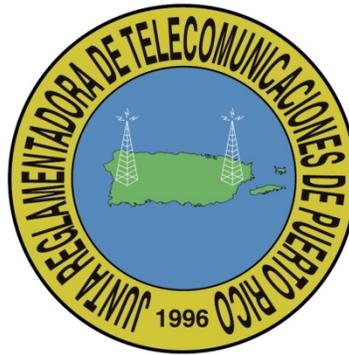


# Telecommunications Regulatory Board of Puerto Rico



## Filing to FCC's CG Docket No. 03-123 For "TRS State Certification Application"

### Puerto Rico Telecommunications Relay Service (TRS) Certification Renewal Application and Supporting Documents

#### Introduction

Puerto Rico is part of the United States under the definition of "State", Section 3 of the Communications Act. As such, for telecommunications purposes it is treated like any of the fifty (50) States. For that reason, whatever is determined by the U.S. Congress and the Federal Communications Commission (FCC) regarding interstate and foreign telecommunications services, may impact the Puerto Rico telecommunications market and how it is regulated.

The Telecommunications Regulatory Board of Puerto Rico (TRB) is the Government agency created by virtue of Law Number 213 of September 12, 1996, known as the Telecommunications Act of Puerto Rico of 1996, to regulate the telecommunications and Cable TV markets. At present it has jurisdiction over intra-island services provided by the telecommunications companies, and is the franchising entity for Cable TV companies doing business within Puerto Rico.

The TRB is also in charge of the administration of the Universal Service Fund of Puerto Rico (PRUSF) and the certification of eligibility to receive funds from both the U.S. and PRUSF. Telecommunications Relay Service (TRS) is one of the programs subsidized by the TRB's PRUSF.

On May 13, 2009 the TRB issued an Administrative Order, pursuant to TRB's case number JRT-SUB-0002, which authorized the TRB's Board of Awards (hereinafter referred to as the "Board of Awards") to develop and celebrate a new bid process for the selection of the new TRS service provider in which the incumbent TRS provider in Puerto Rico, as well as other eligible TRS

providers could participate, in order to elect a new TRS provider. On May 19, 2009, the Board of Awards issued an Invitation for Bids containing the bid specifications documents which were sent to sixteen (16) companies which provide this type of specialized service in the United States, which were listed as such in the FCC web site.

The bid was issued in accordance with the objectives of the TRB's Universal Service Rules (TRB Regulation number 5757), as amended by Regulation number 6124 and the FCC's Regulations for the provision of TRS, pursuant to Section 225 of the Federal Communications Act of 1934, as amended (Title IV of the Americans with Disabilities Act - ADA). A copy of the TRB's Request for Proposals for the provision of TRS is included in Appendix - H.

All potential providers were invited and on July 14 of 2009, the bid process was awarded to Sprint International Caribe, Inc. as representative of Sprint Communications Company L.P. (referred to here as *Sprint Relay* or *Sprint*), which once again proved to be the most cost-effective bidder that substantially complied with the essential requirements of the bid process, to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606.

Therefore, beginning on January 1, 2010 until January 1, 2013, Sprint Relay shall be the incumbent provider of TRS within the Commonwealth of Puerto Rico as approved and authorized by TRB's Resolution and Order on case number JRT-2009-SUB-0002. As agreed on contract # 2010-00005, the TRB may renew this agreement for one (1) additional year term and up to two (2) years.

As provider of TRS, a Sprint Relay TRS operator/Communications Assistant (CA) located in a call/service center outside of Puerto Rico handles calls between the originating and terminating parties to or from a TRS user in Puerto Rico. The TRS service in Puerto Rico is branded as "Puerto Rico Relay".



Please note that although Sprint Relay provides Internet Protocol (IP) and Captioned telephone web-based services, the TRB does not contract to provide these services in Puerto Rico, nor is

Puerto Rico Relay responsible for oversight of IP and VRS or other Internet or web-based relay services.

The following narrative and attached appendices have been prepared to comply with the FCC TRS Certification Renewal Application, specifically in response to the **FCC Public Notice DA 12-1187, CG Docket No. 03-123** released on July 25, 2012. Included in the Public Notice are the minimum mandatory FCC TRS requirements under **47 C.F.R. §64.604 and §64.606**.

A copy of this Public Notice and these mandatory requirements is attached as **Appendix A**.

In order to facilitate the evaluation of this application for Re-certification, the following content describes each one of the FCC requirements and an explanation of how The Puerto Rico Relay program complies with it.

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## Section A - 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

The TRB contracts with Sprint Relay to provide the hiring, training and oversight of Communication Assistants. Under the **Puerto Rico Relay** program, Sprint Relay 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.

CA applicants are required to pass a valid and unbiased 12th grade level spelling and 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.

*§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.*

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

- 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 Relay's diversified culture training program provides the CA with information about understanding TRS users in Puerto Rico, including deaf users and their culture, history and communication needs.
- 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 Relay provides an extensive process for hiring CAs who provides Speech to Speech (STS). CA applicants must successfully achieve the following:

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

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint Relay'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 Relay's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman

obtained during the initial STS trial conducted along with eight years of experience processing STS calls.

