

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

TRAINING TOPICS

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

TRAINING TOPICS

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

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

TRAINING TOPICS

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

TRAINING TOPICS

	TRS Regulations pertaining to call content	Confidential Customer Information.
--	---	------------------------------------

Appendix C:
TRS Pledge of Confidentiality

Agreement Regarding Confidential Information

SPRINT TRS RELAY CENTERS AGREEMENT REGARDING CONFIDENTIAL CUSTOMER INFORMATION

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

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

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

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

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

EMPLOYEE SIGNATURE DATE

MANAGER/SUPERVISOR SIGNATURE DATE

CAPTEL CONFIDENTIALITY

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

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

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

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

Confidentiality Policy

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

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

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

Employee Name

Date

Appendix D:
Sprint Carrier of Choice
Letter of Invitation

Sprint Relay

<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

Appendix E:

Disaster Recovery Plan

Page

Intentionally

Left

Blank

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

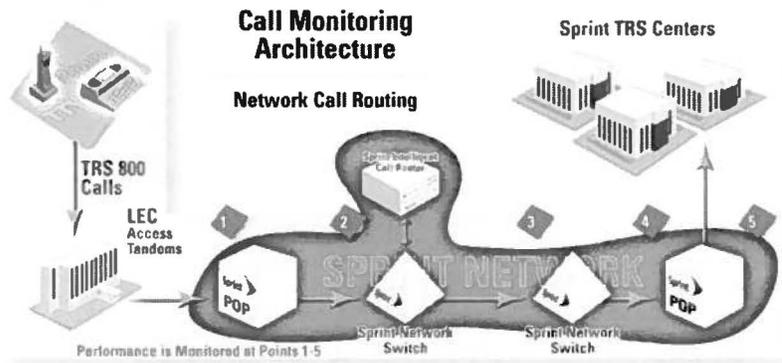
Surveillance for the Sprint network is managed by the Network Operations Center located in Overland Park Kansas. In the event of a network problem causing customer degradation of service, Network Operations will notify the Service Assurance Management Center (SAMC) of Sprint's TRS Group. SAMC will then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

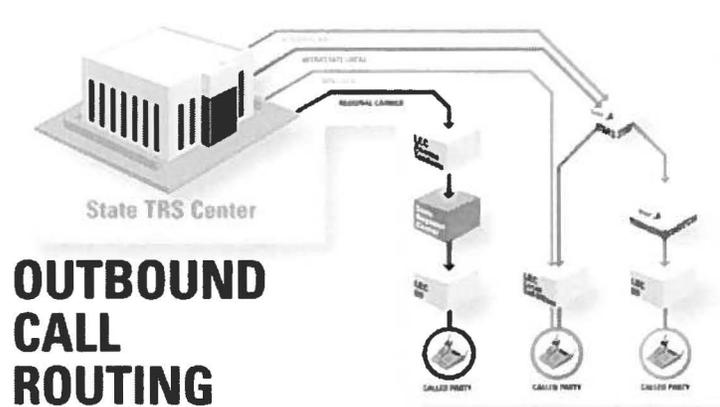
Sprint's inbound configuration ensures that if an issue is identified anywhere in the network, it will be promptly addressed and reported.

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 <u>After Hours:</u> getdennis@gmail.com (pager) 913-231-1386 (cell) (608) 441-8800 Pam.Frazier@captelmail.com
2	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	<u>After Hours:</u> 608-516-7517 (cell) 608-832-6233 (home) (608) 441-8800 Jayne.Turner@ultratec.com
3	Captioned Telephone Inc.'s (CTI) Call Center Vice President	Jayne Turner Vice President	<u>After Hours:</u> 608-274-0598 (home)

Table 44 – Sprint CapTel Outage Escalation

SPRINT PROCEDURE FOR OUTAGE NOTIFICATION TO CONTRACT ADMINISTRATORS

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

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

Sprint Customer Notification Procedure

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

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

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

DISASTER RECOVERY FOLLOW-UP

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

DISASTER RECOVERY POST-MORTEM DOCUMENTATION

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

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

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

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

TIME FRAMES FOR SERVICE RESTORATION

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

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

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

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

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

TROUBLE REPORTING PROCEDURES (FOR INDIVIDUAL CUSTOMERS TO CUSTOMER SERVICE)

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

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

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

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

Table 46 – CapTel Customer Service Escalation Procedures

ALTERNATIVE USAGE FOR CAPTEL PHONE DURING OUTAGE FOR VCO USERS.

