personnel. This process ensures that Wyoming Relay users have access to the correct and appropriate PSAP when their call is handled in any Hamilton facility.
- Wyoming Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- If the caller is using a cellular phone, the ANI is not a good indication of where the caller is actually calling from. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.
- Wyoming Relays' emergency database application described above meets the requirements established by the FCC.

If a Caller Disconnects Before Being Connected to the PSAP

In the event that a caller disconnects before being connected to the PSAP, even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information, if needed, so no matter when the caller hangs up, Wyoming Relay can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

Wyoming Relay is not intending to be a 911 center; however, as stated above, we will not turn away an emergency situation and Wyoming Relay will take all reasonable steps possible to get the call placed and summon any necessary help. During the course of any such calls, the CA continually attempts to solicit as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call, even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from. This meets the FCC's requirement where a CA must pass along the caller's telephone number to the Public Service Answering Point (PSAP) when a caller disconnects before being connected to emergency

services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help. If time allows, the CA will let the relay user give this information to the dispatcher through normal call practices.

The emergency call plan used by Hamilton follows this section. This covers the scenario of a Wyoming Relay user disconnecting before the call is completed. If the 9-1-1 call is completed, the CA will follow normal relay procedures with the assistance of a Supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

If the 9-1-1 caller disconnects before the emergency call to the PSAP is completed:

Call the 9-1-1 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

- A. **Greeting:** This is "CA XXXX" from "State" Relay Center. We just received a 9-1-1 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
- B. Ask the 911 dispatch operator if they have a TTY. If they do not, proceed to item "C". Ask if they know how to use the TTY. If they don't know how to use the TTY, proceed to item "C". If they know how to use the TTY, proceed to item "E".
- C. Give the 911 dispatch operator the Voice relay number for the correct state.
 - 1. LA 800-947-5277
 - 2. WI 800-947-6644
 - 3. KY 800-648-6057
 - 4. NE 800-833-0920
 - 5. ID 800-377-1363
 - 6. RI 800-745-6575
 - 7. ME 800-457-1220
 - 8. WY: 800-877-9975
 - 9. IA: 800-735-2943
 - 10. MT: 866-253-4090
 - 11. GA: 800-255-0135
 - 12. WV 800-982-8772
 - 13. AZ 800-842-4681
 - 14. KS 800-766-3777
 - 15. MD 800-201-7165
 - 16. Saipan: 866-339-9384
 - 17. Virgin Islands: 800-809-8477
- D. Ask the 911 dispatch operator if they know how to use the relay. If yes, proceed to item "E".
 - 1. Relay Explanation
The person you are calling through relay will be typing their conversation and the CA will read it to you.
- E. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Complete the Supervisor Emergency Call Slip in the Emergency Dispatch Numbers folder.

A.5 STS Called Numbers

§64.604(a)(5) 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.

Wyoming Relay offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Wyoming Relay's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to thirty (30) frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, has been and 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 repeats the name and state the telephone number to the STS user to ensure accuracy; and then the CA dials the associated 10-digit telephone number without delay.

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

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

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

Wyoming Relay 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)(1) TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Wyoming Relay is capable of receiving and transmitting ASCII and Baudot formats, at any speed generally in use. Wyoming currently contracts with Sprint to provide Voice, Baudot (45.5 Baud and 50 Baud), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use. Previously, Wyoming contracted with Hamilton to provide Voice, Turbo Code, ASCII or Baudot formats at any speed generally in use. Both Sprint and Hamilton offer Turbo Code, a proprietary alternate protocol developed by Ultratec which allows faster typing speeds and interrupt capability. All equipment is compatible with industry-wide standards. The modems used by Wyoming Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. Wyoming Relay furnishes all necessary telecommunications equipment and software to be capable of communicating with all Voice, Baudot and ASCII calls at the correct Baud rate. The workstations and switching mechanisms used by Wyoming Relay are flexible enough to process other formats as they become available to relay users.

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 voice, the CA will request the text device if a voice user originated the call.

B.2 Speed of Answer

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

Wyoming's Contract with both Sprint and Hamilton requires the Contractor to ensure adequate staffing to provide Wyoming Relay callers with efficient access under projected calling volumes so that the probability of a busy response due to CA unavailability is functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Wyoming Relay contracts with Sprint, who currently has ten (10) TRS and CapTel® call 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 fifteen (15) minutes for each twenty-four (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 fifteen (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 fifteen (15)-minute period of the day
- Total number of CAs scheduled for each fifteen (15)-minute period
- The number of CAs over or under the requirement needed to meet forecasted 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 fifteen (15)-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

With Wyoming Relay's previous TRS provider, Hamilton, relay users never receive a busy signal. Additionally, Hamilton's CAs do not answer a call until they are ready to engage the call. Hamilton has the ability to monitor the amount of time a call waits to be answered on a real-time basis via a monitoring system that is accessible to management and supervisors. This information is utilized to make CA staffing changes throughout the day. Average answer time is displayed on the supervisor console. The supervisor workstation and reader boards in the center indicate if calls are in queue waiting to be answered. The supervisors are responsible for making sure that when that alert comes up all available CA resources are logged in to the system and answering calls. Each of these tracking mechanisms allows Hamilton to respond quickly by adding more CAs immediately. Daily activity reports used for internal management purposes also track answer performance information for future scheduling. In addition to this, Hamilton uses a variety of other scheduling techniques to ensure that staffing meets traffic demands. Hamilton makes use of historical data, trending, call patterns and combines that with the knowledge of current events (i.e. footballs games, weather, Mother's Day, etc.) to anticipate staffing needs.