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

The STS training outline is displayed in the following figure:

<b>STS TRAINING OUTLINE</b>	
<b>Values and Goals</b>	
<b>Training Agenda</b>	
<ul style="list-style-type: none"> <li>▪ Objectives / Training Outline</li> <li>▪ Introduction and History</li> <li>▪ Video</li> <li>▪ Service Description</li> <li>▪ Characteristics of Customers</li> <li>▪ Stereotypes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Speech-Disabilities</li> <li>▪ Attributes of Speech-to-Speech Relay CAs</li> <li>▪ Speech-to-Speech versus Traditional Relay</li> <li>▪ FCC Requirements</li> <li>▪ Speech-to-Speech Variations</li> <li>▪ Assessment</li> </ul>
<b>Work Performance Components</b>	
<ul style="list-style-type: none"> <li>▪ Basic Call Processing</li> <li>▪ Call set up</li> <li>▪ Customer Database</li> <li>▪ Frequently Dialed Numbers</li> <li>▪ Customer Requests</li> <li>▪ Emergency Call Processing</li> </ul>	<ul style="list-style-type: none"> <li>▪ Confidentiality</li> <li>▪ Transparency</li> <li>▪ Personal Conversations</li> <li>▪ Developmental Skill Practice</li> <li>▪ Audio</li> <li>▪ Observation</li> </ul>
<b>Participation</b>	
<ul style="list-style-type: none"> <li>▪ CA training</li> <li>▪ Taking over calls – 15 minute</li> <li>▪ CA work performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ Call Focus</li> <li>▪ Teamwork – support peer</li> </ul>
<b>Confidentiality and Transparency</b>	
<ul style="list-style-type: none"> <li>▪ Discuss call speech patterns</li> <li>▪ Discuss techniques customer uses</li> <li>▪ Have two CAs on one call, if necessary or customer requests.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unacceptable to:</li> <li>▪ Have conversation regarding information discussed on calls</li> <li>▪ Discuss customers in general</li> </ul>
<b>Scheduling</b>	

You may review the TRS and STS 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

The TRB contracts with Sprint Relay to provide **Puerto Rico Relay** with 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

The TRB does not contract to provide VRS services for the **Puerto Rico Relay** program, 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 the TRB's contract with Sprint, the **Puerto Rico Relay** program 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)) **Puerto Rico Relay** 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. The **Puerto Rico Relay** program 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.

## 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, the TRB contracts with Sprint Relay to oversee all TRS CAs for the State of Puerto Rico.

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. Puerto Rico Relay 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.

Puerto Rico 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 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.

### STS Limited Exception of Retention of Information

At the request of a caller, Puerto Rico Relay 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

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

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

- CAs accept their being involved only to the point of facilitating communication as a “human telephone wire.”
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf 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, Puerto Rico Relay 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.

### **STS Facilitation of Communication**

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

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

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user’s message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:

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

- STS CA may ask the user to spell the word

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

### A.3 Types of Calls

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

Puerto Rico 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. Puerto Rico 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 Puerto Rico Relay retain full control of the length and number of calls placed anytime through relay.

***§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.***

Puerto Rico Relay, 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. Puerto Rico Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All Puerto Rico Relay 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. Puerto Rico Relay gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Puerto Rico Relay works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and 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.***

Through the TRB's contract with Sprint, the **Puerto Rico Relay** program complies with this standard because Sprint Relay was the first provider to process pay-per-calls, beginning in 1996.

Callers to Puerto Rico Relay 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, Puerto Rico Relay users may make 900 calls through 1-900-230-5656

***§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.***

Puerto Rico Relay 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 Puerto Rico Relay:

- 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

*§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**

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

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

### **Speed Dialing Functionality**

Puerto Rico Relay's 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.

### **Three-Way Calling**

Puerto Rico Relay provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second

call to the Relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her Local Exchange Carriers (LECs) can use this feature when placing a call through Puerto Rico relay. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

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

***§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.***

Through the TRB's contract with Sprint, the **Puerto Rico Relay** program 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. Puerto Rico relay has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

Puerto Rico Relay 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 Relay'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.

***§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**

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

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA 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, Puerto Rico Relay CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call so the end user is not imposed charges for additional calls. If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call.
- Sprint's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

#### 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.***

Puerto Rico Relay accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Puerto Rico Relay 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

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

1.	Puerto Rico Relay 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 Puerto Rico 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 the TRB's contract with Sprint, Puerto Rico Relay 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.

### Training and Support Materials

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

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

### 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.***

Puerto Rico Relay offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Puerto Rico Relay'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.***

Puerto Rico Relay 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.***

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

## **Section B - 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.***

Puerto Rico Relay contracts with Sprint Relay 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.***

For the Puerto Rico Relay program, the TRB contracts with Sprint, who currently has nine (9) 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 Puerto Rico Relay 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.

Puerto Rico Relay expects that Sprint will continue to review TRS 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.***

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

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

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

Puerto Rico Relay, through its TRS contract with Sprint Relay, 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 Relay's 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 Puerto Rico 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.***

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

### **B.3 Equal Access to Interexchange Carriers**

***§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.***

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

TRS 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 Customer Service to receive the benefits of registering their Carrier-of-Choice preferences for calls.

