

Relay Connecticut FCC Certification Renewal and Supporting Documents

Introduction

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

The Public Utilities Regulatory Authority contracted with Sprint to provide Telecommunications Relay Service effective 7/1/07 – 6/30/12 to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the RFP that was issued April 2011. All of the minimum mandatory TRS requirements are listed in the RFP and is attached as **Appendix K**. Please note that although Sprint Relay provides Internet Protocol (IP) and Captioned telephone web-based services, Relay Connecticut does not contract to provide these services in Connecticut, nor is Relay Connecticut responsible for oversight of IP and VRS or other Internet or web-based relay services.

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

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Operational Standards

A.1 Communication Assistants (CAs)

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

CA Employment Standards

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

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

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

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

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

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

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

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

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

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

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

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

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

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

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

includes the characteristics of users who are hard-of-hearing and late deafened, deaf/blind or those with speech disabilities..

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

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

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

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

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

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

The STS training outline is displayed in the following figure:

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

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

All CapTel Operators are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel Operator training provides familiarity with different cultures and competencies.

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

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

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

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

CA Quality Assurance Programs

Sprint Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is

maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in seven (7) Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Relay does not develop training and consumer education programs for the telecommunications Relay service alone. Sprint Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

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

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

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

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Through their contract with Sprint, CTRS exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken-over unless it is absolutely necessary to do so. Sprint CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of ten minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA

- Call requires a specialist (STS, Spanish, etc)
- CA illness
- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of ten or fifteen minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
 - Sprint attempts to honor any requests for a specific gender during call transitions.
 - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

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

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

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

- Automated answer

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

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

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

A.2 Confidentiality and Conversation Context

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

Confidentiality Policies and Procedures

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

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

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

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

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

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

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

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

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

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

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

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all 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 C for the TRS pledge of confidentiality.

STS Limited Exception of Retention of Information

At the request of a caller, Relay Connecticut Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Please see Appendix C for the TRS Pledge of Confidentiality form.

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

Verbatim Relay and the Translation of ASL

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

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

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

Relay Connecticut STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Relay Connecticut STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands that each STS user may also find one technique to be most comfortable. Sprint STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

Relay Connecticut STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the caller with the speech disability 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 multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify items that they are unsure of including the following:

- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask "yes" or "no" questions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user to spell the word

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

A.3 Types of Calls

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

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

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

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

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

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

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

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

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

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

Sprint was the first provider to process pay-per-calls, beginning in 1996. Callers to Relay Connecticut 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, Relay Connecticut users may make 900 calls through 1-900-230-6262.

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

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

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

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

- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

Except where waived by the FCC, Relay Connecticut *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

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

Call Release Functionality

Relay Connecticut'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.

Relay Connecticut adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the per-minute reimbursement. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Speed Dialing Functionality

Relay Connecticut speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which 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.

Three-Way Calling

Relay Connecticut 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 Relay Connecticut. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

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

Relay Connecticut provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

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

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

Relay Connecticut 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.

Relay Connecticut does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call over an ultra-watts line so the end user is not imposed charges for additional calls.

Relay Connecticut 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

Relay Connecticut has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

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

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint will use the touch-tone capability embedded in Sprint's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, Relay Connecticut 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 long distance calls for the first call.

- Sprint's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

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

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

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

A.4 Handling of Emergency Calls

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

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

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

Call Processing Procedures

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

1.	Relay Connecticut CAs act upon the word “emergency”. Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key (i.e., “hot key”) which designates the call as an Emergency. This key also prompts the system to use the caller’s NPA/NXX to automatically route the call to the E-911 center which is closest to the caller’s rate center. This hot-key also “freezes” the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller’s information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller’s Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: “This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Connecticut Relay Service. They are calling from (caller’s telephone number). This is CA # 1234, one moment please.”
6.	The CA advises the inbound caller that the emergency services is on the line. For example, “(POLICE ON LINE NOW)” and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an “Emergency Incident Form” which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical “trouble ticket” for additional investigation.

Back up Procedures

Through their contract with Sprint, Relay Connecticut has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

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

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

Two-Line CapTel Emergency Calling

Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

Relay Connecticut 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.

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

Voice Emergency Calls

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: ***“You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance.”***

When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, " I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

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

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

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

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

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

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

periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

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

Technical Standards

B.1 ASCII and Baudot

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

Relay Connecticut contracts with Sprint to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use.

Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected.

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

B.2 Speed of Answer

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

Relay Connecticut contracts with Sprint, who currently has ten (10) TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

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

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

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

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

Relay Connecticut expects that Sprint will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint develops a Network forecast for each upcoming scheduling week.

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

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

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

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

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states.

Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

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

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

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

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

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

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

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

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

Relay Connecticut 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.

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

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

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

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

Sprint provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint routes calls to the designated carrier in as efficient a manner as possible. Sprint includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone, etc.) Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

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

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

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

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

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

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

- ☎ 10-10-220 Telecom USA
- ☎ 10-10-321 Telecom USA
- ☎ 10-10-432 QWest
- ☎ 10-10-502 WorldxChange
- ☎ 10-10-636 Clear Choice
- ☎ 10-10-752 EXCEL
- ☎ 10-10-811 Vartec
- ☎ 10-10-834 WorldxChange
- ☎ 10-10-987
- ☎ AT&T
- ☎ All Others
- ☎ Broadwing Communications
- ☎ Broadwing Telecom
- ☎ CP Telecom
- ☎ Charter Communications
- ☎ Comcast
- ☎ Cox Communications
- ☎ Global Crossing
- ☎ LDDS
- ☎ MCIWorldCom
- ☎ McLeod USA
- ☎ Metromedia
- ☎ OPEX LD
- ☎ SBC Long Distance
- ☎ Sprint
- ☎ TCG Minnesota Inc.
- ☎ Verizon LD
- ☎ Wiltel
- ☎ Working Assets
- ☎ WorldCom

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

B.4 TRS Facilities

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

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

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

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

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

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored.

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

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

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

Relay Connecticut 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.

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

B.5 Technology

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

Relay Connecticut through Sprint, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Relay Connecticut 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. Relay Connecticut receives calling party identifying information including blocking information, from all relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

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

- Message Retention (up to 24 hours)
- STS Called Numbers

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

Wireless Access – STS (*787)

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

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

STS Message Retention

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

STS Called Numbers

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

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

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

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

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

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

STS with Privacy Option

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

STS Contact Information

Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 7-1-1 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.

Emergency Numbers

In most emergency situations, STS callers dial 9-1-1 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

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

Relay Connecticut, through their contract with Sprint, provides true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint will receive calling party identifying information including blocking information, from all TRS users.

Customer Control

With Sprint's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis.

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

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

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

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

Technology

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

Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

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

Selective Call Acceptance

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

Selective Call Rejection

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

Selective Call Forward

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

Privacy ID (Anonymous Call Rejection)

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

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

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

Instant Access List (Preferred Caller List)

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

Caller's Access Code

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

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002,

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

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

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

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

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

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

Customer Contacts Online Database (CCOD)

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

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

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

See Appendix J for copies of the last five years of Relay Connecticut complaints and commendations that have been submitted to the FCC.

C.2 Contact Persons

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

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

Account Manager Michelle Sangster
Address 34 Jerome Ave. Suite 220, Bloomfield, CT 06002
Web Address www.RelayConnecticut.com
E-mail Michelle.Sangster@sprint.com
TTY 860-242-4635
Fax 860-242-7989
Voice 860-243-0351
VP 860-899-1097

Contract Administrator Peter Pescosolido
Address 10 Franklin Square, New Britain, CT 06051
E-mail Peter.Pescosolido@po.state.ct.us
Web Address
TTY
Fax 860-827-2613
Voice 860-827-2616
VP

C.3 Public Access to Information

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

The Relay Connecticut outreach program has been developed according to the needs and wants of the community. Individuals who are deaf, hard of hearing, deaf/blind, and those with speech disabilities are geographically dispersed throughout the state, all needing their own unique method to retain information about the Relay Connecticut program. Such methods include but are not limited to:

- Appendix F: Relay Connecticut in Telephone Directory
- Appendix G: TRS newsletter and other organization newsletters
- Appendix H: Marketing collateral; i.e. flyers, advertisements, etc.
- Appendix L: Copy of phone bill with surcharge with explanation of the relay service
- Customized Relay Connecticut Website
- Event Sponsorships
- Exhibit booths
- Training; 1:1 or group setting
- Workshops
- Partnering with local organizations to outreach to the community
- Giveaways

C.4 Rates

§64.604 (4) Rates. *TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination*

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

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

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	10%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

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

Please refer to Appendix I

Telecommunications Relay Fund

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

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

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

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

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

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

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

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

C.7 Treatment of TRS Customer Info

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

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

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

§64.606 State Certification

3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

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

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

There have been no substantive changes with Relay Connecticut

Appendix A:
FCC TRS Public Notice
July 25, 2012



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 12-1187
July 25, 2012

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

CG Docket No. 03-123

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

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

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

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

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

⁴ 47 U.S.C. § 225.

⁵ 47 U.S.C. § 225(a)(3).

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

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

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

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

⁶ 47 U.S.C. § 225(a)(3).

⁷ See 47 C.F.R. §64.604.

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

⁹ See 47 C.F.R. § 64.603.

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

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

¹² 47 C.F.R. § 64.606(b)(1)(ii).

¹³ 47 C.F.R. § 64.606(a).

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

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

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

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

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

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

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

¹⁵ See 47 C.F.R. § 64.606(b)(1)(iii).

¹⁶ 47 U.S.C. § 225(f)(2)(B).

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

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

ADDITIONAL INFORMATION

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

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

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

Appendix B:
Sprint TRS, STS, CapTel Training
Outlines

Appendix B: Sprint Training of CAs

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

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

Figure 1 - TRS CA Training Schedule

Topics Covered During Training

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

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

TRAINING TOPICS

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

TRAINING TOPICS		
(Tone of Voice)	<ul style="list-style-type: none"> How phone image is created Provide warm and friendly greeting Conversational Tone Voice Inflection Audibility and breath control Pitch Quality Operator Role Relay Role Relay Skills Conversational Flow Staying focused Listening skills Customer service skill Coping skills Phrases Background Noises Voice Tones/Descriptive Words Transparency and Caller Control 	<ul style="list-style-type: none"> Pacing the Voice Customer Brief pacing phrases Repeating information Voice Customer does not say "GA" Handling Interruptions Voice Tone How Phone Image is Created Provide a Warm Greeting Why Conversational Tone? Transparency, Caller Control & Confidentiality Rudeness, Types of Create an Exceptional Customer Experience Greeting Announce Closing Suggested Redirect Phrases
TTY to Voice and Voice to TTY	<ul style="list-style-type: none"> TTY to Voice Introduction Connecting to the outbound customer Announcement Explanation of service Deaf or hard of hearing Explanation International Announcement TTY to Voice Procedures TTY to Voice Specific Person Request Variations Specific Person Request TTY to Voice Answered TTY Voice Person Not Available TTY to TTY Call Release TTY to Voice Ans. TTY (TTY to TTY) TTY to TTY Specific Person Request TTY to Voice No Answer Types of Busy Signals Redialing 	<ul style="list-style-type: none"> TTY to Voice Busy Signals Regional 800 Voice to TTY Voice to TTY Introduction Connecting to the outbound customer Voice Greeting Voice call progress Announcement Voice to TTY call (Hearing Person Answer) Explanation of service Voice to TTY Procedures Voice to TTY Specific Person Request Voice to TTY Answered Voice Voice to TTY No Answer Voice to TTY Busy Signal
Branding	<ul style="list-style-type: none"> Inbound Answer Type Branding Database Branding 	<ul style="list-style-type: none"> Branding procedures
Recordings, Answering Machines, Pagers and AMR	<ul style="list-style-type: none"> Introduction Recording Feature Information Line Recording (TTY/Voice) Touch Tone Dialing Using Touch Tones (TTY/Voice) Audio text interaction Variations for Recordings Record Feature Tips TTY-Voice Recordings TTY-Voice Recording Information TTY-Voice Answering Machine Variations: Ans Mach/Recording/Pagers Voice Mail Retrieval 	<ul style="list-style-type: none"> AMR (Answering Machine Retrieval) TTY-Voice Pager/Beeper (known) TTY-Voice Pager/Beeper (unknown) Voice to TTY Pager Voice to TTY Answering Machine Other Recording Variations Voice Mail System Privacy Manager/Call Intercept Automatic Redial System Recordings Switchboards Redialing Voicemail thru Switchboard TTY-Voice Asking for Specific Person Live person On Ans Mach Redial
VCO (Voice Carry Over)	<ul style="list-style-type: none"> VCO Introduction VCO Announcement VCO Service Explanation VCO Equipment Non-Branded VCO Branded VCO VCO No Answer VCO Busy VCO Privacy 	<ul style="list-style-type: none"> Reverse Two-Line VCO Intro Reverse Two-Line VCO Procedure VCO Variations VCO comes in Voice Line 2LVCO Conference Calls VCO Requests Relay to give Relay # VCO Privacy while leaving message VCO Voice Mail Retrieval 2LVCO Voice Mail Retrieval

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

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

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

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

TRAINING TOPICS		
	TRS Regulations pertaining to call content	Confidential Customer Information.

Appendix C:

TRS Pledge of Confidentiality

Agreement Regarding Confidential Information

SPRINT TRS RELAY CENTERS AGREEMENT REGARDING CONFIDENTIAL CUSTOMER INFORMATION

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

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

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

I have read and understand the Sprint Relay center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action that may result in my termination and/or criminal prosecution. I also understand that

ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE DATE

MANAGER/SUPERVISOR SIGNATURE DATE

CAPTEL CONFIDENTIALITY

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

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

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

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

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the CapTel management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any CapTel call.
- I will not act upon any information received while processing a CapTel call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at CapTel Inc.

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

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

Employee Name

Date

Appendix D:
Sprint Carrier of Choice
Letter of Invitation



<insert date>

<insert carrier name>

<insert contact name>

<insert tel nbr or fax nbr>

<insert email address>

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

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

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

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

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

Facility-based provider

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

Non-facility based provider

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

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

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

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

Attachment B lists Sprint TRS Access Tandem Interconnection locations. The best way to provide access to your Toll network through relay service for your customers is to designate the 8 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with

minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

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

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

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

Sincerely Yours,

<insert name>

Program Manager, <insert state(s)>

Sprint Relay

CC: Michael Fingerhut, Federal Regulatory, Sprint

<insert name>, Program Manager, Sprint

Connecticut

There are 30 carriers for this product:

Carrier Name	Out COC	COC Index	Carrier Code	Operator Flag	ETurbo RIB
10-10-220 Telecom USA	0220	0220	0220	N	220
10-10-321 Telecom USA	0321	0321	0321	N	321
10-10-432 QWest	0432	LGT2	0432	Y	432
10-10-502 WorldxChange	0502	0502	0502	Y	502
10-10-636 Clear Choice	0636	0636	0636	Y	636
10-10-752 EXCEL	0752	EXL1	0752	Y	752
10-10-811 Vartec	0811	0811	0811	Y	811
10-10-834 WorldxChange	0834	0834	0834	Y	834
10-10-987	0987	0987	0987	N	987
AT&T	0288	0288	0288	Y	ATT
All Others	0001	0001	0001	N	
Broadwing Communications	0948	0948	0948	Y	SSM
Broadwing Telecom	0071	0071	0071	Y	WSN
CP Telecom	0444	ALN9	0444	Y	PDF
Charter Communications	6324	6324	6324	Y	HFB
Comcast	0386	0386	0386	Y	BPH
Cox Communications	6269	6269	6269	N	CJI
Global Crossing	0444	0444	0444	Y	ALN
LDDS	0222	MCI2	0222	Y	LDD
MCIWorldCom	0222	0222	0222	Y	MCI
McLeod USA	0725	0725	0725	Y	IOR
Metromedia	0222	MCI3	0222	Y	MTR
OPEX LD	0444	ALN1	0444	Y	OPX
SBC Long Distance	5792	5792	5792	Y	SBZ
Sprint	0333	0333	0333	Y	SPT
TCG Minnesota Inc.	0292	0292	0292	Y	TPM
Verizon LD	5483	5483	5483	Y	GOP
Wiltel	0222	MCI1	0222	Y	WLT
Working Assets	0649	0649	0649	Y	WRK
WorldCom	0555	0555	0555	Y	WTL

Appendix E: Disaster Recovery Plan

Attachment B Disaster Recovery Plan and Network Support Plan

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

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

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

STATE NOTIFICATION PROCEDURE

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

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

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

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

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

DISASTER RECOVERY PROCEDURES

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

TIME FRAMES FOR SERVICE RESTORATION

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

■ Sprint Relay Call Center Equipment

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

■ Sprint or Telco Network

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

■ Due to Utilities or Disaster at the Center

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

■ Due to Telco Facilities Equipment

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

TROUBLE REPORTING PROCEDURES

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

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

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

MEAN TIME TO REPAIR (MTTR)

MTTR is defined and detailed in Tables 1 and 2:

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

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

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

Table 2 – Current MTTR Objectives

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

ESCALATION PROCEDURES

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

Escalation Level	Contact	Phone
------------------	---------	-------

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

Network Support Plan

NETWORK DESIGN

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

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

■ Quality

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

■ Economy

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

■ Expandability

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

■ Survivability

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

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

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

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

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

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

NETWORK CRITERIA

■ System Capacity

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

■ Service Restoration

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

■ Minimized "single points of failure" including:

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

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

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

FIBER BACKBONE LOOP TOPOLOGY AND RECONFIGURATION

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

SPRINT ROUTE OUTAGE PREVENTION PROGRAMS

■ Call Before You Dig Program

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

■ Awareness Program

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

■ Route Surveillance Program

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

■ Technician Program

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

■ Fiber/Switch Trending Program

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

NETWORK MANAGEMENT AND CONTROL SYSTEMS

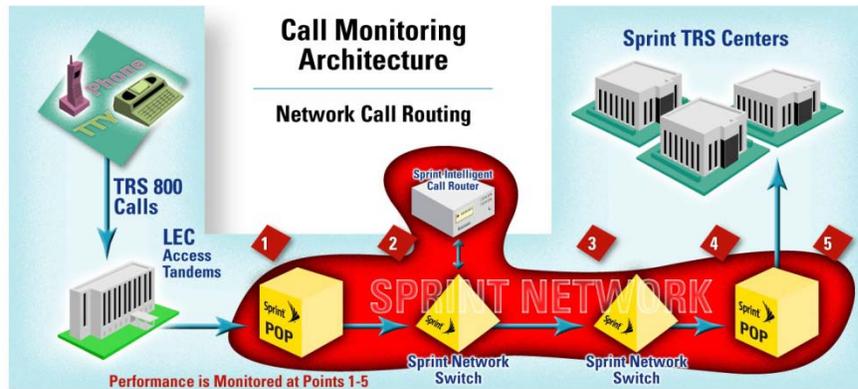
Surveillance for the Sprint network is managed by the Network Operations Center located in Overland Park Kansas. In the event of a network problem causing customer degradation of service, Network Operations will notify the Service Assurance Management Center (SAMC) of Sprint's TRS Group. SAMC will then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

INBOUND CALL ROUTING

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

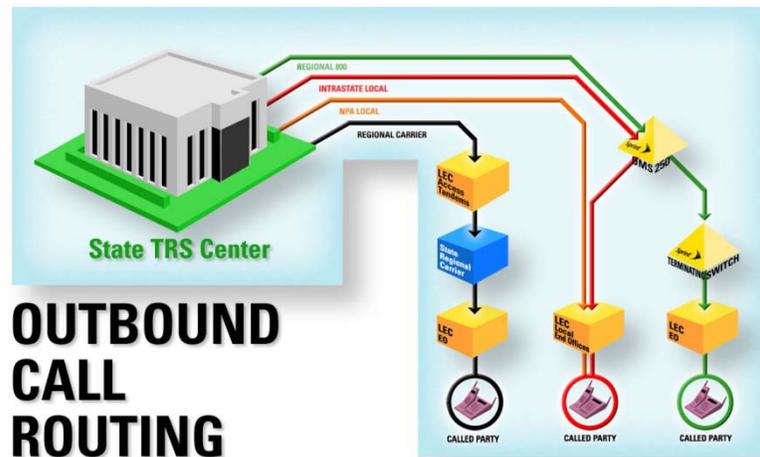
Sprint's inbound configuration ensures that if an issue is identified anywhere in the network, it will be promptly addressed and reported.

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



Call Monitoring Architecture Diagram

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



Outbound Routing Diagram

CapTel Disaster Recovery Plan

CAPTEL OUTAGE PREVENTION STATUS

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

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

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

SPRINT OUTAGE NOTIFICATION FROM CAPTEL CALL CENTER

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

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

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

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

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

Sprint will internally escalate outages in the following manner:

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

Table 44 – Sprint CapTel Outage Escalation

SPRINT PROCEDURE FOR OUTAGE NOTIFICATION TO CONTRACT ADMINISTRATORS

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

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

Sprint Customer Notification Procedure

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

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

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

DISASTER RECOVERY FOLLOW-UP

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

DISASTER RECOVERY POST-MORTEM DOCUMENTATION

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

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

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

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

TIME FRAMES FOR SERVICE RESTORATION

■ Complete loss of service due to equipment

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

- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

- Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

- Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level,
- Four hours at second level
- Eight hours at third level

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

- Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

- Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

- Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level
- Twenty-four hours at second level

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

TROUBLE REPORTING PROCEDURES (FOR INDIVIDUAL CUSTOMERS TO CUSTOMER SERVICE)

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

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

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

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

Table 46 – CapTel Customer Service Escalation Procedures

ALTERNATIVE USAGE FOR CAPTEL PHONE DURING OUTAGE FOR VCO USERS.

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

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

Appendix F:
TRS Information in Telephone
Directories

Connecticut

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CONNECTICUT

Telecommunications for the Deaf and Hard of Hearing, Inc.
 8630 Fenton Street - Suite 604 • Silver Spring, MD 20910-3822
 Phone: 301-589-3786 • Fax: 301-589-3797 • TTY: 301-589-3006
 Video: 301-563-9112 or 71.166.174.51
 info@TDIforAccess.org • www.TDIforAccess.org
Shaping An Accessible World

IN CASE OF EMERGENCY, CALL 9-1-1

EMERGENCY SERVICES

- AUTOMOBILE CLUB OF HARTFORD-AAA** 860-238-6607 (O)
 112 Prospect Ave Hartford, CT 06106-2956
 860-238-0669 (F)
- AVON POLICE** 860-677-2643 (O)
 60 W Main St Avon, CT 06001-3719
- BLOOMFIELD FIRE DEPT** 860-243-8757 (O)
 18 Wintonbury Ave Bloomfield, CT 06002-2416
- BLOOMFIELD POLICE** 860-242-5144 (O)
 800 Bloomfield Ave Bloomfield, CT 06002-2460
- BRISTOL POLICE** 860-584-7900 (O)
 131 N Main St Bristol, CT 06010-8123
- CHESHIRE POLICE** *203-271-5508 (H) 203-271-1808 (O)
 500 Highland Ave Cheshire, CT 06410-2249
- COLCHESTER EMRG** 860-537-2230 (O)
 PO Box 911 R Toms Colchester, CT 06415-0911
- CT STATE POLICE** *860-524-5781 (O)
 100 Washington St Rear Hartford, CT 06106 4420
- CT VLY HOSP-IN PATIENT** 860-344-2585 (O)
 PO Box 351 Middletown, CT 06457 7023
- DANBURY POLICE** 203-797-4592 (O)
 375 Main St Danbury, CT 06810-5525
- DARIEN POLICE FIRE AMBULANCE** *203-655-9238 (O)
 PO Box 148 Darien, CT 06820-0648
- E HAVEN FIRE DEPT** 203-468-3221 (V) 203-468-3844 (O)
 200 Main St East Haven, CT 06512-3005
 203-468-3853 (F)
- EAST LYME EMERGENCY COMMUNICATION CENTER** 860-739-8911 (O)
 PO Box 519 Niantic, CT 06357-0519
- EMRG NEW HAVEN** *203-787-6990 (O)
 200 Orange St Ste 1 New Haven, CT 06510-2016
- ENFIELD POLICE** *860-783-6419 (O)
 293 Elm St Enfield, CT 06082-3907
- FAIRFIELD FIRE DEPT** 203-254-1365 (O)
 140 Reef Rd Fairfield, CT 06824-5997
- FARMINGTON POLICE** 860-673-2527 (O)
 1 Montith Dr Farmington, CT 06032-1082
- GLASTONBURY POLICE** 860-633-1474 (O)
 2108 Main St Glastonbury, CT 06033-2286
- GRANBY POLICE** 860-653-2530 (O)
 15 N Granby Rd Granby, CT 06036-2102
- GREENWICH POLICE** 203-622-8050 (O)
 11 Bruce Pl Greenwich, CT 06830-6535
 203 622-8095 (F)
- GROTON EMRG DISPATCH CTR** 860-445-2497 (H) 911 (O)
 88 Groton Long Point Rd Groton, CT 06340-4806
 860-445-1258 (F)
- HARTFORD POLICE MEDICAL FIRE** *860-278-2333 (O)
 50 Jennings Rd Hartford, CT 06120-1611
- HARTFORD RGN YWCA-SEXUAL ASSAULT CRISIS SVC** .. 860-246-1331 (O)
 135 Broad St Hartford, CT 06105-3718
 860-543 8919 (F)
- LEDYARD EMRG** *860-464-7271 (O)
 741 Colonel Ledyard Hwy Ledyard, CT 06339-1511
- MANCHESTER POLICE** *860-843-9015 (O)
 PO Box 191 Manchester, CT 06045-0191
- MERIDEN POLICE FIRE EMRG** *203-238-2832 (O)
 50 W Main St Meriden, CT 06451-4109

- MILFORD EMRG** *203-674-7199 (O)
 72 New Haven Ave Milford, CT 06460 4827
- N HAVEN POLICE** *203-239-1618 (O)
 8 Linsley St North Haven, CT 06473-2517
- NEW BRITAIN POLICE** 800-826-3000 (V) *860-225-7527 (O)
 125 Columbus Blvd New Britain, CT 06051 2226
 860-826-3102 (F)
- NEWINGTON POLICE** *860-667-1712 (O)
 131 Cedar St Ste 1 Newington, CT 06111-2644
- NW CT PUBLIC SAFETY COMM CTR** 203-758-0056 (V) 911 (O)
 28 Cheshire Rd Prospect, CT 06712-1645
 203-758-0060 (F)
- OLD SAYBROOK POLICE** *860-388-3508 (O)
 225 Main St Old Saybrook, CT 06475 2332
- PLAINVILLE POLICE** *860-747-1619 (O)
 1 Central Sq Plainville, CT 06062-1900
- PUTNAM POLICE FIRE AMB** *860-928-2995 (O)
 189 Church St Putnam, CT 06260 1537
- ROCKY HILL POLICE** *860-529-9861 (O)
 699 Old Main St Rocky Hill, CT 06067-1517
- SEXUAL ASSAULT CRISIS SVCS** *860-223-1787 (O)
 PO Box 2545 P2 Glen St New Britain, CT 06050-2545
 860-225-7443 (F) Email: vobgacs@shot.net
- STAMFORD POLICE FIRE** *203-323-8737 (O)
 888 Washington Blvd Stamford, CT 06901-2902
- VERNON POLICE** *860-875-0781 (O)
 725 Hartford Tnpk Vernon, CT 06066 5115
- W HARTFORD POLICE** *860-232-5886 (O)
 28 S Main St West Hartford, CT 06107-2406
- W HAVEN EMRG** *203-932-6941 (O)
 355 Main St W Haven, CT 06516-4310
- WALLINGFORD FIRE DEPT** 203-269-0278 (O)
 75 Masonic Ave Wallingford, CT 06492-3019
 203-284-8471 (F)
- WETHERSFIELD POLICE** *860-529-1310 (O)
 505 Silas Deane Hwy Wethersfield, CT 06109-2216
- WINDSOR LOCKS POLICE** *860-627-0117 (O)
 4 Volunteer Dr Windsor Locks, CT 06096-2134
- WINDSOR POLICE** *860-683-2524 (O)
 340 Bloomfield Ave Windsor, CT 06095-7211
- WINSTED POLICE** *203-379-2721 (O)
 338 Main St Winsted, CT 06098-1640
- YALE NEW HAVEN HOSP EMRG** *203-785-4462 (O)
 20 York St New Haven, CT 06510 3220

TELECOMMUNICATIONS

- CT STATE TEXT TELEPHONE LOAN DIST PGM** 800-742-1219 (V)
 860-242-4974 (V) (O)
 34 Jerome Ave Bloomfield, CT 06002-2463
 860 243-1320 (F) Email: sales@conversecommunications.com Web: www.conversecommunications.com
- RELAY CONNECTICUT**
 866-857-3242 (VP) Email: michelle.sangster@sprint.com Web: relayconnecticut.com
- RELAY CONNECTICUT (SPRINT ACCT MGR)** *800-659-2965 (O)
 34 Jerome Ave Ste 305 % Converse Comm Corp Bloomfield, CT 06002-2463
 860-243-0351 (F) Email: mike.finneran@mail.sprint.com Web: www.relayconnecticut.com
- SPRINT** 860-243-0351 (V)
 34 Jerome Ave, Suite 220 Bloomfield, CT 06002
 860-242-4536 (TTY) 860-242-7989 (F)
 Email: Michelle.Sangster@sprint.com

ASSISTIVE DEVICES & SERVICES

- BASSETT HRG AID CTR-NEW BRITAIN** *860-224-1817 (O)
 747 Farmington Ave New Britain, CT 06053 1369
- COTTAGE GROVE AUDIOLOGY** 860-243-8510 (O)
 4 Northwestern Dr Bloomfield, CT 06002-3444
- CT K9 EDUC CTR** 860-666-4646 (V) 860-666-4646 (O)
 239 Maple Hill Ave Newington, CT 06111-2726
- HEAR AGAIN CTR** *860-646-7900 (O)
 27 Hartford Tnpk Vernon, CT 06066-5212
- HRG IMPROVEMENT CTR** *860-581-2345 (H) 860-236-5948 (O)
 28 N Main St Ste 101 West Hartford, CT 06107-1920
- ZENITH OMNI HRG CTR** *203-624-9858 (O)
 111 Park St Ste 1K New Haven, CT 06511 5472

AT&T Products and Services

AT&T Connecticut offers basic local residential service from \$10.53 - \$20.00 per month. This monthly rate includes a local telephone line with unlimited local calling within your local calling area, access to in-state and out-of-state long distance, access to E-911, directory assistance, and operator services. In addition, a Federal Subscriber Line Charge will be charged each month.

