

- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)
- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.
- Georgia Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

### **Back-up Emergency Procedures**

As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Georgia Relay's provider has procedures in place to access its own emergency database:

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

### **FCC Rules for Emergency Calls**

In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "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." Georgia Relay's database automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Georgia Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP:

- 1) through the use of Intrado's 9-1-1 infrastructure and
- 2) through the PSAP database maintained by Georgia's provider.

#### **TTY to TTY Communications Between PSAP and Caller**

Georgia Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

#### **If a Caller Disconnects Before Being Connected to the PSAP**

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

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

During the course of emergency 911 calls, the CA continually solicits as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from. This meets the FCC's current requirement where a CA must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

The emergency call plan used by Georgia Relay follows this section. This covers the scenario of a relay user disconnecting before the call is completed. If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

**911 Procedures if the caller disconnects before the emergency call to the PSAP is completed:**

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

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

1. **Greeting:** This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
2. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "3". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "3". If they know how to use the TTY proceed to item "5".
3. Give the 911 dispatch operator the Voice relay number for the correct state.
4. Ask the 911 dispatch operator if they know how to use the relay.
  - Relay Explanation  
The person you are calling through relay will be typing their conversation and the CA will read it to you.
5. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Through its outreach programs and outreach materials, Georgia Relay educates relay users about how to use 911 services. As a part of this information, Georgia Relay encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly in the event of an emergency.

In addition, Georgia Relay gives presentations to 911 centers routinely as part of its outreach program. Georgia Relay provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

*(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.*

**Speech to Speech**

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Georgia Relay's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC.

Georgia Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Georgia Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA. The CA repeats the name and states the number of the person to call. The Speed Dial feature is of great benefit to STS users.

Georgia Relay complies with the 15-minute requirement prior to changing STS CAs. A Supervisor must approve and facilitate a STS CA change. Georgia Relay exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# \_\_\_\_\_ continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Georgia Relay places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.



**§ 64.604 Mandatory minimum standards.**

*(b) Technical standards –*

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

Georgia Relay is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by Georgia Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly.

*(2) Speed of answer.*

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

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

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

*(B) Abandoned calls shall be included in the speed-of-answer calculation.*

*(C) A TRS provider's compliance with this rule shall be measured on a daily basis.*

*(D) The system shall be designed to a P.01 standard.*

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

Georgia Relay is committed to complying with the speed of answer requirements applicable to relay. Georgia Relay answers eighty-five percent (85%) of calls within ten (10) seconds and 97% of all calls within 30 seconds from the time the call enters the TRS system during all times

of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.

Georgia's Relay provider begins measuring Average Answer time from the moment a Relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment used by Georgia's Relay provider accepts the call, call detail records start to capture answer time data. Georgia Relay's timing is very accurate as no rounding takes place since this time is measured in seconds. The information reported is taken from Call Detail Records ensuring the accuracy of the data. Each call detail record tracks the amount of time a call waits to be answered. Georgia Relay's CAs do not answer a call until they are ready to engage the call. Calls in queue or calls receiving the intercept message are not counted as answered. This "queue time" field will be analyzed and reported, but not billed. Abandoned calls are included in the speed of answer calculation.

Georgia Relay has the ability to monitor speed of answer on a real-time basis via a monitoring system that is accessible to management and supervisors. This information is utilized to make CA staffing changes throughout the day. Average Answer time is displayed on the supervisor console. The Supervisor workstation and reader boards in the center indicate if calls are in queue waiting to be answered. The Supervisors are responsible for making sure that when that alert comes up that all available CA resources are logged in to the system and answering calls. Each of these tracking mechanisms allows Georgia Relay to respond quickly by adding more CAs immediately.

Daily activity reports used for internal management purposes also track answer performance information for future scheduling. In addition, Georgia Relay uses a variety of other scheduling techniques to ensure that staffing meets traffic demands. Georgia's Relay provider makes use of historical data, trending, call patterns and combines that with the knowledge of current events (e.g. football games, weather, Mother's Day, etc.) to anticipate staffing needs.

Georgia Relay has outstanding answer performance. Average answer seconds for the past year were 0.3 with 98% of calls answered in ten seconds or less.