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

Wyoming Relay recognizes that for relay callers to experience little or no wait time for a CA to answer their call is an important indicator of quality of relay service. Since the last recertification, Wyoming Relay has averaged ninety-seven percent (97%) of calls answered in ten (10) seconds and Average Answer Times of eighty-five hundredths of a second (.85 seconds). Actual Speed of Answer data is provided in Appendix F: Answer Performance Data.

Wyoming's Contract with Sprint states: "The Contractor shall provide adequate resources, facilities and staffing at all times (except during network failure) to ensure that eighty-five percent (85%) of all TRS and CTS calls are answered within ten (10) seconds, with caller's call immediately being placed and not put in queue or on hold. The ten (10) seconds begins at the time the call is delivered to the TRS/CTS platform from the inbound network. Abandoned calls shall be included in the speed-of-answer calculation. Average speed of answer shall be measured on a daily basis. Liquidated damages may be assessed for any day that answer time standards are not met." "Speed of answer" identifies the number of seconds required to answer a call. Wyoming Relay's CapTel® speed of answer meets or exceeds the FCC's requirement to answer eighty-five percent (85%) of all calls within ten (10) seconds.

Wyoming 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 (6) 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.

Wyoming's contractual agreement with Hamilton Telecommunications required that: "Ninety percent (90%) of all calls, except during network failure, shall be answered within ten (10) seconds on a daily basis by any method which results in the caller's call immediately being placed, not put in queue or on hold. Additionally, the average speed of answer shall be at or less than three and three tenths seconds (3.3 seconds), measured on a daily basis. Abandoned calls shall be included in the speed-of-answer calculation. Average speed of answer shall be measured on a daily basis. Liquidated damages may be assessed for any day that answer time standards are not met". The Contract also required: "Measurement of average speed of answer (ASA) shall begin when the Contractor's switch (ACD-Automatic Call Distribution) accepts the call from the local exchange carrier (LEC) and the public switched network delivers the call to the Relay Center. The Relay Center shall accept all calls immediately when offered by the LEC (without delay) or return of a busy signal. Measurement of speed of answer shall continue until the accepted call is either abandoned or answered by a live operator ready to relay the call. This does not include the call being put in queue or on hold or being answered for any other reason except the immediate initiation of the actual outbound call out-dial and relaying of the call. An acknowledgement that the customer is waiting on the line shall not constitute an answer. ASA must be measured by an average of actual answer times calculated as the sum of all individual call answer times divided by the number of inbound calls, not by periodic sampling, nor by an average of averages. Any call not answered within ninety (90) seconds will be considered a blocked call and reported accordingly." Wyoming's Contract with Hamilton exceeded the FCC standard of eighty-five percent (85%) of all calls answered within ten (10) seconds.

§64.604(b)(2)(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.

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

Wyoming Relay providers (Sprint currently and Hamilton previously) furnish the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Their transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards. Sprint is a certified Interexchange Carrier (IXC) in all fifty (50) states.

§64.604(b)(2)(ii)(B) Abandoned calls shall be included in the speed-of-answer calculation.

Through its Contract with Sprint, and through its previous Contract with Hamilton, Wyoming Relay includes abandoned calls in its daily speed-of-answer performance calculations.

§64.604(b)(2)(ii)(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Both Sprint and Hamilton measure its compliance with average speed-of-answer times on a daily basis and reports this information for Wyoming Relay to the State on a monthly basis.

§64.604(b)(2)(ii)(D) The system shall be designed to a P.01 standard.

Wyoming Relay, 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. The Contract specifically states:

"The average daily blockage rate for all calls to each of the Wyoming Relay access telephone numbers shall be no greater than P.01 (one (1) call out of one hundred (100)). If a call rings or is in queue/hold in excess of ninety (90) seconds, it shall be considered excessive hold time."

"The Contractor shall ensure that the grade of service is monitored continuously and measured every sixty (60) minutes. Any deviations below the P.01 standard shall be addressed immediately."

"Excessive Call Blockage and Excessive Hold Time. A blocked call is defined as a call receiving a busy signal. Excessive hold time is defined as any call that rings or is in queue/hold in excess of ninety (90) seconds. The Contractor must meet the requirement that no more than a daily average of one percent (1%) of the calls to each of the Wyoming Relay access telephone numbers and the CTS access number shall be blocked. Liquidated damages are two hundred fifty dollars (\$250.00) per day for each day the blockage requirement is not met. The Contractor must meet the requirement that all calls shall be answered by a live operator ready to process the call within ninety (90) seconds. Liquidated damages are two hundred fifty dollars (\$250.00) per day for each day there are any calls which ring or are in queue/hold in excess of ninety (90) seconds. Liquidated damages are two hundred fifty dollars (\$250.00) per day for each day more than one percent (1%) of the TRS calls or more than one percent (1%) of the CTS calls ring or are in queue/hold in excess of ninety (90) seconds."

Sprint's Relay system ensures that an excess of ninety-nine and ninety-nine hundredths percent (99.99%) of all calls reach the call center and are answered or receive a ringing signal.

Wyoming Relay's Contract with Hamilton Telecommunications required that: "The Contractor shall include adequate staffing to provide Wyoming Relay callers with efficient access under projected calling volumes so that the probability of a busy response due to relay operator unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. The average daily blockage rate for all calls to each of the Wyoming Relay access telephone numbers shall be no greater than P.01 (one (1) call out of one hundred (100)). The blockage rate will be measured by sampling the number of calls being blocked at a minimum of every thirty (30) minutes for each twenty-four (24)-hour period. If a call rings or is in queue/hold in excess of ninety (90) seconds, it is to be considered a blocked call. Liquidated damages may be assessed for any day that blockage standards are not met. This information shall be reported monthly to the Agency." This requirement in the Contract with Hamilton exceeded the FCC's performance standard for blockage.