Puerto Rico Relay relies on Sprint Relay to provide its users with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint Relay'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 Relay 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 Relay 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 Relay 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 Relay 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 ALLOWS (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 out dials 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 Relay currently has 240 carriers participating in the Sprint Relay's TRS Carrier-of-Choice program. Participation of Carriers in Puerto Rico is dependent on whether carrier is authorized to provide service in Puerto Rico and connectivity to the Sprint Access Tandem. Currently the list of providers in the Puerto Rico includes 25 carriers:

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
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
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

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.***

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

***§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.***

Puerto Rico Relay, through its TRS contract, benefit from using 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. Puerto Rico 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.***

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

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

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

## B.5 Technology

***§64.604 (b)(5) 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.***

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

In order to achieve functional equivalence, Puerto Rico Relay will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Puerto Rico Relay 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 Puerto Rico, under the Puerto Rico Relay program, Sprint Relay 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 Relay announced 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 Puerto Rico Relay customers travel outside of the state, callers will automatically 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 Relay 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 Relay will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

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

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

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

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

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

## STS with Privacy Option

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

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

### Customer Control

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

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

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

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

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

## Technology

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

### Caller ID Enhancements

Many Caller ID enhancements are compatible with 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.

## **Section C - 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.*

Puerto Rico Relay 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.

Puerto Rico Relay works closely with their TRS provider (Sprint Relay) 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 Puerto Rico 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. Puerto Rico Relay reviews the log and then passed the complaint log to the FCC by July 1<sup>st</sup> of each year.

See Appendix F for copies of the last five years of Puerto Rico Relay complaints that have been submitted to the FCC.

## C.2 Contact Persons

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

- Puerto Rico Relay callers may file intrastate complaints and commendations regarding Puerto Rico Relay services through the following contacts:

Elizabeth A. Rios  
304 Ponce de León Ave. Ste. 8  
San Juan, PR 00918  
<http://www.puertoricorelay.com>  
[Elizabeth.a.rios@sprint.com](mailto:Elizabeth.a.rios@sprint.com)  
787-775-6775 TTY  
Fax 787 775 6730  
Voice 787 775 6800  
VP 787 523 7742

TRS Contract Administrator Name:

Roberto Miranda  
Telecommunications Regulatory Board of Puerto Rico  
500 Ave. Roberto Todd Parada 18  
Santurce, PR 00907  
E-mail [rmiranda@jrtrpr.pr.gov](mailto:rmiranda@jrtrpr.pr.gov)  
Web Address [www.jrtrpr.gobierno.pr](http://www.jrtrpr.gobierno.pr)  
Fax 787 756 0814  
Voice 787 756 0804

### 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.*

Outreach education is an importance method to provide information to the relay and non-relay users. The information is useful to acknowledge the different kind of free services that are available for them. As established in the TRB's contract #2010-000005 with Sprint Relay, the TRS service rate includes terms and conditions for Puerto Rico Relay's outreach program, regarding the availability of TRS and our equipment distribution program (EDP).

A full-time community and business outreach program to educate all potential users about TRS and EDP throughout Puerto Rico has been established by Sprint Relay, in compliance with the TRB's requirements, as established in the TRB's request for proposals and clauses sixteen (16), seventeen (17) and eighteen (18) of contract 2010-000005, following the most recent bid award. The outreach program includes a full-time deaf or hard of hearing employee of Sprint, who works as an outreach manager and currently resides in Puerto Rico.

Puerto Rico Relay's outreach program targets deaf or hard-of-hearing and speech impaired individuals, as well as the general population (hearing users who need to communicate with deaf or heard-of-hearing users). Public and Private Businesses, trade shows, *DeafNation* Expos (*celebrated in San Juan, Puerto Rico*), civic organizations, public schools and universities have been venues for the outreach program, which have included visual advertisements, instructional DVD's, demonstrations of equipment and distribution of educational materials and handouts, describing how to use the Relay service and descriptions of how eligible deaf and hard of hearing users may benefit from the Federal and Puerto Rico Lifeline and Link-Up programs.

As part of the outreach program, a Puerto Rico Relay website has been established in Spanish and English, providing details and instructions for use and options for access to TRS. Information such as access telephone numbers, TRS type of calls such as: VCO, HCO, 2LVCO, Caller profile, Credit Card calling and customer Service are included and explained in this website:

[www.puertoricorelay.com](http://www.puertoricorelay.com)

Puerto Rico Relay have also sponsored various organizations and events, including sports events for deaf and hard of hearing people, like softball and basketball tournaments and 5k races.

Examples, such as promotional and educational materials, as well as logs of outreach and service efforts from Sprint's resident outreach manager, are included, from Appendix G & L.

#### 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

Puerto Rico Relay 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 Puerto Rico Relay COC list, will be rated and invoiced by the selected interstate carrier.

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

	Intrastate	Interstate
<b>Day</b> (7 AM – 6:59 PM)	35%	50%
<b>Evening</b> (7 PM – 10:59 PM)	25%	50%
<b>Night/weekend</b> (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 Puerto Rico Relay intrastate and interstate minutes are reported separately to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual

customer invoices, Sprint deducts minutes for which the Rolka Loubé 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 RLSA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RLSA for reimbursement.