Qualifying low-income customers can receive Lifeline credit of \$7.00 per month, with no charge for toll restriction, and a \$30.00 discount on the one-time line connection charge. Prices may vary by location, so please call for specific prices for your area or other available options. Other taxes, surcharges, and fees may apply and all prices are subject to change. Call 1-800-ATT-2020 (288-2020) for more information.



OPERATOR SERVICES

Directory Assistance (Name, address & zip code information available) <ul style="list-style-type: none"> • CT (including ability to search by number) • Out-of-State Listings (zip code and ability to search by number not available) • Spanish Assistance: Servicio de Información Para listados en español de Connecticut y a nivel nacional. 	Call 411 From CT Charge applies llame al "411" y Jugo oprima el "3". Puede oprimir el "3" tan pronto como empiece la grabación. Customers desiring more than one listing per call should inform the Directory Assistance operator at the beginning of the call. Los clientes que desean más de uno que enumera por llamada deben informar al operador del asistencia telefónica al principio de la llamada.
Toll Free Number Directory Assistance 800, 888, 877, 866, & 855 Toll Free Numbers	1-800-555-1212
International Directory Assistance	Operator Assistance Call "00"
Calling Card Calls	Call 1-800-555-5321 (Surcharge applies) From anywhere in CT, the U.S., Canada, Puerto Rico & the U.S. Virgin Islands
Operator Assisted Calls <ul style="list-style-type: none"> • Collect • Bill to Third Party • Person to Person 	Call 0+Area Code+ 7 digit telephone number Surcharge applies
Operator Dialed Calls Request Operator to call a local or long distance number for you Operator Busy Line Verification Operator Line Interruption	Call "0" Service Charge may apply Call "0" Service Charge applies Call "0" Service Charge applies

Telephone Services for Persons with Disabilities

AT&T Connecticut has an office to help our customers with disabilities. We specialize in answering questions and helping people with disabilities choose products and services that will best meet their needs. For more information regarding AT&T products and services, call 1-800-922-4605.

Service	Company	Telephone Numbers	Hours of Operation
Directory Assistance Exemption*—for people who cannot look up phone numbers	AT&T Office for Persons with Disabilities	1-800-922-4605 (Voice) 1-800-842-1514 (TDD/TTY)	8:30A to 5:00P, Monday – Friday 8:30a to 12 Noon, Saturday.
Repair Service	AT&T Repair	611 (Voice) 1-800-397-3172 (TDD/TTY)	Open all day—24 Hours
Service for persons using TTY/TDD	Relay Connecticut	Call 711 (If unable to dial 711, call 1-800-842-9710 for TDD/TTY user placing a call OR 1-800-833-8134 for voice callers contacting a TTY/TDD user)	Open all day—24 Hours
TDD/TTY Directory Equipment Loans	Converse Communications Center	1-800-743-1219 1-800-242-4974	8:00A to 4:30P, Monday – Friday

*Directory Assistance Exemption

If a disability makes it impossible for you to look up phone numbers in a telephone directory, AT&T Connecticut has a Directory Assistance Exemption Plan. This plan allows certain AT&T Connecticut customers with disabilities up to 100 free in-state Directory Assistance calls when dialing 411 and up to 100 free out-of-state Directory Assistance calls when dialing 1+area code+555-1212. To receive information about free Directory Assistance for persons with disabilities, call the AT&T Office for Persons with Disabilities at 1-800-922-4605.

The information contained in this directory is current to February 2012 and may be changed at any time. For example, AT&T Connecticut may add a new service or product, or the Department of Public Utility Control or the Federal Communications Commission may regulate certain services we provide may approve or order a change in our rates or procedures.



Customer Service Guide

Appendix G:
Relay Connecticut
Newsletters

Connecticut Association of the Deaf



CAD Newsletter

Volume 7, Issue 15

Spring - Summer
2012

CT becomes the 12th State to have the Deaf Child Bill of Rights Law

“A great beginning for Connecticut children and youth who are deaf and hard of hearing!” --Dr. Harvey Corson, President, CAD

Early evening on Tuesday, January 24, 2012, a special event took place at the Governor's Mansion in Hartford where 125 parents, deaf and hard of hearing leaders and supporters of deaf and hard of hearing children were greeted by Governor Dannel Malloy. This event, called the “Deaf Child Bill of Rights (DCBR) Initiative in Connecticut”, was to kick off an important legislative proposal which could greatly benefit all current and future generations of deaf and hard of hearing children in CT. At this function, attendees heard inspiring speeches given by five different presenters.

This DCBR legislation requires that “A Language & Communication Plan” be attached to every deaf and hard of hearing student's Individualized Education Program (IEP).

This plan would make the IEP: (1)



Dr. Corson with Gov. Dannel Malloy

Photo Credit: Michael E. Fiorino

language & communication driven; (2) *focused* on deaf/hard of hearing child's unique language & communication needs, (3) effective by implementing an action plan to meet these needs. It is of significant worth and consequence because in addition to CAD, many other different organizations serving deaf and hard of hearing citizens here in CT including the Hear Here Hartford (HHH) – a chapter of Hearing Loss Association of America (HLAA), American School for the Deaf (ASD), AG Bell CT Chapter, CREC Soundbridge, Connecticut Council of Organizations Serving the Deaf (CCOSD), Hands & Voices CT Chapter, and New England Center of Hearing Rehabilitation (NECHEAR); have fully supported this legislation.

Under the leadership of Dr. Harvey Corson, the President of the Connecticut Association of the Deaf (CAD), and Ms. Terry Bedard, a mother of a deaf son, who is the President of the Hear Here Hartford (HHH), many deaf and hard of hearing individuals, parents and alliances as well as organizations serving them have worked together and put all their efforts into getting this bill passed. Many of them have written letters, made phone calls to and even met with their legislators. They did a great job because both the CT House of Representatives and CT Senate had unanimously passed the bill, HB 5353 by



Governor Malloy with Michael Fiorino, CAD Board Member
Photo Credit: Harvey Corson

Wednesday, May 9, 2012. Then finally on June 15, 2012 the Governor signed the Deaf Child Bill of Rights bill into a law, thus making Connecticut, the birthplace of deaf education, the 12th state to have the Deaf Child Bill of Rights. The new law becomes effective on July 1, 2012. Ms. Bedard explained “This is a huge step forward in an effort to close the wide achievement gap for our children with hearing loss by focusing their IEPs specifically on their language and communication needs.” It is truly a historic day in the making for the Deaf and Hard of Hearing communities in Connecticut as well across the country, because the DCBR law creates an environment that will allow our deaf and hard of hearing children to become who they really are, develop, learn, expand and shine in all education settings.

To read the new Deaf Child Bill of Rights law, go to page 2 or to the CAD website at <http://www.deafcad.org>.

Newsletter Vol. 7, Issue 15

Richard Morris, Editor
Paul Ditimi, Graphic Designer

2011—2013 Officers

Dr. Harvey Corson, President
Sandra Inzinga, Vice President
Tammy Ennis, Secretary
James Pedersen, Treasurer
Richard Soboleski, Law Chair
Michael Fineran, Past President

Board Members-At-Large

Michael Elio Fiorino, North Central
Patti Wilson, South Central
Barbara J. Cassin, East
Anna Maria Rinaldi, Northwest
Terri Ditimi, Southwest

Charles Reisinger, Conference Chair

President's Message - Dr. Harvey Corson

For the past six months, from January to June 2012, it was an incredible experience working with many extraordinary people all over the state, advocating for the Deaf Child Bill of Rights (DCBR) legislation. Today this law is part of the new educational landscape for deaf and hard of hearing children and youth and their parents working with teachers and staff in various educational settings. **A great beginning for Connecticut children and youth who are deaf and hard of hearing!**

I want to take the opportunity to thank the co-chairs of the Joint Education Committee of the CT General Assembly, Representative Andrew Fleischmann and Senator Andrea Stillman and the Education Committee members for their understanding, sensitivity, and support and the following state officials for their understanding, leadership, and support – House Speaker Christopher Donovan, Senate President Pro Tempore Donald Williams, Lt. Governor Nancy Wyman, and Governor Dannel Malloy.

Also to the team members of the Connecticut Coalition on Education of the Deaf and Hard of Hearing Children and the leadership and professionals of the American School for the Deaf, CREC Soundbridge, and some school districts for taking the time to educate others of the need for the Language and Communication Plan as part of each child's individual education plan.

Above all, to many, many deaf and hard of hearing citizens, parents, and allies along with many organizations representing them who have contacted their legislators and testified at the public hearing in support of the proposed Deaf Child's Bill of Rights legislation.

Most important development I see happening in this State is the spirit of unity among various groups of people – deaf and hard of hearing citizens, parents and family members, professionals in education of deaf and hard of hearing children and youth, and allies – working together in support of this effort. United we achieved the desired goal!

I am pleased to say that in this effort we have gained a new friend in Terry Beardard, President of Hear Here Hartford, who was working along with me side by side as co-chairs of this DCBR Initiative.

As summer is upon us, have a great summer!

Best, Harvey

**Connecticut's Deaf Child Bill of Rights,
 Public Act No. 12-173**

AN ACT CONCERNING INDIVIDUALIZED EDUCATION PROGRAMS AND OTHER ISSUES RELATING TO SPECIAL EDUCATION.

Sec. 11. (NEW) (*Effective from passage*) The individualized education program for any child identified as deaf or hearing impaired shall include a language and communication plan developed by the planning and placement team for such child. Such language and communication plan shall address: (1) The primary language or mode of communication chosen for the child, (2) opportunities for direct communication with peers and professional personnel in the primary language or mode of communication for the child, (3) educational options available to the child, (4) the qualifications of teachers and other professional personnel administering such plan for the child, including such teacher's or personnel's proficiency in the primary language or mode of communication for the child, (5) the accessibility of academic instruction, school services and extracurricular activities to the child, (6) assistive devices and services for the child, and (7) communication and physical environment accommodations for the child.

Change of Address

Name

Old Address

City, State, Zip

New Address

City, State, Zip

Email

Address

VP

(_____) _____ - _____



Mail to CAD Treasurer
 P. O. Box 270539
 West Hartford, CT 06127

Deaf Awareness Day at Lake Compounce is on Saturday, July 21, 2012

On Saturday, July 21, 2012, Connecticut Association of the Deaf will be hosting and celebrating the Annual Deaf Awareness Day at the Lake Compounce Amusement Park in Bristol, CT from 11 a.m. to 10 p.m. It will be an exciting day filled with fun and smiles for Deaf and hard of hearing individuals and their hearing family members and friends. Come and join us to try out one of the newest rides, called 'Riptide Rider'. Lake Compounce tickets are now available and you can buy the tickets directly from us under the tunnel near the main entrance. Come and have fun with us!



Connecticut Association of the Deaf

Proudly hosts & celebrates
The Annual Deaf Awareness Day
At

Lake Compounce
822 Lake Avenue
Bristol, CT 06010
(Exit 31 from I-84)

Saturday, July 21, 2012
(Rain or Shine)

11:00 AM – 10:00 PM



Deaf, Hard of Hearing & Hearing Family Members and Friends are welcome!



Gate Open At 10:00 A.M. For Parking \$8.00



Buy Tickets or Visit us under Tunnel at Lake Compounce

2012 Summer Admission Rates	
CAD member Admission	\$28.00
Non CAD member Admission	\$30.00
Junior Admission (Under 52" tall)	\$25.00
Kids 3 years and Under	FREE



CAD New England Deaf Mixed Volleyball Tournament was a Success!

CAD had sponsored a successful CAD New England Deaf Mixed Volleyball Tournament on Saturday, March 24, 2012. Approximately 120 CAD members, fans and friends showed up at the American School of the Deaf (ASD) Ward Gym to witness a record breaking seven different teams played volleyball games filled with energy. Lunch was provided by CAD. An Information Sharing session was held during lunch. The tourney concluded at 4:30pm with the following results: 1st place: Volley Hands; 2nd place: Flying Monkeys; and 3rd place: Adult Vocational Services. CAD congrats all seven teams for their participation and thanks all fans for their support. Special thanks go to Barbara Cassin, Chair and her fine committee for coordinating a well done event.



Volley Hands Team - First Place

Photo Credit: Paul Ditimi



Players in Action

Photo Credit: Paul Ditimi

Connecticut Association of the Deaf has a new upgraded website and a new Facebook page

The Connecticut Association of the Deaf (CAD) is pleased to announce the launch of its new upgraded website and its Facebook home page. The revamped website and the Facebook home page will serve as two of the primary sources of valuable information and news for deaf and hard of hearing individuals in Connecticut and their friends/supporters, such as the latest state advocacy work on Connecticut legislation, current and upcoming events.

The website underwent a major redesign to make it more user-friendly, provide better navigation and to make it easier for users to search and find relevant information. The website has several new features that the user can use and enjoy to read breaking news, look up schedules of major events, and browse through pictures. Special thanks go to Martha Heron, Website Designer, for her help improving the CAD website.

CAD also has created a Connecticut Association of the Deaf home page on Facebook where CAD members and their friends can post articles, share photos and provide feedbacks. To see the new exciting website, go to www.deafcad.org. To find the CAD home page on Facebook, go to www.facebook.com and type "Connecticut Association of the Deaf" or click on the Facebook icon on the CAD website. It is highly recommended that you bookmark the new website and the CAD Facebook page because in addition to being informed of what is happening in Connecticut, they contain valuable features that greatly benefit you.



Walk4Hearing on Saturday, June 2, 2012 was a Huge Success!

The Walk4Hearing Event at the Great River Park in East Hartford, CT on Saturday, June 2, 2012 was a big success in spite of the rain most of the day. This event was sponsored by the Hearing Loss of America Association (HLAA) and coordinated by the Hear Here Hartford, a chapter of HLAA. It was held and approximately 450 people registered for that day and it is believed that at least some 350 individuals showed up at the walk event on that day!

The CAD Walk team, consisted of 14 members, walked 5 K and raised at a total of \$2,360.00. Richard Morris, CAD Walk Team Captain explained that CAD will receive 40% of the total amount raised, approximately \$944.00 which will be used toward youth leadership program for deaf and hard of hearing teenagers as well toward training programs for deaf and hard of hearing adults in Connecticut. He added "It was a great accomplishment for the CAD team especially since it was the first time CAD has participated in this event. From the bottom of their hearts, the CAD Walk Team thanks you for all your generosity and support.



The CAD Walk Team at the finish line

Photo provided by Richard Morris



The CAD Walk Team

Photo provided by Richard Morris

National Theatre of the Deaf has a new Corporate Office

Betty Beekman, Interim Executive Director announced that the National Theatre of the Deaf is returning to the Eugene O'Neill Theatre Center and will retain an office in the historic Monte Cristo Cottage in New London, Connecticut. The company will continue to operate the Little Theatre of the Deaf in West Hartford.

Monte Cristo Cottage is known as the Summer House of Nobel-Prize winner Eugene O'Neill and is located on Pequot Avenue along the Thames River in New London, Connecticut.

The house was declared a National Historic Landmark in 1971 and is owned and operated by the Eugene O'Neill Theater Center as a historic house museum. "We are very honored and pleased to be in this beautiful building that plays such an important part in American theatrical history," Beekman said, "and to be back at the O'Neill; where we started and where we belong."

Currently the company is enjoying its third annual residency at the

O'Neill Theatre Center where the LTD is developing a new work, *The W-5*, that will be produced for the 2012-13 touring theatre season.

"Our thanks to Preston Whiteway, Executive Director of the Eugene O'Neill Theater Center, the Board of Directors and the entire O'Neill staff for this creative opportunity at one of the greatest theatre centers in the country" Ms. Beekman added.



Sprint awarded to provide Telecommunication Relay Services in Connecticut for five more years, 2012 - 2017

Sprint has been providing TRS in Connecticut for the past 19 years and actively participates in the Equipment Distribution program with Converse Communication Center (CCC) in Bloomfield, CT.

On April 25th, after hearing over 40 people at the public hearing and reviewing two bids, the Connecticut Public Utilities Regulatory Authority (PURA), formerly known as the Department of Public Utilities Control (DPUC) awarded the contract for provision of this service to Sprint Communications Company, L.P. Hamilton Telecommunications was

the other bidder.

The contract provides that while all current services offerings will continue, there will be a new service offering of optional wireless devices such as pagers.

In this Decision, the Public Utilities Regulatory Authority also permits Sprint Communications Company, to continue subcontracting with Solix, Inc. for billing and collection functions.

I wanted to thank the members of the CAD TRS Task Force: Sue Pedersen; Sandy Inzinga; Richard

Morris; and Barbara Cassin for all their work. They met several times and provided eight recommendations to PURA why it is important to continue with Sprint and CCC and what can be done to improve the telecommunication services for the deaf and hard of hearing communities in CT. The CAD Board, the CAD TRS Task force and I thank you for attending the public hearing and showing your support.

Patti Wilson, Chairperson
CAD TRS Task Force

Deaf Blind Association of Connecticut celebrates 25th Anniversary

This 25th Anniversary Luncheon Event was held at Crown Plaza Hotel in Cromwell, CT on Saturday, May 5, 2012 from 11:00 am to 5:00 pm attended by approximately 50 people. The Connecticut Association of the Deaf was represented by Dr. Harvey Corson, President and his wife, Mary Ann; James Pedersen,

Treasurer and his wife Susan; and Michael Elio Fiorino, Board Member.

As part of the program, the Guest Speaker was Elaine Ducharme, Director of Deaf Blind Community Access Network in Allston, MA where she has served for the past 11 years.

She was born and raised in Connecticut. She was born deaf and later became blind when she was 27 years old, caused by Usher's syndrome. She attended the Mystic Oral School, and then went to the Northwestern CT Community College where she received an Associate Degree. She continued her education at the University of Connecticut for her B.A. Degree. Her M.A. Degree was from Springfield College in Massachusetts.

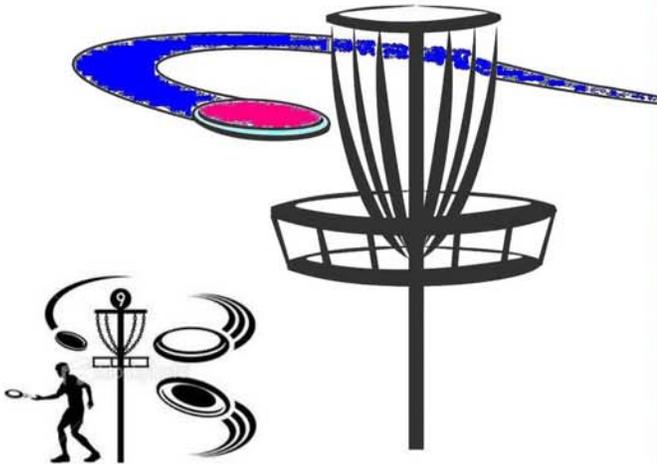
Next on the program was Awards. Two Recognition Awards were given to Elaine Ducharme and Susan Pedersen for their roles as co-founders of the Deaf Blind Association of Connecticut 25 years ago in 1987.

This event concluded with raffle drawings and a social function. Everyone had a grand time.



Susan Pedersen and Elaine Ducharme with the awards.

Photo credit: Michael E. Fiorino



**Connecticut Association
of the Deaf**

Proudly presents
1st Annual Disc Golf Tournament
@
Wickham Park
Manchester, CT
Saturday, September 22, 2012

**Registered players need to pick up
their entries at 8 AM sharp.**

Games Begin at 9 A.M. till End.

For More Information

Contact Chairperson
 Tammy Ennis
 VP: 860.378.8162
 Email: tammy.ennis@gmail.com

Admission
 \$5.00 for CAD Members
 \$8.00 for non-CAD Members

Disc Golf discs can be rented if you
do not have discs.



Based on 20 single players
Entry Fee: \$35.00

1st Place \$200.00
 2nd Place \$150.00
 3rd Place \$100.00

The deadline for the registration is on September 15, 2012.
 Please mail the form and send check or money order payable to **CAD**
 P.O. Box 270539, West Hartford, CT 06127.

Name _____

Address _____

City _____ State _____ Zip Code _____

Telephone (____) _____ Email _____

**Hearing people (CODAs, Deaf Studies majors, Interpreters/Interpreter majors),
Hard of Hearing and Deaf people are welcome to play!**

CT Association of the Deaf
P. O. Box 270539
West Hartford, CT 06127
E-mail: president@deafcad.org



WE'RE ON THE WEB!

WWW.DEAFCAD.ORG

Sponsored by



The mission of the CAD as a state association is to promote, protect, and preserve the rights and quality of life of Deaf and Hard of Hearing citizens of Connecticut.

The CAD is a civic, non-profit organization serving the Deaf and Hard of Hearing community needs in the areas of:

- | | |
|----------------------|---------------------|
| Advocacy | Access |
| Education | Technology |
| Employment | Civil Rights |
| Communication | Empowerment |

Appendix H:
Relay Connecticut
Brochures and other Advertisements



Speech to Speech: Talk with Ease



◀ Home | About | Traditional Relay | Captioned Telephone | Spanish Relay | TTY Loan Program | Internet-based Relay | Contact Us

NEW SERVICE -
 Speech-to-Speech
 Email Set Up

Click here
 to learn more



Dial 7-1-1 and Welcome to Relay Connecticut!

A free public service for communication between standard (voice) users and persons who are deaf, hard-of-hearing, deaf-blind, and speech-disabled using text telephones (TTYs) or PCs via the Internet.

7-1-1 and other telephone numbers provided by Relay Connecticut.

Hey! Relay Connecticut is a service that will allow me to contact a deaf user!



[click here to pause](#)

Quick Glance

-  [Please, Don't Hang Up](#)
-  [Relay Connecticut Customer Profile](#)
-  [FAQs](#)
-  [Service Feedback](#)
-  [Sprint Relay Store](#)
-  [For Active Federal Employees, Veterans or U.S. Tribal Members](#)



Enhanced Speech-to-Speech

Dial 7-1-1 or 877-842-5177

Talk with Ease and Confidence



relayconnecticut.com/sts

- Tired of struggling to be understood over the phone?
- Want to be free to communicate anytime from anywhere?

Sprint Relay has the perfect solution for you — **Relay Connecticut Speech-to-Speech (STS)** provides one-on-one support for telephone calls.

“ Now I can make my own phone calls without having to depend on someone else. ”

What is STS?

STS is a free service for people with a speech disability. A specially trained STS operator simply listens to the conversation and repeats your message, whenever needed.

- Free and confidential
- Available 24 hours a day / 7 days a week
- Spanish is available

My Email Set Up (NEW)

This new feature makes call set-up a piece of cake for you.

In order to speed up the set-up of the call, Sprint Relay now offers **My Email Set Up**. Now, you can e-mail call instructions or information 2 to 24 hours prior to the call. This can include information such as the number to be dialed, the name of the person being called, any special instructions and nature of the call, or anything that makes it easier for you to complete the call.

Read more information on the back.



New Customer Service designated for STS users:

■ Call: 877-787-1989 ■ Email: Sprint.TRSCustServ@sprint.com ■ Website: relayconnecticut.com/sts

My Email Set Up

Speech Assistance - Easier Than Ever!



relayconnecticut.com/sts



My Email Set Up

- You can email call instructions or information 2 to 24 hours prior to the call.
- information can be included such as:
 - the number to be dialed
 - the name of the person being called
 - any special instructions and subject of the call, or
 - anything that makes it easier for you to complete the call.

IMPORTANT INFORMATION:

Before you use **My Email Set Up**, it is important to call **My Support (Sprint STS Customer Support)** at **877-787-1989**.

The Sprint STS customer support representative will fill out your profile. Below is information about STS features and descriptions.



My Support 877-787-1989

- A dedicated customer support for STS users.
- Assist you with:
 - basic information about STS,
 - filling out customer profiles, and
 - other Sprint Relay features designed to support you and your callers.
- Open 24 hours a day, 7 days a week.