There was no blockage at Hamilton switch points because their incoming network capacity was well in excess of any peak load requirements. Wyoming Relay users never received a busy signal from Hamilton. If a relay user did reach a busy signal, there was a problem somewhere else in the network that was not under Wyoming Relay's control (i.e. local network, long distance network, equipment, etc.) Although very unlikely, in the event the switch used by Wyoming Relay went down, calls would have been automatically rerouted or intercept messages used rather than busy signals. The systems used by Hamilton to process Wyoming Relay calls were designed to prevent blockage. The switch used was a high-speed, stand-alone, non-blocking digital switching matrix. The system was fully redundant to insure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detected any problems and moved to the secondary system immediately, if necessary. Hamilton's networks made use of SONET survivability technology. All of the networks controlled by Hamilton and used for Wyoming Relay—from the point a relay user picked up the phone in their home or

business, through the relay and then back to the other phone being called—are redundant and could survive fiber cuts and other such outages. This allowed Wyoming Relay to maintain its zero percent (0%) blockage rate.

Call blockage data is included in Appendix F: Answer Performance Data.

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

Performance of inbound traffic on each Wyoming 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 provided to the State.

Hamilton Telecommunications recorded and reported its answer performance and blockage rate information for the State as well and abided with the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

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

Wyoming Relay 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.

Wyoming Relay TRS and CTS users have equal access to their chosen inter-exchange carrier through relay, and to all other operator services, to the same extent access is provided to voice users. All operator-assisted calls are sent to the customer's carrier of choice for processing and billing. Wyoming Relay users can pick their carrier of choice, receive one (1) bill for all of their calls, and the Wyoming Relay user can shop for the best rates, just like they do today for calls not made through the relay. The Wyoming Relay user can continue to work with one (1) carrier and the relay remains invisible.

TRS and CapTel® users are encouraged to register their preferred Carrier Of Choice (COC) with Customer Service. Wyoming Relay explains long distance billing and setting up a Customer Profile, including COC, in outreach materials and activities. 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 CTS Customer Service to receive the benefits of registering their COC preferences for CTS calls.

Voice-in users calling CTS users are also notified that their call may incur long distance charges. After connecting to the CTS voice-in Voice Response Unit (VRU), they receive a verbal announcement stating, "For long distance calls, be sure to register your preferred long distance provider," and then are given the choice of hitting the # key for additional information.

Wyoming relies on their TRS provider (currently Sprint, previously Hamilton) to provide Wyoming Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Both

providers' networks have the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay.

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.

Wyoming's TRS provider routes calls to the designated carrier in as efficient a manner as possible. The provider includes the identification of the call as a Wyoming 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.

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.

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

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

- Wyoming 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. Wyoming 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.
- The Wyoming Relay user will receive one (1) bill from their carrier of choice just like they do for all of their direct calls.

Sprint currently has two hundred forty (240) carriers participating in the Sprint Relay's TRS Carrier of Choice program. Participation of carriers in Wyoming is dependent on whether the carrier is authorized to provide service in Wyoming and if the carrier has connectivity to the Sprint Access Tandem. Currently, the list of providers in Wyoming includes:

Carrier Name	Out COC	COC Index	Carrier Code	Operator Flag	ETurbo RIB
10-10-811 Vartec	0811	0811	0811	Y	811
AT&T	0288	0288	0288	Y	ATT
All Others	0001	0001	0001	N	
Alltel	5253	5253	5253	Y	AEJ
Bresnan Communications	0432	LGT5	0432	Y	BRS
Broadwing Telecom	0071	0071	0071	Y	WSN
CenturyLink	0550	CTL1	0550	Y	CTL
CenturyTel Long Distance	0550	CAL1	0550	Y	CAL
Charter Communications	6324	6324	6324	Y	HFB
Comcast	0386	0386	0386	Y	BPH
EXCEL	0752	0752	0752	Y	EXL
Global Crossing	0444	0444	0444	Y	ALN
Harmony Telephone Company	0432	LG11	0432	Y	HTC
Lightyear	0555	WTL8	0555	Y	LTY
MCIWorldCom	0222	0222	0222	Y	MCI
McLeod USA	0725	0725	0725	Y	IOR
QWest	0432	0432	0432	Y	QWD
SBC Long Distance	5792	5792	5792	Y	SBZ
Sprint	0333	0333	0333	Y	SPT
TTI National	0555	WT21	0555	Y	WTL
Trans National Communications International, Inc.	6398	6398	6398	Y	RNA
Verizon LD	5483	5483	5483	Y	GOP
Windstream Communications, Inc.	0893	0893	0893	Y	WCI

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

B.4 TRS Facilities

§64.604(b)(4)(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.

Wyoming Relay is available twenty-four (24) hours a day, every day of the year for all TRS services and CTS. Customer Service for Wyoming Relay is available twenty-four (24) hours a day, every day of the year in both English and Spanish for all TRS call types including CTS. CTS Customer Service (specific to CTS users) is available twenty-four (24) hours a day, seven (7) days a week but excludes holidays.

Wyoming Relay does not provide, contract to provide, or oversee VRS services and is exempt from this section's VRS requirements.

§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.

The facilities used by Wyoming Relay have the needed redundancy, including uninterruptible power, to ensure Wyoming Relay has continuous operation twenty-four (24) hours per day, even in emergencies.

Sprint's TRS and CTS platforms used to process Wyoming Relay calls feature digital switching systems that are an integral part of the platforms. The systems offer availability in excess of ninety-nine and ninety-nine hundredths percent (99.99%) redundancy of all major system components (including CPU) and catastrophic fault recovery that provides for call continuity in the event of a switch failure. Sprint's Intelligent Call Router ensures that required levels of service are maintained in the event of a processor failure. If a center is shut down for any reason, all Wyoming Relay calls are automatically re-routed around the affected center to the remaining operating centers in the Sprint network. Wyoming Relay customers will be unaware of any system fault.

