

A significant amount of time is spent training CAs to relay all conversation verbatim unless requested otherwise by the relay callers. Their ability to comply with this requirement is measured during diagnostics, quality assurance testing and during side-by-side observations.

On-going reviews during a CA's career of the Code of Ethics and Pledge of Confidentiality keep this important requirement of not altering conversations and relaying verbatim at the forefront of every call that is processed.

The Colorado Speech-to-Speech CAs have special training and skills to facilitate the conversation of relay users with speech disabilities without altering the intent of the conversation or interfering with the speech-to-speech user's independence or control of the call.

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

The Colorado Relay Service places no limits on the number of relay calls or length of any relay call. Users are able to place as many sequence calls as they wish or to speak as long as they wish.

(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.

With the exception of handling and processing of Coin Sent Paid calls which have been waived indefinitely by the Commission, the Colorado Relay Service is capable of handling any type of call including all types of operator-assisted calls (i.e. collect, bill to third, billed to a calling card, and person to person calls).

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

Relay Colorado allows its CAs to decline to complete any call where appropriate acceptance of charges or credit authorization has not been provided. Examples of this includes denial of charges for a collect call or invalid calling or credit card number.

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

The Colorado Relay Service platform allows for completion of any pay-per-call. Procedures require the CA to convey to the user any and all information provided by the 900 service provider regarding the cost for accessing the service and completing the call. Relay Colorado users have the option to request blocking of any pay-per-call service.

(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.

The relay platform that supports Colorado Relay Service supports all TRS call modalities including (1) text-to-voice and voice to text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. In addition, Relay Colorado users are able to place TTY to CapTel and vice versa; Speech-to-Speech to TTY and vice versa; Speech-to-Speech to CapTel and vice versa. These call types are part of initial training for all Relay Colorado CAs and are also available to Colorado Spanish Relay users.

(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:

Colorado's relay provider's platform allows the CA to sign-off or be "released" from the telephone line after the CA has set up a telephone call between the originating TTY caller, and a called TTY party. This feature is used to process TTY to TTY calls when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard.

Another scenario where this feature is used is when a TTY user is billing to a calling card that is accessed through an 800 number. The Relay Colorado's CAs dial and interact with the toll free number prompts and then release the call once they are sure direct communication between the TTY users is taking place. The CAs press two keys to transmit a message indicating "ANSWERED BY TTY ...ONE MOMENT CONNECTING YOUR CALL" and then "CONNECTION COMPLETE". CAs then ensure that communication is taking place between the TTY users and release the call from their position allowing them to be available for another relay call.

Speed dialing functionality:

Colorado's relay provider's platform allows users to store up to 100 names and numbers in their speed dial profile. Callers can then ask the CA to dial based on the name entered for that telephone number in the speed dial list such as "call mom" or "please call the dentist" or call "Charlie".

Callers can also provide the number of the listing in their speed dial list such as call number 22. CAs then press a single key to have the telephone number entered from the caller's speed dial list. The CA does not need to manually copy the number over to the dialing field. This eliminates the possibility of CA error in entering the number to dial.

Three-way calling functionality:

The Colorado Relay Service supports three-way calling functionality that allows more than two parties to be on the telephone line at the same time with the CA.

Customers who have purchased the three-way calling feature from their LEC can access the Colorado Relay Service and they can then conference in an additional person on their three-way calling line. CAs will be able to communicate with both the caller and the third-party on the same line and will be able to type to the caller on the additional line (forward number). This three-way calling feature is available for use by all relay customers including our STS users who especially appreciate this feature.

Another option for Relay Colorado users is to dial in to another relay connection with the forward number, allowing for an additional party to be joined on the line. Customers have the option to choose how to connect, either with another relay line or directly through their own connection.

(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.

**The Colorado Relay Service enables and facilitates calling to Interactive Menus and Voice Mails. All CA positions are equipped with macro keys (pre-programmed messages) that are used when a recorded message is reached. When CAs reach a recorded message, they transmit a macro indicating (recorded msg). If the recorded message is an interactive menu, CAs transmit this macro:
*(Would you like complete msg typed or hold for specific dept or live rep?)***

This macro allows the customer to have full control of their call at all times. Customers can also elect to have the entire recording typed to them verbatim. CAs follow customer instructions at all times (either holding for a specific department or live rep or typing the options).

