

DOCKET NO. 03-123

**DOCUMENT OFF-LINE**

This page has been substituted for one of the following:

- o This document is confidential (**NOT FOR PUBLIC INSPECTION**)
  
- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.
  
- o Microfilm, microform, certain photographs or videotape.
  
- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12<sup>th</sup> Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

ICD ROOM



Received & Inspected

NOV 10 2012

FCC Mail Room

**DEPARTMENT OF HUMAN SERVICES**

DIVISION OF REHABILITATION SERVICES

Hillsview Properties Plaza, East Highway 34

c/o 500 East Capitol

Pierre, South Dakota 57501-5070

Phone: (605) 773-3195

FAX: (605) 773-5483 TTY: (605) 773-4547

[www.state.sd.us/state/dhs](http://www.state.sd.us/state/dhs)

November 6, 2012

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

RE: South Dakota TRS State Certification Application

Dear Ms Dortch,

Enclosed please find an original and 1 copy of the South Dakota State TRS Certification Renewal Application along with an electronic copy labeled SD TRS Certification. Per Public Notice DA 12-1187 dated July 25, 2012 an additional copy was sent to the attention of Dana Wilson.

This application has been prepared and submitted by the South Dakota Department of Human Services. Please direct any questions or future correspondence concerning this application to Janet Ball, TRS Program Administrator or Grady Kickul, Director, Division of Rehabilitation Services, Hillsview Plaza, c/o 500 East Capitol, Pierre, SD 57501-5070. Janet Ball can be emailed at [janet.ball@state.sd.us](mailto:janet.ball@state.sd.us) and Grady Kickul at [grady.kickul@state.sd.us](mailto:grady.kickul@state.sd.us) or at 605-773-5990.

Sincerely,

  
Laurie R. Gill  
Secretary, Department of Human Services  
State of South Dakota

Attachments

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

0+1

Received & Inspected

NOV 16 2012

FCC Mail Room



**STATE OF SOUTH DAKOTA**

**RENEWAL OF**

**STATE**

**TELECOMMUNICATIONS RELAY SERVICES**

**PROGRAM CERTIFICATION**

**CG DOCKET NO. 03-123**

**SUBMITTED TO**

**FEDERAL COMMUNICATIONS COMMISSION**

**OFFICE OF THE SECRETARY**

**FEDERAL COMMUNICATIONS COMMISSION**

**WASHINGTON, DC 20554**

**NOVEMBER 2012**



Received & Inspected  
NOV 16 2012  
FCC Mail Room

**APPLICATION**  
**for Renewal of the**  
**South Dakota Telecommunication Relay Service**  
**State Program Certification**  
**by the**  
**South Dakota Department of Human Services**  
**Hillsview Properties Plaza**  
**3800 East Highway 34, c/o 500 East Capitol**  
**Pierre, South Dakota 57501**  
**(605) 773-5990**

**Overview**

On behalf of the State of South Dakota, the Department of Human Services (DHS) submits the enclosed application for renewal of the certification of South Dakota's Telecommunications Relay Services (TRS) State Program by the Federal Communications Commission (FCC). This application will establish, as required by the FCC's Public Notice (DA 12-1187) released July 25, 2012, that our TRS State Program (1) "meets or exceeds all operational, technical, and functional mandatory minimum standards contained in 47 C.F.R. §64.604"; (2) "makes available adequate procedures and remedies for enforcing the requirements of the state program"; and, (3) where our program "exceeds the mandatory minimum standards contained in §64.604, ... [it] in no way conflicts with federal law."

The Department of Human Services certifies that it has and will continue to comply with the mandatory minimum standard relay guidelines and will oversee its current TRS provider, CSD (who partners with Sprint), to ensure that all requirements are met. For the FCC's convenience, we have enclosed a copy of South Dakota Codified Law Chapter 49-31 as Appendix K and a copy of DHS/CSD purchase of services agreement as Appendix O.

**Background**

The South Dakota Telecommunication Relay Services have been and continue to be provided to individuals with disabilities who are, otherwise, prevented from using a regular telephone since it was established by the 1989 Session of the South Dakota State Legislature. South Dakota TRS statutes impose a surcharge on regular landline telephone service along with wireless telecommunications such as cellular phones and pagers. South Dakota's TRS statute also created separate funding to be used for purchase of telecommunications equipment for individuals with other disabilities.