The TRB oversees the Puerto Rico Relay service and operation through the following means:

1. The following clauses of contract 2010-00005, establish service requirements for TRS that are subject to fines or liquidated damages and require certain reports that allow the Board's compliance office, as well as the Board's TRS Administrator to oversee the quality of the Puerto Rico Relay service. The contract clauses are the following:

#### Contract Clauses regarding Service Standards:

FOUR: SPRINT TRS shall comply with the requirements of the IFB, with SPRINT Proposal, as well as any current or future standard set by the American with Disabilities Act of 1990 (hereinafter referred to as "ADA") and the Federal Communications Commission (hereinafter referred to as "FCC") and any applicable Federal or Puerto Rico law or regulation. If there is any discrepancy among these requirements, the most stringent shall apply.

SEVEN: The following service requirements, which are further described in FCC's mandatory minimum requirement rules, SPRINT's proposal and the IFB, will be met in the following level of service.

- a) The TRS center shall be capable of handling any type of call normally provided by telecommunications carriers including pay-per-call calls. SPRINT has the burden of proving the infeasibility of handling any type of call.
- b) Minimum of 60 WPM typing speed for agents.
- c) Relay processing for STS Callers.
- d) Relay Agent to stay on the line for at least 10 minutes for regular relay, 15 minutes for Speech To Speech (hereinafter referred to as "STS"), after the commencement of a call, and for subsequent agent transfers on calls made

INITIALS HERE

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- thereafter.
- e) Answer 85% of all calls within 10 seconds on a daily basis.
  - f) Handling of Emergency Calls.
  - g) Maintain a log of consumer complaints and reports to FCC in compliance with FCC rules. Copy of such logs and evidence of their filing at the FCC shall be sent to the BOARD. SPRINT must retain the log until the next application for certification by the FCC is granted to the BOARD.
  - h) Provide TRS customer profile data to incoming TRS vendor 60 days prior to SPRINT's last day of service.

SPRINT acknowledges that states must notify the FCC of any substantive changes in the TRS programs within sixty (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. To assure compliance with said requirement on time SPRINT shall submit a duly certified report to the BOARD describing said substantive changes and stating whether the TRS continues to meet the federal minimum standards after implementing such substantive standards. If the TRS exceeds the minimum standards SPRINT shall also certify whether the TRS does not conflict with federal laws and regulations. Said certified report shall be submitted to the BOARD within thirty days after the changes were made.

EIGHT: SPRINT will assure that access to 7-1-1 service is provided in compliance with the FCC rules and as a toll free call. The procedure for handling/answering 7-1-1 calls will be that the default response for all first-time 7-1-1 calls from an ANI will be voice first, then TTY tones, and then ASCII. Subsequent calls from the same ANI will be answered in whatever mode the last call made to 7-1-1 was received (automatic branding on the last call). The relay caller has the option to request that the relay agent permanently brand the ANI for a specific mode of answer.

### Contract clauses regarding Scheduling, Implementation and Completion of Work:

NINE: SPRINT shall implement TRS as detailed in the Proposal, in the IFB, the FCC Rules, this CONTRACT, Bid 2009-02 Award and the BOARD Resolution and Order approving said bid award under case JRT-2009-SUB-0002, all of which are incorporated by reference as if copied verbatim.

TEN: Time is of the essence in this CONTRACT and, accordingly, all time limits shall be strictly construed and strictly enforced. SPRINT's failure to meet a deadline imposed hereunder shall be considered a material and significant breach of this CONTRACT and shall entitle the BOARD to any applicable liquidated damages set forth in the IFB and this CONTRACT, and may lead to termination of this CONTRACT.

### Clauses regarding Administration:

ELEVEN: The BOARD designates its Mr. Roberto Miranda, Special Aid to the President of the Board, as its representative to serve as the "BOARD's TRS Administrator" and contact. The BOARD may change its designation at any time, in its sole discretion, and when it deems appropriate. Such change will be effected via delivery of a written notice to SPRINT in accordance with the provisions of this CONTRACT. All communications relating to the implementation of this CONTRACT shall be directed to the BOARD's TRS Administrator. SPRINT acknowledges that the BOARD's TRS Administrator does not have any authority to amend this CONTRACT, to initiate change orders, to alter the cost proposal submitted by SPRINT, or to otherwise alter performance requirements established under the IFB, SPRINT Proposal, or this CONTRACT. SPRINT further acknowledges that the President of the BOARD holds such authority exclusively.

Any action regarding TRS complaints shall be processed through the Secretary of the BOARD, who is also the contact for the same purposes at the FCC.

TWELVE: SPRINT designates Ms. Elizabeth Rios as Puerto Rico's resident TRS Administrator and contact person. SPRINT may change this designation at any time, in its sole discretion, and when it deems appropriate. Such change will be effected via delivery of a written notice to the BOARD in accordance with the provisions of this CONTRACT. SPRINT Puerto Rico's TRS Administrator does not have any authority to amend this CONTRACT, to initiate change orders, to alter the cost proposal submitted by SPRINT, or to otherwise alter performance requirements established under the IFB, SPRINT Proposal, or this CONTRACT. Authority to enter into any contract on SPRINT behalf, resides only in SPRINT.

THIRTEEN: The PRESIDENT, in conjunction with the BOARD'S TRS Administrator, will monitor the progress of the TRS. Upon the written or oral request of the PRESIDENT, and/or through the BOARD's TRS Administrator, SPRINT agrees to discuss at any time any element of the provision of TRS and the implementation of any new and desirable features.

### Clauses regarding Consumer Relations and Out-Reach program:

FOURTEEN: SPRINT agrees to cooperate fully with the PRESIDENT and the BOARD's TRS Administrator, to assure quality of service and effective consumer relations.