Georgia Relay also meets all FCC call blockage standards. Georgia Relay's relay service is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Georgia Relay defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal. Currently, Georgia Relay has never come close to blocking 1 call in 100.

The systems used by Georgia Relay's are designed to prevent blockage. The switches used are high-speed, stand-alone, non-blocking digital switching matrixes. The system is fully redundant to ensure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure Georgia Relay has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by Georgia Relay - from the

point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages.

Georgia Relay measures, records and reports its answer performance and blockage rate information to the PSC and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

The transmission circuits used by Georgia's provider meet or exceed industry interexchange performance standards for circuit loss and noise.

*(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.*

### **Equal Access (Carrier of Choice)**

Georgia Relay provides relay users with access to the interexchange carrier of their choice through TRS, and to all other operator services, to the same extent that such access is provided to voice users. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each interlata and intralata call, Georgia Relay forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. Georgia Relay's provider has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive Georgia Relay traffic. Georgia Relay offers equal access to all carriers who choose to participate.

Georgia Relay provides relay users with access to all other Operator Services to the same extent as that provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by Georgia Relay is based on the relay users' ANI that provides automatic connection to the carrier of choice for both interlata and intralata calls made by the relay user. Relay users complete a customer profile with their carrier information and Georgia Relay adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the CA of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the CA is able to do so.

Georgia Relay offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay.

In order to obtain new carriers on its platform, Georgia Relay contacts all carriers that are requested by Georgia relay users to see if they will participate in relay equal access. Georgia's Relay provider then works through ordering and testing phases with that carrier to ensure that the carrier becomes available to Georgia relay users. Georgia's Relay provider maintains a list of participating long distance carriers and makes this information available to relay users.

*(4) TRS facilities.*

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

Georgia Relay provides telecommunications relay service 24 hours a day, 7 days a week. .

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

The facility used by Georgia Relay has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Georgia Relay is operated from an in-state center located in Albany, Georgia. Georgia Relay calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the Georgia relay provider. This ensures continuous operation of the Georgia Relay.

The switches and relay platforms used by Georgia Relay's provider's are located in the Louisiana and the Nebraska relay centers. Workstation equipment, database information, and CA are located in all relay centers. Workstations in the Maryland and Massachusetts centers are controlled by the main processing and switch unit located in Nebraska via digital telecommunications facilities which are redundant T -1 circuits. Workstations in the Georgia Center are controlled by the main processing and switch unit located in Louisiana via digital telecommunications facilities which are redundant T -1 circuits. All incoming relay calls enter the relay provider's network. Calls can then be connected to workstations in any of the Relay provider's facilities. This all happens instantaneously with no call delays. Calls made to the terminating party exit through the call network as well. Georgia Relay users receive outstanding call processing and superior answer performance as a result of this network configuration.

**Uninterruptible Power**

All relay centers operated by Georgia's Relay provider make use of an uninterruptible power source with full battery backup to operate each center at full capacity for extended periods of time. In addition, battery back-up systems have the capability to automatically connect to a generator at each of its existing relay centers. The combination of battery and generator back-up allows Georgia Relay's provider to provide relay service for days and weeks at a time during power outages.

The power system supports the switch system and its peripherals, switch room environmental (air conditioning/heating, fire suppression system, emergency lights & system alarms), CA consoles/terminals, CA work-site and lighting and Call Detail Record recording at each center. Employees are given procedures to follow in the event of emergency.

Georgia's Relay provider provides auxiliary power sources for nine central offices in addition to all its relay centers and has significant experience at purchasing, installing, testing and insuring that such back-up equipment is in place. All of Hamilton's back-up power systems have redundancy features functionally equivalent to the equipment in normal central offices including uninterruptible power for emergency use.

### **Switching System**

Georgia Relay provider's second generation relay platform makes use of an Excel telecommunications switch. Its switch is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The switch supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The switch adapts to all standard network and line interfaces, including T1, E1, 11, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records.

The ISOS is a fully operational basic switch and has great flexibility. Georgia's Relay provider took advantage of this flexibility and has customized many relay functions in the ISOS operating system.