The Department of Human Services, as authorized by the TRS statute, contracts with CSD for uninterrupted relay services. Currently, the term of the purchase of services agreement is a three-year contract with the option for renewal by the State for two additional one year periods. CSD, in its continued partnership with SPRINT, continues to provide quality TRS services and features to South Dakota's deaf and hard of hearing population. South Dakotans not only benefit from an in-state center based in Sioux Falls, SD, but also have access to services such as Internet Relay, Video Relay Services, and Sprint Relay Wireless.

South Dakota's newly designed and expanded outreach program provides more promotion through statewide television and radio ads, webpage design, billboards, newsletters, postcard mailings and outreach booths at various events. A new campaign created new designs for brochures, websites, billboards, video, and folder information. Included in this campaign are 711 brochures, IP Fraud information, how to make a relay call brochures, business relay call information, Native American brochures, and postcards identifying SD's website and Relay SD (See Appendix J).

The South Dakota Equipment Distribution Program continues to distribute telecommunications equipment to individuals who are deaf, hard of hearing, deaf-blind and speech-disabled with our program introducing new updated equipment on an annual basis. South Dakota implemented distribution of Captioned Telephones in December of 2007 which has consistently grown. South Dakota's deaf and hard of hearing population benefit from in-home distributions along with training and follow-up services.

South Dakota also offers the Telecommunication Adaptive Devices Program (TAD). The TAD Program purchases telecommunication devices to make telephone services accessible for individuals with disabilities, other than the deaf, hard of hearing, deaf-blind and speech-impaired.



Received & Inspected  
NOV 16 2012  
FCC Mail Room

## Relay South Dakota South Dakota Relay FCC Certification Renewal and Supporting Documents

### Introduction

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

As indicated in the opening background, the Department of Human Services contracts with CSD for relay services (see Appendix O). CSD, in its continued partnership with SPRINT, continues to provide quality TRS services and features to South Dakota's deaf and hard of hearing population. CSD operates a call center in Sioux Falls, South Dakota and works closely with Sprint as the technology vendor to CSD. This FCC re-certification will reference both CSD and Sprint. Named **Relay South Dakota**, this application will reference Relay South Dakota also as South Dakota Relay.

South Dakotans not only benefit from an in-state center located in Sioux Falls, South Dakota, but through Sprint, South Dakota Relay users also have access to services such as Internet Relay (IP) and Sprint Relay Wireless. Please note that although Sprint Relay provides Internet Protocol (IP) and Captioned telephone web-based services, South Dakota Relay does not contract to provide these services in South Dakota, nor is South Dakota's Relay responsible for oversight of IP or other Internet or web-based relay services.

South Dakota Department of Human Services contracted with CSD and Sprint to provide Telecommunications Relay Services effective June 1, 2010 to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the RFP that was issued December 2009. All of the minimum mandatory TRS requirements are identified in the RFP and is attached as Appendix M.

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

## Table of Contents

South Dakota FCC Certification Renewal and Supporting Document .....	1
Table of Contents .....	3
Operational Standards.....	5
A.1 Communication Assistants (CAs).....	5
A.2 Confidentiality and Conversation Context .....	11
A.3 Types of Calls .....	14
A.4 Handling of Emergency Calls .....	19
A.5 STS Called Numbers .....	22
Technical Standards.....	23
B.1 ASCII and Baudot .....	23
B.2 Speed of Answer.....	23
B.3 Equal Access to Interexchange Carriers .....	25
B.4 TRS Facilities .....	28
B.5 Technology .....	29
B.6 Caller ID.....	31
Functional Standards.....	33
C.1 Consumer Complaint Logs.....	33
C.2 Contact Persons .....	35
C.3 Public Access to Information.....	35
C.4 Rates .....	37
C.5 Jurisdictional Separation of Costs.....	37
C.6 Complaints.....	39
C.7 Treatment of TRS Customer Info .....	40
§64.606 State Certification .....	41

## Appendices

Appendix A: FCC TRS Public Notice, July 25, 2012.....	1
Appendix B: Sprint TRS, STS, CapTel Training Outlines .....	8
Appendix C: TRS Pledge of Confidentiality .....	12
Appendix D: Sprint Carrier of Choice Letter of Invitation .....	28
Appendix E: Disaster Recovery Plan.....	28
Appendix F: TRS Information in Telephone Directories / Bill Inserts .....	37
Appendix G: Copies of Phone Bill with Surcharge Rate or Legislative Order .....	37 & 41
Appendix H: Copies of Relay Newsletters .....	36
Appendix I: Copies of Annual Report.....	39
Appendix J: Copies of Relay Outreach Material & Monthly Outreach Reports .....	37
Appendix K: Copy of Legislation or Other Establishing TRS in the State .....	38 & 41
Appendix L: Copies of Complaint Logs from 2008 - 2012 .....	34 & 40
Appendix M: Copy of TRS RFP .....	1 & 41
Appendix N: Copy of the 2008 TRS Recertification Renewal Letter from the FCC.....	41
Appendix O: Copy of the Purchase of Service Agreement with CSD .....	1
Appendix P: Copy of Annual Local Exchange Carriers Access Fee Notification .....	39