FIFTEEN: SPRINT shall provide for public relations activities via outreach programs as provided in SPRINT's Proposal.

SIXTEEN: Included in, but not limited to, the SPRINT outreach program are the following activities:

- (A) The Outreach Program will target multiple federal, state, and local government agencies as well businesses, schools, and universities.
- (B) The Outreach Program includes an educational campaign material as described in SPRINT's Proposal. The campaign targets specifically businesses and the medical community and provides information on the following:
  1. American with Disabilities Act (ADA)
  2. Puerto Rico Relay brochure and instructional pamphlets
  3. PowerPoint presentations
  4. Hands-on use of TRS equipment
  5. Brochures on Deafness and Hearing Loss
  6. A better understanding of sign language as a natural language.
- (C) The media means that will be used for the SPRINT Relay educational and outreach campaign will include, among others:
  1. Folders
  2. Letter to Businesses
  3. Stickers of Compliance
  4. Posters
  5. Audio and Television PSAs.

### Contract Clauses Regarding Reports:

NINETEEN: SPRINT shall maintain its records of relay service operations, for a minimum of six years, so as to permit review and determination of TRS results. SPRINT shall make these records available for inspection by the BOARD and its designees.

TWENTY: As specified in the IFB, SPRINT shall provide written monthly reports to the BOARD on the operation of the Puerto Rico TRS detailing usage and revenues associated with providing the TRS and calculating daily and monthly statistics concerning operations, including but not limited to:

- A. Traffic patterns
- B. Call volumes
- C. Price per minute of use
- D. Average speed of answer
- E. Price per call
- F. Percentage of local versus long distance and intrastate versus interstate
- G. Customer service inquiries

TWENTY-ONE: SPRINT shall supply a monthly complaint resolution report that shows the complaints filed and the actions taken to resolve each complaint. SPRINT shall prepare and retain a log of consumer complaints until the next application for FCC certification of the TRS program 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. SPRINT shall submit to the FCC and to the BOARD summaries of logs indicating the number of complaints received for the 12-month period ending May 31 by July 1 of each year, and as required by the FCC.

The BOARD may request further information regarding the complaints and their resolutions; in response, SPRINT will provide a more detailed report to the BOARD's TRS Administrator.

SPRINT must submit to the FCC and to the BOARD a contact person and/or office for TRS consumer information and complaints about SPRINT's TRS service. Said submission shall include, at a minimum, the name and address of the office that receives complaints, grievances, inquiries, and suggestions; voice and TTY telephone numbers, fax number, e-mail address, and web address; and the physical address to which correspondence should be sent.

TWENTY-TWO: SPRINT shall prepare and report outage information in a format approved by the BOARD and notify the BOARD within twenty-four hours of an outage, or if the outage occurs over the weekend, by eight a.m. the following Monday, and will submit the report within five business days.

TWENTY-THREE: SPRINT shall prepare an annual report for the BOARD, describing the performance and usage of Puerto Rico TRS, including, but not limited to, a report of the TRS revenues, operations, and traffic patterns. This report shall be due on July 1<sup>st</sup> of each contract year.

TWENTY-FIVE: SPRINT agrees to provide, free of cost, reasonable additional reports that may be required by the BOARD regarding Puerto Rico TRS.

### Contract Clauses regarding Audits to TRS:

TWENTY-SEVEN: The BOARD reserves the right to audit all records held by SPRINT relating to this CONTRACT. SPRINT agrees to retain reports, work sheets and other documents associated with the services covered by this CONTRACT, so that they can be examined or copied by the BOARD or the Office of the Comptroller of Puerto Rico, in its audits of the BOARD. Said documents shall be kept for a period of no less than six (6) years or until an investigation is conducted by the Office of the Comptroller of Puerto Rico, whichever occurs first.

### Contract Clauses Regarding non-compliance of Implementation and Performance requirements that may constitute cause for fines or Liquidated Damages:

THIRTY-SEVEN: In the event that the TRS service is not fully implemented by SPRINT as per the Implementation Schedule of this CONTRACT, the BOARD will impose liquidated damages until the TRS service is in full operation. The TRB will disallow \$5,000.00 per day of arrear of the implementation schedule, from invoices for services rendered after cutover. Nevertheless, if such delays happen as a result of natural disasters (Acts of God) such as hurricanes, tornados, earthquakes, floods, or causes not attributable to the Successful Bidder, the TRB will take these into consideration to determine if the imposition of liquidated damages should apply. In addition, the non-compliance of the TRS standards and requirements in the IFB and this CONTRACT could lead to fines by the Telecommunications Regulatory Board of up to \$25,000 per infringement, or as otherwise permitted by the BOARD's rules.

THIRTY-EIGHT: SPRINT agrees to a disallowance from the total compensation provided for under this CONTRACT, if SPRINT "fails to perform." When, for a period exceeding four (4) consecutive hours, or more than four (4) hours in a twenty-four hour period, calls are unable to be completed via the TRS. For each "failure to perform" exceeding four (4) consecutive hours or more than four (4) hours within a twenty-four (24) hour time period commencing with the "failure to perform", a disallowance will be made for twice the amount of total hours of disrupted service rounded up to the next fraction of hour, divided by twenty four (24) hours and multiplied by the average daily charge invoiced under this agreement during the month preceding the event giving rise to the disallowance. No disallowance will result however, where the source or cause of the failure is, or is due to, a Local Exchange Carrier or Interexchange Carrier facility or service outage or for any causes not attributable to SPRINT.