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing. The switching systems contain a fully redundant central processing unit on hot standby with automatic failover. This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. Georgia's Relay provider maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The on-sight switching system spare equipment includes:

- D4 channel bank
- All required channel bank cards

- T1 CSU packs
- Switch T -1 card
- Switch conference card

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

Georgia's Relay provider has made changes to its relay platform in recent years, making use of leading edge technology. It has upgraded its switching servers to new hardware that evolved its switching operating system from 32 bit UNIX to 64 bit Linux for more robust hardware support; and tested and deployed new switching control code which allows additional ad hoc reporting capabilities for comprehensive traffic analysis and enhanced failover and recovery. Georgia's Relay provider has also replaced database servers with new hardware and replaced legacy profile database servers with SQL servers for improved redundancy and database management. Finally Georgia's Relay provider has completed a multi-year upgrade of all production workstations to newer, standardized hardware; upgraded workstation operating systems from 16 bit to 32 bit which provides a higher level of stability; and rolled out several new workstation versions to support a variety of new features.

*(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.*

### **Upgrades in Technology/Process in Determining of Technology is Reliable**

Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Georgia Relay is ideal for today's rapidly changing technologically advanced environment. Georgia Relay's provider takes advantage of innovations and technological improvements to enhance the state of Georgia's relay service.

### **Signaling System Seven (SS7)**

The relay platform used by Georgia Relay has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Georgia Relay provides true

Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

*(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.*

### **True Caller ID**

Through the use of SS7 signaling Georgia Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. Georgia Relay provides this information on all call types and on all carriers. Georgia Relay brings true functional equivalence to Caller ID relay users.

Georgia Relay receives and passes calling line identification information, including blocking information from all users calling through the relay service.



**§ 64.604 Mandatory minimum standards.**

*c) Functional standards —*

*(1) Consumer complaint logs.*

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

Georgia Relay tracks all TRS complaints and all other customer service activity. Georgia Relay maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the State until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. **All information is kept on file and available to the PSC and FCC.** Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

The PSC's complaint log consists of the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling

- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access
- CapTel Complaints

*(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.*

Georgia Relay's provider reports complaint activity to the PSC on a monthly basis. The PSC submits the necessary information to the FCC as required in § 64.601 Mandatory Minimum Standards on an annual basis. The PSC has submitted copies of its 2008 through 2012 complaint logs to the FCC. The provider for Georgia Relay issues each complaint a Record ID number to enable the PSC and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainants.

*(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.*

The Georgia PSC submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the State office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to which correspondence should be sent. Following is the name of the contact at the PSC for those purposes:

Mr. Michael Russell, Utilities Analyst  
Utilities Division, Georgia Public Service Commission  
244 Washington Street, Atlanta, GA 30334  
Tel (voice) 404-656-0995; FAX 404-656-2341;  
E-mail: [MIKERU@psc.state.ga.us](mailto:MIKERU@psc.state.ga.us)  
Web site <http://www.psc.state.ga.us>

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

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1006 12th Street  
Aurora, NE 68818  
Voice/TTY 402-694-3656  
Fax: 402-694-5037  
E-mail: [dixie.ziegler@hamiltonrelay.com](mailto:dixie.ziegler@hamiltonrelay.com)  
Website: [www.hamiltonrelay.com](http://www.hamiltonrelay.com)

*(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1,*

*2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

### **Community Outreach, Public Relations and Educational Programs**

Georgia Relay provides community and business outreach and promotes a public awareness campaign to educate all Georgia citizens about the relay service. These efforts educate and heighten public awareness of 7-1-1 and TRS throughout Georgia through marketing, advertising and community involvement. In compliance with FCC requirements, which call for outreach to all telephone users, Georgia Relay's outreach initiatives focus on the need to educate the hearing community. As it has been in the past, the primary outreach concern is the number of hearing people who hang up on relay calls. Through participation in promotional events, presentations, workshops and instructional seminars, Georgia Relay reaches out to all relay user communities and always adjusts its programs to meet the specific needs of every audience.

Georgia Relay's outreach and awareness efforts specifically target individuals who are deaf, hard of hearing, late deafened, deaf-blind or have difficulty speaking, as well as their family, friends and caregivers. Georgia Relay performs a variety of activities to inform the public about relay and regularly participates in activities held by Georgia organizations that serve relay users.