My Wireless *STS (Dial *787)

- A **NEW** national wireless solution for STS users.
- A national wireless short code for STS to make it easier to place or receive STS calls.
- Simply dial *787 (*STS) from any Sprint wireless phone to be connected with a Sprint STS relay operator.
- **PLEASE NOTE** that this service is only available on the Sprint wireless network at this time.
- If you are interested in purchasing a Sprint wireless phone,
 - go to sprintrelaystore.com or
 - contact My Support at 877-787-1989 and they will get a representative to assist you.



My Name

- Receiving calls is now easier than ever!
- Your callers can simply call and ask for you directly by name without having to provide the telephone number.
- You can also be reached at multiple numbers.
- Simply add multiple telephone numbers and hours of availability.
- Different numbers can be added for certain times of the day and days of the week.



My Place



My Saved Messages

- A solution to prevent from spending time dictating a message for an answering machine and then getting a busy signal and being unable to leave that message.
- Upon request, the STS relay operator can copy any messages desired onto your customer profile for 24 hours.
- When you try again, you simply re-dial STS service and ask to retrieve saved messages.
- After 24 hours the message copied into your customer profile is automatically deleted from the system.



My Style

- You are allowed to determine the kind of conversation style.
- STS relay operator can simply look up your style in the customer profile such as re-voice the entire conversation or simply repeat upon request.



My Phone Book

- Your customer profile can store up to 30 speed dial numbers in a phone book.
- To place a call, you simply ask for a caller by name.

New Customer Service designated for STS users:

- Call: 877-787-1989
- Email: Sprint.TRSCustServ@sprint.com
- Website: relayconnecticut.com/sts

Dial 7-1-1. Say hello and communicate with a breeze.



With Relay Connecticut dialing 7-1-1 will connect you to a free service which allows effortless communication with people who are deaf, hard-of-hearing, deaf-blind, speech-disabled, or hearing.

It is very simple to make a phone call. All you do is:

- 1) Dial 7-1-1* or use these toll-free numbers.
- 2) Press an option and dial the number of a person you are calling to.
- 3) Communicate while a relay operator relays messages between you and the caller with a breeze.

For more information, please visit www.relayconnecticut.com

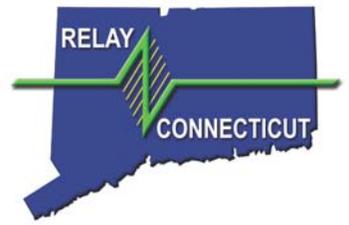
For any questions about the relay services or request for presentations, please feel free to contact

Michelle Sangster,
Account Manager
michelle.sangster@sprint.com
860-243-0351 (voice)
866-857-3242 (videophone)

			
Deaf	Voice User	Hard of Hearing	Speech Disabled
<i>TTY to Voice</i> 1-800-842-9710 <i>TeleBraille</i> 1-800-842-9710	<i>Voice to Relay</i> 1-800-833-8134	<i>Voice Carry-Over</i> 1-800-842-9488 <i>Voice to CapTel</i> 1-877-243-2823	<i>Speech-to-Speech</i> 1-877-842-5177 <i>Hearing Carry-Over</i> 1-800-842-9710
			
Internet User	Spanish Relay	Customer Service	
<i>Internet Relay</i> www.sprintip.com <i>WebCapTel</i> www.sprintcaptel.com	<i>Spanish Relay</i> 1-877-855-0921	1-800-676-3777 <i>Español</i> 1-800-676-4290 <i>CapTel</i> 1-888-269-7477	

* Some office phone systems do not work with 7-1-1. The above toll-free numbers are alternatives customized to callers' needs.

Are you tired of saying “What?” while on the phone? Try free Relay Connecticut Captioned Telephone Service



www.relayconnecticut.com/captel

Free Captioned Telephone (CapTel®) Service by Relay Connecticut enables individuals with hearing loss to read what their caller says, while they speak and listen on the telephone.*

Relay Connecticut CapTel® Service:

- 24-hour service is offered at no cost to users*
- Spanish Captioning is available for Spanish-to-Spanish calls
 - Hours are from 8 am to 12 midnight EST

The CapTel® 800 telephone:

- has a large 5" screen with easy-to-read display
- has a volume control (up to 40dB) and it is easy to adjust during a call
- functions as a regular telephone and can be used by everyone

Website:

- relayconnecticut.com/captel

* CapTel users are responsible for their own long distance charges.

Although CapTel can be used for emergency calling, such emergency calling may not function the same as traditional 911/E911 services. By using CapTel for emergency calling, you agree that Sprint is not responsible for any damages resulting from errors, defects, malfunctions, interruptions or failures in accessing or attempting to access emergency services through CapTel; whether caused by the negligence of Sprint or otherwise. Sprint reserves the right to modify, extend or cancel offers at any time without notice. Other restrictions apply. For details, see www.sprint800.com. ©2010 Sprint. Sprint and logos are trademarks of Sprint. CapTel is a registered trademark of Ultratec, Inc. Other registration marks are the property of their respective owners.

How to get a CapTel® 800

- To apply for a free CapTel® 800 telephone through the TTY Loan Program, contact
 - www.conversecommunications.com
 - (800) 743-1219 (Voice/TTY)
- For more information:
 - contact Michelle Sangster
 - michelle.sangster@sprint.com
 - (860) 243-0351
 - relayconnecticut.com/howtogetcaptel



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- Spanish Captioning is available for Spanish-to-Spanish calls
 - Hours are from 8 am to 12 midnight EST

The CapTel® 800 telephone:

- has a bright, easy-to-read display
- captions while the conversation is in process
- functions as a regular telephone and can be used by everyone

How to get a

CapTel® 800 telephone:

- see information on the back

Website:

- www.relayconnecticut.com/captel

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Although CapTel can be used for emergency calling, such emergency calling may not function the same as traditional 911/E911 services. By using CapTel for emergency calling, you agree that Sprint is not responsible for any damages resulting from errors, defects, malfunctions, interruptions or failures in accessing or attempting to access emergency services through CapTel, whether caused by the negligence of Sprint or otherwise. Sprint reserves the right to modify, extend or cancel offers at any time without notice. Other restrictions apply. For details, see www.sprint800.com. ©2010 Sprint. Sprint and logos are trademarks of Sprint. CapTel is a registered trademark of Ultratec, Inc. Other registration marks are the property of their respective owners.



CapTel® 800 Features



5 " diagonal display –
high quality screen

Bright color screen and
easy-to-read captions

Adjustable font size and
colors (320 x 240 pixels)

(CapTel CA# C1234) (Tones)
Ringing 1 2 3 (F) Hello this is
Doctor Campbells office how may
I help you today? OK I need
your full name and I will bring
up your information thank you
hold on for a second please

Press ▲ to Review the Conversation

Screen tilts
forward and back
to your comfortable
viewing preference

For more information, go to
relayconnecticut.com/captel

Easy to follow menu
with "Yes/No" questions

One-button
push to connect
Customer Service

Adjustable tone control
(high, medium, low)
for best clarity

Captions button is
automatically "ON"
for both outgoing
and incoming calls
(can be disabled for
non-CapTel users)

Adjustable volume control
up to 40dB gain



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 - (800) 743-1219 (Voice/TTY)
- For more information: contact Michelle Sangster
 - michelle.sangster@sprint.com
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 - www.relayconnecticut.com/howtogetcaptel

relayconnecticut.com/captel



Greater
Hartford
Transit District

1-800-743-1219

5680

THIS VEHICLE STOPS
AT RAILROAD CROSSINGS

VEHICLE MAKES
FREQUENT STOPS

Are you tired of saying
"what?"
while on the phone?

Try **FREE**
CapTel® Service

Enables those with
hearing loss to read
what their caller says

800.743.1219

www.RelayConnecticut.com/captel



Are you tired of saying ***“what?”***
while on the phone?
Try **FREE** CapTel® Service



Enables
those
with
hearing loss
to read
what their
caller
says



800.743.1219
www.RelayConnecticut.com/captel

Appendix I:
Copy of Legislation Establishing
TRS in Connecticut

Connecticut General Statute

Chapter 283, Sect 16-247e

Sec. 16-247e. Basic telecommunications services. Lifeline and telecommunications relay service programs. Universal service program. (a) In order to ensure the universal availability of affordable, high quality telecommunications services to all residents and businesses throughout the state regardless of income, disability or location, the department shall (1) periodically investigate and determine, after notice and hearing, local service options, including the definition and components of any basic telecommunications services, necessary to achieve universal service and meet customer needs; and (2) establish lifeline and telecommunications relay service programs funded by all telecommunications carriers that provide intrastate telecommunications services, as such terms are defined in 47 USC 153, as amended from time to time, sufficient to provide low-income households or individuals or speech and hearing impaired individuals with a level of telecommunications service or package of telecommunications services that supports participation in the economy and society of the state. The department shall apportion the funding for the lifeline and telecommunications relay service programs among telecommunications carriers on an equitable basis based on the gross revenues of each telecommunications carrier that are generated in Connecticut, both interstate and intrastate. The lifeline and telecommunications relay service programs shall be administered by an entity authorized, and subject to oversight, by the department. The department shall determine by order which customers qualify for the lifeline program. Recipients of lifeline funds shall use such funds to pay for telecommunications services provided by any telecommunications carrier.

(b) The department may, if necessary, establish a universal service program, funded by all telecommunications companies or users in the state on an equitable basis, as determined by the department, to ensure the universal availability of affordable, high quality basic telecommunications services to all residents and businesses throughout the state regardless of location. Any funds contributed to a universal service program shall be used to support the availability of basic telecommunications services provided by any telecommunications company in a manner to be determined by the department.

(P.A. 85-187, S. 5, 15; P.A. 94-83, S. 5, 16; P.A. 97-121, S. 1, 2; P.A. 99-11, S. 1, 3.)

History: P.A. 94-83 entirely replaced previously existing language re telephone company rates and revenue requirement with new Subsec. (a) re basic service and lifeline program and new Subsec. (b) re universal service program, effective July 1, 1994; P.A. 97-121 amended Subsec. (a) to require telecommunications carriers that provide intrastate telecommunications services to fund lifeline

program, based on their gross revenues and substituted "telecommunications carriers" for "telecommunications companies", effective June 6, 1997; P.A. 99-11 amended Subsec. (a) by adding references to telecommunications relay service program and to speech and hearing impaired individuals, effective May 12, 1999.

Federal Communications Act does not preempt department from imposing universal service contribution assessments on commercial radio service providers. 253 C. 453. State assessment does not violate federal funding mechanisms solely because it taxes both intrastate and intrastate revenues. Id. Court rejected claim that statute had disparate effect on certain commercial mobile radio service providers because complainant provided no evidence to show a discriminatory result. Id.

Sec. 16-256b. Special telecommunications equipment for deaf and hearing impaired persons. Fund. Amplification controls for coin and coinless telephones installed for public or semipublic use. (a) Each telephone company and each certified telecommunications provider that makes equipment available to customers shall make special telecommunications equipment capable of serving the needs of deaf and hearing and speech impaired persons available for rental or purchase and be responsible for the maintenance and repair of any such equipment it leases or sells.

(b) (1) Each domestic telephone company having at least one hundred thousand customers shall pay into a Special Telecommunications Equipment Fund twenty thousand dollars not later than July 1, 1992. The fund shall be administered by the Commission on the Deaf and Hearing Impaired. The Department of Public Utility Control shall include all payments made by a company into said fund as operating expenses of the company for purposes of rate-making under section 16-19.

(2) Except for the funding specified in subdivision (1) of this subsection, the State Commission on the Deaf and Hearing Impaired may draw on funds obtained through agreements between the state and domestic telephone companies in accordance with a plan developed, after notice and hearing, by the commission not later than January first, annually, and approved by the joint standing committee of the General Assembly having cognizance of matters relating to public utilities. The plan shall provide for the distribution of moneys from the funds to deaf and hearing and speech impaired persons for the purchase, upgrading, rental, maintenance and repair of special telecommunications equipment capable of serving the needs of such persons or to vendors providing such equipment or servicing. The plan may also provide for the distribution of moneys from the funds for the provision of message relay services for persons using telecommunication devices for the deaf, upon a determination by the commission that such moneys are needed to ensure that such services are made available to such persons and that there are adequate moneys in the funds for special telecommunications equipment purposes. The plan shall provide that not more than ten per cent of the moneys annually paid into the fund shall be allocated to the commission to carry out its administrative responsibilities under this subdivision and not more than five per cent of the moneys annually paid by a telephone company into the fund shall be allocated to such corporation to carry out its responsibilities under subdivision (1) of this subsection. All moneys allocated to the commission shall be paid to the State Treasurer for deposit in the General Fund.

(3) The Commission on the Deaf and Hearing Impaired shall, not later than March first, annually, submit a written financial report on the fund it administers under subdivision (2) of this section to the General Assembly and the Auditors of Public Accounts. Such report shall include a balance sheet and income and expense statement for the preceding calendar year, clearly setting forth the fund's income and expenses and all amounts spent for the direct purpose of the fund.

(c) (1) Each telephone company and each certified telecommunications provider shall, in

consultation with the Commission on the Deaf and Hearing Impaired, prepare and submit to the Department of Public Utility Control and the joint standing committee of the General Assembly having cognizance of matters relating to public utilities a plan which shall provide that, to the extent possible, (A) not less than eighty per cent of the coin and coinless telephones installed for public use by the telephone company or certified telecommunications provider shall be equipped, not later than July 1, 1995, with controls for the amplification of incoming transmissions and not less than eighty per cent of the coin and coinless telephones installed for public use by the telephone company or certified telecommunications provider after July 1, 1995, shall be equipped with such controls, and (B) not less than fifty per cent of the coin and coinless telephones installed for semipublic use by the telephone company or certified telecommunications provider pursuant to tariffs shall be equipped, not later than July 1, 1995, with such controls and not less than fifty per cent of the coin and coinless telephones installed for semipublic use by the telephone company or certified telecommunications provider pursuant to tariffs after July 1, 1995, shall be equipped with such controls.

(2) Not later than July first, annually, each such telephone company and each such certified telecommunications provider shall submit a report to said commission, department and joint standing committee on the implementation of the plan prepared under subdivision (1) of this subsection, provided, if a telephone company or a certified telecommunications provider documents in any such report that it has fully complied with the provisions of subdivision (1) of this subsection, it shall not be required to submit additional annual reports.

(3) The cost of compliance with the provisions of this subsection shall be recoverable from ratepayers through the overall rate structure approved by the Department of Public Utility Control.

(d) Not less than eighty per cent of the coin and coinless telephones installed for public use on or after July 1, 1993, by any person, other than a telephone company or a certified telecommunications provider shall be equipped with such amplification controls at the time the telephones are installed.

(P.A. 79-156; P.A. 80-482, S. 4, 40, 345, 348; P.A. 82-254, S. 1, 2; P.A. 83-125, S. 1, 2; P.A. 85-228, S. 1, 2; P.A. 86-50, S. 2; P.A. 87-388, S. 1, 3; P.A. 88-158, S. 1, 2; P.A. 92-146, S. 4, 5; P.A. 93-34, S. 1, 2; P.A. 94-74, S. 7, 11; P.A. 99-286, S. 10, 19; P.A. 00-53, S. 6.)

History: P.A. 80-482 made division of public utility control within the department of business regulation an independent department and abolished department of business regulation; P.A. 82-254 required telephone companies to maintain and repair only special telecommunications equipment they lease or sell and department to establish conditions of service and rates for such maintenance and repair, relettered subsections, made all provisions of Subsec. (a) applicable only to extent consistent with federal law and added new Subsec. (b) requiring establishment of special telecommunications equipment funds; P.A. 83-125 established procedure under Subsec. (b) for transferring administration of funds from telephone companies to tax-exempt corporation and added Subdiv. (3) requiring corporation to submit annual financial report on fund to general assembly and auditors of public accounts; P.A. 85-228 added Subsecs. (c) and (d) re the installation of amplification controls for coin and coinless telephones for public

use; P.A. 86-50 allowed the plan to provide for the distribution of funds for message relay services; P.A. 87-388 amended Subsec. (b) by requiring payment of \$75,000 into fund by January 1, 1988; P.A. 88-158 amended Subsec. (b)(1) requiring that any person, firm or corporation authorized by the department to provide intrastate interexchange telecommunications service pay into the fund; extended the fund's existence to 1990 and provided for payments by telecompanies and others certified by the department to pay \$50,000 into the fund in 1989 and \$25,000 in 1990; P.A. 92-146 amended Subsec. (b) re funding of special telecommunications fund and specified commission on deaf and hearing impaired as administrator of fund; P.A. 93-34 amended Subsec. (c) by requiring each telephone company to submit a plan by January 1, 1994, to equip at least 80% of coin and coinless telephones installed for public use and at least 50% of coin and coinless telephones installed for semipublic use pursuant to tariffs with amplification controls by July 1, 1995, and thereafter, and submit a report by July 1, 1994, and amended Subsec. (d) by increasing the percentage of coin and coinless telephones installed for public use by anyone other than a telephone company which must be equipped with amplification controls from 25% to 80% as of July 1, 1993, effective May 5, 1993; P.A. 94-74 amended Subsecs. (a), (c) and (d) by adding provision re persons, firms or corporations certified to provide intrastate telecommunication service, and amended Subsec. (a) by deleting provision re conditions of service and rates for equipment, effective July 1, 1994; P.A. 99-286 changed references to person, firm or corporation certified to provide intrastate telecommunications service to "certified telecommunications provider" and made technical changes, effective July 19, 1999; P.A. 00-53 made technical changes in Subsec. (b)(1).

Appendix J:
Complaint Logs
2008 - 2012



DOCKET FILE COPY ORIGINAL

STATE OF CONNECTICUT

Commission on the Deaf and Hearing Impaired

67 Prospect Avenue, 3rd Floor Hartford, CT 06106-2980

Received & Inspected

JUN 23 2008

FCC Mail Room

June 20, 2008

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, DC 20554

Re: In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03- 123

Dear Ms. Dortch:

Enclosed is the State of Connecticut's Annual Telecommunications Relay Service Complaint Log summary. This submission fulfills the mandates established by the Federal Communications Commission.

If you have any questions or require additional information, I can be reached at (860) 231-8756.

Sincerely,

Stacie J. Mawson
Executive Director

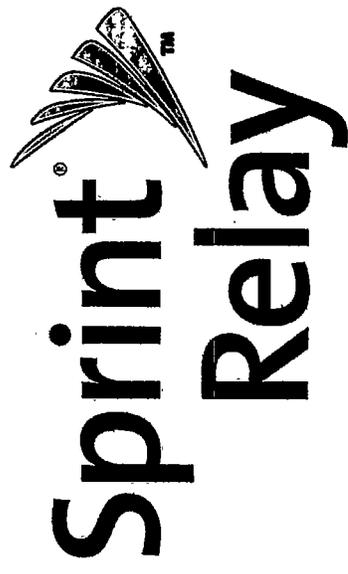
SJM:cfr

Enclosures

cc: Patricia Reilly, Supervisor of Technical Analysis - Telecommunications
Connecticut Department of Public Utility Control

Mike Finneran
Account Manager - Relay Connecticut

No. of Copies rec'd 0
List A B C D E



CONNECTICUT
FCC COMPLAINT LOG
2008

Complaint Tracking for CT (06/01/2007-05/31/2008). Total Customer Contacts: 37

<u>Tally</u>	<u>Date of Complaint</u>	<u>Nature of Complaint</u>	<u>Date of Resolution</u>	<u>Explanation of Resolution</u>
1	05/26/08	Agent tried to handle Voice Carry Over call, repeatedly hung up while trying to connect Voice Carry Over call. Would not give answer and had a bad attitude and bad tone with caller.	05/26/08	Supervisor spoke with this agent about how to process a Voice Carry Over call and tone of voice while talking to voice caller. Agent did not remember call, but apologized for inconvenience to caller.
2	04/29/08	Voice Carry Over customer states that the Customer Service representative said they would enter a ticket for their issue and another Customer Service representative verified that a ticket was entered but this Customer Service representative was not able to find the ticket. Apologized, TT 6332695. Follow-up requested.	04/29/08	Attempted to contact customer at 4:10 PM CT on 4/29...busy signal. Will keep trying. Attempted to contact customer again at 4:50p CT. No answer. Will try again later. We have left several messages for consumer; so far, the consumer has not contacted us yet.
3	04/29/08	Caller said she is not getting her important incoming calls. She gets some calls but not the important ones. Apologized for the problem and opened TT ID 6330266. Caller requests follow-up on this issue.	04/29/08	We have made several test calls and have been able to get through to the customer without any difficulties. Consumer has been advised to contact us if problems appear again.
4	04/22/08	CT voice caller called to complain that he could not reach relay dialing 711 or voice number. Entered TT number 6299499 Customer did request follow up.	04/22/08	We have attempted to contact consumer several times, and have not heard back from him. Messages has been left for him to contact us if he continues to have problems.
5	04/21/08	Technical - General	04/21/08	This customer stated they experienced a "fast busy" when attempting their outbound call. At approximately 8:45 a.m. 4/20/08, the CapTel Call Center identified a problem with a network circuit. During this time, the Call Center continued to process calls and service level and ASA were not affected. The matter was fully corrected at approximately 9:50 a.m. Customer Service Representative confirmed the customer was able to make their call upon trying again.
6	04/16/08	Dialing issue - Phone line does not require 1 when dialing 800 number	04/16/08	Customer's phone technician advised CCS that a "1" is not required when dialing a toll-free number. Tech support removed "1" from data-in caption number for customer's unit.
7	04/15/08	TTY customer cannot make long distance calls with Comcast through the CT Relay. Apologized for the problem. Ticket 6260810 was opened. Follow up requested. Internal Update Performed	04/15/08	There was a block on consumers phone and this has been removed. Consumer is able to Dial 711 without problems.

8	04/07/08	Disconnect/Reconnect during calls	04/07/08	Sent customer information explaining the difference between a CapTel and a traditional phone. Explained to customer why disconnection/reconnection might be occurring and sent email with tips to reduce their occurrence.
9	03/18/08	Billing - General	03/18/08	Discussed need to register long distance carrier of choice with caller and registered voice user accordingly.
10	03/12/08	Customer notes say to leave a message on first call every time. Operator did not allow customer to leave message on first call. The operator kept asking what message would you like to leave or told Voice Carry Over recording playing (beep) Voice Carry Over asked if notes appears on her account? The operator said no (operator notes were hidden on screen) The operator said she did not check. Supervisor stated to the operator the actions are unacceptable and will not be tolerated.	03/12/08	The supervisor went over the correct procedures with the operator and coached the operator on reading and following the consumer's notes and requests.
11	03/12/08	Voice Carry Over called said that operator did not follow notes on the account. Notes appear to leave a message on the first call. The Voice Carry Over user said the operator was very unprofessional and not acceptable. The supervisor went over proper procedures with the agent and coached agent on reading and follow all customer notes.	03/12/08	The consumer was informed that the supervisor has reviewed the procedures with the agent and has coached the agent on reading and following the consumer notes.
12	02/27/08	Voice Carry Over left message on ans machine; when redialing back to do that, agent typed (ANS MACH PLAYING) (BEEP) but did not send GA. When Voice Carry Over asked agent if entire message was relayed, agent responded "yes ma'am" and disconnected.	02/27/08	Agent did not have any CT Voice Carry Over calls this evening. Voice Carry Over user initially was confused as to what agent number she had, but gave a valid number so supervisor followed up with the agent.
13	02/07/08	Service - General	02/07/08	On Wednesday February 6th, the CapTel call centers were impacted by a severe snow storm. The storm, the second largest in recorded history, resulted in Madison receiving over 13 inches of snow while Milwaukee received over 16 inches of snow over a few hours time. The Governor declared a state of emergency and called out the Wisconsin National Guard. Bus service in both cities stopped and plows were pulled off the roads reducing our staffing level for the evening shifts. Both centers remained open and fielded calls non-stop. Service levels started to decline at about 3:00 p.m. continuing through approximately 10 p.m. Consumers likely experienced long answer times. The state of emergency ended. Staffing capacity was restored.

14	01/17/08	A CT Voice Carry Over customer says she is having trouble receiving incoming calls via relay. When she answers the phone, no one is there. Several people have reported to her that they have trouble reaching 711. Apologized for inconvenience. Explained 711 is routed via local telephone companies and advised her to have inbound callers call their companies to check 711. Suggested calling voice 800 number instead. Opened TT 5721583. Follow-up requested. Internal Update Performed	01/17/08	We updated our software and the problem has been resolved. I have attempted to contact consumer 3 times, but have not been able to reach her. Consumer has been educated to contact us if problems persist.
15	12/27/07	Customer stated that they have customer notes that state that they will leave a message the first time an answering machine is reached. When this operator dialed the number, the agent said that the answering machine hung up. When the customer asked to read the customer notes because they wanted to leave a message, the operator did not respond and then hung up. Thanked the customer for letting us know and informed them that we would forward this to the appropriate supervisor. No follow-up requested.	12/27/07	Agent has since been terminated from company. Ticket will be closed.
16	12/24/07	A CT Voice Carry Over customer complains that the agent misdialled a LD number four times. He asked her to get credit for the calls and she disconnected. Apologized for inconvenience. Follow-up requested.	12/24/07	The agent is not familiar with the call. The supervisor coach agent on disconnecting calls. I also went over the correct credit procedures if a LD number is dialed in error. Followed up on 1/16 @ 1:26pm (left a msg) Followed up again on 1/23 @ 2:02pm (left a msg)
17	12/18/07	Technical - General	12/18/07	Customer reported problem trying to call through captioning service on 12/14/07. A Technical issue with SS7 equipment was identified on that date, resulting in a few isolated calls not succeeding. This was remedied during system maintenance at 2:30am on 12/15/07.
18	12/15/07	Customer is a Voice Carry Over user and states that when people call her and Voice Carry Over is turned on that they can hear her but she does not get a response on her machine from the operators. I did a test call to her and she received everything I typed to her with no problems at all yet her and her son both state that when he calls her and other family members call her they can hear her but when he operators type to her she is not responding and she states she does not receive any text on her machine. The customer would like to be contacted back with an update and solution at the number provided.	12/15/07	I have contacted consumer several times and her phone has been branded, her son's phone has been branded and her friends have been able to call without any problems. She has been able to call out and receive Voice Carry Over calls without problems. Consumer is pleased.