## **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**

South Dakota contracts with CSD and Sprint to provide the hiring, training and oversight of Communication Assistants for South Dakota's Relay. CSD & Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. CSD & 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.

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

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

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

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

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

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

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

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

South Dakota Relay, through their contract with CSD and Sprint, has shown that CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. All CAs are required to possess clear and articulate voice communications. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. 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.
- 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

CSD and Sprint's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. This diversified culture training also incorporates training on the characteristics of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.

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

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

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

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

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

The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE Sprint Values and Goals	
<b>Training Objectives</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> </ul>	<ul style="list-style-type: none"> <li>▪ Confidentiality</li> <li>▪ Transparency</li> <li>▪ Personal Conversations</li> </ul>

STS TRAINING OUTLINE Sprint Values and Goals	
<ul style="list-style-type: none"> <li>▪ Frequently Dialed Numbers</li> <li>▪ Customer Requests</li> <li>▪ Emergency Call Processing</li> </ul>	<ul style="list-style-type: none"> <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>	

All CapTel Operators are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel Operator training provides familiarity with hearing, deaf, and speech-disabled cultures.

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

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

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

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

**CA Quality Assurance Programs**

Sprint Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in seven (7) Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customer’s feedback and takes proactive steps to implement suggestions and feedback. Sprint

Relay does not develop training and consumer education programs for the telecommunications Relay service alone. Sprint Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training for 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**

South Dakota contracts with CSD and Sprint to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the Relay environment are conducted. Internal testing on typing speeds demonstrated that 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**

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

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

### **In-Call Replacement of CAs**

Through their contract with CSD and Sprint, South Dakota Relay exceeds all FCC minimum requirements regarding changing CAs during a call. Calls are not taken-over unless it is absolutely necessary to do so. 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)) South Dakota 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. South Dakota Relay uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

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

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

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

## A.2 Confidentiality and Conversation Context

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

### Confidentiality Policies and Procedures

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

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. South Dakota 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.

South Dakota Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. CSD and 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.

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

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

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

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

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionist's understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination. Please see Appendix C for the TRS pledge of confidentiality.

### **STS Limited Exception of Retention of Information**

At the request of a caller, South Dakota 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**

South Dakota 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, South Dakota 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.

South Dakota Relay CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of South Dakota does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

### **STS Facilitation of Communication**

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

South Dakota 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.***

South Dakota 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. South Dakota 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 South Dakota Relay retain full control of the length and number of calls placed anytime through relay.

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

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

***§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not***

***technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.***

South Dakota Relay, through CSD and 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. South Dakota Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and CapTel users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. South Dakota Relay gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. South Dakota 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.***

Callers to South Dakota 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, South Dakota Relay users may make 900 calls through 1-900-230-3301.

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

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

South Dakota Relay provides access to all available relay call types. Through the state's contact with CSD and 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 South Dakota 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

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

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

### **Call Release Functionality**

South Dakota Relay 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.

South Dakota 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. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

### **Speed Dialing Functionality**

South Dakota Relay speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer

can simply provide the CA the “short-hand” name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, “Please call mom,” and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

### **Three-Way Calling**

South Dakota 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 South Dakota 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.

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

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

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

South Dakota 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.

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

South Dakota Relay CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

***§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.***

### **Retrieving Answering Machine and Voice Mail Messages**

South Dakota 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, South Dakota 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.

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

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

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

#### **A.4 Handling of Emergency Calls**

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

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

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

1.	South Dakota 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 South Dakota 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 our contract with CSD and Sprint, South Dakota 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.

### **CapTel Emergency Calling**

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

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

## **Two-Line CapTel Emergency Calling**

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

### **Training and Support Materials**

South Dakota 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.***

South Dakota Relay offers the ability for STS users to maintain a record of regularly called names and telephone numbers. South Dakota Relay's speed dialing functionality (also known as frequently dialed numbers) allows South Dakota 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.***

South Dakota 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.***