CAs keep the caller informed while selecting any menu prompts as directed by the customer. CAs type updates such as (*pressing 2 for balance inquiry*) or (*pressing 0 for live rep*). This ensures that the caller is always in control of the call and can select additional prompts if they would like.

RECORDING DEVICE

CA positions are equipped with a Play Back Device (PBD) that enables the CA to capture recorded messages in their entirety without the need to redial. The CA has the ability to play back to any point in the recording, which allows the CA to provide continuous message transcription to the TTY user. All messages recorded on the PBD are erased as soon as the customer disconnects, ensuring confidentiality requirements are met.

The Colorado Relay Service does not impose any charges for additional calls, if needed, in order to complete calls involving recorded or interactive messages. Relay callers are only billed for one complete call. This provides a functionally equivalent billing scenario comparable to that of a direct-dialed call.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Relay Colorado CAs are trained to retrieve voice and TTY messages from voice processing systems and answering machines, and relay the message to the relay caller in the caller's communication mode (voice, TTY, ASCII, etc.). Following are basic steps for processing these types of requests.

RETRIEVING MSGS FROM ANSWERING MACHINE

The following is a brief outline of the CA's process for retrieving messages from an answering machine or voice processing system.

Retrieving Messages from Answering Machine or Voice Processing System
1. Caller requests message retrieval and provides CA with appropriate phone number and access codes to retrieve messages.
2. CA enters access codes in electronic scratchpad that allows them to be available for only the current call. The electronic scratchpad ensures confidentiality as it is automatically deleted when the call is complete.
3. CA Dials to the requested number and reaches answering machine.
4. CA enters appropriate access codes from electronic scratchpad.
5. Recording Device (PBD) is activated to record new messages left on the customer's answering machine. (NOTE: If only one message or a short message, will be relayed real time and will not require recording device.)
6. Complete messages are typed to the caller and caller is given the option to save or delete messages.
7. CA redials without creating another billing record to delete or save each individual message at the direction of the caller.
8. Access code information in the electronic scratchpad is automatically deleted at the completion of the call.

As with all things relay, the Colorado Relay Service protects the confidentiality of access codes that may be used to retrieve messages.

(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.

Although relay users are encouraged to dial 911 directly from their TTY or telephone for the fastest response, the Colorado Relay Service is able to support users who reach the relay service for 911 calls. Following are the procedures employed by Relay Colorado for these types of calls:

Emergency Call Handling
1. CAs can directly access a database with emergency agency listings based on the caller's Automatic Number Identification (ANI). In the rare occurrence that the agency number doesn't appear in the database, the CA contacts Directory Assistance. After getting the number, the CA needs only two key strokes to immediately access the emergency agency.
2. Our Caller ID technology enables the emergency agency to receive the relay caller's ANI directly, eliminating the time and potential inaccuracy of number transmission by the CA.
3. When the agency answers, the CA informs the dispatcher that the call is coming through Relay Service, provides their CA number, and indicates whether the caller is TTY or voice. The CA then remains available to the emergency agency to provide any information or assistance to support emergency service. The call is given the CA's undivided attention – call transfer is strictly prohibited – and a supervisor is typically summoned to provide support to the CA until the call ends when the agency disconnects.
4. Emergency calls are treated differently from a confidentiality perspective. CAs are trained and prepared to provide any and all information requested to the PSAP agency to ensure the relay caller receives expeditious emergency services. These may include the Billing Telephone Number (BTN) and any information stated by the caller before connection, etc. It is our goal to get the caller assistance as quickly as possible.

CAs notify their supervisor and solicit the supervisor's support when processing Emergency calls. Procedures explicitly instruct the CA to contact the PSAP agency if a caller disconnects from Relay Colorado prior to reaching the emergency agency. CAs contact the PSAP and provide them with the caller's telephone number and other pertinent information shared by the caller prior to disconnection.

CAs are trained to stay on the line with emergency calls as long as required to ensure that emergency services are rendered. CAs will stay on the line until the PSAP hangs up or tells the CA to drop the line.