19	12/15/07	Customer is stating that when calling in to 711 they either get dead air or ty tones that do not stop at all. Customer states this happens with him his sister and his cousins on a regular basis when they are trying to call his mother who is a Voice Carry Over user. The customer would like to be contacted back at the number provided and said if he does not answer to just leave a message updating him on this situation.	12/15/07	RPM has been able to contact consumer and consumer has been able to contact his mother without any problems. There was an upgrade in the system and that has taken care of the problem.
20	12/14/07	TTY customer states when voice/hearing people attempt to contact her via 711 they are hearing buzzing, ty tones and then get disconnected without reaching a relay operator. RCS apologized for problem and gave customer CT's toll free voice operator number for her hearing acquaintances and entered in TT 5538282. Follow up has been requested from Program Manager and Technician with resolution to customer.	12/14/07	Correction: The customer is a Voice Carry Over customer not TTY please contact using Voice Carry Over. I have contacted customer and worked with the customer to resolve her issues. There was a branding issue involved. She is now able to receive calls from her son and friends.
21	11/30/07	An AT&T tech called to report that a CT TTY customer cannot get through using 711. The customer gets a fast busy signal. Apologized. Explained that 711 is a local routing problem. He did not accept this, so I opened a TT 5439871 and asked our technician to call him. Follow-up requested.	11/30/07	This has been re-routed to the CT RPM. I have followed up with the technician and explained how the LEC works. He understood and has fixed the problem. The consumer is now able to receive Relay calls without problems.
22	11/30/07	Customer reports his relatives are having trouble reaching Relay CT when dialing 711. Customer also reports he got a recording saying invalid number through Relay on 11/29/07, but he knows it's a correct telephone number. Apologized for problems. Ticket 5443988 was opened. Follow up requested	11/30/07	We have followed up with the customer and it was a LEC issue. ATT has corrected the problem and he is now able to use relay.
23	11/29/07	A CT voice caller called to complain that when she was dialing through the relay service she was receiving a recording stating line had been disconnected. When she dials the number directly without using relay the call goes through. Entered TT # 5437687 Customer did not request follow up.	11/29/07	We attempted to duplicate the problem and we were unable to do so. We have attempted 3 times, and every time it went through. No issues identified. The problem appears to have cleared itself.
24	11/29/07	CT Voice caller unable to reach Mom via CTRS. He gets "number disconnected" recording, but is able to reach her without relay. Apologized, explained I will let the technicians know the issue. Entered TT #5437204. Customer wants contact with resolution.	11/29/07	This is a LEC issue. We have contacted the customer and informed them that they need to contact their local phone service to make sure his mother's phone number is working. The Relay part is working fine. There are no service issues on our end.

25	11/29/07	CT voice customer calls 711 and gets TTY tones. Customer states they have used 711 for many years and has never had a problem before now. Customer is very upset and does not want to use the 800 numbers. Customer Service apologized to the customer and opened TT 5433281. Customer request follow up today from the program manager.	11/29/07	The customer has had the phone branded correctly and they are able to use 711 instead of the 800 numbers. Services are normal and consumer is capable of dialing the correct number without problems.
26	11/28/07	CT voice caller is not able to reach Relay when dialing 711. He gets tones rather than a voice answer by Relay Ct. Apologized. Branded the line for Voice. Ticket 5422104 was opened. No follow up.	11/28/07	This consumer's phone has been branded as a voice line. It was a TTY line but we have corrected it and made it a voice line.
27	11/19/07	The customer stated after being disconnected from an agent, Customer wanted to emphasize the importance of lower his typing speed to 50 as instructed in his customer note. He was unable to obtain the agent's Communication Assistant ID at this time. Apologized for the inconvenience and assured the customer that his note did state as instructed. No follow up necessary.	11/19/07	Internal database checked and confirmed that consumer has a 50 wpm limit on his typing speed.
28	11/15/07	Voice Carry Over user was in a lengthy call and operator 6339 took over the call and completely disconnected the call.	11/15/07	No agent or supervisor by this number. No action taken.
29	11/15/07	Agent disconnected an upsetting, very important call about the callers deceased daughter. Been having a lot of problems with Agents with 6000 and 7000 numbers.	11/15/07	Supervisor spoke to the agent. The agent does not remember this particular call. The agent did remember losing a few calls and notifying the supervisor on duty. Proper disconnect procedures were reviewed with this agent and he understands.
30	11/08/07	Inability for CapTel unit to reach data toll free #	11/08/07	Technical Support changed outbound calling number in CapTel system to enable outbound captioned calling. This remedied the circumstance.
31	09/20/07	Voice Carry Over customer reports Operator did not process call correctly and needs more training. Voice Carry Over Customer Database Notes indicate the customer does not use GA. When the Operator dialed out and reached the calling to party the Operator would not respond after announcing service because the Voice Carry Over did not say GA at the end of their response. The calling to party asked the Operator what was going on and the Operator said they could not talk with them. Both parties finally hung up because the Operator was not processing the call correctly. (apologized for the problem experienced and advised a complaint would be forwarded to supervisor) Customer did not request contact. Internal Update Performed	09/23/07	The Jacksonville center does not have an agent with the ID #.

32	08/08/07	8/6/2007 1:39am Follow up not needed. TTY user had a call come in to her she was the outbound a partial message was sent to the tty user. She was afraid something was wrong and was not sure if she still had service, she then called back to relay and reached operator 8541F she asked for a supervisor the operator continued to ask for a number calling to. The operator then hung up. Follow up not needed.	08/08/07	Operator followed proper protocol.
33	08/08/07	7/30/07 TTY user stated agent did not respond in a timely manner. Customer did not request call back.	08/08/07	Coached agent on remaining focused on all calls and responding properly and timely.
34	07/19/07	Voice customer billed by incorrect COC month after month after correct COC entered in Relay database (apologized for problem advised T.T. and complaint would be entered) T.T. 4530100 Customer requests contact asp	09/13/07	We have updated the database and made sure that customer had the Correct COC on her data base. We have checked the database and it indicates her COC is correct. Customer will contact us if problems continue.
35	07/13/07	CT Voice Carry Over customer states the Communication Assistant misdialed to a long distance number. Customer states this happened last month and was charged 10 cents. Customer Service apologized to the customer. No follow up needed.	07/13/07	Agent did not recall this particular call. Supervisor educated agent to verify the to number before placing the call. And also the correct procedure to have a credit issued if the to number is dialed incorrect by the agent.
36	07/13/07	CT Voice Carry Over customer states on two different calls both of these Communication Assistant's both had about 30 seconds of "air time" when the customer was not informed about what was going on. Customer Service apologized to the customer. No follow up needed.	07/13/07	Supervisor spoke with both agents and they are not aware of the call. The agents also said it could have been due to technical issues. Educated agents if there are technical issues to immediately contact the supervisor so that a trouble ticket can be filled out. Also informed agents to keep customer informed at all times.
37	07/02/07	Disconnect/Reconnect during calls	07/02/07	Customer reports periodic disconnect/reconnect incidence. Reports this only happens on some calls. Gave customer information explaining to customer what can cause disconnect/reconnection and tips on things to try to reduce incidence.

DOCKET NO. 03-123

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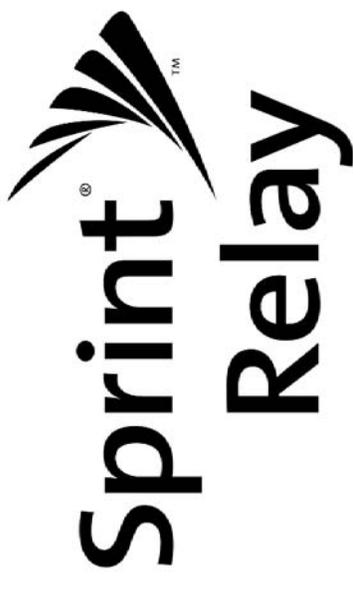


**Connecticut FCC Complaint Log
2009**

Complaint Tracking for CT (06/01/2008-04/30/2009). Total Customer Contacts: 20

Tally	Date of Completion	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/13/08	A customer contacted the Program Manager to report that they had not been able to connect to CT relay by dialing 711 since March. Mike forwarded this to a Customer Service Representative to investigate. Customer Service investigated to find the LEC responsible for that number and entered a trouble ticket. Follow-up was requested.	06/13/08	This has been resolved as it was a LEC issue. The customer can call in now.
2	06/28/08	A customer said her mother's VCO would receive garbled messages from CT Relay. I apologized for the inconvenience and informed him that the matter would be directed to technical support for resolution. A follow-up call was requested.		No ticket was opened as this is a known issue. The technical team have assigned a Bug number to fix garbling.
3	07/14/08	Disconnect/Reconnect during calls	07/14/08	I explained the difference between a CapTel phone and a traditional phone. I explained to the customer why disconnection/reconnection might be occurring and provided tips to reduce the occurrence. I advised customer to program the Call Waiting block code in the menu of their CapTel phone to avoid the disconnection phenomenon on captioned calls.
4	08/04/08	A customer called to say that they have been unable to reach 711 since Sunday, 8-3-08. I advised the customer that a trouble ticket would be entered for a Relay Technician to determine what the problem is. I provided the Relay CT 800 number for the customer to use to make calls. The customer requests contact asap.	05/13/09	I called 2 times and on the third call reached the customer. They have no more issues and are able to make relay calls.
5	08/07/08	he customer reports that they call into 711 and only hear TTY tones. They wait for the call to rollover, but no one picks up. The customer states that they have been a customer for 10 to 11 years and has called into Customer Service before. They are upset that they never used to have to wait for their calls to rollover. The customer also states that this has been happening for days. Their LEC is AT&T, but they have tried calls in various locations and the same thing happens. The Customer Service Representative apologized for the inconvenience and stated that they would put in a ticket and asked if the customer would like follow-up. The customer would like to have follow-up.	08/07/08	A Customer Service Representative in Independence has re-branded the caller as a voice user and also chose "voice" in preferences. The ticket was reassigned to the Customer Service Supervisor to close. The Customer Service Representative left a voice mail with the customer to advise them that their branding has been updated and a note has been added to their account. The message advised them to call back to Customer Service if the problem continues.
6	08/21/08	This customer reports that the agent had a bad attitude. Their first call was accidentally hung up, and when it was redialed, the Communications Assistant was rude and when the voice caller asked her to repeat things, she raised her voice rudely	08/27/08	I spoke with the Communications Assistant and coached her on maintaining a professional tone with all callers.
7	08/21/08		08/27/08	I met with the Communications Assistant and coached them on maintaining a professional tone. The first call was accidentally disconnected and when it was redialed, the Communications Assistant was rude. When the voice person asked her to repeat things she raised her voice rudely.
8	09/07/08	A voice customer had called the prior weekend and was unable to place a call to a TTY user from her home phone, but was able to get through using a using cell phone. Technical support contacted the customer the following Wednesday, saying the problem had been resolved. The customer recently tried to place a similar call and experienced the same problem, again having to use a cell phone to complete the relay call. I apologized for the inconvenience and informed the customer that the problem would be forwarded again to technical support for resolution. A follow-up call was requested.	09/07/08	I called the customer on 9/8/08 at 9:05 AM and left a message requesting a call back regarding the issue. On 9/10/08 I still had not received a call back, so I branded the customer's number for VOICE to correct the problem in the system. 3:40 PM.
9	09/09/08	A VCO customer requested credit when the Communications Assistant mis-dialed their call. The Communications Assistant transferred the caller to Customer Service. I apologized for the problem and advised that only the CA can obtain instant credit. If it is not done with the CA, the customer needs to send or fax the billing statement to Relay Customer Service requesting credit. The VCO customer was very upset that the CA did not know how to do their job and did not get them credit as requested. The customer did not request contact	09/09/08	A team leader spoke with this agent about the procedure for requesting credit on misdials. Also explained that the agent needs to ask for help if they are unfamiliar with a process. The agent apologized.
10	09/16/08	A CT VCO customer says that people have not been able to reach her via 711 for three weeks. I apologized for inconvenience and suggested that voice users try the 800 number instead, to see where the problem lies, but customer did not want to make them dial more than 711. I did a test call to the 711 exchange number and it went through fine. I opened a troubled ticket. Follow-up was requested.	09/16/08	This was a branding issue and we have re-branded them as a VCO consumer. When we originally started working with customer, she was not branded and we offered to brand any of the other callers to her number for her.
11	09/25/08	A UCON hospital operator is concerned that she is unable to reach a deaf patient regarding a 911 issue by calling via the CT Relay toll free or 711. I apologized and explained that I would let the technicians know. I instructed the caller to remain on the line for a voice response from relay operator. I branded the line, set preference and noted the line for voice. I submitted a trouble ticket. The caller wants contact from a supervisor or the Relay Program Manager with resolution.	09/25/08	The number has been branded and the customer has been informed. There was a branding issue and the information has been corrected and updated to the customer's satisfaction.
12	09/29/08	Accuracy of captions	09/30/08	The customer shared feedback regarding the accuracy of captions. The Customer Service Representative apologized for the incident and thanked the customer for bringing their experience to our attention. Customer Service suggested that the customer document the date, time, and Communications Assistant number of any future calls to allow us to take specific action with the Communications Assistant captioning the call.
13	11/11/08	The Communications Assistant did not read the notes to let the customer leave a message the first time. The customer is disappointed with the Communications Assistant for not listening to what she asked for.	11/11/08	The customer did not leave a name or contact information so there is no way to follow up with them. We reminded our agents to make sure they followed the notes of our customers. A team leader met with the agent, who realized the customer's request after typing out the answering machine message. The agent apologized about the mistake, but the customer insisted on filing a complaint.
14	12/02/08	A user called into Relay at 5:45 PM on November 29 and asked the Communications Assistant to dial. The Communications Assistant did not respond and hung up on the inbound TTY caller. The complaint was made at 6:19 PM the same night.	12/02/08	This agent number is no longer assigned to an agent as of 12/3/08. The agent that this customer contact concerns left employment with the company. Given the opportunity, the agent would have been coached on proper call procedures and the importance of following customer instructions with particular attention to providing good customer service. 12/3/08, 9:25 AM CST - I called the customer, attempting to follow-up, but there was no answer. 12/4/08, 3:38 PM CST - I called the customer, attempting to follow-up. I reached an answering machine and left message saying that I would attempt to contact them again. 12/8/08, 12:58 PM CST - I called the customer, apologized, and thanked them for their feedback.
15	03/05/09	Accuracy of captions	03/05/09	A customer shared feedback regarding the accuracy of captions. The Customer Service Representative apologized for the incident and thanked the customer for bringing their experience to our attention. Customer Service suggested that the customer document the date, time and Communications Assistant number of any future calls to allow us to take specific action with the Communications Assistant captioning the call.
16	3/26/2009	Technical - General	3/26/2009	At 12:40 PM CST, a major network supplier, CapTel relies on experienced difficulties that impacted some CapTel calls. At 3:15 PM CST CapTel's supplier re-established its link allowing all calls to be routed and processed normally. Daily service level was met as only some calls were affected. Customer confirmed ability to make their call.
17	04/06/09	The customer felt that the agent did not send the correct macro when the outbound party disconnected.	04/06/09	A supervisor on the floor looked at the screen and everything appeared to be correct. It is suspected that there was garbling on the inbound party's machine. Follow-up was requested and the customer was emailed on 4/6/09.

18	04/28/09	A CT VCO customer says that she has had problems receiving calls through the relay service. The greeting for a VCO call comes in, and the customer says "Go Ahead," but there is no response. I apologized for inconvenience. I did a test call and could not re-create the issue. Trouble ticket number 7878429 was opened and follow-up was requested.		Account Manager called the customer three times and there were no answering machine. There is no other way to contact this customer. Therefore, the complaint is closed.
19	04/30/09	A CT voice caller reached TTY tones when calling 711 and the voice number. Customer Service apologized to the customer, who would like follow-up. Customer Service turned in a trouble ticket.	04/30/09	The Account Manager called the customer, who said the problem still existed. I did some test calls and then called back. At that time the customer could make calls and did not have any more complaints. They were satisfied with the calls.
20	05/09/09	Customer recently had their telephone company (AT&T) out to work on their line. When the customer used 711, people sometimes have trouble reaching the customer. The customer stated that during conversations the line occasionally disconnects. Customer would like a relay technician to work with AT&T to resolve the issue. Customer Service representative apologized for the trouble and informed the customer that a relay technician would look into the issue. A follow-up is requested by phone.	05/09/09	Not enough specific information provided by the Customer Service representative to enter a trouble ticket. Customer Service Representative will contact the customer for additional information and if a trouble ticket is warranted, will enter to technician. CS contacted customer and discovered that he was unintentionally pressing the button on the VCO Ameriphone device that switches from VCO mode to Telephone Mode. When in "Telephone Mode" the device will no longer transmit any text, so he believed the line was disconnecting. He now understands not to press that button during a relay call and was very appreciative for CS contact call and helpful information. Also provided manufacturer's



Connecticut FCC Complaint Log 2009-2010

Complaint Tracking for CT (06/01/2009-05/31/2010). Total Customer Contacts: 17

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/30/09	A customer stated that neither 711 or the toll free number is working to contact relay. She said that a Communication Assistant answered, but disconnected because she could not hear the VCO customer. The customer was thanked for the feedback, and was informed that a trouble ticket would be entered. It was also suggested that the customer check with the Local Exchange Carrier to make sure that the 711 switch is working correctly.	12/11/09	Three calls, no connection with customer was reached. Could not determine if there is still any problems. Customer never called back.
2	07/05/09	A customer complained that while using HCO they were hearing tones, and the Communication Assistant was not receiving her text. There was also an occasional disconnect. The customer also requested to change their frequently dialed numbers. Customer Service changed their frequently dialed numbers, and apologized for the inconvenience. Customer Service also rebranded the number as HCO. The customer requested a follow up from a technician when the problem was fixed.	07/05/09	The customer's database was updated and their number was rebranded for HCO. Customer Service will contact the customer to let them know.
3	07/16/09	A customer said that the Communication Assistant must have missed their note about leaving a message the first time on the answering machine. The customer pointed this out, and asked the Communication Assistant to redial so they could leave ea message. The Communication Assistant dialed, the line rang ten times, and then the Communication Assistant redialed again without being instructed to do so. The customer was upset because the agent did not offer an apology for ignoring the notes, and instead took control of the call. The customer asked for a supervisor, and the Communication Assistant said "one moment please," but a few minutes later the customer realized that the call was disconnected. The customer says missing the notes is human error, but the lack of apology made the situation worse.	07/17/09	The Team Leader met with the Communication Assistant and went over proper call procedures, and stressed the importance of reading and following the customer's notes and instructions. The consequences of being rude to a customer were addressed, and the Communication Assistant was also informed that disconnecting callers is grounds for termination. The Communication Assistant understood.
4	07/31/09	Disconnect/Reconnect during calls	07/31/09	Customer Service sent the customer information explaining the difference between a CapTel and a traditional phone. Disconnect/reconnect was also explained to the customer, and an email was sent with tips on how to reduce this occurrence.
5	08/02/09	A customer stated that they often send and receive garbled messages when using relay. A Customer Service Representative apologized, and offered to have the issue investigated. A follow up was requested via email.	08/02/09	Customer Service contacted the customer to find out the brand of the TTY equipment and provided instructions on how to correct the garbling issue. Test calls were placed to check for further garbling.
6	08/26/09	A customer said that the Communication Assistant was very unprofessional and condescending. The customer said that during a call, their conversation was cut short. She asked the Communication Assistant to redial and ask for a staff member, but the Communication Assistant said "you were talking to a child." The customer felt that was unprofessional and not appropriate for her to say.	08/26/09	The Communication Assistant indicated that a child answered the phone because a child "answered the phone". The inbound TTY customer became abusive to the Communication Assistant after that was typed and began using foul language directed at the Communication Assistant. The operator did put up her red cup for assistance at that point but the TTY customer hung up before a supervisor was able to get to her station. The Communication Assistant demonstrated knowledge of correct procedures, and followed protocol.

7	09/08/09	A Doctor's office called to say that during a relay call from a patient, the Communication Assistant was very rude. The office is familiar with Relay and has never encountered this before. The Communication Assistant was yelling and interrupting by saying "I have to finish typing...only speak when I say go ahead." The Doctor's office said they replied "Do not speak to me that rudely," and the Communication Assistant typed that to the patient. This made the patient confused. A Customer Service Representative apologized and informed the caller that this would be forwarded to the appropriate person. A follow up was requested.	09/08/09	The Team Leader spoke with the Communication Assistant who understood the seriousness of this issue. The Team Leader provided some tools for dealing with these types of issues in the future. The Team Leader also spoke with the customer and explained that this behavior was unacceptable, and that the Communication Assistant did admit that she was rude. The Team Leader also thanked the customer for bringing this to our attention. The Communication Assistant will be monitored closely.
8	09/09/09	A customer was unable to dial long distance via Verizon. A trouble ticket was entered. Follow up was requested.	09/09/09	Customer Service spoke with the customer and the problem was solved with technical support. The customer's profile was changed, and the platform upgrade was checked. It was confirmed that the customer was able to make calls using 711.
9	09/16/09	Disconnect/Reconnect during calls	09/16/09	The customer reported calls where the audio was lost for a few moments, and it would seem that no one was on the line. A Customer Service Representative researched and identified calls showing incidences of disconnect/reconnect where the data connection was disrupted. The Customer Service Representative explained this is to the customer, comparing the situation to old dial up computer connections, when a connection would be disrupted and the data connection would be lost. Customer Service gave the customer tips on how to reduce this problem. The customer was satisfied.
10	02/15/10	Accuracy of captions	02/15/10	A customer shared feedback regarding the accuracy of captions and provided specific call data. A Customer Service Representative apologized for the incident, and thanked the customer for the feedback. The call detail was shared with Call Center Management for follow up with the Communication Assistant by a supervisor. A technical issue was identified at the Communication Assistant's workstation.
11	02/19/10	Dialing Issue - Unable to dial regional 800 number	02/19/10	A customer reported that they were unable to make a call to a regional toll-free number with captions. Technical Support made an adjustment so that the CapTel customer can successfully make captioned calls to this regional 800 number.
12	03/17/10	A Voice customer gets TTY tones when dialing the Connecticut toll free number, and is unable to connect to a Communication Assistant. Apologized for the problem and performed test calls to check the number. A trouble ticket was entered. No follow up was requested.	03/17/10	A Technician opened a trouble ticket to solve the issue. There were no further issues. The customer did not request a follow up.
13	03/23/10	Dial Tone - Not heard	03/23/10	A customer's mother said that their CapTel phone did not have a dial tone. Further troubleshooting determined that the jacks in the back of the phone were damaged. The Customer Service Representative advised the customer to contact the issuing agency to have the unit replaced or serviced.
14	04/12/10	Dialing Issue - Unable to dial regional 800 number	04/12/10	A customer stated that she was unable to access certain toll-free numbers. Technical Support made an adjustment so that the CapTel user can successfully make captioned calls to this regional 800 number.
15	04/15/10	A Voice customer cannot call to a Delaware VCO customer through relay. The customer can call without relay, however when they call through relay they get a siren noise. A Customer Service Representative apologized to the customer and turned in a trouble ticket. The customer would like a follow up email when a solution has been found.	04/15/10	A trouble ticket was opened, and a technician worked on this issue. The Account Manager followed up as per the customer's request. The customer stated that the problem was resolved.

16	05/04/10	Dial Tone - Not heard	05/04/10	A customer reported that her CapTel phone did not have a dial tone and is not ringing. A Customer Service Representative advised a physical reset. This resolved the customer's experience.
17	05/18/10	Dial Tone - Not heard	05/18/10	A customer's husband reported no dial tone heard on their CapTel. A Customer Service Representative advised the customer's husband to perform a physical reset. This resolved the customer's experience.



**Connecticut
FCC Complaint Log
2010 - 2011**

Complaint Tracking for CT (06/01/2010-5/31/2010). Total Customer Contacts: 19

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	10/29/10	Unable to make captioned calls	10/29/10	Customer reported that their other party needed to wait for an operator when attempting to make a captioned call. Customer Service Representative apologized for this experience and noted that there was a technical difficulty at the Call Center that caused calls not to ring through to a waiting captionist. An equipment vendor corrected the matter. Customer Service Representative confirmed that the customer's callers are now able to make their captioned call successfully without delay.
2	12/20/10	Technical - General	12/21/10	Customer reported a lack of captions when attempting to make a captioned call. Customer Service Representative apologized for this experience and noted that there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. Customer Service Representative confirmed that the customer is now able to make their captioned call successfully without delay.
3	12/20/10	Technical - General	12/21/10	Customer called and reported that they saw "Waiting for CapTel Operator" when attempting to place a captioned call. Customer Service Representative apologized for this experience and noted that there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. Customer Service Representative confirmed that the customer is now able to make their captioned call successfully without delay.
4	12/20/10	Technical - General	12/23/10	Customer reported by Live Help that they were receiving the waiting for CapTel Operator message when attempting to place a captioned call. Customer Service Representative apologized for this experience and noted that there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. Customer Service Representative confirmed the customer is now able to make their captioned call successfully without delay.
5	12/20/10	Technical - General	12/21/10	Customer reported the need to wait for an operator when attempting to make a captioned call. Customer Service Representative apologized for this experience and noted there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. Customer Service Representative confirmed the customer is now able to make their captioned calls successfully without delay.
6	12/21/10	Technical - General	12/21/10	A customer stated that their CapTel phone was not working. Customer Service Representative advised the caller that the technical issue is resolved. Customer Service Representative apologized for this experience and noted there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. Customer Service Representative confirmed the customer is now able to make their captioned calls successfully without delay.
7	12/27/10	Service - General	12/27/10	Customer indicated that their outgoing calls rang but did not connect to the captioning service. Customer Service Representative explained that there was an unanticipated spike in call volume resulting in some calls experiencing longer than usual wait times beyond the usual few seconds. Customer Service Representative noted that if this should happen again to wait a bit longer than usual for the call to connect. Customer Service Representative apologized for the additional wait time. Customer was satisfied.
8	01/11/11	A voice customer stated that the Communication Assistant was rude to her regarding the relay procedures. Apologized to the customer. No follow-up was requested.	01/11/11	A Supervisor followed up with the Communication Assistant. The Communication Assistant was coached on appropriate ways to educate and pace a caller without sounding rude, and was reminded of the importance of good customer service.
9	02/02/11	Service - General	02/03/11	Customer reported seeing "Captioning Service is Ringing" when trying to place calls. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.

10	02/02/11	Service - General	02/02/11	Customer reported seeing "Captioning Service is Ringing" when trying to place calls. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.
11	02/02/11	Service - General	02/02/11	Customer's husband reported that his wife is seeing Caption line is ringing. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.
12	02/02/11	Service - General	02/02/11	Customer reported experiencing a longer than normal wait for a captionist. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.
13	02/02/11	Service - General	02/02/11	Customer reported seeing "Captioning Service is Ringing" when trying to place calls. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.
14	02/02/11	Service - General	02/02/11	Customer reported they were having difficulties connecting with captions and needing to wait for the captionist. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.
15	02/02/11	Service - General	02/03/11	Customer reported seeing "Captioning Service is Ringing" when trying to place calls. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.
16	02/03/11	Service - General	02/03/11	Customer reported that he was not getting captions on his CapTel Phone and the only thing that comes up on the screen are the words WAITING FOR CAPTIONS on 2/2/11. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner on 2/3/11.
17	02/03/11	Service - General	02/03/11	Customer's son indicated his mother was not able to get captions. Customer Service Representative advised customer that on 2/2/11 CapTel's staffing was affected by blizzard conditions. Customer Service Representative apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under both a "state of emergency" and a "civil danger" warning declared by Wisconsin Governor Scott Walker. Even though bus and taxi services were shut down in both cities and many roads were impassable the Milwaukee and Madison centers both remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. Customer Service Representative confirmed with customer they are able to make and receive calls in a timely manner.