THIRTY-NINE: SPRINT shall answer 85% of calls made into Puerto Rico Relay within 10 seconds. For any day (24-hour period from 12:00 AM to 11:59 PM) that SPRINT fails to answer 85% of Puerto Rico Relay calls within the 10-second requirement, liquidated damages shall be assessed. The formula for average answer time ("AAT") criteria is as follows: the procedure to determine the percentage of the AAT that is over the required average takes the difference between the actual and target (10 second) AAT and divides that difference by the target (10 second) AAT, rounded to one decimal point. The BOARD will withhold \$2,500.00 each calendar day that the service level for all Puerto Rico calls is less than 85%. The penalty amount will be deducted from the invoice amount for that month. Penalties will not be assessed for days in which acts of God or system or network breakdowns occur that are not the fault of the TRS Provider and that cause the AAT to exceed the 10 second average. The burden is on the TRS provider to show cause why the penalty should not be assessed.

**FORTY:** The liquidated damages criteria for the average daily blockage (“ADB”) rate for all Puerto Rico relay calls will be for any 24-hour period from 12:00 am to 11:59 pm and shall be shown on SPRINT’s monthly report. For any day that the ADB rate exceeds 1%, the liquidated damage shall be \$2,500 per day. The penalty amount will be deducted from the invoice amount for that month. Penalties will not be assessed for days in which acts of God or system or network breakdowns occur that are not the fault of SPRINT and that cause the ADB to exceed the 1% target. The burden is on the SPRINT to show cause why the penalty should not be assessed.

**FORTY-ONE:** Liquidated damages equal to \$1,000.00 per day will be assessed for every day that SPRINT is late submitting to the BOARD or its designee the full and complete relay reports required per this CONTRACT and the IFB. If the BOARD does not receive the reports required herewith by the 15<sup>th</sup> of the following month, the BOARD will withhold \$1,000.00 each day until the full and complete relay report is received in the Board’s offices.

**FORTY-TWO:** The right of the BOARD to claim such liquidated damages under this CONTRACT shall be in addition to any other rights and remedies afforded by law or by this CONTRACT.

**2. Establishment of the TRB’s Compliance Office,** a division that is currently under the Board’s Finance Director, which has the responsibility to oversee that all services under contract with the Board, including all Universal Service Fund programs (which includes TRS) are in compliance with the established terms and conditions.

Regarding TRS, this includes monitoring of minimum service requirements for TRS services via the following means:

- a. Review and approval of monthly invoices, assuring that the agreed compensation rate is correctly applied.
- b. Review of monthly traffic reports, assuring that specified service levels and minimum service requirements are being met.
- c. Review of monthly log of Sprint’s designated resident in Puerto Rico as TRS Administrator and contact person (TRS Liaison), specifying daily service errands and Outreach related activities.
- d. Daily, weekly or monthly test calls to TRS operators and TRS Customer Service through their established communication means (711 and 1-800-676-4290).

If on a given month, a minimum service requirement is not met or if call service levels are reported below their required level, the matter is reported to the Finances Director and the Board’s TRS Administrator, citing the related contract clause (if applicable).

The Board’s TRS Administrator first refers the matter to the TRS Liaison, in order for the matter to be addressed and solved accordingly. The assessment and resulting corrective

action or explanation (if the matter was caused by incidental or unforeseen circumstances) done by the TRS Liaison regarding the matter is reported back to the Administrator, who reports it back to the Finances Director.

If applicable, the Administrator also reports the matter to the Board with his/her own remarks of how the matter has been assessed and a recommendation to the Board for applicable action to be solely exercised at the Board's discretion.

### Historical Overview of Relay Establishment

The Universal Service objectives of the Commonwealth of Puerto Rico's Act No. 213, of September 12, 1996, (hereinafter referred to as "Law 213"), known as the Puerto Rico Telecommunications Act of 1996, which created the Puerto Rico Telecommunications Regulatory Board (hereinafter referred to as "TRB"), states that all segments of population in all geographic areas should have access to the public telecommunications system of Puerto Rico. Such legislative intention was adopted under Article III-6 of Law 213.

Article 3 (o) 8 of the TRB's Universal Service Rules (TRB Rule No. 5757), includes Telecommunications Relay Service (TRS) as one of the telecommunications services included under the definition of Universal Service, as follows:

#### 3. Definitions

- (o) "Universal Service" - shall mean a level of basic telecommunication services under development in Puerto Rico, as may be established from time to time by the Board, pursuant to the Federal Communications Law. At present, it shall include the following services:

Telecommunications Relay Services ("TRS")

Accordingly, on June 1<sup>st</sup> of 2001, the TRB awarded the first Bid for the provision of TRS in Puerto Rico to Sprint Relay. During the month of September 2001, 711 TRS began operating in Puerto Rico, known as "Puerto Rico Relay".

A second bid process was awarded in 2005, adding Video Relay and an Equipment Distribution Program (EDP) to the existing 711 service. Eligibility for the EDP was established, using the same eligibility criteria for Lifeline and Link-Up subsidy programs and offered free equipment for deaf/hard of hearing TTY and voice communication, as well as equipment for Video Relay Communication. After the initial 3-year term expired, an additional one (1) year extension was added in order to develop the next required TRS bid process.