Sprint incorporates a proven Automatic Call Distributor that is fully redundant to provide a non-stop environment for the relay call center. The Automatic Call Distributor is designed to allow maintenance without interrupting service and incorporates a back-up processor, memory and disk subsystems.

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.

Each relay center maintains a complete system's spare inventory to meet any malfunction or emergency situation. In addition to spares for switch components, spare units include relay operator position units, computer desktop spares, and LAN and modem equipment.

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

Hamilton Telecommunications operated Wyoming Relay from an in-state center located in Aurora, Nebraska. Wyoming Relay calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by Hamilton. This ensured continuous operation of Wyoming Relay.

Hamilton made use of an Excel telecommunications switch. The GS-2000 is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allowed for simplified and cost-effective application development. The GS-2000 supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The GS-2000 adapts to all

standard network and line interfaces, including T1, E1, J1, and ISDN PRI. The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms.

The switching system used by Hamilton to process Wyoming Relay calls contained a fully redundant central processing unit on hot standby with automatic failover. This was to ensure that no calls were dropped due to technical failure. It also had a redundant power supply on hot standby. Backup control and database servers were also on hot standby with automatic failover. Hamilton maintained an inventory of spare critical components for the switching system onsite to ensure that the required levels of service were met (listed below).

The switch used by Hamilton was a high-speed, stand-alone, non-blocking digital switching matrix. The system was fully redundant to ensure quality, reliable performance. The system utilized a standard T1 interface that enabled it to be linked to other digital switches. All cards and power supplies within the system were redundant which gave the flexibility to switch from one side of the switch to the other to perform updates or to troubleshoot without interrupting call processing. The system was set up to automatically access the secondary operating system on the switch with no human intervention. The system auto-detected any problems and moved to the secondary system immediately, if necessary.

The on-sight switching system spare equipment includes:

- D4 channel bank
- All required channel bank cards
- T1 CSU packs
- Switch T-1 card
- Switch conference card

If one of the switching systems used by Hamilton for Wyoming Relay calls could not be returned to service by transferring control to redundant equipment, the calls automatically overflowed to another switching system. Switching systems used by Hamilton were designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, was used to control and monitor each of the switching systems. The control systems provided on-line system monitoring and real-time programming capabilities that would not take the system off-line and had the ability to perform preventative maintenance or repair while the system was on-line. Remote capabilities were also provided so the system could be remotely monitored, reconfigured or controlled as necessary. All of this was provided to ensure the required levels of service were always met.

The backup power supply system used by Hamilton for Wyoming Relay fully complied with and exceeded the requirements for uninterruptible power. An uninterruptible power source with full battery backup was available to operate Wyoming Relay at full capacity for extended periods of time. Wyoming Relay also had automatically activated generator back-up capabilities allowing it to provide relay service for days and weeks at a time during power outages. This power system supported the switch system and its peripherals, switch room and CA work site emergency lights and system alarms, CA consoles/terminals, Call Detail Recording, Supervisory and traffic monitoring consoles, Customer Service and administrative phone and voice mail systems, and building security systems. Hamilton maintained auxiliary power sources for nine (9) central offices in addition to all its relay centers. All of Hamilton's back-up power systems were comparable to central office auxiliary power sources in terms of time and capacity.

Please see Appendix H for Sprint's Disaster Recovery Plan and the Network Support Plan and Hamilton's Disaster Recovery Plan.

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

Wyoming Relay 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.

Wyoming Relay 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) 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.

Wyoming Relay is constantly looking to improve the availability and quality of telecommunications to persons with disabilities. We actively seek and are willing to try innovative technological solutions. As an example, Wyoming was an early adopter of CTS and we are currently exploring providing video-assisted STS. Wyoming Relay relies on user feedback a great deal to set its technological development priorities. Wyoming Relay is also involved in several industry groups to stay abreast of the latest FCC activities, user needs, and developing technology.

State-of-the-Art Technology

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

- Message Retention (up to twenty-four (24) hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

STS Message Retention

Sprint has expanded its Customer Profile to allow Wyoming Relay STS users to retain messages for up to twenty-four (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 twenty-four (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 twenty-four (24) hours, the STS user can redial Wyoming Relay and request that the call be attempted

without delay. At the end of twenty-four (24) hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers

Wyoming Relay will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Wyoming Relay's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to thirty (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 10-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

Wyoming Relay 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 user's 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 (10) 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.

Wyoming Relay 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, Wyoming Relay 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. Wyoming Relay delivers Caller ID in the same manner that these services are delivered today in the public switched network. Wyoming Relay receives calling party identifying information, including blocking information, from all relay users. Wyoming Relay'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
- Wyoming Relay passes through the calling party information (rather than 711 or the number of the Relay Center)

B.6 Caller ID

§64.604(b)(6) 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.

Wyoming Relay 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. Wyoming Relay will receive calling party identifying information, including blocking information, from all TRS users.

Customer Control

With Wyoming Relay'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 Wyoming Relay'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

Wyoming Relay offers True Caller ID for all local and long distance calls to Carriers who have SS7 connectivity with the TRS Provider. Wyoming Relay's SS7 network interfaces with all national long distance carriers and major LECs, CLECs, and ILECs.

Wyoming Relay'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. Wyoming Relay 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 Wyoming Relay 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 ten (10) numbers that can bypass the 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.