18	03/22/11	<p>A customer stated: "When I call customer service they don't understand what I am saying and the Communication Assistant got aggravated at me and swore at me. I have never had anyone talk to me like that before. I called 3 times and got the Communication Assistant for all of those calls. I want him fired." Apologized to caller. Follow up was requested.</p>	03/22/11	<p>The operator identified by the customer as handling this call was not working at the time the call occurred. No additional action is possible. Tried contacting this customer on 3 attempts but was unable to reach the party.</p>
19	04/22/11	<p>A Connecticut VCO user stated that they could not make long distance calls, and that the Communication Assistant stated that the customer has no long distance carrier showing. The customer stated that they had previously established a carrier with customer, and that when the customer calls Customer Service the carrier of choice shows in their system. Apologized to the customer and worked with them on testing the database. A trouble ticket was entered. Explained to the customer that they would be notified with the relay technicians findings. Customer did not want a follow up with the resolution.</p>		<p>Relay Program Manager attempted to call customer three separate times, however the customer could not be reached. The ticket has been closed.</p>



**Connecticut FCC
2011 - 2012
Complaint Log**

Complaint Tracking for CT (06/01/2011-05/31/2012). Total Customer Contacts: 2

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	09/19/11	Accuracy of captions	09/19/11	A Customer reported an instance where she received captions of a swear word repeatedly. The Customer Service Representative apologized for this incidence and thanked the customer for bringing the experience to our attention. The customer did not recall the date or time of the call. The Customer Service Representative reported the incidence to the Call Center as described without specifics. The Customer Service Representative also explained upon request how captions are created. The Customer Service Representative explained that captions are created by a live captionist using voice recognition technology. The Customer Service Representative explained that sometimes similar sounding words can be captioned and that errors will be corrected shortly thereafter in brackets. The Customer thanked the Customer Service Representative for explaining how captions are produced and confirmed that when speaking with the Customer Service Representative the captions were very clear and understandable.
2	01/18/12	Accuracy of captions	01/18/12	Customer reported that not all of their words were being captioned during a call the week before but did not remember the time or date. The Customer Service Representative apologized for this experience and researched to see if there was a technical cause. No technical explanation was identified. The Customer Service Representative suggested that the customer document the date, time, and Communication Assistant # of any future calls to allow us to take specific action with the Communication Assistant captioning the call. The Customer said if it happens again that she would do so.

Appendix K:
Connecticut TRS RFP

August 17, 2006

Re: Docket No. 06-05-08, DPUC Review of the State of Connecticut Telecommunications Relay Service 2007-2012; Request for Proposal to Provide Connecticut Intrastate Telecommunications Relay Service

To Whom It May Concern:

The Utilities Operations and Management Analysis Unit (UOMA) of the Connecticut Department of Public Utility Control (Department) is sending your company a Request for Proposal (RFP) to provide intrastate Telecommunications Relay Service (TRS), for speech and hearing impaired people who rely on the use of a telecommunications device for the deaf (TDD), a computer, or other mechanical adaptation to communicate via the telephone network with parties who do not require such a device. To address the provision of Connecticut intrastate Telecommunications Relay Service, the Department has opened Docket No. 06-05-08, DPUC Review of the State of Connecticut Telecommunications Relay Service 2007-2012.

Attachments pertinent to the engagement are enclosed. Attachment 1 identifies the authority and required scope of the engagement. Attachment 2 provides engagement activities and guidelines. Attachment 3 provides guidelines on the proposal itself. Attachment 4 provides more specific proposal guidelines. The proposals will be reviewed and evaluated by the Department. Service providers meeting Department requirements and demonstrating superior capability to offer TRS may be invited to make oral presentations to the Department.

Documents must be filed with the Executive Secretary of the Department in both electronic and paper form. The date and time of filing shall be the date and time the Department first receives a complete electronic version or the paper version and the required number of paper copies. Unless otherwise specified, filings are due by 4:00 p.m. on or before October 17, 2006. If a complete electronic version of the filing is submitted through the Department's Web Filing System, only one paper version of the filing is generally required. (For exceptionally voluminous or complex filings, the Department reserves the right to request additional paper copies.)

If a complete electronic version of the filing is not web filed, submit an original and seven (7) copies for all documents. Each copy shall be collated and secured with the docket number prominently displayed on the first page. If additional paper copies of interrogatory responses and Late Filed Exhibits are required, each page shall be three-hole punched.

Very truly yours,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Executive Secretary

ATTACHMENT 1

STATEMENT OF SCOPE AND PURPOSE

Background

This docket concerns the award of the contract to provide TRS in Connecticut. The Department, in consultation with the Commission on the Deaf and Hearing-Impaired (CDHI), awards the contract for provision of this service. All telecommunications service providers are required to participate in the funding for TRS.

Scope of Engagement

This RFP is issued to contract for the establishment and ongoing provision of Connecticut intrastate TRS, in compliance with the Americans with Disabilities Act of 1990 (ADA). TRS enables persons who have a speech or hearing impairment and use a TDD to engage in communication, using voice communication services, with an individual who does not have a TDD, pursuant to the ADA and Title 47 of the Code of Federal Regulation, Chapter 1, Part 64, Subpart F, Telecommunications Relay Services and Related Customer Premises Equipment for Persons with Disabilities.

ATTACHMENT 2

ENGAGEMENT ACTIVITIES AND GUIDELINES

A. Timetable

Intrastate offering of TRS must be fully operational as of July 1, 2007. The contract shall be effective on July 1, 2007, and shall remain in effect for a period of 60 months.

B. Department Review of Proposals

During the process of evaluating the proposals, the Department reserves the right to request additional information or clarification from any service provider submitting a proposal, and to permit corrections of errors or omissions without notice to other competing service providers. The Department shall be held harmless if staff or the service provider retained for this or any subsequent engagement employs at any time, any technique, methodology, or procedure suggested in any proposal, regardless of whether such proposal is from the service provider selected to offer TRS for this contract. Proposals received by the Department are subject to the Freedom of Information Act, §1-200et. seq. of the General Statutes of Connecticut (Conn. Gen. Stat.).

C. Notification of Award

You agree to not make any press announcement or issue a news release or announcement concerning your selection for the contract period prior to the Department's public release of said information or in the alternative, without the written approval of the Department.

D. Other Department Rights

The Department reserves the right to reject any oral proposals received in response to this RFP. The Department may terminate the contract at any time with or without cause, upon 10 days written notice to the service provider selected. The selected service provider, by acceptance of the contract, waives any right to claim damages as a result of such termination.

The Department will be the final arbiter of all disputes arising from contract related matters.

The Department reserves the right to conduct an audit of the TRS provider's costs, expenses and revenues associated with this service.

E. Costs of Preparing Proposals

Any service provider submitting proposals in response to this RFP does so at its own expense. It is understood that the selected service provider will not include proposal costs, or any costs incurred prior to the contract award, as reimbursement costs related to the contract itself.

F. Subcontractors

Intended use of subcontractors must be clearly explained in the proposal and a copy of any proposed subcontract must accompany the proposal. The service provider selected to provide TRS may enter into written subcontract(s) for performance of certain of its functions under the contract only with written approval from the Department prior to the effective date of any subcontract. If the selected service provider intends to use a subcontractor (during the term of the contract) that has not been identified within its response to this RFP, the Department reserves the right to reject or accept the use of subcontractors for the purposes herein. The selected service provider shall be wholly responsible for the entire performance of the contract whether or not subcontractors are used. Any subcontractor must comply with the Department's terms and conditions herein, as well as any other related, negotiated terms between the Department and contractor for the services herein.

G. Department Staff Participation

The Department will exercise such monitoring and controls as are appropriate and necessary to achieve the desired and agreed-upon service from the selected service provider.

H. Engagement Activities Schedule

The selected service provider must be available immediately and will be required to attend meetings, hearings and consult with the Department staff and/or CDHI on an as needed basis.

I. Reporting Procedures

The selected service provider and the Department staff and/or CDHI will meet as necessary to review the selected service provider's performance and to discuss any concerns that may arise.

J. Hearings

The selected provider may be called upon to participate in hearings and may be called upon to offer testimony, and face cross-examination, regarding its activities during the contract time period.

K. Work Papers

At the conclusion of the engagement, the selected service provider shall make copies of significant work papers and source documents available to the Department, if so requested.

L. Costs

A cost ceiling for services to be provided in this engagement must be included in the proposal. The Department will require a third party billing and collection agent. Therefore, costs for billing and collection agents subcontracted by the selected service provider must be identified and included in the proposal. Pricing must be firm and shall remain firm for 60 months. Estimates are not acceptable.

M. Payments

The selected service provider will submit monthly invoices to the billing and collection agent. The billing and collection agent will review such charges and submit them to the telecommunications service providers for payment. All expenses associated with the intrastate provision of TRS shall be borne by the telecommunications providers. However, the Department, not the telecommunications providers, is the contractor for the engagement. The Department will be the final arbiter of all disputes regarding cost and payment.

ATTACHMENT 3

PROPOSAL GUIDELINES

A. Service Provider's Experience and References

The proposal should contain brief descriptions of the knowledge and previous experience in providing intrastate TRS, including, but not limited to, knowledge and experience of Connecticut's telecommunications industry. The proposal should contain brief descriptions why the company is qualified, the scope, complexity and location of any present TRS services, performance statistics for those services and any other pertinent information. Proposer shall provide the name and telephone numbers of three references. If possible, each should have or have had a TRS contract with the proposer.

B. Oral Presentation/Site Visits

Proposers may be asked to make oral presentations or to make their facilities available for a site inspection by the Evaluation Committee. Such presentations and/or site visits will be at the proposer's expense. Any clarifications to a bid response resulting from these sessions will be in writing and will be incorporated in the bid response.

C. Approach

The general approach to be used to offer TRS should be briefly described. If applicable, explain how your company intends to transition the offering of its services from the current service provider.

D. Affidavits

Submit an affidavit in which your company certifies and attests that neither it nor any member of its staff retained for this matter has provided, or caused to be provided, gifts, as defined in Conn. Gen. Stat. § 1-79(e), to any state official or employee of the Department.

Submit an affidavit in which your company certifies that no member of its staff retained for this matter has been convicted of bribery or attempting to bribe an officer or employee of the State, nor has made an admission of guilt of such conduct which is a matter of record.

Submit an affidavit in which your company identifies any business, personal, or investment relationships that exist, or have existed, between your company or members of its staff retained for this matter and the telecommunications

providers, their affiliates, and their holding companies. *(Not applicable in this instance).*

Submit the attached Affidavit Regarding consulting agreements in which you disclose any agreements entered into for a fee by you, your company, or any member of its staff for counsel, contacts, lobbying or any similar activity related to the herein proposal.

E. Affirmative Action

The proposal should include a brief description of the service provider's Affirmative Action plan and its employee census from the standpoint of Affirmative Action.

F. Legal Compliance

The service provider shall certify that the offering of TRS will be in compliance with all federal and Connecticut laws, including all labor laws and all anti-discrimination legislation.

All service providers submitting a proposal in response to this request, and all potential subcontractors to such service providers shall certify that: (1) the prices quoted have not been knowingly disclosed to any competitor or any other potential bidder, (2) such prices have been determined independently without communication, agreement, or collusion with such competitors or potential bidders, (3) no attempt has been made to persuade any such competitor or potential bidder to submit or not to submit a proposal, and (4) no other actions of any kind have been taken which might be perceived as having the purpose of restricting or discouraging competition.

G. Insurance

Your company shall be expected to secure and maintain, at no cost or expense to the Department, professional liability insurance or Comprehensive General Liability Insurance (CGL) to insure against damages and costs resulting from, but not limited to, negligent acts, errors, and omissions in the offering of TRS resulting from this RFP. If such policy contains a deductible clause, your company shall be liable to the extent of the deductible amount. Proof of insurance shall be provided to the Department no later than the date of execution of any agreement.

H. Indemnity

Your company shall be expected to indemnify and shall defend and hold harmless the State, its officers, and its employees from and against any and all suits, actions, legal or administrative proceedings, claims, demands, damages, liabilities, monetary loss, interest, attorney's fees, costs and expenses of

whatsoever kind or nature arising out of the performance of this engagement, including those arising out of injury to or death of your employees or subcontractors, whether arising before, during, or after completion of the services hereunder and in any manner directly or indirectly caused, occasioned or contributed to in whole or in part, by reason of any act, omission, fault or negligence of Contractor or its employees, agents or subcontractors.

I. Page numbering

The pages of the proposals should be sequentially numbered for accurate referencing. Proposals should be typed and bound securely. Proposals must be organized with headings and separated by numeral tabs.

AFFIDAVIT REGARDING CONSULTING AGREEMENTS

All state contractors, vendors, consultants or other entities seeking to conduct business with the State of Connecticut who anticipate entering into, or renewing, an agreement for procurement of goods or services having a total value to the state of more than fifty thousand dollars in a calendar or fiscal year (hereinafter "agreement") shall disclose any and all consulting agreements, whether written or oral, to the head of the contracting agency (hereinafter "such agency").

"Consulting agreement" means any written or oral agreement to retain the services, for a fee, of an individual or business entity for the purposes of:

- (1) providing counsel to a contractor, vendor, consultant or other entity seeking to conduct, or conducting, business with the State of Connecticut, or
- (2) contacting, whether in writing or orally, any executive, judicial, or administrative office of the state, including any department, institution, bureau, board, commission, authority, official or employee for the purpose of solicitation, dispute resolution, introduction, requests for information or
- (3) any other similar activity related to the procurement agreement.

"Consulting agreement" does not include those agreements or services registered under the provisions of Chapter 10 of the Connecticut General Statutes (Code of Ethics for Lobbyists).

Such disclosure affidavit shall be required if any duties of the consultant include communication concerning business of such agency, whether or not direct contact with a state agency, state official and state employee is expected or made. The disclosure affidavit shall include the name of the consultant, the consultant's firm, whether the consultant is a former state employee or public official (if so, indicate the consultant's former agency and termination date), the basic terms of the consulting agreement, and a brief description of the services to be provided. The disclosure affidavit shall be amended whenever such entities enter into any new consulting agreements during the term of the procurement agreement.

I, _____ (name, title, and company name)
disclose the following consulting agreements (if not applicable, indicate "none"):

- 1.
- 2.
- 3.

I understand that this information shall be updated, as necessary, during the pendency of this, or any other contract that I may have with the State of Connecticut.

Sworn as true to the best of my knowledge and belief, subject to the penalties of false statement.

Name: _____ Signature: _____ Date: _____

Subscribed and Sworn before me this day of , 20__.

Notary Public/Commissioner of the Superior Court

ATTACHMENT 4

SPECIFIC PROPOSAL REQUIREMENTS

A. Description of Proposed System

Please explain, in detail, how each of the operational, technical and functional standards of the FCC will be met, as well as a supporting network design diagram indicating quantities and types of inbound/outbound circuits. (Access to the relay service center from all points in Connecticut shall be toll-free.) State the location of the Communications Assistants (CA) and the location of the TRS administrative offices.

B. Start-up Plan

Provide an implementation schedule and plans including such detail as whether existing intrastate TRS telephone numbers might be used, and what other transitional steps will be taken to ensure full coverage on the start-up date.

C. Policy and Procedures Manual

Please provide a comprehensive outline of a proposed Operator Policy and Procedures Manual which shall include, but not be limited to, confidentiality, handling of emergency and crisis calls, consequences of noncompliance and the functions and roles of a CA. Describe how this manual may be obtained by the public.

D. Monitoring Report Requirements

1. Traffic Reports

The selected service provider shall provide to CDHI the following written reports on a monthly basis, no later than 21 days after the end of the report month. (More frequent or more detailed reports shall also be available upon request.)

a. Report by day and by month:

- i. number of incoming calls;
- ii. number of outgoing calls
(including busy, no answer, disconnected);
- iii. number of complete local calls and toll calls;
- iv. number of abandoned calls.

b. Average daily and monthly blockage rate.

- c. Average daily and monthly answer time; range of answer times for the month.
- d. Average daily and monthly number of calls in queue (caller is receiving a ringing, waiting to be answered by an operator); average length of time in queue.
- e. Average daily and monthly length of call, broken down into call set-up, call duration, and call wrap-up.
- f. Total daily and monthly number of calls of the following lengths:
 - 0 to 6 minutes;
 - 6+ to 15 minutes;
 - 15+ to 30 minutes;
 - 30+ to 45 minutes;
 - 45+ to 60 minutes;
 - over 60 minutes.
- g. Usage patterns (number of calls and length of calls) by hour of day and day of week.
- h. Number of operators on duty by hour of day and day of week.

2. Outages

Provide monthly reports of outages by date, duration, cause and steps taken to prevent recurrence.

3. Other

Please provide within the proposal any other reports you provide to other state/federal agencies for the purpose of monitoring your TRS activity that would support the Department and CDHI's oversight responsibility.

E. Prices

1. Prices for the provision of intrastate TRS shall be firm for the 60 months of the resulting contract. Although the proposer is required to have the capability of providing TRS for interstate calls along with equal access, the recovery of these costs will be subject to FCC regulations as may be developed and will not be covered under this contract. The proposer may bill, collect and retain revenue from the intrastate transport associated with TRS, under its own tariffs, as may be allowed by the Department and/or CDHI. Remaining costs will form the basis for prices to be submitted under this RFP. Proposer must provide two sets of prices for the mandatory portion of this RFP, the first

assuming that the proposer is allowed by the Department to charge users for the intrastate transport associated with TRS, and the second assuming that the proposer is not allowed to charge for such transport. In the first case, please state the underlying assumptions to support what rate the users will pay.

2. Prices in response to this RFP and ultimate reimbursement to the contractor will be based on a price per completed call minute. A completed call minute shall include the time the calling party is connected to the called party or to an answering machine at the called party's number, or to a recorded message or intercept for the called number. A completed call minute does not include time in queue (call is ringing, waiting for a live answer), call set-up, call wrap-up, or calls that have reached numbers that are busy or receive no answer. The vendor shall also provide the price per minute in Session minutes and Conversation minutes. Proposers will complete the attached Price Quotation sheet. One rate per completed call minute will apply each month. The actual total call minutes for the month will be multiplied by the appropriate rate per completed call minute to determine the total dollars due the vendor for that month.

3. The price for each optional feature will be a flat monthly rate.

F. Proposal Submission Certification

A certification form must be signed and accompany the Proposal.

G. TDD Directory Requirements

Compile, publish, and distribute an annual directory listing to all Connecticut persons, companies and other organizations which use a TDD. Such directory shall also contain emergency TDD numbers for each of the 50 states and shall include the names, addresses and TDD numbers of relay services serving each of the 50 states. Describe such a directory, noting any additional features that would be useful to provide. Describe how such a directory shall be updated and distributed in a timely fashion.

H. TRS Office in Connecticut Option

Provide all relay calls to and from parties in Connecticut from a facility physically located within Connecticut. Describe the location and staffing of such office, including the number of positions by each job title on the staff. The proposals will have two prices: one with an in-state facility and one without an in-state facility.

I. Identification of Call Assistant Requirement

Require each Call Assistant (CA) to give their name or number to the caller at the outset of the call; and in the event that a CA handling a particular call is replaced by another CA, to require the replacement CA to immediately give their name or number to the caller.

J. Advisory Board Requirement

Establish and utilize an advisory board composed of Connecticut residents, the majority of whom are deaf, hard-of-hearing and speech impaired TRS users. Explain how members would be recruited, what their role would be, and how often they would meet with TRS management.

K. Management & Staff Positions Requirements

Provide assurances that, to the maximum extent possible, TRS management and staff positions will be filled by persons with disabilities who regularly use relay services. Explain how they will be recruited. Provide a list of job titles and descriptions, indicating which disabilities will not meet the job requirements.

L. Sign Language Requirement

Ensure that at least one staff member on each shift shall be a person fully skilled in the use and understanding of American Sign Language and deaf culture.

M. Spanish Language Requirement

Ensure that at least one staff member on each shift shall be a person fully skilled in the use and understanding of the Spanish language and culture.

N. Relaying Speech-Impaired Spoken Words Requirement

Ensure that the understood spoken words of speech-impaired persons who are unable to use a TDD will be relayed. Outline the special training to be provided to staff in support of this service.

O. TRS Newsletter Requirement

State the additional monthly cost, if any, to regularly publish and distribute (at least annually) a newsletter as a means for educating deaf, hard-of-hearing and speech impaired TRS users about the purpose and use of TDDs and TRS.

P. Education and Training Program

State the additional monthly cost, if any, to expand the FCC mandatory requirement for public access to information. Describe all elements of an education and training program to be carried out by the TRS provider, using resources which include but are not necessarily limited to, news media, information and referral centers, libraries, exhibits and displays of equipment, specialized pamphlets, brochures and other explanatory documentation. Such description should also include how general audiences, TRS consumer audiences, and specialized service providers (such as E911) shall be reached by the education and training program.

Q. TDD Distribution Program Requirement

State the additional monthly cost, if any, to establish a program based in the state for people who need a TDD to communicate over the telephone network and are financially qualified pursuant to Connecticut standards for one TDD per household available on loan, free of charge and for an unlimited time period. Also, such program shall provide free TDD repair or replacement services, and free temporary loans of substitute TDDs while a user's TDD is under repair. Describe such program noting specifically how a TDD model will be selected and purchased, how TDDs will be distributed, any pertinent eligibility criteria, how such eligibility criteria will be evaluated, application procedures and location of distribution and repair sites. Such equipment provided shall allow for placement of a relay call as well as for receiving a relay call. In some situations this may include a ring signaling device.

R. Convenience Features

Please describe any convenience services (e.g., Turbo Charge, Caller ID, Video Relay, etc.) that might be provided and any additional associated monthly cost to enable the relay user to access each of such services.

S. Other

Please describe any other features which you feel are especially valuable additions to telecommunications relay service, and provide any additional monthly cost associated with each of such features.

REQUEST FOR PROPOSAL
TELECOMMUNICATIONS RELAY SERVICE
FORMAT FOR SUBMITTING PRICES

I. Assuming proposer is allowed to charge users for the intra-state transport of TRS.

<u>COMPLETED CALLS PER MONTH</u>		
<u>UNDER 40,000</u>	<u>40,000 TO 60,000</u>	<u>OVER 60,000</u>

Price per Conversation/
Session Call Minute

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In the event that the service is provided for all Connecticut local exchange carriers and/or cellular providers, please state if the price will be different in any regard.

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II. Assuming proposer is not allowed to charge users for the intra-state transport of TRS.

<u>COMPLETED CALLS PER MONTH</u>		
<u>UNDER 40,000</u>	<u>40,000 TO 60,000</u>	<u>OVER 60,000</u>

Price per Conversation/
Session Call Minute

--	--	--

In the event that the service is provided for all Connecticut local exchange carriers and/or cellular providers, please state if the price will be different in any regard.

--	--	--

April 12, 2011

Re: Docket No. 11-03-04, DPUC Review of the State of Connecticut Telecommunications Relay Service 2012-2017; Request for Proposal to Provide Connecticut Intrastate Telecommunications Relay Service

To Whom It May Concern:

The Utilities Operations and Management Analysis Unit (UOMA) of the Connecticut Department of Public Utility Control (Department) is sending your company a Request for Proposal (RFP) to provide intrastate Telecommunications Relay Service (TRS), for speech and hearing impaired people who rely on the use of a telecommunications device for the deaf (TDD), a computer, or other mechanical adaptation to communicate via the telephone network with parties who do not require such a device. To address the provision of Connecticut intrastate Telecommunications Relay Service, the Department has opened Docket No. 11-03-04, [DPUC Review of the State of Connecticut Telecommunications Relay Service 2012-2017](#).

Attachments pertinent to the engagement are enclosed. Attachment 1 identifies the authority and required scope of the engagement. Attachment 2 provides engagement activities and guidelines. Attachment 3 provides guidelines on the proposal itself. Attachment 4 provides more specific proposal guidelines. The proposals will be reviewed and evaluated by the Department. Service providers meeting Department requirements and demonstrating superior capability to offer TRS may be invited to make oral presentations to the Department.

The Department requests that one original and five (5) copies of the proposals be filed with the UOMA Unit to the attention of Robert Palermo at the Department's address (State of Connecticut, Department of Public Utility Control, Ten Franklin Square, New Britain, Connecticut 06051). The Department would also appreciate an electronic version of the proposal in Word, which may be filed with the paper copies on diskette or CD, or may be e-mailed and sent to both robert.palermo@po.stat.ct.us and nancy.joaquim@po.state.ct.us. The date and time of filing of the proposal shall be the date and time the Department first receives a complete electronic version or the paper version and the required number of paper copies. Unless otherwise specified, proposals are due by 4:00 p.m. on or before October 3, 2011.

Each copy shall be collated and secured with the docket number prominently displayed on the first page. If additional paper copies of interrogatory responses and Late Filed Exhibits are required, each page shall be three-hole punched.

Very truly yours,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Kimberley J. Santopietro
Executive Secretary

ATTACHMENT 1

STATEMENT OF SCOPE AND PURPOSE

Background

This docket concerns the award of the contract to provide TRS in Connecticut. The Department, in consultation with the Commission on the Deaf and Hearing-Impaired (CDHI), awards the contract for provision of this service. All telecommunications service providers are required to participate in the funding for TRS.

Scope of Engagement

This RFP is issued to contract for the establishment and ongoing provision of Connecticut intrastate TRS, in compliance with the Americans with Disabilities Act of 1990 (ADA). TRS enables persons who have a speech or hearing impairment and use a TDD to engage in communication, using voice communication services, with an individual who does not have a TDD, pursuant to the ADA and Title 47 of the Code of Federal Regulation, Chapter 1, Part 64, Subpart F, Telecommunications Relay Services and Related Customer Premises Equipment for Persons with Disabilities.

ATTACHMENT 2

ENGAGEMENT ACTIVITIES AND GUIDELINES

A. Timetable

Intrastate offering of TRS must be fully operational as of July 1, 2012. The contract shall be effective on July 1, 2012, and shall remain in effect for a period of 60 months.

B. Department Review of Proposals

During the process of evaluating the proposals, the Department reserves the right to request additional information or clarification from any service provider submitting a proposal, and to permit corrections of errors or omissions without notice to other competing service providers. The Department shall be held harmless if staff or the service provider retained for this or any subsequent engagement employs at any time, any technique, methodology, or procedure suggested in any proposal, regardless of whether such proposal is from the service provider selected to offer TRS for this contract. Proposals received by the Department are subject to the Freedom of Information Act, §1-200et. seq. of the General Statutes of Connecticut (Conn. Gen. Stat.).

C. Notification of Award

You agree to not make any press announcement or issue a news release or announcement concerning your selection for the contract period prior to the Department's public release of said information or in the alternative, without the written approval of the Department.

D. Other Department Rights

The Department reserves the right to reject any oral proposals received in response to this RFP. The Department may terminate the contract at any time with or without cause, upon 10 days written notice to the service provider selected. The selected service provider, by acceptance of the contract, waives any right to claim damages as a result of such termination.

The Department will be the final arbiter of all disputes arising from contract related matters.

The Department reserves the right to conduct an audit of the TRS provider's costs, expenses and revenues associated with this service.

E. Costs of Preparing Proposals

Any service provider submitting proposals in response to this RFP does so at its own expense. It is understood that the selected service provider will not include proposal costs, or any costs incurred prior to the contract award, as reimbursement costs related to the contract itself.

F. Subcontractors

Intended use of subcontractors must be clearly explained in the proposal and a copy of any proposed subcontract must accompany the proposal. The service provider selected to provide TRS may enter into written subcontract(s) for performance of certain of its functions under the contract only with written approval from the Department prior to the effective date of any subcontract. If the selected service provider intends to use a subcontractor (during the term of the contract) that has not been identified within its response to this RFP, the Department reserves the right to reject or accept the use of subcontractors for the purposes herein. The selected service provider shall be wholly responsible for the entire performance of the contract whether or not subcontractors are used. Any subcontractor must comply with the Department's terms and conditions herein, as well as any other related, negotiated terms between the Department and contractor for the services herein.