The TRB was approved for TRS Certification Renewal by the FCC in 2008. For a copy of this letter, please see Appendix I.

A third bid process was awarded in 2009, including 711 TRS and EDP. The current contract for TRS in Puerto Rico will expire on January 1, 2013.

Due to 2012 being an election year and after submitting this re-certification application request, a one (1) or two (2) year extension period will be added (at the Board's discretion) in order to develop the next TRS bid process.

### Telecommunications Relay Fund

*§64.604 (c)(5)(iii) through §64.604 (c)(iii)(M) does not pertain to State programs. However, the state of Puerto Rico 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 Puerto Rico 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.*

The TRB works in conjunction with the TRS provider, Sprint Relay, 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. Puerto Rico 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 Telecommunications Regulatory Board of Puerto Rico, to file complaints or commendations.

Puerto Rico Relay 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. Puerto Rico

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

### 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.*

Puerto Rico Relay, through Sprint Relay'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 Relay 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.*

The TRB was approved for TRS Certification Renewal by the FCC in 2008. For a copy of this letter, please see appendix I.

The Puerto Rico TRS program, known as Puerto Rico Relay, is funded through the Puerto Rico Universal Service Fund (PR-USF), which regulations were originally established via the TRB Rule 5757 of February 17, 1998 (amended to Rule 7795 in January 2010). Funds are collected from participating Telecommunications service providers that do business in Puerto Rico, as specified in these regulations.

Procedures for enforcing requirements, including how funds are collected in Puerto Rico are included in Rule 7795, specifying the following:

Article 4 – **Principles of the Universal Service**, specifies the following:

### **4. Principles of the Universal Service**

The Board shall preserve and promote the Universal Service through predictable, specific and sufficient support mechanisms, pursuant to the provisions of Section 254 of the Federal Communications Law and also pursuant to the following principles contained in Law 213:

- (1) The goal of Universal Service is to provide comparable quality telecommunication services to all sectors of the population and in all geographic areas of Puerto Rico.
- (2) The telecommunication services shall be available throughout Puerto Rico at fair and reasonable prices, which means that the service rates in rural areas shall be reasonably comparable with the prices for similar services in the urban areas.
- (3) Advanced telecommunication services shall be available in all

municipalities and communities, as well as in all health services installations, libraries, and classrooms of the public schools of Puerto Rico.

(4) Every company offering telecommunications to the public for a fee shall contribute, on an equitable and non-discriminatory basis, to the preservation and development of the Universal Service in Puerto Rico.

(5) The structure of the contribution mechanisms that the Board may develop, implement and periodically revise, shall be complementary to, but shall not duplicate, the contribution mechanisms established at the federal level. The Universal Service support mechanisms shall be specific, predictable, competitively neutral, and sufficient to preserve and develop the Universal Service.

Article 7 – Contributors to the Universal Service Fund, specifies the following:

Pursuant to Chapter III, Article 6 (c) of Law 213, every telecommunications company providing intra-state telecommunications services shall contribute to the Universal Service Fund in an equitable, non-discriminatory and competitively neutral manner. The following list includes, but is not limited to, several of the referred to telecommunications companies.

1. Commercial Mobile Radio Services - (“CMRS”)
  - a. PCS
  - b. Cellular
  - c. Paging services
  - d. Mobile Radio
2. Wire Service Companies
  - a. Competitive Access Providers (“CAPS”)
  - b. Local Carrier Companies (“LECs”)
3. Other Telecommunications Services Providers
  - a. Re-sellers
  - b. Public Telephones
  - c. Other companies (for instance, cable service, electric energy, etc.) that in the future may provide telecommunication services.

Article 15 – **Reports**, specifies the following:

In addition to the information required by FCC reporting forms, pursuant to Section 25 of these Regulations, the eligible telecommunications companies that provide intra-state telecommunication services, shall submit to the Board the following reports: (i) a report on the total support required for rendering of the services included in the definition of Universal Service pursuant to Section 21(a)(1) of these Regulations and as determined by the processes established by the rules of the Federal Communications Commission; (ii) A report on the actual revenues generated by said services; and (iii) a report on the number of residential lines and total access lines in service.

The above mentioned reports shall be submitted quarterly to the Board, within a period of thirty (30) days after the end of each quarter.

Article 21 – **Annual Computation of the Universal Service Fund**, states:

The amount required for the Universal Service Fund shall be established annually. Said amount shall be sufficient to cover the cost of the following items:

1. The difference between the point of reference for affordability (“affordability benchmark”) for the services included within the definition of Universal Service pursuant to Section 5.1 of these Regulations, and the cost of providing said service as determined by the Board pursuant to Section 22 of these Regulations, minus any amount corresponding to federal support for Universal Service;
2. The administrative cost of the operation of the Universal Service Fund;
3. The annual intra-island cost of the “Lifeline” and “Link-up” programs of Puerto Rico; and
4. The costs related to the Telecommunications Relay Service (“TRS”) in which the carrier certified to provide such service in Puerto Rico may have incurred and which have not been obtained from the federal fund.