Wyoming Relay provides a twenty-four (24) hour-per-day process for handling complaints, inquiries, comments, and commendations regarding relay services, including CTS and relay center personnel.

Wyoming Relay works closely with the TRS Provider to maintain a log of consumer complaints, including all complaints about TRS in the State of Wyoming, whether filed with the previous TRS provider (Hamilton Telecommunications), the current TRS Provider (Sprint Communications), or the State. Wyoming Relay has retained all previous complaint logs and will continue to retain the logs, at a minimum, until the next application for certification is granted. Wyoming Relay complaint logs at a minimum include: the date the complaint was filed; the nature of the complaint; the date of the resolution; and an explanation of the resolution.

Wyoming Relay processes any complaint, regardless of whether it originates via email, fax, telephone, videophone, regular mail, online, at outreach events, at advisory committee meetings, etc. All complaints, as well as the resolutions, are documented in the Customer Contacts Online Database (CCOD), also known as the Customer Service Database. The CCOD serves as a seamless and timesaving device for documenting customer contacts. The TRS Provider documents all contacts and complaints received by Customer Service, Supervisors, Account Management, and State staff in the CCOD. The CCOD automatically notifies the TRS Sprint Program Manager assigned to the State of Wyoming via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD tracks consumer contact information as required by the FCC.

Upon receipt of a direct complaint filed by a customer, a designated representative accepts the complaint, provides the customer with information regarding the process for resolution, and offers to follow-up with the customer. Wyoming Relay ensures that all records include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, the result of any investigation, and the date of resolution. Wyoming Relay works closely with the TRS Provider 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 (45) database categories including complaints, inquiries and unsolicited commendations.

Since the beginning of the program, according to Wyoming Relay records, zero (0) complaints have been escalated for action by the Federal Communications Commission.

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

The State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation, Wyoming Relay program has submitted and will continue to submit annual consumer complaint log summaries indicating the number of complaints received for each twelve (12)-month period ending May 31 to the Federal Communications Commission by July 1 of each year. Copies of the complaint logs submitted in 2001 and 2002 were included in the application for

recertification submitted in 2002 and the 2003 through 2007 logs were included in the application for recertification submitted in 2007. Copies of the Complaint Log Summaries submitted by Wyoming Relay to the FCC for the last five (5) years are included in this recertification application.

Each complaint log summary also includes a tally sheet which indicates the total number of complaints for the year, the monthly totals, the number of complaints by category, and the percentage that each category of complaint within "Service, Technical, and Miscellaneous Complaints" is of the total complaints.

By approximately June 15th of each calendar year, the TRS provider submits a copy of the twelve (12)-month complaint log report generated from the data in the CCOD for the period of June 1- May 31 to the State relay administrator. The State relay administrator reviews the log to ensure that it matches with the State's record of complaints and resolutions and that it is accurate and complete. The State then submits the Wyoming Relay complaint log to the FCC by July 1st of each year.

See Appendix I for copies of the last five (5) years (2008-2012) of Wyoming Relay Complaint Log Summaries that have been submitted to the FCC.

C.2 Contact Persons

§64.604(c)(2) 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.***

Wyoming Division of Vocational Rehabilitation has submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission included the name and address of the State office that receives complaints, grievances, inquiries and suggestions; voice and TTY telephone numbers; fax number; email address; web address; and physical address to which correspondence should be sent. Following is the name of the contact at the Wyoming Division of Vocational Rehabilitation for those purposes:

Lori Cielinski
TRS/Deaf Services Consultant
Wyoming Department of Workforce Services
Division of Vocational Rehabilitation
851 Werner Court, Suite 120
Casper, WY 82601
800.452.1408 TTY/V
307.472.5601 Fax
lori.cielinski@wyo.gov
www.wyomingrelay.com

Sprint Communications Company, L.P., the current provider of Wyoming Relay, has submitted to the Commission a contact person for TRS consumer information and complaints about Sprint's service. The submission included the name and address of the state office that receives complaints, grievances, inquiries, and suggestions; voice

and TTY telephone numbers; fax number; email address; and physical address to which correspondence should be sent. Following is the name of the contact at Sprint for those purposes:

Chameen Stratton
Program Manager
Wyoming Relay
707 17th Street, Suite 3750
Denver, CO 80202
866.540.4657
877.309.4337 Fax
Chameen.R.Stratton@sprint.com
www.sprintrelay.com

Hamilton Telephone Company, d/b/a Hamilton Telecommunications, the previous provider of Wyoming Relay, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission included the name and address of the state office that receives complaints, grievances, inquiries, and suggestions; voice and TTY telephone numbers; fax number; email address; and physical address to which correspondence should be sent. Following is the name of the contact at Hamilton Telecommunications for those purposes:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1001 12th Street
Aurora, NE 68818
402.694.3656 TTY/Voice
800.618.4781 Toll Free
402.694.5037 Fax
dixie.ziegler@hamiltonrelay.com
www.hamiltonrelay.com

C.3 Public Access to Information

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

Wyoming Relay provides public access to information through various means, which assures that callers in Wyoming are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS 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.

Telephone Directories, Periodic Billing Inserts, and Directory Assistance

Every year, the Wyoming Division of Vocational Rehabilitation, Wyoming Relay TRS Provider, and the Wyoming Public Service Commission work together to ensure that carriers providing services in Wyoming are provided with information including phone numbers, instructions, and camera-ready copies to include in their telephone directories and on billing inserts. The Public Service Commission assists by providing names and addresses of all known carriers. Wyoming Relay Service then mails out a letter with a camera-ready directory page and billing insert, jointly developed by the TRS Provider and the State, which the carriers can use directly or take information from to develop their own directory page and billing insert. A sample letter to the carriers, telephone directory page developed by Wyoming, billing insert developed by Wyoming Relay and an actual Directory Page and Billing Insert are included in Appendix J. Local Exchange Carriers have been provided with Wyoming Relay numbers to be used in their directory assistance services.