G. Department Staff Participation

The Department will exercise such monitoring and controls as are appropriate and necessary to achieve the desired and agreed-upon service from the selected service provider.

H. Engagement Activities Schedule

The selected service provider must be available immediately and will be required to attend meetings, hearings and consult with the Department staff and/or CDHI on an as needed basis.

I. Reporting Procedures

The selected service provider and the Department staff and/or CDHI will meet as necessary to review the selected service provider's performance and to discuss any concerns that may arise.

J. Hearings

The selected provider may be called upon to participate in hearings and may be called upon to offer testimony, and face cross-examination, regarding its activities during the contract time period.

K. Work Papers

At the conclusion of the engagement, the selected service provider shall make copies of significant work papers and source documents available to the Department, if so requested.

L. Costs

A cost ceiling for services to be provided in this engagement must be included in the proposal. The Department will require a third party billing and collection agent. Therefore, costs for billing and collection agents subcontracted by the selected service provider must be identified and included in the proposal. Pricing must be firm and shall remain firm for 60 months. Estimates are not acceptable.

M. Payments

The selected service provider will submit monthly invoices to the billing and collection agent. The billing and collection agent will review such charges and submit them to the telecommunications service providers for payment. All expenses associated with the intrastate provision of TRS shall be borne by the telecommunications providers. However, the Department, not the telecommunications providers, is the contractor for the engagement. The Department will be the final arbiter of all disputes regarding cost and payment.

ATTACHMENT 3

PROPOSAL GUIDELINES

A. Service Provider's Experience and References

The proposal should contain brief descriptions of the knowledge and previous experience in providing intrastate TRS, including, but not limited to, knowledge and experience of Connecticut's telecommunications industry. The proposal should contain brief descriptions why the company is qualified, the scope, complexity and location of any present TRS services, performance statistics for those services and any other pertinent information. Proposer shall provide the name and telephone numbers of three references. If possible, each should have or have had a TRS contract with the proposer.

B. Oral Presentation/Site Visits

Proposers may be asked to make oral presentations or to make their facilities available for a site inspection by the Evaluation Committee. Such presentations and/or site visits will be at the proposer's expense. Any clarifications to a bid response resulting from these sessions will be in writing and will be incorporated in the bid response.

C. Approach

The general approach to be used to offer TRS should be briefly described. If applicable, explain how your company intends to transition the offering of its services from the current service provider.

D. Affidavits

Submit an affidavit in which your company certifies and attests that neither it nor any member of its staff retained for this matter has provided, or caused to be provided, gifts, as defined in Conn. Gen. Stat. § 1-79(e), to any state official or employee of the Department.

Submit an affidavit in which your company certifies that no member of its staff retained for this matter has been convicted of bribery or attempting to bribe an officer or employee of the State, nor has made an admission of guilt of such conduct which is a matter of record.

Submit an affidavit in which your company identifies any business, personal, or investment relationships that exist, or have existed, between your company or members of its staff retained for this matter and the telecommunications

providers, their affiliates, and their holding companies. *(Not applicable in this instance).*

Submit an affidavit in which your firm certifies that it has a specific written policy, resolution, or other form of documented commitment to non-discrimination in its workforce and any subcontractor's workforce such that your firm does not discriminate in any manner prohibited by the laws of the State of Connecticut.

Submit the attached Affidavit Regarding consulting agreements in which you disclose any agreements entered into for a fee by you, your company, or any member of its staff for counsel, contacts, lobbying or any similar activity related to the herein proposal.

E. Affirmative Action

The proposal should include a brief description of the service provider's Affirmative Action plan and its employee census from the standpoint of Affirmative Action.

F. Legal Compliance

The service provider shall certify that the offering of TRS will be in compliance with all federal and Connecticut laws, including all labor laws and all anti-discrimination legislation.

All service providers submitting a proposal in response to this request, and all potential subcontractors to such service providers shall certify that: (1) the prices quoted have not been knowingly disclosed to any competitor or any other potential bidder, (2) such prices have been determined independently without communication, agreement, or collusion with such competitors or potential bidders, (3) no attempt has been made to persuade any such competitor or potential bidder to submit or not to submit a proposal, and (4) no other actions of any kind have been taken which might be perceived as having the purpose of restricting or discouraging competition.

G. Insurance

Your company shall be expected to secure and maintain, at no cost or expense to the Department, professional liability insurance or Comprehensive General Liability Insurance (CGL) to insure against damages and costs resulting from, but not limited to, negligent acts, errors, and omissions in the offering of TRS resulting from this RFP. If such policy contains a deductible clause, your company shall be liable to the extent of the deductible amount. The State requires consultants to carry adequate insurance. Include in the proposal information regarding the type and amount of liability insurance carried by your

firm. Proof of insurance shall be provided to the Department no later than the date of execution of any agreement.

H. Indemnity

Your company shall be expected to indemnify and shall defend and hold harmless the State, its officers, and its employees from and against any and all suits, actions, legal or administrative proceedings, claims, demands, damages, liabilities, monetary loss, interest, attorney's fees, costs and expenses of whatsoever kind or nature arising out of the performance of this engagement, including those arising out of injury to or death of your employees or subcontractors, whether arising before, during, or after completion of the services hereunder and in any manner directly or indirectly caused, occasioned or contributed to in whole or in part, by reason of any act, omission, fault or negligence of Contractor or its employees, agents or subcontractors.

I. Page numbering

The pages of the proposals should be sequentially numbered for accurate referencing. Proposals should be typed and bound securely. Proposals must be organized with headings and separated by numeral tabs.

AFFIDAVIT REGARDING CONSULTING AGREEMENTS

All state contractors, vendors, consultants or other entities seeking to conduct business with the State of Connecticut who anticipate entering into, or renewing, an agreement for procurement of goods or services having a total value to the state of more than fifty thousand dollars in a calendar or fiscal year (hereinafter "agreement") shall disclose any and all consulting agreements, whether written or oral, to the head of the contracting agency (hereinafter "such agency").

"Consulting agreement" means any written or oral agreement to retain the services, for a fee, of an individual or business entity for the purposes of:

- (1) providing counsel to a contractor, vendor, consultant or other entity seeking to conduct, or conducting, business with the State of Connecticut, or
- (2) contacting, whether in writing or orally, any executive, judicial, or administrative office of the state, including any department, institution, bureau, board, commission, authority, official or employee for the purpose of solicitation, dispute resolution, introduction, requests for information or
- (3) any other similar activity related to the procurement agreement.

"Consulting agreement" does not include those agreements or services registered under the provisions of Chapter 10 of the Connecticut General Statutes (Code of Ethics for Lobbyists).

Such disclosure affidavit shall be required if any duties of the consultant include communication concerning business of such agency, whether or not direct contact with a state agency, state official and state employee is expected or made. The disclosure affidavit shall include the name of the consultant, the consultant's firm, whether the consultant is a former state employee or public official (if so, indicate the consultant's former agency and termination date), the basic terms of the consulting agreement, and a brief description of the services to be provided. The disclosure affidavit shall be amended whenever such entities enter into any new consulting agreements during the term of the procurement agreement.

I, _____ (name, title, and company name)
disclose the following consulting agreements (if not applicable, indicate "none"):

- 1.
- 2.
- 3.

I understand that this information shall be updated, as necessary, during the pendency of this, or any other contract that I may have with the State of Connecticut.

Sworn as true to the best of my knowledge and belief, subject to the penalties of false statement.

Name: _____ Signature: _____ Date: _____

Subscribed and Sworn before me this day of _____, 20__.

Notary Public/Commissioner of the Superior Court

ATTACHMENT 4

SPECIFIC PROPOSAL REQUIREMENTS

A. Description of Proposed System

Please explain, in detail, how each of the operational, technical and functional standards of the FCC will be met, as well as a supporting network design diagram indicating quantities and types of inbound/outbound circuits. (Access to the relay service center from all points in Connecticut shall be toll-free.) State the location of the Communications Assistants (CA) and the location of the TRS administrative offices.

B. Start-up Plan

Provide an implementation schedule and plans including such detail as whether existing intrastate TRS telephone numbers might be used, and what other transitional steps will be taken to ensure full coverage on the start-up date.

C. Policy and Procedures Manual

Please provide a comprehensive outline of a proposed Operator Policy and Procedures Manual which shall include, but not be limited to, confidentiality, handling of emergency and crisis calls, consequences of noncompliance and the functions and roles of a CA. Describe how this manual may be obtained by the public.

D. Monitoring Report Requirements

1. Traffic Reports

The selected service provider shall provide to CDHI the following written reports on a monthly basis, no later than 21 days after the end of the report month. (More frequent or more detailed reports shall also be available upon request.)

a. Report by day and by month:

- i. number of incoming calls;
- ii. number of outgoing calls
(including busy, no answer, disconnected);
- iii. number of complete local calls and toll calls;
- iv. number of abandoned calls.

b. Average daily and monthly blockage rate.

- c. Average daily and monthly answer time; range of answer times for the month.
- d. Average daily and monthly number of calls in queue (caller is receiving a ringing, waiting to be answered by an operator); average length of time in queue.
- e. Average daily and monthly length of call, broken down into call set-up, call duration, and call wrap-up.
- f. Total daily and monthly number of calls of the following lengths:
 - 0 to 6 minutes;
 - 6+ to 15 minutes;
 - 15+ to 30 minutes;
 - 30+ to 45 minutes;
 - 45+ to 60 minutes;
 - over 60 minutes.
- g. Usage patterns (number of calls and length of calls) by hour of day and day of week.
- h. Number of operators on duty by hour of day and day of week.

2. Outages

Provide monthly reports of outages by date, duration, cause and steps taken to prevent recurrence.

3. Other

Please provide within the proposal any other reports you provide to other state/federal agencies for the purpose of monitoring your TRS activity that would support the Department and CDHI's oversight responsibility.

E. Prices

1. Prices for the provision of intrastate TRS shall be firm for the 60 months of the resulting contract. Although the proposer is required to have the capability of providing TRS for interstate calls along with equal access, the recovery of these costs will be subject to FCC regulations as may be developed and will not be covered under this contract. The proposer may bill, collect and retain revenue from the intrastate transport associated with TRS, under its own tariffs, as may be allowed by the Department and/or CDHI. Remaining costs will form the basis for prices to be submitted under this RFP. Proposer must provide two sets of prices for the mandatory portion of this RFP, the first

assuming that the proposer is allowed by the Department to charge users for the intrastate transport associated with TRS, and the second assuming that the proposer is not allowed to charge for such transport. In the first case, please state the underlying assumptions to support what rate the users will pay.

2. Prices in response to this RFP and ultimate reimbursement to the contractor will be based on a price per completed call minute. A completed call minute shall include the time the calling party is connected to the called party or to an answering machine at the called party's number, or to a recorded message or intercept for the called number. A completed call minute does not include time in queue (call is ringing, waiting for a live answer), call set-up, call wrap-up, or calls that have reached numbers that are busy or receive no answer. The vendor shall also provide the price per minute in Session minutes and Conversation minutes. Proposers will complete the attached Price Quotation sheet. One rate per completed call minute will apply each month. The actual total call minutes for the month will be multiplied by the appropriate rate per completed call minute to determine the total dollars due the vendor for that month.

3. The price for each optional feature will be a flat monthly rate.

F. Proposal Submission Certification

A certification form must be signed and accompany the Proposal.

G. TDD Directory Requirements

Compile, publish, and distribute an annual directory listing to all Connecticut persons, companies and other organizations which use a TDD. Such directory shall also contain emergency TDD numbers for each of the 50 states and shall include the names, addresses and TDD numbers of relay services serving each of the 50 states. Describe such a directory, noting any additional features that would be useful to provide. Describe how such a directory shall be updated and distributed in a timely fashion.

H. TRS Office in Connecticut Option

Provide all relay calls to and from parties in Connecticut from a facility physically located within Connecticut. Describe the location and staffing of such office, including the number of positions by each job title on the staff. The proposals will have two prices: one with an in-state facility and one without an in-state facility.

I. Identification of Call Assistant Requirement

Require each Call Assistant (CA) to give their name or number to the caller at the outset of the call; and in the event that a CA handling a particular call is replaced by another CA, to require the replacement CA to immediately give their name or number to the caller.

J. Advisory Board Requirement

Establish and utilize an advisory board composed of Connecticut residents, the majority of whom are deaf, hard-of-hearing and speech impaired TRS users. Explain how members would be recruited, what their role would be, and how often they would meet with TRS management.

K. Management & Staff Positions Requirements

Provide assurances that, to the maximum extent possible, TRS management and staff positions will be filled by persons with disabilities who regularly use relay services. Explain how they will be recruited. Provide a list of job titles and descriptions, indicating which disabilities will not meet the job requirements.

L. Sign Language Requirement

Ensure that at least one staff member on each shift shall be a person fully skilled in the use and understanding of American Sign Language and deaf culture.

M. Spanish Language Requirement

Ensure that at least one staff member on each shift shall be a person fully skilled in the use and understanding of the Spanish language and culture.

N. Relaying Speech-Impaired Spoken Words Requirement

Ensure that the understood spoken words of speech-impaired persons who are unable to use a TDD will be relayed. Outline the special training to be provided to staff in support of this service.

O. TRS Newsletter Requirement

State the additional monthly cost, if any, to regularly publish and distribute (at least annually) a newsletter as a means for educating deaf, hard-of-hearing and speech impaired TRS users about the purpose and use of TDDs and TRS.

P. Education and Training Program

State the additional monthly cost, if any, to expand the FCC mandatory requirement for public access to information. Describe all elements of an education and training program to be carried out by the TRS provider, using resources which include but are not necessarily limited to, news media, information and referral centers, libraries, exhibits and displays of equipment, specialized pamphlets, brochures and other explanatory documentation. Such description should also include how general audiences, TRS consumer audiences, and specialized service providers (such as E911) shall be reached by the education and training program.

Q. TDD Distribution Program Requirement

State the additional monthly cost, if any, to establish a program based in the state for people who need a TDD to communicate over the telephone network and are financially qualified pursuant to Connecticut standards for one TDD per household available on loan, free of charge and for an unlimited time period. Also, such program shall provide free TDD repair or replacement services, and free temporary loans of substitute TDDs while a user's TDD is under repair. Describe such program noting specifically how a TDD model will be selected and purchased, how TDDs will be distributed, any pertinent eligibility criteria, how such eligibility criteria will be evaluated, application procedures and location of distribution and repair sites. Such equipment provided shall allow for placement of a relay call as well as for receiving a relay call. In some situations this may include a ring signaling device.

R. Convenience Features

Please describe any convenience services (e.g., Turbo Charge, Caller ID, Video Relay, etc.) that might be provided and any additional associated monthly cost to enable the relay user to access each of such services.

S. Other

Please describe any other features which you feel are especially valuable additions to telecommunications relay service, and provide any additional monthly cost associated with each of such features.

REQUEST FOR PROPOSAL
TELECOMMUNICATIONS RELAY SERVICE
FORMAT FOR SUBMITTING PRICES

I. Assuming proposer is allowed to charge users for the intra-state transport of TRS.

<u>COMPLETED CALLS PER MONTH</u>		
<u>UNDER 40,000</u>	<u>40,000 TO 60,000</u>	<u>OVER 60,000</u>

Price per Conversation/
Session Call Minute

--	--	--

In the event that the service is provided for all Connecticut local exchange carriers and/or cellular providers, please state if the price will be different in any regard.

--	--	--

II. Assuming proposer is not allowed to charge users for the intra-state transport of TRS.

<u>COMPLETED CALLS PER MONTH</u>		
<u>UNDER 40,000</u>	<u>40,000 TO 60,000</u>	<u>OVER 60,000</u>

Price per Conversation/
Session Call Minute

--	--	--

In the event that the service is provided for all Connecticut local exchange carriers and/or cellular providers, please state if the price will be different in any regard.

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Appendix L:
**Copies of Phone Bill with Surcharge
Rate or Legislative Order**

Get Minutes Used	Get Data Used	Get Balance
#MIN + SEND	#DATA + SEND	#BAL + SEND

Explanation of Charges

Verizon Wireless' Surcharges

Verizon Wireless' Surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative Charge, which helps defray certain expenses we incur, including charges we or our agents pay local telephone companies for delivering calls from our customers to their customers, fees and assessments on our network facilities and services, and costs and charges associated with new cell site construction, local number portability, and other government mandates. Please note that these are Verizon Wireless charges, not taxes. These charges, and what's included, are subject to change from time to time.

Taxes, Governmental Surcharges and Fees

Includes sales, excise and other taxes and governmental surcharges and fees that we are required by law to bill customers. These taxes, surcharges and fees may change from time to time without notice.

Late Fee Information

A late payment applies for unpaid balances. The charge is the greater of \$5 or 1.5% per month, or as permitted by law.

Verizon Wireless' Other Charges and Credits

Includes charges for products and services, and credits owing.

Payments

Previous Balance	\$82.09
Payment – Thank You	
Payment Received 08/25/12	-82.09
Total Payments	-\$82.09
Balance Forward	\$0.00

Total Amount Due will be submitted to your card provider on 09/25/12

Correspondence Address: Verizon Wireless 20 Alexander Drive PO Box 5029 Wallingford, CT 06492-2458

By signing below, you authorize Verizon Wireless to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon Wireless is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon Wireless. Check with your bank for any charges.

1. Check this box.
2. Sign name in box below, as shown on the bill and date.
3. Return this slip with your check for this month's payment.

Changing your billing address for Account.

Use this space or sign in to My Verizon at www.verizonwireless.com to change the mailing address where we send your bill. If we do not have your most recent email address, provide it below and we'll use it to tell you important information about your Verizon Wireless service. Allow 2 billing cycles for the address change to take effect.

New Address _____
 City _____
 State/Zip _____
 Work Phone _____ Home Phone _____
 Email _____

PLACE OF PRIMARY USE (PPU)

The home or business mailing address indicated to the left is for the person using the phone(s) and is the person's residential street address or primary business address
 ___YES ___ NO If "NO" or for multi-line accounts with more than one PPU address, please contact our Customer Service Department or visit our website to change the user's PPU address.

Summary for

Your Plan

Nationwide Talk & Text 450
 \$59.99 monthly access charge
 450 monthly allowance minutes
 \$.45 per minute after allowance

UNL Night & Weekend Min
 Unlimited OFFPEAK

Email & Web Unlimited
 \$29.99 monthly access charge
 Unlimited monthly kilobyte

Beginning on 01/02/09:
17% Access Discount

Beginning on 06/28/08:
20% - Feature Discount

UNL Picture/Video MSG
 Unlimited monthly Picture & Video

UNL Text Messaging
 Unlimited monthly M2M Text
 Unlimited monthly Text Message

M2M National Unlimited
 Unlimited monthly Mobile to Mobile

Have more questions about your charges?
 Get details for all your Usage Charges at
www.verizonwireless.com. Sign into My
 Verizon and go to My Bill and click on
 Usage Details.

Charges

Monthly Access Charges

Nationwide Talk & Text 450 09/02 - 10/01	59.99
17% Access Discount 09/02 - 10/01	-10.20
Email & Web Unlimited 09/02 - 10/01	29.99
20% - Feature Discount 09/02 - 10/01	-6.00
Extended Warranty 09/02 - 10/01	1.99
	\$75.77

Usage Charges

Voice	Allowance	Used	Billable	Cost
Calling Plan minutes	450	168	---	---
Mobile to Mobile minutes	unlimited	149	---	---
Night/Weekend minutes	unlimited	159	---	---
Total Voice				\$.00

Messaging

Unbilled Usage from Previous Months

Picture & Video messages		311	---	---
--------------------------	--	-----	-----	-----

Current Messaging Usage

Text messages	unlimited	2669	---	---
Unlimited M2M Text messages	unlimited	802	---	---
Picture & Video messages	unlimited	1048	---	---
Total Messaging				\$.00

Data

Unbilled Usage from Previous Months

Kilobyte Usage kilobytes		1203	---	---
--------------------------	--	------	-----	-----

Current Data Usage

Kilobyte Usage kilobytes	unlimited	104,598	---	---
Total Data				\$.00

Total Usage Charges

\$3.00

Verizon Wireless' Surcharges

Fed Universal Service Charge	1.22
Regulatory Charge	.16
Administrative Charge	.99
CT Telecom Relay Srvc Surchg	.02
	\$2.39

Taxes, Governmental Surcharges and Fees

CT State 911 Fee	.67
CT State Sales Tax	3.43
	\$4.10

Total Current Charges for

\$82.26

Appendix M:
Copy of 2008 TRS Recertification
Renewal Letter from FCC



PUBLIC NOTICE

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

News Media Information 202-418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 08-1673
Released: July 16, 2008

NOTICE OF CERTIFICATION OF STATE TELECOMMUNICATIONS RELAY SERVICE (TRS) PROGRAMS

CG DOCKET NO. 03-123

Notice is hereby given that the applications for certification of Telecommunication Relay Services (TRS) programs of the states¹ listed below have been granted, pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 225(f)(2), and section 64.606(b) of the Commission's rules.² On the basis of the state applications, the Consumer & Governmental Affairs Bureau (Bureau) has determined that:

- (1) The TRS program of the states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;³
- (2) The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of the state program; and
- (3) The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.⁴

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states on demonstrating compliance with such rule changes.

In response to the *Public Notice* released seeking comment on the applications for certification of state TRS programs,⁵ the Commission received 84 comments, all of which address Speech-to-Speech

¹ For purposes of this proceeding, the term "states" refers to states, U.S. territories, and the District of Columbia where applicable.

² 47 C.F.R. § 64.606(b).

³ 47 C.F.R. § 64.604.

⁴ 47 C.F.R. § 64.606(d).

⁵ *Applications for Certification as Certified State Telecommunications Relay Service (TRS) Programs Filed; Pleading Cycle Established for Comment on Applications*, CG Docket No. 03-123, Public Notice, DA 08-60 (Jan. 10, 2008).

(STS) outreach.⁶ As part of their applications for certification, states were required to submit specific examples of all outreach activities, including those targeted to users and receivers of STS services. We reviewed each of the outreach plans submitted by the states in conjunction with each of the applications listed below and found them to be in compliance with the Commission's requirements. The Bureau reminds states receiving certification herein of their continued obligation to engage in outreach activities, or to ensure that their contracted TRS providers conduct outreach in accordance with 47 C.F.R. § 64.604(c)(3).⁷

This certification, as conditioned herein, shall remain in effect for a five year period, beginning July 26, 2008, and ending July 25, 2013, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2012, the states may apply for renewal of their TRS program certification by filing documentation in accordance with the Commission's rules, pursuant to 47 C.F.R. §§ 64.606(a) and (b).

STATES APPROVED FOR CERTIFICATION

File No: TRS-46-07
Alabama Public Service Commission
State of Alabama

File No: TRS-19-07
Department of Commerce
State of Alaska

File No: TRS-47-07
Arkansas Deaf and Hearing Impaired
State of Arkansas

File No: TRS-02-07
Commission for the Deaf and Hard of Hearing
State of Arizona

File No: TRS-32-07
California Public Utilities Commission
State of California

File No: TRS-23-07
Colorado Public Utilities Commission
State of Colorado

File No: TRS-48-07
Connecticut Department of Public Utility
State of Connecticut

File No: TRS-35-07
Delaware Public Service Commission
State of Delaware

⁶ Each comment was directed to a specific state program, and requested that the Commission review the STS outreach activities of the specified state prior to granting certification. The Commission received the following number of comments regarding the following states: California- 36, Colorado- 2, Georgia- 1, Hawaii- 4, Illinois- 5, Kansas- 2, Massachusetts- 1, Minnesota- 1, Montana- 5, Nebraska-1, New Jersey- 1, New Mexico- 1, New York- 3, Ohio- 2, Oregon- 2, Pennsylvania- 1, South Carolina- 2, South Dakota- 1, Vermont- 1, Virginia- 3, Washington- 1, Wisconsin- 8.

⁷ See 47 C.F.R. § 64.604(c)(3) Public Access to Information. This rule states, “[c]arriers, 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.”

File No: TRS-49-07
Public Service Commission
District of Columbia

File No: TRS-51-07
Georgia Public Service Commission
State of Georgia

File No: TRS-43-07
Idaho Public Service Commission
State of Idaho

File No: TRS-08-07
Indiana Telephone Relay Access Corporation
State of Indiana

File No: TRS-07-07
Kansas Relay Services, Inc.
State of Kansas

File No: TRS-13-07
Louisiana Relay Administration Board
State of Louisiana

File No: TRS-33-07
Telecommunications Access of Maryland
State of Maryland

File No: TRS-54-07
Michigan Public Service Commission
State of Michigan

File No: TRS-55-07
Mississippi Public Service Commission
State of Mississippi

File No: TRS-56-07
Telecommunications Access Program
State of Montana

File No: TRS-25-07
Relay Nevada
State of Nevada

File No: TRS-45-07
New Jersey Board of Utilities
State of New Jersey

File No: TRS-16-07
New York State Department of Public Service
State of New York

File No: TRS-50-07
Florida Public Service Commission
State of Florida

File No: TRS-22-07
Hawaii Public Utilities Commission
State of Hawaii

File No: TRS-10-07
Illinois Commerce Commission
State of Illinois

File No: TRS-03-07
Iowa Utilities Board
State of Iowa

File No: TRS-52-07
Kentucky Public Service Commission
Commonwealth of Kentucky

File No: TRS-53-07
Maine Public Utilities Commission
State of Maine

File No: TRS-34-07
Department of Telecommunications and Energy
Commonwealth of Massachusetts

File No: TRS-39-07
Minnesota Department of Commerce
State of Minnesota

File No: TRS-15-07
Missouri Public Service Commission
State of Missouri

File No: TRS-40-07
Nebraska Public Service Commission
State of Nebraska

File No: TRS-42-07
New Hampshire Public Service Commission
State of New Hampshire

File No: TRS-14-07
Commission for the Deaf and Hard of Hearing
State of New Mexico

File No: TRS-30-07
Department of Health and Human Service
State of North Carolina

File No: TRS-12-07
Information Technology Department
State of North Dakota

File No: TRS-57-07
Oklahoma Telephone Association
State of Oklahoma

File No: TRS-58-07
Pennsylvania Bureau of Consumer Services
Commonwealth of Pennsylvania

File No: TRS-59-07
Division of Public Utilities and Carriers
State of Rhode Island

File No: TRS-60-07
Department of Human Services
State of South Dakota

File No: TRS-17-07
Texas Public Utility Commission
State of Texas

File No: TRS-09-07
Utah Public Service Commission
State of Utah

File No: TRS-04-07
Department of the Deaf and Hard of Hearing
Commonwealth of Virginia

File No: TRS-06-07
Public Service Commission of West Virginia
State of West Virginia

File No: TRS-18-07
Division of Vocational Rehabilitation
State of Wyoming

File No: TRS-37-07
Public Utilities Commission of Ohio
State of Ohio

File No: TRS-36-07
Oregon Public Utilities Commission
State of Oregon

File No: TRS-28-07
Telecommunications Regulatory Board
Puerto Rico

File No: TRS-11-07
South Carolina Office of Regulatory Staff
State of South Carolina

File No: TRS-20-07
Tennessee Regulatory Authority Services
State of Tennessee

File No: TRS-61-07
Virgin Islands Public Services Commission
U.S. Virgin Islands

File No: TRS-44-07
Vermont Department of Public Service
State of Vermont

File No: TRS-27-07
Office of the Deaf and Hard of Hearing
State of Washington

File No: TRS-01-07
Wisconsin Department of Administration
State of Wisconsin

The full text of this document and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. These documents and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor at, Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554. Customers may contact the duplicating contractor at their website: www.bcpweb.com or call 1-800-378-3160. Filings may also be viewed on the Consumer & Governmental Affairs Bureau's, Disability Rights Office homepage at http://www.fcc.gov/cgb/dro/trs_by_state.html.