The outreach team offers informative presentations on the features of relay services to organizations, relay user groups, businesses, educators and students, health care providers, 9-1-1 call centers, emergency, fire and law enforcement personnel, libraries, senior centers, and public and private entities. Georgia Relay's statewide outreach and awareness efforts include:

- Presentations
- Exhibits
- 911 Education
- Strategies for reaching Hard to Reach Relay Users
  - Hard of Hearing and Elderly Strategies
  - Speech to Speech
  - Deaf Blind
- Outreach to Businesses and Educational Institutions
- Outreach to Spanish
- Equipment Distribution Programs
- Involvement of Deaf and State Agencies
- Customized Outreach materials
- Promotional Materials
- Variety of Brochures
- Description of Complaint Procedures in Printed Materials
- Bill Inserts and Directory Pages
- Newsletters
- TRS and CapTel Web sites
- Social Media
- Press Release and Public Relations
- Print Advertising

- Media Advertising

Please refer to Attachment B for sample outreach materials and a list of the outreach activities Georgia Relay has accomplished.

*(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.*

Georgia Relay's provider performs no billing. All billing is performed by the relay users' carrier of choice for both intralata and interlata toll calls. Thus the relay users' carrier of choice bills all intralata and interlata toll calls at their applicable discounted rate for relay users. Georgia Relay's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

*(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.*

Georgia Relay's provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated from the Georgia Relay Fund.

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

Please refer to Tab 7, Method of Funding for a complete description of the State of Georgia's funding mechanism.

*(6) Complaints —*

*(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the*

*program of such state under §64.606 is in effect, the Commission shall refer such complaint to such state expeditiously.*

*(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.*

The Georgia PSC will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

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

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

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

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

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

The Georgia PSC understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

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

The Georgia PSC understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

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

*(A) Informal complaints —*

*( 1 ) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable*

*means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.*

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

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

*(B) Review and disposition of informal complaints.*

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

*( 2 ) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on*

*the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.*

The Georgia PSC will assist as necessary in this process.

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

*( 1 ) The name and address of the complainant,*

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

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

*( 4 ) The relief sought.*

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

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

*(F) Service.*

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

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

*(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this*

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

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

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

The Georgia PSC will assist as necessary in this process.

**Supplemental Information:**

Intrastate Georgia Relay complaints are processed in the following manner for the PSC by its TRS provider:

Trained personnel located within the State of Georgia answer all Georgia Relay Customer Service calls. Georgia Relay provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers with Georgia TRS inquiries and complaints. Customers may also contact Georgia Relay via e-mail and through the Georgia Relay web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. Georgia Relay processes any complaints, which originate via e-mail, fax, telephone, regular mail, outreach events, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is Georgia Relay Customer Service department. The National Customer Service Manager, Center Manager and Vice President of Relay Service for Hamilton also view all complaint information. In the event of a complaint regarding the Georgia Relay, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate

coaching, re-training and counseling steps will be taken by the primary Supervisor to resolve the situation. Georgia Relay's detailed call records show each key command (not actual text) the CA makes. Georgia Relay can easily investigate Georgia Relay CA complaints and take disciplinary action when needed.

- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff Georgia Relay uses and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the National Customer Service Manager to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to the Georgia PSC when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem. Georgia Relay describes the above procedures and FCC complaint processes, including contact information for both Georgia PSC and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by Georgia Relay or with any action taken, Georgia Relay's monthly report to the PSC will so state. The user then has the opportunity and is given written notice of that opportunity by Georgia Relay to have the complaint and action of Georgia Relay reviewed by the PSC for such action as it may deem appropriate in accordance with its rules and regulation. The Georgia PSC will act on such complaint no later than 180 days from the filing of the complaint.

The Georgia PSC will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the State of Georgia. The PSC will cooperate in the investigation or resolution of any and all complaints concerning the Georgia Relay with the Federal Communication's Commission.

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

The contract between the PSC and The Hamilton Telephone company d/b/a Hamilton Telecommunications provide for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton will provide the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Georgia Relay user to his/her called party. Hamilton has not and will never make any relay information

available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.

Georgia Relay

Tab 6  
Exceeding FCC Minimum Standards