Community Outreach, Public Relations, and Educational Programs

Wyoming Relay provides a community and business outreach program that educates all people in Wyoming about the relay service. The Division of Vocational Rehabilitation, the TRS provider (currently Sprint, previously Hamilton), and the Telecommunications Relay Service Advisory Committee work together to annually determine outreach priorities and activities that will assure that the citizens in Wyoming are aware of the availability and use of all forms of TRS. These priorities and activities are evaluated on an on-going basis to ensure that they are effective and that we are reaching all target audiences. The TRS Advisory Committee felt that it was important that all outreach materials and activities be customized to meet the varying and unique needs of Wyoming Relay users, and, to the extent possible, use actual Wyoming Relay users in the promotional materials and activities.

Hearing people hanging up on the relay, not initiating calls to relay users, or returning calls from relay users continue to be major outreach problems. Advertising campaigns and outreach programs that focus on the availability and ease of use of 711, and "Don't Hang Up" were developed to address these problems. (Please see 711 and "Don't Hang Up" billboards, posters, and print ads in Appendix K: Education and Outreach.)

Wyoming Relay has developed materials specifically for businesses. In addition to providing education on being accessible to relay customers and using relay, the education program also provides the business with tools to avoid being a victim of Internet relay fraud.

Wyoming Relay is currently in the process of developing and implementing increased outreach efforts to underserved markets, including: veterans; STS users; Native Americans; Spanish-speaking users; teenagers; baby boomers; cochlear implant users; and users who are Deaf-Blind. Wyoming is the least populated state in the country. The rural nature of the state poses obstacles and also some opportunities. Many consumer groups and organizations that are found in other states do not exist in Wyoming. Broadband service is still not available in places in Wyoming and where it is available, some groups (such as many of the senior citizens we serve) have been slow to adopt use of the technology. An advantage to conducting outreach in Wyoming is that mass media is considerably cheaper than in larger market and thus, it is an affordable option for the Wyoming Relay program. Additionally, because of the lack of resources, the existing agencies and organizations in Wyoming have developed strong collaborative networks to leverage the existing resources.

Wyoming Relay Service has developed and disseminates educational brochures which are included in Appendix K. There is a general relay brochure that provides basic information on relay, including information on all the call types; how to make relay calls from pay phones; and how users can file complaints, concerns, or compliments with either Wyoming Relay Service or the FCC. We have additional brochures that provide specific information on the various forms of TRS, including brochures for TTY users, Voice users, VCO users, HCO users, STS users, CapTel® users, and Spanish-speaking users.

Presentations, demonstrations, workshops, and instructional seminars have been conducted to educate the public about Wyoming Relay. These 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. Wyoming Relay disseminates give-away items and informational items at these presentations to further enhance awareness of the relay service. Examples of the different segments of the public receiving education are: WY-HI, which is a statewide gathering of deaf, hard-of-hearing, and deaf-blind students, and their teachers, parents, and service providers; The Deaf Association of Wyoming until it dissolved; University of Wyoming students and staff; Community College students and staff; Wyoming Registry of Interpreters for the Deaf; Division of Vocational Rehabilitation counselors and assistants; Independent Living Center staff; Wyoming Council for the Blind; veterans fair; Assistive Technology Program staff; Department of Health's Case Manager Conference, which is a conference for a broad spectrum of service providers, including those for senior citizens, individuals with speech disabilities, and deaf, hard-of-hearing and deaf-blind individuals; hospitals; senior citizen centers; Casper Senior Network; assisted living centers; PEO Chapter AJ; health fairs; Governor's Conference on Aging; domestic violence shelters; all police officers attending Peace Officer's Basic Training at the Law Enforcement Academy; all 911 Dispatchers attending Communications Basic Training at the Law Enforcement Academy; training for specific community police or dispatchers by request; individual users and their families; audiologists; non-profit organizations; mental health providers; and employers.

Wyoming Relay recently marked 20 years of service with a celebration and showing of the open-captioned movie *Deaf Jam* at a public movie theater. This event provided an exciting opportunity to further promote and educate both Wyoming Relay users and the general public about the benefits of Wyoming Relay.

Informational packets have been sent to Wyoming Relay users informing them of new relay features, usage tips, and happenings. Additionally, Wyoming Relay Service has submitted articles and information for inclusion in the Deaf Association of Wyoming newsletter as well as their list serve, prior to their dissolution. Wyoming Relay Service provides an overview of the services available for publication in the Wyoming Public Service Commission's annual report and the Division of Vocational Rehabilitation's annual report.

Wyoming Relay Service has web pages which are part of Wyoming's Department of Workforce Services, Division of Vocational Rehabilitation's website. This can be found at www.wyomingrelay.com.

Wyoming Relay Service has produced, aired, and circulated a variety of paid advertisements, including paid television commercials, radio commercials, print ads in newspapers, billboards, sport stadium signage, and posters. (Samples of the print media are included in Appendix K and samples of the aired media are available upon request.) Careful consideration is given in selecting appropriate media to ensure that it reaches both geographically as well as by user type the widest audience possible. Wyoming Relay has also participated in informative news shows on both radio and television. Wyoming Relay Service also collaborated with Montana Relay Service to do a trial of shared advertising along the border between Wyoming and Montana.

C.4 Rates

§64.604(c)(4) 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.