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

For further information regarding this *Public Notice*, contact Diane Mason, Consumer and Governmental Affairs Bureau, Disabilities Rights Office (202) 418-7126 (voice), (202) 418-7828 (TTY), or e-mail Diane.Mason@fcc.gov.

- FCC -

Connecticut FCC Certification Renewal and Supporting Documents

Introduction

The State of Connecticut, with the assistance of Sprint Relay, has prepared this narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, particularly in response to the **FCC Public Notice DA 07-2761, CG Docket No. 03-123** released on June 22, 2007. Included in the Public Notice are the minimum mandatory FCC TRS requirements under 47 C.F.R. **§64.604 and §64.605**. A copy of this Public Notice and these mandatory requirements is attached as Appendix A.

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

The Appendices included with this TRS Certification Renewal Application are as follows:

- A. Copy of the Public Notice DA 07-2761
- B. TRS, CapTel, STS, IP, VRS Training Outlines
- C. TRS, IP, VRS and CapTel Pledge of Confidentiality
- D. E911 Call Procedure
- E. Sprint Carrier of Choice Letter of Invitation
- F. Sprint Outage Prevention Program
- G. Sprint Disaster Recovery Plan
- H. Sprint TRS Standard Features Matrix
- I. Sprint Policy on 10 and 15 minute Rule
- J. FCC TRS Mandatory Minimum Standards & Compliance Matrix
- K. FCC CapTel Mandatory Minimum Standards & Compliance Matrix
- L. Sprint's Report to the FCC on VRS and IP Waivers
- M. Sprint Relay Fact Sheet
- N. Sprint's TSP Press Release
- O. Copy of TRS Information in Telephone Directories
- P. Copy of Telephone Bill Inserts
- Q. Copies of Relay Newsletters
- R. Copy of Annual Report or Other
- S. Copy of Relay Brochures or Other Advertisements
- T. State legislation or Other establishing TRS program in the State
- U. Copies of Complaint Logs from 2002-2007
- V. Copy of TRS RFP/Department of Utility Control Decision
- W. Copy of Phone Bill with Surcharge Rate or Legislative Order

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Operational Standards

A.1 Communication Assistants (CAs)

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

CA Employment Standards

Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

Sprint IP (Internet Relay) CAs follow the same employment and training standards as TRS CAs. In addition, Sprint provides an enhanced VCO service called Captioned Telephone (*CapTel*) Services. Sprint requires that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job.

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§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.

Communication Assistants Training Program

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance

based skills such as grammar; spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and VRS interpreters where appropriate. Please review the Sprint TRS, Speech to Speech (STS), CapTel and Video Relay Service (VRS) Training outlines in Appendix B.

A team of ASL fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

Captioning Assistants Training Program

CapTel CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the CTI standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages as well as attendance and attitude standards as set by *CapTel* management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminate employment. See Appendix A

All *CapTel* CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures. A captioned telephone user does not type while making a call; therefore there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

- 1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.

- 1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.
- 1.3 The CA shall be required to meet the FCC standards for TRS minimum transcription speed.
- 1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.
- 1.5 The CA shall pass along a *CapTel*/caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.
- 1.6 Personnel supporting *CapTel* will have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel* Services in a professional manner.

Please review the Sprint TRS, STS, *CapTel* and Video Relay Service (VRS) Training outlines in Appendix B for more information on CA training requirements.

CA Quality Assurance Programs

Monthly Surveys

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint centers and or an independent third party quality testing firm has been retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter, but often conducts monthly tests of 100 test calls on *CapTel*.

Relay Program Management and Trainer Test Calls

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

Sprint Relay and the Relay Program Management team also perform test calls for *CapTel*/CAs.

§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

All Sprint Relay CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. This applies to Sprint IP and IP wireless relay CAs as well.

Sprint Relay utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

CapTel's voice recognition technology transmits above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all *CapTel*/CAs.

§64.604 (a) (1) (iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§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

Sprint Relay requires all CAs, including Sprint IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs), to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix B, Module 4I, and the Video Relay Service Training Outline and Qualifications. CapTel CAs also stay on all calls for a minimum of 10 minutes.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

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

When a Sprint VRS and Sprint IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of VIs is necessary during the call, every attempt will be made to accommodate the previous gender request.

CapTel CAs are waived from this requirement. See Appendix K, FCC *CapTel* Mandatory Minimum Standards & Compliance Matrix.

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

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

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

A.2 Confidentiality and Conversation Context

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

Confidentiality Policies and Procedures

Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and Video Interpreters 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. After the call has been terminated, billing information is transferred to billing files and is no longer accessible, except for billing purposes.

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

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

- Prospective CAs and VIs are screened during the interview process on issues regarding ethics and confidentiality.
- During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs and VIs 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 and VIs 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.

Please refer to Appendix C for the TRS and Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and IP/IP Wireless CAs.

CapTel Captionist must comply with the same rules that TRS does regarding confidentiality. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *CapTel* Captionist. A copy of the *CapTel* confidentiality form signed by *CapTel* CAs can be found under Appendix C.

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

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

A Captionist may feel the need to "vent" about a call due to problems, complaints or stress from handling the call. The Captionist may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

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

STS Limited Exception of Retention of Information

At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

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

Verbatim Relay and the Translation of ASL

Sprint 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.

At the request of the relay user, Sprint Relay CAs will translate written ASL into conversational English. All Sprint Relay CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

Sprint VRS interpreters, Sprint IP/IP Wireless CAs and *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

Sprint Relay STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated on

monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint Relay users have full control of all of their relay calls.

A.3 Types of Calls

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

Sprint Relay Services

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

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

CapTel CAs are not waived for inbound calls to a *CapTel* user made through a TRS facility. However, if a call is made directly to the captioned telephone access number no set up is involved and the *CapTel* CA cannot refuse to call. Please see Appendix K for more information on these waivers.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services shall be capable of handling pay-per-call calls.

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

When a TRS or *CapTel* call is placed through Sprint Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, in between calls and wrap up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay. Sprint was the first provider to process pay-per-calls, beginning with the state of Texas in 1996.

Sprint VRS, Sprint IP and IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

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

Sprint Relay provides access to all available relay call types. A complete list of all call types proved by Sprint may be found in Appendix I Sprint Standard Features Matrix. Most call types are waived for IP and VRS users. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

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

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

Call Release Functionality

TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name to Sprint Relay CAs, instead of the entire 10-digit number. The *CapTel* Consumer Premises Equipment (CPE or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

Sprint *CapTel* users are also able to participate in a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or “flash”) button on his or her CPE. Thus, Sprint *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel*. For Two-Line *CapTel*, either party can initiate a three- way call should the user purchased this as a LEC option. Sprint *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

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

When a Sprint Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple calls. In addition, Sprint relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an

interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

CapTel users are able to hear and interact directly with the recorded message and makes 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.

Callers to Sprint relay services 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.

Connecticut's current 900 number is 1-900-230-6262

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

Sprint Relay TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Appendix I, Standard Call Features Matrix.

Answering Machine

Sprint Relay CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the Relay User to leave a message, as included in the outgoing message, if applicable.

The CA will leave the relay user's message in the appropriate mode of communication. Sprint has the capability to leave messages in both voice, text and touch tones (pagers).

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

(UR MSG LEFT) CA XXXXM/F GA

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional calls, the customer does not incur toll charges. Customers will only be charged for the first call. CapTel CAs are also equipped with the ability to retrieve messages stored on a local answering machine.

Voicemail Retrieval

Sprint has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed. The *CapTel* user both hears and interacts directly with the recorded message and makes 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.

A.4 Handling of Emergency Calls

§64.604(a) (4) Handling of emergency calls. 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.

Sprint meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint's intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP Center in Connecticut. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Sprint Relay considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay, the Sprint CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a

- communication modality other than TTY, [i.e., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or
- The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the Sprint CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

911 services are currently waived for IP and VRS providers. Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or phone.

Sprint IP via website permits manual 911 processing. If user tell operator to dial 911, operator will request supervisor assistance. User will need to provide the address and city where he/she is calling from. Supervisor will call Directory Assistance (on separate phone call) to obtain 10-digit emergency PSAP number. Then the supervisor will pass it to CA to make outbound call to 911 dispatcher (PSAP). It can take few minutes or so to get the information. Users are encouraged to enter a 10-digit emergency number on the website for more efficient call processing.

More information about Sprint's procedure for handling E911 calls, including *CapTel* calls, may be found in Appendix D.

Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 13 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP

program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay STATE users. Sprint is proud to voluntarily comply with the FCC's TSP program. Please see Appendix N for a copy of the general press release regarding the TSP program.

A.5 Speech-to-Speech (STS) Called Numbers

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

Sprint's Relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term. Currently, STS is waived from Internet Relay, Video Relay and *CapTel* services.

Technical Standards

B.1 ASCII and Baudot

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

Each Sprint CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

Sprint IP currently provides services via ASCII connection. Currently, ASCII and Baudot requirements are waived for *CapTel* services. For more information about *CapTel* waivers, see Appendix K.

B.2 Speed of Answer

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

Sprint Relay has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve Connecticut are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the Connecticut call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data is monitored for both short and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless, VRS and *CapTel* calls. Sprint *CapTel* ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. Sprint *CapTel* system is designed to a P.01 standard or greater measured on a daily basis.

§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.

Sprint has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint currently samples every 15 minutes.

Sprint Relay is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. There will be no more than 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number.

Sprint begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not be placed in a queue or on hold after reaching the Relay switch.

Sprint's Service Level calculation for TRS

Sprint's Service Level (SSL) calculation for all TRS calls, excluding *CapTel*, is described below:

Number of calls handled < 10 seconds / (total calls handled + total calls abandoned)

The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.

(Number of calls offered = total number of calls handled + total number of calls abandoned),

(SVL = Number of calls handled in < 10 / Number of calls offered).

Sprint's Service Level Calculation for CapTel

For *CapTel* users, the number of calls that arrive at the *CapTel* call center will be the number of Calls Offered.

The number of calls that are answered by a CA is the number of Calls Answered.

The time for each call between the time the call arrives at the *CapTel* call center and the time answered by a CA until it is abandoned is the Speed of Answer.

Any time spent in the Voice-in telephone menu is time controlled by the user to enter in the phone number of the CapTel user they are calling. This time is subtracted out from the Speed of Answer time.

The total number of calls with the Speed of Answer as 10 seconds or less is the number of Qualifying Calls.

Qualifying Calls divided by Calls Offered = Service Level (x percent of calls answered within 10 seconds).

Sprint's Weighted Service Level for TRS

Sprint uses a 'weighting' process to combine the results of several Call Centers into a single result:

The 'weighted' service level (SVL) is a calculation that multiplies the number of 'State' calls handled in each center by the center's daily SVL (the outcome is a factor called 'SVL points'). The resultant 'SVL points' for each center that handled that 'State' traffic is then summed. The sum of the 'SVL points' is then divided by the total number of 'State' calls to get a daily 'weighted' SVL.

Sprint will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is

delivered to the Sprint Relay Center and Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

Sprint's Weighted Service Level for CapTel

While *CapTel* operates two *CapTel* call centers, all calls are directed through one Automatic Call Distributor switch. All calls are answered in the order received and are measured, by this switch.

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

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

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

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

Please see (b) (2) (ii) above.

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

Please see (2) (b) (ii) above.

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

Sufficient transmission facilities have been provided to service all traffic levels, including peak hours. Sprint utilizes trunks that are sized to provide a peak hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording message, stating that all circuits are busy and to try the call again within a few minutes.

In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers state Relay customers the advantages of a superior digital fiber network which is unsurpassed in the industry. Through the use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter Machine Trunks (IMT) which are engineered at P.01 Grade of Service (GOS) for the peak hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

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

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

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

Sprint Relay complies with this requirement. Please refer to Sprint Relay's report to the FCC under Appendix L.

B.3 Equal Access to Interexchange Carriers

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

Sprint provides Connecticut callers with the ability to have their intrastate, interstate and international calls carried by any Inter-exchange carrier who has agreed to participate in the Connecticut Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

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

- AT&T Communications
- Bell South Long Distance
- Bestline
- Birch Telecom
- Broadwing Communications
- Broadwing Telecommunications
- Cox Communications
- Excel Telecommunications, Inc.
- Global Crossings Telecommunications
- MCIWorldCom
- McLeod USA
- Qwest Communications
- SBC Communications Long Distance
- Souris River Telecommunications
- Sprint
- Telecomm*USA (MCIWorldCom)
- Touch America Services, Inc.
- U.S. Link
- VarTec dba Clear Choice Communications
- VarTec Telecom, Inc.
- Verizon Long Distance
- Winstar
- Working Assets
- WorldCom
- WorldXChange

If a Connecticut caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix E for a sample of the Carrier of Choice letter sent to carriers when a customer has a preferred inter-exchange carrier that does not participate in the Sprint COC program.

B.4 TRS Facilities

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

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless, VRS and *CapTel* Relay Services are also available 24 hours a day, seven days a week.

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

Sprint Relay Network Support Plan

Service Reliability

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

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

Quality

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

Economy

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

Expandability

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

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute traffic during any single cable cut. This is a significant benefit to Connecticut, and a competitive differentiation of the Sprint network.

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

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

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

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

Network Criteria

System Capacity

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

Service Restoration

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

Do everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.
- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
 - Utilization of established plans to respond effectively to these outages.
 - The capability to rapidly deploy network transmission facilities when needed.
 - Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.

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

Fiber Backbone Loop Topology and Reconfiguration

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

Please see Appendix F for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Appendix G for a complete explanation of Sprint's back-up plan.

B.5 Technology

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

Sprint is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint 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. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information

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

Sprint meets all minimum technological standards regarding Video Relay Service. Sprint VRS is available through www.sprintVRS.com and sprintrelay.tv (for Videophone users).

On 31 July 2006, Sprint launched **MySprintVRS number**. This **MySprintVRS Number** feature empowers Deaf and hard of hearing Video Relay Service (VRS) users with a simple means of receiving incoming calls. With MySprintVRS Number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the Deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the VI with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On 28 October 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. ***Sprint VRS Mail for wireless devices*** is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge technology using Sprint IP using AIM®. Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM.

Sprint also provides *CapTel* services, which is recognized as an enhanced VCO service.

For more information on technology provided through Sprint Relay, please refer to Appendix M: Sprint Relay Fact Sheet.

B.6 Caller ID

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

Sprint Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Sprint provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Connecticut. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators.

C.2 Contact Persons

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

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C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech

disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

C.4 Rates

§64.604 (4) Rates. *TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination*

Relay Connecticut users are charged no more for services than for those charges paid by standard “voice” telephone users. Relay Connecticut users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the Relay Connecticut COC list, will be rated and invoiced by the selected interstate carrier.

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

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

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. *Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery.* *Costs caused by interstate TRS shall be recovered*

from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Connecticut relay intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA) would reimburse. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, States receive only a 51% deduction for Toll Free and 900 minutes since this is what NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Connecticut. Further, Sprint maintains a log of each individual

complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

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

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

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

Sprint has the capability to transfer the caller on-line to the Customer Service department. A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including relay web sites.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31st of each year by the July 1st deadline.

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.

The Sprint Customer Preference Database includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) Sprint will transfer all Connecticut database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

§64.605 State Certification

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



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 07-2761
June 22, 2007

CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REMINDS STATES THAT CURRENT TELECOMMUNICATION RELAY SERVICE (TRS) CERTIFICATION WILL EXPIRE ON JULY 26, 2008, AND PROVIDES A TIMELINE FOR SEEKING RECERTIFICATION

CG Docket No. 03-123

The current TRS certifications for all states and territories will expire on July 26, 2008. Under the TRS regulations, states can apply for “renewal” one year prior to expiration, *i.e.*, July 26, 2007. 47 C.F.R. § 64.605(c).

BACKGROUND

TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with voice telephone users. Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at Section 225 of the Communications Act of 1934. 47 U.S.C. § 225. Under the statute, TRS services are intended to be functionally equivalent to voice telephone service. The TRS regulations set forth mandatory minimum standards that TRS providers must follow in offering service, and are intended to ensure that TRS meets the functional equivalency mandate. *See* 47 C.F.R. §64.604 (set forth in the attached Appendix).

Because the states have primary responsibility for the oversight and compensation of intrastate TRS, the regulations also set forth the process by which state TRS programs may be certified. 47 C.F.R. § 64.605; *see also* 47 U.S.C. §§ 225(c) & (d)(3)(B). The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The relevant sections of § 64.605 are set forth in the Appendix.

APPLICATIONS FOR CERTIFICATION:

Applications for certification (or renewal of certification) may be filed with the Commission beginning July 26, 2007. All certified state TRS programs are

required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech (STS) service. If a state program also offers Internet Protocol (IP) Relay, Video Relay Service (VRS), Captioned Telephone Service, or IP Captioned Telephone Service, the state must also demonstrate that it provides these services consistent with the rules.

Although there is no deadline for filing, renewal applications should be filed by October 1, 2007, to give the Commission time to review and rule on the applications prior to the expiration of the prior certification.

Applications for certification are reviewed to determine whether the state TRS program has sufficiently documented that it meets all of the applicable mandatory minimum standards set forth in Section 64.604. If the program exceeds the mandatory minimum standards, the state must certify that the program does not conflict with federal law.

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123.

Electronic Filers: Filings may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. Follow the instructions provided on the website for submitting electronic filings.

- For ECFS filers, if multiple docket or rulemaking numbers appear in the caption of this proceeding, filers must transmit one electronic copy of the filing for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic filing by Internet email. To get filing instructions, filers should send an email to ecfs@fcc.gov, and include the following words in the subject line or body of the message: get form <your email address>. A sample form and directions will be sent in response.

Paper Filers: Parties who choose to submit by paper must submit an original and four copies of each filing on or before October 1, 2007. To expedite the processing of complaint log summaries, states and interstate TRS providers are encouraged to submit an additional copy to Attn: Diane Mason, Federal Communications Commission, Consumer & Governmental Affairs Bureau, 445 12th Street, SW, Room 3-A503, Washington, D.C. 20554 or by email at Diane.Mason@fcc.gov. Parties should also submit electronic disk copies of their certification filing on a standard 3.5 inch diskette or CD-Rom formatted in an IBM compatible format using Word 2003 or compatible software. The electronic media should be submitted in “read-only” mode and must be clearly labeled with the state’s name, the filing date and captioned “TRS Certification Application.”

Filings can be sent by hand or messenger delivery, by electronic media, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). The Commission's contractor will receive hand-delivered or messenger-delivered paper filings or electronic media for the Commission's Secretary at 236

Massachusetts Avenue, NE, Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building. Commercial and electronic media sent by overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail should be addressed to 445 12th Street, SW, Washington, D.C. 20554. All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-B204, Washington, D.C. 20554.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE:

DATE	ITEM	FCC ACTION
October, 2007	Public Notices are issued indicating that applications have been received by the Commission and seeking comment	Public Notices are released seeking comment on the filing. Comments due within 30 days and then an additional 15 days for reply comments.
September 2007 – May 2008	Applications for TRS recertification are reviewed for compliance with 47 C.F.R. §§ 64.604 & 64.605.	Deficiency letters are sent to request additional information that demonstrates compliance with the mandatory minimum requirements.
May - July, 2008	Public Notices informing states that their applications for recertification have been reviewed and certification has been renewed.	Public Notice

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Suite CY-A257, Washington, D.C. 20554, (202) 418-0270. These documents also may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, D.C. 20554. Customers may contact BCPI at their web site: www.bcpweb.com or by calling 1-800-378-3160. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at <http://www.fcc.gov/cgb/ecfs> (insert CG Docket No. 03-123 into the Proceeding block).

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

For further information regarding this *Public Notice*, please contact Diane Mason, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-7126 (voice), (202) 418-7828 (TTY), or e-mail at Diane.Mason@fcc.gov.

APPENDIX

RELEVANT RULES:

§64.604 MANDATORY MINIMUM STANDARDS¹

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

- (a) *Operational standards—(1) Communications assistant (CA).* (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.
- (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.
- (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.
- (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.
- (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.
- (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.
- (vii) TRS shall transmit conversations between TTY and voice callers in real time.
- (2) *Confidentiality and conversation content.* (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.
- (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

¹ Note that some of these requirements have been waived for certain forms of TRS.

conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

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

(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.

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

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

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

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

(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.

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

(4) *Handling of emergency calls.* 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.

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

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

(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.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in

a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) 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.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

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

(D) The system shall be designed to a P.01 standard.

(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.

(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.

(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.

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

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

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

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

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

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

(2) *Contact persons.* Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

(3) *Public access to information.* 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.

(4) *Rates.* TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

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

(ii) *Cost recovery.* Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

(iii) *Telecommunications Relay Services Fund.* Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

(A) *Contributions.* Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

(B) *Contribution computations.* Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least \$25 per year. Carriers whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total \$1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

(C) *Data collection from TRS Providers.* TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

(D) [Reserved]

(E) *Payments to TRS providers.* TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS

providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in §64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

(1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or

(2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or

(3) Interstate common carriers offering TRS pursuant to §64.604; or

(4) Video Relay Service (VRS) and Internet Protocol (IP) Relay providers certified by the Commission pursuant to §64.605.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community,

TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

(I) *Information filed with the administrator.* The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (*See 47 CFR 54.701 of this chapter*), the North American Numbering Plan administration cost recovery (*See 47 CFR 52.16 of this chapter*), and the long-term local number portability cost recovery (*See 47 CFR 52.32 of this chapter*). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under §0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

(6) *Complaints—(i) Referral of complaint.* If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

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

(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 §64.605.

(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.

(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.

(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.

(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.

[65 FR 38436, June 21, 2000, as amended at 65 FR 54804, Sept. 11, 2000; 67 FR 13229, Mar. 21, 2002; 68 FR 50977, Aug. 25, 2003; 69 FR 5719, Feb. 6, 2004; 69 FR 53351, Sept. 1, 2004; 69 FR 55985, Sept. 17, 2004; 69 FR 57231, Sept. 24, 2004; 70 FR 51658, Aug. 31, 2005; 70 FR 76215, Dec. 23, 2005]

§64.605 STATE CERTIFICATION.

(a) *State 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.

(2) *VRS and IP Relay provider.* Any entity desiring to provide VRS or IP Relay services, independent from any certified state TRS program or any TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and to receive compensation from the Interstate TRS Fund, shall submit documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “VRS and IP Relay Certification Application.” The documentation shall include, in narrative form:

- (i) A description of the forms of TRS to be provided (*i.e.*, VRS and/or IP Relay);
- (ii) A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;
- (iii) A description of the provider's procedures for ensuring compliance with all applicable TRS rules;
- (iv) A description of the provider's complaint procedures;
- (v) A narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards;
- (vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;
- (vii) Demonstration of status as a common carrier; and
- (viii) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

(b) (1) *Requirements for state certification.* After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

- (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;
- (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2) Requirements for VRS and IP Relay Provider FCC Certification. After review of certification documentation, the Commission shall certify, by Public Notice, that the VRS or IP Relay provider is eligible for compensation from the Interstate TRS Fund if the Commission determines that the certification documentation:

(i) Establishes that the provision of VRS and/or IP Relay will meet or exceed all non-waived operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the VRS and/or IP Relay provider makes available adequate procedures and remedies for ensuring compliance with the requirements of this section and the mandatory minimum standards contained in §64.604, including that it makes available for TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

(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.

(2) *VRS and IP Relay Provider FCC certification period.* Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.

(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.

(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.

(2) *Suspension or revocation of VRS and IP Relay Provider FCC certification.* The Commission may suspend or revoke the certification of a VRS or IP Relay provider if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. The Commission may, on its own motion, require a certified VRS or IP Relay provider to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

(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.

(2) VRS and IP Relay providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur, and must certify that the interstate TRS provider continues to meet federal minimum standards after implementing the substantive change.

(g) VRS and IP Relay providers certified under this section shall file with the Commission, on an annual basis, a report providing evidence that they are in compliance with §64.604.