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

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

Appendix F:
Copies of Complaint Logs
2008 - 2012

Complaint Tracking for PR (06/01/2007-05/31/2008). Total Customer Contacts: 0

<u>Tally</u>	<u>Date of Complaint</u>	<u>Nature of Complaint</u>	<u>Date of Resolution</u>	<u>Explanation of Resolution</u>
--------------	--------------------------	----------------------------	---------------------------	----------------------------------

There were no complaints received by Customer Service for PR between June 2007 through May 2008



**Puerto Rico
FCC Complaint Log 2009**

Complaint Tracking for Puerto Rico (06/01/2008-05/31/2009). Total Customer Contacts: 3

Tally	Date of Compl.	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	09/24/08	Caller gets connected to Customer Service instead of Relay operator when dialing 711 to make a relay call. Apologized for the problem and opened Trouble Ticket. Caller requested follow-up on this issue.	10/14/08	Make a call with 711 and reach an Operator. Also, my Customer made a call with 711 and it went thru. Please close this resolution as it been resolved.
2	01/20/09	PR Relay customer reports continual problems making Long Distance calls via Relay. Long Distance and calls to cell phones are not successful and problem has been experienced for a month or more. (Advised customer that a Trouble Ticket and complaint would be entered regarding this issue).Customer requests contact asap.	02/04/09	VCO Customer switched long distant carrier to Sprint, this was the problem that prevent customer making call from TTY because the PR Telephone Co has been blocking his calls. Once customer signed an authorization form to change LD carrier. solution has been resolved since now customer can make call.
3	01/09/09	Has problem calling(wife's cell) from home number .He says it's "blocked" but would not explain what he meant. Say's she has called from his office number to that same cell and has no problem. Customer requests a follow-up at his wife's cell number . Apologized to the customer and informed him we would pass this on to the technician.	01/09/09	1/9/09 Spoke with technician regarding this complaint. Technician said that it sounded like the number had been blocked unintentionally by the customer but that was not something we could fix. Team Leader contacted customer via the number provided and left a message for the customer.

Date Generated: Tue, Apr. 28th, 2009 @ 08:42:30 AM CT

Complaint Tracking for PR (06/01/2009-05/31/2010). Total Cust:

Tally	Date of Compl.	Nature of Complaint	Date of Resolution
-------	----------------	---------------------	--------------------

Date Generated: Wed, Jun. 2nd, 2010 @ 10:07:00 AM CT

omer Contacts: 0

Explanation of Resolution



**Puerto Rico
FCC Complaint Log
2010 - 2011**

Complaint Tracking for PR (06/01/2010-5/31/2011). Total Customer Contacts: 1

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	06/14/10	A Puerto Rico TTY user was unable to reach the Relay Program Manager and asked them to call back regarding obtaining equipment. The customer stated that they tried to contact the Program Manager at least ten times. Customer Service apologized and explained that they would be sure to let the Program Manager know that the customer is waiting to hear from them. The Customer Service Representative verified the number with the customer. The customer prefers through their daughter on voice.	06/14/10	The Relay Program Manager received a letter from the customer in which the customer stated that they are not interested in having a TTY because they do not have a telephone line at home. The customer wanted another item that could be used for a mobile device. The Relay Program Manager wrote a letter to the customer explaining that Puerto Rico Relay does not and cannot purchase the item that the customer was requesting. It was also explained that any items outside of the Puerto Rico Equipment Distribution Program must be purchased and paid for by the customer. This resolution is now closed.



**Puerto Rico FCC
2011 - 2012
Complaint Log**

Complaint Tracking for PR (06/01/2011-05/31/2012). Total Customer Contacts: 0

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
-------	-------------------	---------------------	--------------------	---------------------------