Wyoming Relay users are not charged more for services than standard "voice" telephone users. Wyoming Relay users incur no telephone charges for calls inbound to the relay center. TRS and CTS users who select a preferred carrier of choice will be rated and invoiced by the selected carrier for intralata and/or interlata toll calls. Thus, Wyoming Relay users' carrier of choice bills all intralata and interlata toll calls at their applicable discounted

rate for relay users. Wyoming Relay's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, and be rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is responsible for ensuring that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

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. By FCC jurisdiction, Sprint has two (2) separate Message Telephone Service (MTS) rates: one (1) for interstate and one (1) for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone Service rates.

	Intrastate	Interstate
Day (7:00 AM – 6:59 PM)	50%	50%
Evening (7:00 PM – 10:59 PM)	50%	50%
Night/weekend (11:00 PM – 6:59 AM; all day Saturday & Sunday)	50%	50%

C.5 Jurisdictional Separation of Costs

§64.604(5)(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.

All Wyoming Relay intrastate and interstate minutes are reported separately to the State on the TRS Provider's invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are billed to the State and compensated from the Wyoming Relay Fund. The TRS Provider deducts minutes reimbursable by the Interstate Telecommunications Relay Services Fund administrator (currently Rolka Loube Saltzer Associates [RLSA], previously National Exchange Carrier Association [NECA]), on Wyoming's invoices. These deductible minutes are associated with the following 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, Wyoming's current TRS provider (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.

§64.604(5)(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

Wyoming Relay's interstate and international minutes are reimbursed to Wyoming's TRS provider by the TRS Interstate Fund according to FCC rules. Wyoming Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and does not pay for VRS cost.

Costs caused by intrastate TRS are recovered from a fund established by the Wyoming Legislature in House Bill 377, Section 1 W.S. § 16-9-201 through 16-9-210. The Telecommunications Relay Service Advisory Committee is responsible for annually determining the amount of the special fee, not to exceed twenty-five cents (\$.25) per access line per month, based upon available cost data and other information, that will cover the costs of providing intrastate message relay services as provided in Section 401 of the Americans with Disability Act of 1990, including the cost of implementing and administering this Act. The fee is currently three cents (\$.03) per access line and will be reduced to two cents (\$.02) per access line effective January 1, 2013. After the Committee notifies the Public Service Commission, in writing, of the amount determined for the monthly access line special fee, the Public Service Commission shall provide for the inclusion and identification of the special fee on each monthly billing for service from each local exchange company and radio communications service provider. Wyoming Relay is financially supported by every Wyoming ratepayer and the cost recovery mechanism is consistent with ADA requirements. (See Appendix B: State Legislation and Appendix L: Cost Recovery Mechanism).

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604(c)(5)(iii)(M) does not pertain to State programs.

However, the State of Wyoming 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)(5)(iii)(N) through §64.604(c)(5)(iii)(N)(4) pertain to VRS providers.

The State of Wyoming 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 §64.606 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.

The Wyoming Division of Vocational Rehabilitation has resolved, and will resolve, all intrastate complaints within one hundred eighty (180) days after the complaint is first filed with the State, regardless of whether the complaint is filed with the Wyoming relay administrator, the Wyoming PSC, the relay provider, or with any other state entity.

Wyoming Relay works in conjunction with the TRS provider to establish a complaint resolution procedure to ensure complaints are expeditiously resolved, but always within one hundred eighty (180) days of filing.

Trained personnel answer all Wyoming Relay Customer Service calls. Wyoming Relay provides twenty-four (24)-hours-a-day, seven (7)-days-a-week customer service via a toll-free telephone number (1-888-694-4450), accessible from anywhere in the U.S., to assist all call type users, including CTS in both English and Spanish, who have Wyoming TRS inquiries and complaints. There is also a CTS dedicated Customer Service toll-free telephone number (1-888-269-7477) available twenty-four (24)-hours-a-day, seven (7)-days-a-week, but excludes holidays. Customers may also contact the Sprint Relay Program Manager or the Wyoming Division of Vocational Rehabilitation, Wyoming Relay Program Consultant via email, fax, telephone, videophone, regular mail, at outreach

events, at advisory committee meetings, etc. Printed outreach materials for Wyoming Relay provide information on how users can file complaints, concerns, or compliments with either Wyoming Relay Service or the FCC.

Any caller to the Wyoming Relay center having a complaint can reach a Supervisor or Customer Service representative while still on line during a relay call.

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 is 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.

Wyoming Relay submits all complaints from June 1 - May 31st to the FCC by the annual July 1st deadline. The Wyoming Division of Vocational Rehabilitation will process all complaints referred by the Federal Communications Commission for intrastate Telecommunications Relay Service for the State of Wyoming. The Wyoming Division of Vocational Rehabilitation will cooperate in the investigation or resolution of any and all complaints concerning Wyoming Relay with the Federal Communications Commission.

To see copies of the Complaint Logs from 2008 -2012, please refer to Appendix I.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under § 64.606.

The Wyoming Division of Vocational Rehabilitation understands that if it does not provide a resolution to a complaint, the FCC may exercise jurisdiction.

iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

The Wyoming Division of Vocational Rehabilitation understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within one hundred eighty (180) days.

(v) Complaint Procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal Complaints -(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints. (1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

The Wyoming Division of Vocational Rehabilitation understands that complainants may file an informal complaint with respect to intrastate TRS directly with the Commission without going through the internal complaint mechanism available in our state. Although this has never happened, the Division of Vocational Rehabilitation has been, and will be, supportive of the FCC's complaint mechanism and will assist as necessary in this process. The Division of Vocational Rehabilitation has provided the FCC with the agent and all the required contact information, from both the State as well as the provider, whose principal responsibility has been and will be to

receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service. (1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of § 1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

The Wyoming Division of Vocational Rehabilitation understands that complainants may file a formal complaint with respect to intrastate TRS directly with the Commission without going through the internal complaint mechanism available in our state. Although this has never happened, the Division of Vocational Rehabilitation has been, and will be, supportive of the FCC's complaint mechanism and will assist as necessary in this process.