[70 FR 76215, Dec. 23, 2005]

Appendix B: Sprint TRS, STS, CapTel, and VRS Training Outlines

Sprint TRS Training Outline

Module	Module Description
Module 1	Orientation <ul style="list-style-type: none"> ▪ Objectives ▪ Welcome & History ▪ Future of Sprint ▪ What is Relay? ▪ CA Training ▪ Call Flow Chart
Module 2	Phone Image <ul style="list-style-type: none"> ▪ Objectives ▪ Introduction ▪ Communicating Information ▪ Using Conversational Tone ▪ Managing Dissatisfied Customers
Module 3A	Overview of System and Equipment <ul style="list-style-type: none"> ▪ Objectives ▪ Logging In ▪ Logging Out ▪ Screen Display ▪ Checking for Understanding ▪ Headsets ▪ Modem ▪ Error Correction ▪ Keyboard ▪ Last Typed Macro Feature ▪ English Macros ▪ Spanish Macros ▪ Telephony Terms
Module 3B	Interactive Terminals <ul style="list-style-type: none"> ▪ Knowing Your TTY ▪ Closing a Conversation ▪ Typing Background Noises
Module 3C	Overview of System and Equipment (FRS Only) <ul style="list-style-type: none"> ▪ Malfunctions ▪ Relay Procedures ▪ Confidentiality ▪ Statistics ▪ Handling Obscene Calls ▪ Requesting a Supervisor ▪ Reporting ▪ Macros
Module 4A	Call Processing Procedures <ul style="list-style-type: none"> ▪ Objectives ▪ Your Role as CA ▪ Call Processing for All States

Module	Module Description
Module 4B	Destinations of Traffic <ul style="list-style-type: none"> ▪ Destinations not Allowed ▪ IntraLata Competition ▪ State Differences
Module 4C	Answering Machines and Audiotext <ul style="list-style-type: none"> ▪ Record Feature ▪ Voice Answering Machine ▪ Voice to TTY Answering Machine ▪ Information Line ▪ Audiotext ▪ Voice Mail ▪ Pagers/Beepers (TTY-Voice) ▪ Pagers/Beepers (Voice - TTY) ▪ Variations ▪ Answering Machine Retrieval
Module 4D	Voice Originated Calls <ul style="list-style-type: none"> ▪ Local Call Description ▪ Toll Free and Paid ▪ Paid over Sprint Network ▪ Paid over Alternate Carrier ▪ Variations
Module 4E	Long Distance Calling <ul style="list-style-type: none"> ▪ FONcard ▪ LEC Card ▪ Optional Cards ▪ Pre-Paid Cards ▪ Collect ▪ Third Party ▪ Immediate Credit
Module 4F	VCO and HCO <ul style="list-style-type: none"> ▪ Voice Carry Over (VCO) ▪ Inbound VCO Branding ▪ Busy Line ▪ No Answer ▪ Two-Line VCO ▪ Hearing Carry Over (HCO) ▪ Non-Branded HCO ▪ Branded HCO

Module	Module Description
Module 4G	Alternate Call Types <ul style="list-style-type: none"> ▪ VCO to VCO ▪ VCO to TTY ▪ TTY to VCO ▪ HCO to HCO ▪ HCO to TTY ▪ TTY to HCO
Module 4H	Customer Database <ul style="list-style-type: none"> ▪ Customer Database Feature ▪ Customer Notes Window ▪ UCR Main Menu ▪ Name Submenu ▪ COC Submenu ▪ InterLata COC ▪ IntraLata COC ▪ Billing Method Window ▪ Billing Options ▪ Numbers Submenu ▪ Emergency Numbers ▪ Frequently Dialed Numbers (FD) ▪ Blocked Numbers ▪ Customer Notes
Module 4H	Customer Database <ul style="list-style-type: none"> ▪ Preferences ▪ Answer Type ▪ Language Type ▪ Dialout Restrictions ▪ Macros ▪ Last Number Redial

Module	Module Description
Module 4I	Variations <ul style="list-style-type: none"> ▪ Busy Signals ▪ Poor Connection ▪ No Answer ▪ Request for Information ▪ Speech Impaired ▪ Pacing Voice Customer ▪ Profanity towards CA ▪ Request for M or F CA ▪ CA Knows Customer ▪ Suicide ▪ Abuse ▪ Illegal Calls ▪ Sensitive Topics ▪ Redialing ▪ Switchboards ▪ Young Children ▪ Inbound ASCII ▪ Repeating Information ▪ Request for Relay Number ▪ Restricted Calls ▪ ASCII on Outbound Line ▪ Regional 800 ▪ Two Calling From Numbers ▪ LEC Service Office ▪ Double Letters ▪ Call Waiting ▪ Conference Calls ▪ Three-Way Calling ▪ Changing CAs ▪ 800 Number Referral ▪ Hard-of-Hearing Customer ▪ Call Backs for TTYs ▪ Multiple Calls
Module 4I	Variations <ul style="list-style-type: none"> ▪ Call Modification ▪ Holding ▪ Alternate Language ▪ Typing in Parenthesis ▪ Product Information ▪ Spanish Calls ▪ Voice Customer Hangs Up ▪ Variable Time Stamp ▪ TTY Customer Hangs Up ▪ Conversation being Recorded ▪ Prompting Voice for "GA" ▪ Non-Standard TTY Capability ▪ Internet Characters ▪ TTY does not type "GA" ▪ Cellular Long Distance Calls ▪ Party Line Calls

Module	Module Description
Module 5	Emergency Call Processing <ul style="list-style-type: none"> ▪ Emergency Calls ▪ Non-Emergency Calls ▪ Emergency Incident Form
Module 6A	Performance and Procedures <ul style="list-style-type: none"> ▪ Performance Measurement Plan ▪ Quality Customer Service ▪ Commitment ▪ Personal Effectiveness ▪ Assessment Survey and Replay ▪ Emergency Procedures ▪ Emergency Assistance Form ▪ Checking for Understanding
Module 6B	Healthy Relay <ul style="list-style-type: none"> ▪ Introduction ▪ Analogy ▪ Stretching Exercises ▪ CA Reinforcement ▪ Ergonomic Review ▪ Setting up Workstation ▪ GUAM - Get up and move
Module 6B	Healthy Relay <ul style="list-style-type: none"> ▪ Ergonomic Relief ▪ Slowing the Customer ▪ Overtime Relaxation
Module 7A	Responding Positively <ul style="list-style-type: none"> ▪ Stress Management ▪ Thoughts and Feelings ▪ Relaxing Emotionally ▪ Thinking Powerfully ▪ Exercise ▪ Nutrition ▪ Relaxation/Meditation ▪ Energy Resource Assessment ▪ Suggested Reading ▪ Leader's Notes
Module 7B	Healthy Detachment <ul style="list-style-type: none"> ▪ Interactive Communication ▪ TDD Communication ▪ Potential Stressors ▪ Detaching
Module 8	Assessing Performance <ul style="list-style-type: none"> ▪ Assessment Process ▪ Coaching ▪ Feedback ▪ Pass/Fail Guidelines ▪ Role Plays

Module	Module Description
Module 9	Supervisor as Trainer and Coach <ul style="list-style-type: none"> ▪ Introduction ▪ Objectives ▪ Being a Coach/Trainer ▪ An Adult Learner ▪ Giving Effective Instruction ▪ Feedback
Module 10	A Healthy Approach to Relay <ul style="list-style-type: none"> ▪ Learning Continuum ▪ Adult Education ▪ Dale's Cone of Experience ▪ Elements of Lesson Design ▪ Preparation for Training ▪ Warm Ups ▪ Voice Inflection ▪ Handling Interruptions ▪ Prep for Final ▪ Hearing Thru (TDD - Voice) ▪ Hearing Thru (Voice - TDD) ▪ Voice Thru (TDD - Voice) ▪ Voice Thru (Voice - TDD) ▪ Audiotext ▪ Information Lines ▪ Business Answering Machines ▪ Residential Answering Machines ▪ Beepers ▪ Spanish Answering Machine ▪ TTY Answering Machine

Speech-to-Speech Training Outline

Module 1	Orientation <ul style="list-style-type: none"> ▪ Objectives ▪ Welcome & Introductions ▪ Description ▪ History 	What is Speech to Speech Differences from Relay Agent Training
Module 2	Speech to Speech Customers <ul style="list-style-type: none"> ▪ Objectives ▪ Introduction ▪ Phone Image ▪ Characteristics of Speech to Speech Customers ▪ Breaking the Stereotypes 	Varying Speech Patterns Voice Synthesizers Types of Calls Transparency & Confidentiality Phrases
Module 3	Attributes of STS CAs <ul style="list-style-type: none"> ▪ Objectives ▪ Patience ▪ Concentration ▪ Listening Skills 	Caller Control Sensitivity and Understanding
Module 4A	Call Processing Procedures <ul style="list-style-type: none"> ▪ Objectives ▪ Your Role as CA ▪ Billing ▪ Directory Assistance ▪ Changing CAs 	
Module 4B	Answering Machines and Audiotext <ul style="list-style-type: none"> ▪ Answering Machines ▪ SA to SD Answering Machine ▪ Busy/Disconnects ▪ Audiotext Message ▪ Pagers/Beepers 	
Module 4C	Emergency Call Processing <ul style="list-style-type: none"> ▪ Emergency Services ▪ EM Numbers ▪ Emergency Incident Form 	
Module 4D	Variations <ul style="list-style-type: none"> ▪ Outbound to Relay ▪ Personal Conversations ▪ Operator Calls ▪ Talking on Hold ▪ Keeping the Customer Informed ▪ Differentiating STS and Relay ▪ Out dialing to STS 	Using GA Spelling Announcement 900 Calls Request to Hold SD to SD through STS Non STS Calls

Sprint CapTel Training Outline

1.0 Training Summary Outline

1.1 Introduction/Tour

Introductions: Lead trainer, training assistant, Call Center director, and other administrative personnel that may be involved in the first day of training. Prospective CAs are given a tour of the building and the facilities. Each individual is given a security passkey and shown how to use it. The CTI building is a secured facility and the passkey is needed to enter the parking lot after normal business hours, enter the building and gain access to the Call Center floor by stairway or elevator.

1.2 Human Resources Overview

The Human Resource coordinator meets with each group to go over required employment paperwork for the State of Wisconsin, Call Center policies, non-disclosure agreement, confidentiality requirements, expected standards that must be met to pass out of training, and current scheduling needs.

1.3 Videos

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

1.4 Mini Demonstration *CapTel* Phone

A brief explanation of the *CapTel* phone and the captioning system is given including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using the *CapTel* phone. This helps individuals to better understand what we are asking them to provide our clients and what the client experiences.

1.5 Introduction - Developing a Personal Voice Profile

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

1.6 Introduction - Training Program

The *CapTel* training program allows individuals to listen to various pre-recorded scripts and “re-voice” what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the

computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

1.7 Introduction - Call Handling Tools

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

1.8 Introduction - Call Handling Skills –Pacing a Conversation

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

1.9 Introduction - Call Handling Skills – Inserting Words

CapTel trains its CAs to insert particular words that the Voice Recognition is not able to caption successfully or in a consistent manner. These words include such things as people's names and regional cities and towns.

1.10 Introduction – How to Handle Various Recordings

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

1.11 Introduction & Demo of *CapTel* Conversation

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

2.0 Introduction to Call Simulation

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

2.1 Call Simulation-Timings

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy baseline timings provide a

progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

2.2 Review of Baseline Timings

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

2.3 Introduction to Correction Tool

The correction tool is introduced to provide CAs with another opportunity to provide the highest quality captions.

2.4 Review Training Elements

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

3.0 Monthly Timing Policy

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

3.1 Call Simulation-Timings

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

4.0 Production Floor Orientation

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

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

Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Ethics.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Posses the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

Appendix C: TRS Pledge of Confidentiality

RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISITORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL. The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE _____ DATE _____

MANAGER/SUPERVISOR SIGNATURE _____ DATE _____

CapTel CA Pledge of Confidentiality

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the *CapTel* management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any *CapTel* call.
- I will not act upon any information received while processing a *CapTel* call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel* Inc.
- I will not share any information about *CapTel* calls with anyone except a member of the *CapTel* Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel* Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel* Inc. management staff.
- I will not share with anyone any technical aspect of my position at *CapTel* Inc. unless asked by a member of the *CapTel* Inc. management staff.

- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

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

Employee Name

Date

Appendix D: E 911 Call Procedure

Sprint uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a “hot key”.
- The CA’s terminal sends a query to the E911 database containing the caller's geographic area ANI.
- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller’s ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller’s ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller’s ANI to the E911 center operator.

When a CapTel user dials 9-1-1, Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller’s Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.

If a CapTel user had only one line connected to their CapTel phone, captions will not be engaged on the call. A prompt on the phone will instruct the CapTel user how to communicate with the 9-1-1 center to request Voice-Carry-Over communications to begin. The PSAP would be engaged in typing directly to the user, and the user would be able to speak to the 911 dispatcher.

Appendix E Sprint Carrier of Choice Letter of Invitation



(date)

(name)

(Company name)

(address)

(telephone)

(fax)

(e-mail address)

Re: (Customer's name and phone number – requested
LEC for COC)

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

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

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

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is

not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

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

Non-facility based provider

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

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

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

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

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access

Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days).

Information obtained from the carriers will be used solely for the purpose of providing equal access for (Company Name) LD customers and shall be held proprietary.

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

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint
Angela Officer, Program Manager, Sprint

Attachment A

Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

<u>Entity</u>	<u>CIC Code</u>
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

Attachment B

Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern B
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

Attachment C

S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager
 <Street1> <Street2>
 <City>, <State> <Zip Code>
 FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

1. Regional COC Tandems

You will need to provide Sprint with the following:

Toll Carrier: < insert name>

CIC Code: <insert CIC>

Underlying Toll Carrier: <insert name>

Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern B
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

2. Call Type Restrictions

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

OR

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

Appendix F: Sprint Route Outage Prevention Programs

Call Before You Dig Program

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

Awareness Program

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

Route Surveillance Program

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

Technician Program

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

Fiber/Switch Trending Program

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

Network Management and Control Systems

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOCC in cases where a network problem may affect Connecticut operations. In cases such as these, the NOCC or RCC immediately alerts the ESOCC of the situation so that appropriate steps can be taken to minimize service impacts. The NOCC and RCCs also serve as reference points for the ESOCC when problems are detected in the TRS center that are not the result of internal center operations.

Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect the Connecticut call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management, into a two-level organization which maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

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

CAPTEL OUTAGE PREVENTION

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

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

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

Appendix G: Disaster Recovery Plan

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

The first line of defense against degradation of Connecticut is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other States; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore Connecticut to its full operating level in the shortest possible time.

Connecticut Notification Procedure

To provide Connecticut with the most complete and timely information on problems affecting their TRS, the trouble reporting procedure for Connecticut will include three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify Connecticut within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to Connecticut has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Connecticut Administrator within five business days of return to normal operation. Examples of service disruption to Connecticut include:

- ACD failure or malfunction
- Major transmission facility blockage
- Threat to Connecticut CA's safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC).

Disaster Recovery Procedures

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

Time Frames for Service Restoration

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

- **Sprint Call Center Equipment** - A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- **Sprint or Telco Network Facilities** - For an outage of facilities directly serving Connecticut incoming TRS calls will immediately be routed to one of nine throughout the US. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- **Due to Utilities or Disaster at the Center** - Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment

has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.

- **Due to Telco Facilities Equipment** - A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a Telco central office - In (CITY), for example, only local (CITY) residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

Trouble Reporting Procedures

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

- Service Description "Connecticut"
- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by Connecticut users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the ESOC will handle calls from the Customer Service agents 24 hours a day, 7 days a week. The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's 11 TRS Call Centers to respond quickly to any event, including natural disasters.

Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1 Time to Investigate + Time to Repair + Time to Notify

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

Table A-2 Current MTTR Objectives

Switched Services	8 Hours
--------------------------	---------

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

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

Escalation Procedures

If adequate results have not been achieved within two hours, a Connecticut user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3 Escalation Levels

Escalation Level	Contact	Phone
2	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
3	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

Service Reliability

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

A 100 percent fiber-optic network, with significant fiber miles in Connecticut, provides critical advantages over the other carriers. These advantages include:

- **Quality**

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

- **Economy**

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

- **Expandability**

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

- **Survivability**

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Connecticut and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The LATAs in Connecticut are served by Sprint POPs. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With POPs in the state, all areas will be adequately serviced by Sprint.

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

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

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

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

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the

capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Sprint Outage Notification from *CapTel*/Service Center

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

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

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

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

Sprint Procedure for Outage Notification to Contract Administrators during Business Hours

Upon receiving notification from CTI during business hours (8AM to 5PM CT), Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 468-4345 M: (925) 895-9176 E: John.E.Moore@sprint.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

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

In cases of partial loss of service, such as several inoperable CA positions or, local area network outages, the *CapTel* Center on-site technician will notify *CapTel* Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 15 minutes will be email to the state Contract Administrator.

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

Sprint Procedure for Outage Notification to Contract Administrators outside of Business Hours

Upon receiving notification from CTI outside of business hours (5PM to 8AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify Contract Administrators immediately by email of an outage if possible, but by no later than 8AM CT the next business day. Follow-ups and post-mortem will still be provided within the required guidelines.

Disaster Recovery Follow-Up

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

Disaster Recovery Post-mortem documentation

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

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

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

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

Time Frames for Service Restoration

Complete loss of service due to equipment -

- Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.
- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level
- Four hours at second level
- Eight hours at third level

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

Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level
- Twenty-four hours at second level

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

Trouble Reporting Procedures (for Individual Customers to Customer Service)

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

- Caller’s Name
- Contact Number
- Calling to / Calling from (if applicable)
- Description of the trouble

Report service affecting trouble to Customer Service during normal business hours, 8:00 AM to 5:00 PM Central Time, Monday through Friday. Normal business hours do not include Saturday, Sunday, and holidays.

Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 captel@captelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@captelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(877) 437-4660 Pam.Frazier@captelmail.com

Table 4 – CapTel Customer Service Escalation Procedures

Hours outside the normal business day are 5:00 PM to 8:00 AM Central Time for every day of the week (Monday through Friday), and all day Saturday, Sunday, and holidays. Outside of normal business day hours, a recording will play and trouble calls can leave a message for customer service to follow up during the next business day.

The recording played to customers outside of CapTel customer service business hours:

Thank you for calling CapTel customer service. Our hours are Monday through Friday from 8AM to 5PM central time. You may try again during business hours or leave a voice mail message by pressing 3 now.

If the “3” button is pressed, then the customer will hear the following message:

Thank you for calling CapTel customer service. We are unable to take your call at this time. Please leave a detailed message with your name and phone number with area

code, or email address, and a reason for your call, and one of our representatives will return your call as soon as possible.

Alternative usage for CapTel phone during outage for VCO users.

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

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 711 (user must dial only 711 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call.

Appendix H: Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as "CA".	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State's requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA's tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system's ability to answer an incoming call based on the previous call in the caller's communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system's ability to brand the caller's preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialled and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE]RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE]RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

Appendix I: Policy on 10- and 15-Minute Rule

Sprint understands that a change of CAs can interrupt the natural call flow. Therefore, Sprint strives to keep the same CA dedicated to each call. Sprint will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for Speech-to-Speech call). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in their headset at the position and watch the call for several minutes in order to assess the “spirit” of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY user:

“THIS IS CA # CONTINUING YOUR CALL.”

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

Appendix J: FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Provision of Services		
<p>§ 64.603</p>	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.</p> <p>Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).</p> <p>Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.</p> <p>Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.</p>
Operational Standards		
<p>§ 64.604 A.1</p>	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.</p> <p>Each Sprint CA is required to take the 60 WPM typing test quarterly (four times a year).</p> <p>Sprint administers Oral-to-type tests.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere to RID Code of Ethics.
§ 64.604 A.2	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p> <p>Certain exceptions are provided for Speech-to-Speech calls.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise</p>	<p>CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>Sprint CAs are prohibited from disclosing any call content.</p> <p>STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.</p> <p>CAs relay calls verbatim and do not alter relayed conversation.</p> <p>During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.</p>
§ 64.604 A.3	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers.</p>	<p>CAs process all calls and never prohibit sequential calls or limit length of calls.</p> <p>Sprint TRS is capable of handling all call types normally provided by common carriers</p>
§ 64.604 A.4	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP.</p> <p>CAs pass along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.</p>
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10</p>	<p>TRS and VRS CAs stay on the call for a minimum of 10 minutes.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>minutes.</p> <p>STS CAs - 15 minutes.</p>	<p>STS CAs stay on the call for a minimum of 15 minutes.</p>
<p>§ 64.604 A.6</p>	<p>CA Gender Preferences</p> <p>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.</p>	<p>Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.</p>
<p>§ 64.604 A.7</p>	<p>STS Called Numbers</p> <p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>	<p>Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user.</p> <p>Sprint will provide the STS user information to any new provider.</p>
Technical Standards		
<p>§ 64.604 B.1</p>	<p>ASCII & Baudot</p> <p>TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.</p>	<p>Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use.</p> <p>The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.</p>
<p>§ 64.604 B.2</p>	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Speed of Answer is measured on a daily basis.</p> <p>Sprint's system is designed to the P.01 standards.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 B.3	<p>Equal Access to IXCs</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.</p>
§ 64.604 B.4	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>Sprint TRS is available 24 hours a day, everyday.</p> <p>Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
§ 64.604 B.5	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression.</p> <p>Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.</p>
§ 64.604 B.6	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete</p>	<p>CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call.</p> <p>Sprint does not charge for any additional calls necessary to complete call involving recorded</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>or interactive menus.</p> <p>Sprint was the first provider to process pay-per-calls (Texas, 1996).</p>
Functional Standards		
<p>§ 64.604 C.1</p>	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	<p>Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p> <p>Sprint has submitted annual summary of Consumer Complaints log report:</p> <p>June 1, 2002-May 31, 2003 June 1, 2003-May 31, 2004 June 1, 2004-May 31, 2005 June 1, 2005-May 31, 2006 June 1, 2006-May 31, 2007</p>
<p>§ 64.604 C.2</p>	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p>Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p>
<p>§ 64.604 C.3</p>	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p>	<p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p>TRS.</p> <p>Sprint regularly provides 711 dialing information in its education and outreach programs.</p>
<p>§ 64.604 C.4</p>	<p>Rates</p> <p>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.</p>	<p>Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
<p>§ 64.604 C.5</p>	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(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</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>
<p>§ 64.604 C.6</p>	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	<p>The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 C.7	<p>Treatment of TRS Customer Info</p> <p>Future contacts 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, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.</p>	<p>Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees.</p>
§ 64.605	<p>State Certification</p> <p>Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.</p>	<p>Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.</p>
<p>Availability of SS7 Technology to TRS Facilities</p> <p>Transmittal of Calling Party Information</p>	<p>Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (§16)</p> <p>Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (§22)</p> <p>Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider. (§25)</p>	<p>Sprint's SS7 platform supports Caller ID services.</p> <p>Sprint complies with all FCC rules pertaining Caller ID and call blocking services.</p> <p>Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.</p>
Types of Calls	<p>Concluded that the following call types are adopted as mandatory minimum standards of TRS.</p> <p>Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY</p>	<p>Sprint has provided the VCO and HCO calling combinations since 1996.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>VCO-to-VCO</p> <p>This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (§36)</p>	
Handling of Emergency Calls	<p>Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (§42)</p> <p>This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)</p>	<p>Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.</p>
Answering Machine Message Retrieval	<p>This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party.</p> <p>Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (§62)</p>	<p>Sprint has provided the Answering Machine Retrieval since 1996.</p>
Call Release	<p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation.</p> <p>Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (§68)</p> <p>This requirement is waived for Internet Relay and Video Relay Services.(§76)</p>	<p>Sprint has provided the Call Release feature since 2003.</p> <p>Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.</p>
Speed Dialing	<p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p> <p>This requirement is waived for Internet Relay and Video Relay Services.(§76)</p>	<p>Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
Three-way Calling	<p>Three-way calling feature is generally arranged in one of two ways. (§73)</p> <p>1. The TRS consumer may request that the CA set up the call with two other parties</p> <p>or;</p> <p>2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.</p>

Appendix K: FCC CapTel Mandatory Minimum Standards & Compliance Matrix

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS. (¶7)</p>	<p>Sprint has been a CapTel provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-complaint CapTel service, first -ever in the TRS Industry.</p> <p>Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3.</p> <p>Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>Sprint is able to process inbound 711 calls to include access to CapTel services.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Operational Standards			
<p>§ 64.604 A.1</p>	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Requirement applies.</p> <p>Use of CapTel's voice recognition software "is a permissible means ...for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§39).</p> <p>Waived. Interpreting typed ASL is not applicable.</p> <p>Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for ... enhancing transmission speed..." (§39)</p> <p>Waived. Permits use of Oral-to-text tests instead.</p>	<p>Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.</p> <p>A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL</p> <p>CapTel's voice recognition technology transmits above 100 WPM.</p> <p>Oral to text tests are given to all CapTel CAs</p>
<p>§ 64.604 A.2</p>	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 A.3</p>	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.</p>	<p>Waived for outbound calls (§ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (§46)</p> <p>Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call (§46).</p> <p>Requirement applies.</p> <p>Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound 711 calling waived for one year (8/1/03 - 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p>	<p>CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls.</p> <p>CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call.</p> <p>CapTel is capable of handling all call types normally provided by common carriers.</p>
<p>§ 64.604 A.4</p>	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.</p>	Requirement applies.	CapTel CAs stay on all calls for a minimum of 10 minutes.
§ 64.604 A.6	<p>CA Gender Preferences</p> <p>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.</p>	Waived. (§ 36, 47-48).	
§ 64.604 A.7	<p>STS Called Numbers</p> <p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>	Waived. (§29)	
Technical Standards			
§ 64.604 B.1	<p>ASCII & Baudot</p> <p>TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.</p>	Waived. (§53-54)	

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.2</p>	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Requirement applies</p> <p>Requirement applies.</p> <p>Requirement applies.</p>	<p>Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.</p>
<p>§ 64.604 B.3</p>	<p>Equal Access to IXCs</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Requirement applies.</p>	<p>CapTel users will be able to choose their IXC carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to voice users.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.4</p>	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)</p> <p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p>	<p>Sprint CapTel is available 24 hours a day, everyday.</p> <p>Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
<p>§ 64.604 B.5</p>	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>FCC acknowledged that CapTel is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.6</p>	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user both hears and interacts directly with the recorded message and makes 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.</p> <p>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.</p> <p>Sprint CapTel supports pay-per-call call types.</p>
Functional Standards			

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p><u>§ 64.604 C.1</u></p>	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	<p>Requirement applies.</p>	<p>Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p>
<p><u>§ 64.604 C.2</u></p>	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p>Requirement applies.</p>	<p>Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p>
<p><u>§ 64.604 C.3</u></p>	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p> <p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p>Requirement applies.</p>	<p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 C.4</p>	<p>Rates</p> <p>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.</p>	<p>Requirement applies.</p>	<p>CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
<p>§ 64.604 C.5</p>	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(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</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>Requirement applies.</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate CapTel is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 C.6</p>	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	<p>Requirement applies.</p>	<p>The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.</p>
<p>§ 64.604 C.7</p>	<p>Treatment of TRS Customer Info</p> <p>Future contacts 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, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.</p>	<p>Requirement applies.</p>	<p>Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.</p>
<p>§ 64.605</p>	<p>State Certification</p> <p>Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.</p>	<p>Requirement applies.</p>	<p>Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators. Sprint CapTel will deliver the SS7 technology on February 1, 2004.
Types of Calls	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived. VCO requirements still apply.	Sprint CapTel supports the VCO calling combinations.
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.
Answering Machine Retrieval	Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users. Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.	The requirement was not addressed in the Declaratory Ruling.	Answering machine and voicemail retrieval is provided by CapTel. Answering machine retrieval through CapTel is accomplished when the CapTel facility caption the voice message to the CapTel users.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	<p>Concluded that call release is required under FCC's functional equivalency mandate.</p> <p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.</p>	Waived. (§ 52)	
Speed Dialing	<p>Concluded that speed dialing feature is required under FCC's equivalency mandate.</p> <p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p>	The requirement was not addressed in the Declaratory ruling.	CapTel telephones have the Speed Dial feature.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	<p>Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide.</p> <p>The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways " One way is for the TRS consumer to request that the CA set up the call with two other parties.</p> <p>The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p>	The requirement was not addressed in the Declaratory Ruling.	<p>Sprint CapTel users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint CapTel meets the requirement for three-way calling. (For One-Line CapTel.) For Two-Line CapTel either party can initiate a 3 way call should the user purchased this as a LEC option.</p> <p>Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals.</p>

Appendix L: Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report
April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP (VoIP) requires Quality of Service. QoS means that all the associated	We are currently providing two-line VCO and HCO controlled at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					<p>data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.</p>	<p>the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.</p>
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated	Sprint implemented a "manual" (directory assistance	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated	No additional information to submit beyond our recent

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	submission to the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					interexchange carrier features for Video Relay Service.	
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						connection at end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO - to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. The videoconferencing via internet or ISDN protocols are not compatible.
11. HCO - to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO - to - VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			compatible.			ISDN protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not need to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						between two video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

Appendix M: Sprint Relay Fact Sheet

Sprint Relay

www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

Sprint Relay Services

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:

Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experience Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

- 1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.
- 2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

CapTelSM (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, *CapTel*-equipped phone is required in order to place a call through the *CapTel* relay service. The *CapTel* phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the *CapTel* phone's built-in screen

so the user can read the words while listening to the voice of the other party. For more information on CapTel, visit www.captionedtelephone.com.

Relay Conference CaptioningSM, developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit www.sprintrelay.com

Appendix N: Copy of TSP Press Release

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General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service

requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services

Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.