Article 23 – **Subsidy Provided by the Universal Service Fund of Puerto Rico**, states:

Pursuant to Section 254(l) of the Federal Communications Law, the Universal Service Fund of Puerto Rico shall ensure that the services supported by said fund are available at fair, reasonable and affordable prices. This fund shall complement the Federal Universal Services Fund regarding the costs assignable to the local jurisdiction.

Article 25 – Quarterly Contribution to the Universal Service Fund, states:

The quarterly contribution to the Universal Service Fund shall be calculated on the basis of the retail revenues (“end-user revenues”), contained in Form 499 of the Federal Communications Commission. If Form 499 from a telecommunications company contains revenues from services chargeable to the inter-state or international jurisdiction, the company shall file a new Form 499 with the Board which shall contain information on the revenues obtained exclusively from the rendering of telecommunications services in Puerto Rico, together with an explanation of the method utilized to segregate the revenues from telecommunications services provided outside of Puerto Rico, a list of such services, and the amount of revenues identified in connection with each service.

1. The forms mentioned in the preceding paragraph shall be filed with the Board twice per year: (i) on or before March 31, containing information on the preceding calendar year; and (ii) on or before September 1, containing information on the first two (2) quarters of the calendar year.
2. The forms filed on or before September 1 shall be used to calculate the required contribution for each one of the first two (2) quarters of the following calendar year. The forms filed on or before March 31 shall be used to calculate the required contribution for each one of the two (2) last quarters of the current calendar year.
3. The total base contribution for the Universal Service Fund shall equal the sum of the retail revenues of the telecommunications companies obtained from the rendering of telecommunication services in Puerto Rico. The relevant revenues figure shall be obtained by subtracting from column (a) of Form 499, any revenue indicated under column (c).
4. The contribution factor for each quarter shall be calculated as one fourth (1/4) of the total annual amount of the Universal Service Fund, pursuant to Section 21 of these Regulations, and the total contribution of the quarter in question.
5. Copies of Forms 499 and other documents that must be filed with the Board by the telecommunications companies shall be available in a public file, to be examined by any interested party, unless the company should claim confidentiality regarding the information submitted. The request for confidentiality shall contain the reasons or bases of same (e.g., competitive damage), as well as the specific facts on which the company justifies submitting such request.

6. On or before December 1 of each year, the Administrator shall submit to the Board the factor he will use to calculate the contributions for the first two (2) quarters of the following calendar year. On or before April 30 of each year, the Administrator shall submit to the Board the factor he will use to calculate the contributions for the last two (2) quarters of the current calendar year.
7. Within a period of thirty (30) days beginning from the start of each quarter, the Administrator shall send to every telecommunications company contained in Section 7 of these Regulations, a statement of account regarding the quarterly contributions, including instructions for its payment.
8. Once approval by the Board is obtained, the Administrator may periodically revise and adjust the base contribution or the contribution factor, taking into account the annual revenues of the fund.
9. Any deficit or surplus of the Universal Service Fund at the end of the calendar year, shall be transferred to the following calendar year and shall be used in establishing the contribution for said year.

Article 27 – **The de minimis Exception**, states:

Every telecommunications company whose contribution to the Universal Services Fund during a given year is less than One Thousand Dollars (\$1,000.00), shall not be obligated to contribute to the Universal Service Fund during that particular year.

For additional information regarding this matter, you may view the complete PR-USF regulations on Rule #7795 at the Telecommunications Regulatory Board's website at [www.jrtp.gobierno.pr](http://www.jrtp.gobierno.pr).

Once there, you may view the file by selecting "*Conocenos*" and down to "*Reglamentos*" on the upper left side of the page.

Telecommunications companies in Puerto Rico which contribute to the PR-USF may recover these costs from their customers, in compliance with Federal Regulations for cost recovery and *Truth in Billing* guidelines.

Telecommunications service customers may view this charge in their invoice among the rest of the applicable "line-item" or "regulatory Charges", identified in any of the following ways:

Servicio Universal de Puerto Rico  
Servicio Universal PR  
PR-USF  
Universal Service Fund PR

An example of how this charge may be viewed in a customer invoice is shown below:

<b>Resumen del Móvil: (Continuación)</b>	
<b>Usuario:</b>	
<b>Créditos, Ajustes y Otros Cargos</b>	
Cargo Reglamentario de Costo de Recuperación	0.90
Recargo del Centro de Recaudación de Ingresos Municipales	0.20
Cargo por el Servicio Universal Federal	0.43
<b>Servicio Universal de Puerto Rico</b>	<b>0.03</b>
<b>CRÉDITOS TOTALES, AJUSTES Y OTROS CARGOS</b>	<b>\$1.56</b>
<b>Impuestos y Cargos del Gobierno</b>	
Cargo por el servicio de emergencia	0.50
<b>TOTAL IMPUESTOS Y CARGOS DEL GOBIERNO</b>	<b>\$0.50</b>
<b>CARGOS TOTALES DEL:</b> 787-	<b>\$53.72</b>

*§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. Appendix O*

Since the TRB's FCC Certification Renewal in 2008, there have been no substantive changes to the Puerto Rico Relay program, which may have required the TRB to notify to the FCC.

As stated in this application's introduction, a third bid process to contract a TRS service provider was celebrated in 2009, with the incumbent provider (Sprint Relay) once again being awarded, as the bidder who met or exceeded all required service standards at the most cost effective price.