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.

All contracts between the Wyoming Division of Vocational Rehabilitation and past, current, and future TRS providers/vendors provide for the transfer of TRS customer profile data. Wyoming Relay, 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 sixty (60) days prior to the last day of service, in a usable format.

The Division of Vocational Rehabilitation ensures that any provider of relay service for the State of Wyoming has not and will not use customer profile data for any purpose other than to connect the TRS user with the called parties desired by that TRS user. The Division of Vocational Rehabilitation ensures that any provider of relay service for the State of Wyoming has not and will not make any relay information available for sale, distribution, to be shared or revealed in any other way than for purpose of connecting the TRS user with the called parties desired by that TRS user. 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's relay center and/or employees will not sell, distribute, share or reveal in any other way the information referenced above unless compelled to do so by lawful order.

§64.606 Internet-based TRS provider and TRS program certification

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

The State of Wyoming is currently certified to provide intrastate TRS through July 25, 2013. This application is submitted to re-certify the State of Wyoming for an additional five (5) years. (Please see Appendix M: State Certification.)

§64.606(a)(2) through §64.606(a)(3) Pertain to internet-based TRS providers and does not pertain to State programs.

§64.606(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;

This application for the renewal of Wyoming's Telecommunications Relay Service program certification provides historical, statistical, and illustrative evidence demonstrating Wyoming's program meets or exceeds all applicable operational, technical, and functional minimum standards contained in §64.604 of the Federal Communications Commission's TRS rules.

(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

The provider of Telecommunications Relay Service for the State of Wyoming is selected after a comprehensive and impartial evaluation of proposals submitted in response to a Request for Proposal (RFP) released by the State. This competitive process, as well as the comprehensive Request for Proposal, and the resulting Contract which includes liquidated damages for the failure to meet performance requirements (see Appendix C: TRS Provider Contract, pgs. 65-67), provide the Division of Vocational Rehabilitation a method that makes available adequate procedures and remedies for enforcing the requirements of the state program. The contract entered into between past and current TRS providers and the Wyoming Division of Vocational Rehabilitation provides that all state and federal laws shall be complied with (Appendix C: TRS Provider Contract, pg. 9). Failure to do so by the TRS provider would be a breach of contract for which the Wyoming Division of Vocational Rehabilitation could terminate the Contract and seek such other remedies as may be available by law. (Please see Appendix C: TRS Provider Contract.)

The Division of Vocational Rehabilitation makes available to TRS users informational materials on State and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints. Information on how users can file complaints, concerns, or compliments with the State and/or Commission is provided in printed outreach materials and at outreach events. (Please see Appendix K: Education and Outreach.)

(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.

This application for recertification of Wyoming Relay has documented some instances where the state program exceeds some of the mandatory minimum standards contained in §64.604. The Wyoming Attorney General's Office, in collaboration with the Wyoming Division of Vocational Rehabilitation, drafts the Contract with the TRS Provider for the provision of Telecommunications Relay Service. The Wyoming Attorney General's office investigates any possible conflicts with federal law and none have been found. Therefore, the Wyoming Division of Vocational Rehabilitation establishes that its program in no way conflicts with federal law.

§64.606(b)(2) through §64.606(b)(2)(ii) Pertain to internet-based TRS providers and does not pertain to State programs.

§64.606(c)(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

The State of Wyoming is currently certified to provide intrastate TRS through July 25, 2013. The State of Wyoming is requesting certification beginning July 26, 2013, continuing for a five (5)-year period.

§64.606(c)(2) Pertains to internet-based TRS providers and does not pertain to State programs.

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

The method of funding intrastate TRS is a special fee determined annually by the TRS Advisory Committee. Each customer of a local exchange company or radio communications service provider is liable for payment to the local exchange company or radio communications service provider of the special fee which is currently three cents (\$0.03) per access line. After the TRS Advisory Committee annually notifies the Public Service Commission, in writing, of the amount determined for the monthly access line special fee, the Public Service Commission shall provide for the inclusion and identification of the Wyoming Relay surcharge on each monthly billing for service for each local exchange company and radio communications service provider. The billings read TELECOMMUNICATION RELAY SERVICE FUND. This promotes statewide and national understanding of TRS while not offending the public. Wyoming Relay Service is financially supported by every Wyoming ratepayer and the cost recovery mechanism is consistent with ADA requirements. (See Appendix B: State Legislation and Appendix L: Cost Recovery Mechanism.)

§64.606(e)(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

Wyoming Relay has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

§64.606(e)(2) Pertains to internet-based TRS providers and does not pertain to State programs.

§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.

Wyoming Relay understands and will notify the Commission of substantive changes in its TRS programs within sixty (60) days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

The Division of Vocational Rehabilitation notified the Commission of substantive changes by letter on June 30, 2011. A copy of this letter is included as Appendix N. These changes included the change of Wyoming's TRS provider and change of Wyoming Relay's state contact email address.

By this application, the Wyoming Division of Vocational Rehabilitation intends that the operation of Wyoming Relay will continue to be in compliance with the Federal Communications Commission's rules and orders regarding Telecommunications Relay Service. If there is any technical or substantial variation discovered by the Federal Communications Commission that would cause or could cause Wyoming Relay to be out of compliance, the Wyoming Division of Vocational Rehabilitation agrees to take such action as may be reasonably required to bring Wyoming Relay into compliance.

§64.606(f)(2) through §64.606(g)(4) Pertains to internet-based TRS providers and does not pertain to State programs.