Transferring of emergency calls to other CAs is not permitted.

When receiving a call that a CA suspects may be an emergency, the CA will treat that call as an emergency call. The CAs will not attempt to question the caller about the exact nature of the emergency, other than to determine whether fire, police, or ambulance is required. CAs will let the professionally trained PSAP Operator question appropriately and respond to the emergency.

A fully automated (“electronic”) system to handle emergency services for each call type is not currently trusted or used by Relay Colorado. Our provider’s emergency call handling system has been optimized over the years to support the wide variety of call types handled through the platform with concierge care and accuracy. Since Relay call types vary significantly (e.g. POTS lines, wireless phones, payphones, voice users, data users, STS users, and wire line TTYs), this optimization comes in the form of a CA determining the most appropriate handling method for each E911 instance.

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

Relay Colorado STS customers have the option to maintain a list of frequently called numbers through the AT&T Relay Customer Profile. The AT&T Relay Customer Profile allows STS users to create a list of over 100 frequently called number which can be arranged in alphabetical order of the first name, with each entry having a number with the first entry assigned the number one and the number of each subsequent entry increasing one (1, 2, 3, 4...). Whenever a STS user elects to place a call to an entry in their Relay Customer Profile, the CA states the name and number of the requested person to the STS user prior to dialing the number.

(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.

This requirement is not applicable to the Colorado Relay Service as it does not provide VRS as part of its state relay program.

(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.

This requirement is not applicable to the Colorado Relay Service as it does not provide VRS as part of its state relay program.

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

The Colorado Relay Center is equipped with all necessary telecommunications equipment and software capable of full and normal communication with inbound callers and outbound called parties compatible with relay equipment commonly used and at speeds generally used. This includes support for TTY, voice, and computer users via these protocols: voice (inc. STS), public switched network TTY, Baudot TTY, TurboCode[®], ASCII Computer, and ASCII. The Arizona Relay Service equipment automatically adjusts to match the protocol and speed of the TRS user's equipment. No manual intervention by the CA is required for the relay system to effectively communicate with the TRS user.

(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.

The Colorado Relay Service provider is required to ensure that CAs are available to respond to the projected calling volumes based on hour of day, day of week, and month of year. The provider utilizes historical calling volumes and trends to project the number of CAs required on any given day and at any given hour. Intraday adjustments are made as needed to respond to unexpected changes in call volume projections.

Additionally, average length of call, average session minutes, average conversation minutes, and average CA work time are all used to project the number of CAs required to meet the projected call volumes.

As part of the monthly reporting process, the provider is required to prepare and submit a detailed report that provides evidence of their success in meeting this requirement for staffing.

(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.

As part of the contract requirements, the Colorado Relay Service provider is required to prepare and submit, on a monthly basis, a report that provides evidence of meeting the 85% of calls answered within 10 seconds service level on a daily basis. Penalties may be assessed for failure to meet the service level requirement. Generally, more than 95% of callers are serviced in less than 10 seconds.

The Colorado Relay Center has adequate network facilities to meet the requirement of the P.01 standard for call blocking. ASA and call blocking on a daily and monthly basis is provided in the monthly reports provided by the relay provider.

(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.

The Average Speed of Answer for Relay Colorado is measured from the time the call is accepted by the provider's equipment regardless of whether the call originated through the public switched network, a wireless network or a Voice Over IP network.

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

The Colorado Relay Service contract requires the provider to include abandoned calls in calculating the speed of answer on a daily basis. A monthly report is generated and provided to the state each month which reflects the number of abandon calls to the relay service.

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

Evidence of compliance with this rule is provided each month as part of the monthly reporting requirements. The report measures the actual speed of answer level on a daily basis.

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

The circuits used for the Colorado Relay Service are ISDN MegaCom 800, which will transverse on the Software Defined Network (SDN) within the AT&T telecommunications architecture. These circuits comply with a grade-of-service of P.01, which provides a functionally equivalent probability of a fast busy as one might encounter on the overall voice network.

(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.

Both the State of Colorado and the contracted relay provider understand that the LEC is required to provide call attempt rates and rates of calls blocked between the LEC an the Colorado Relay Service facility upon request.

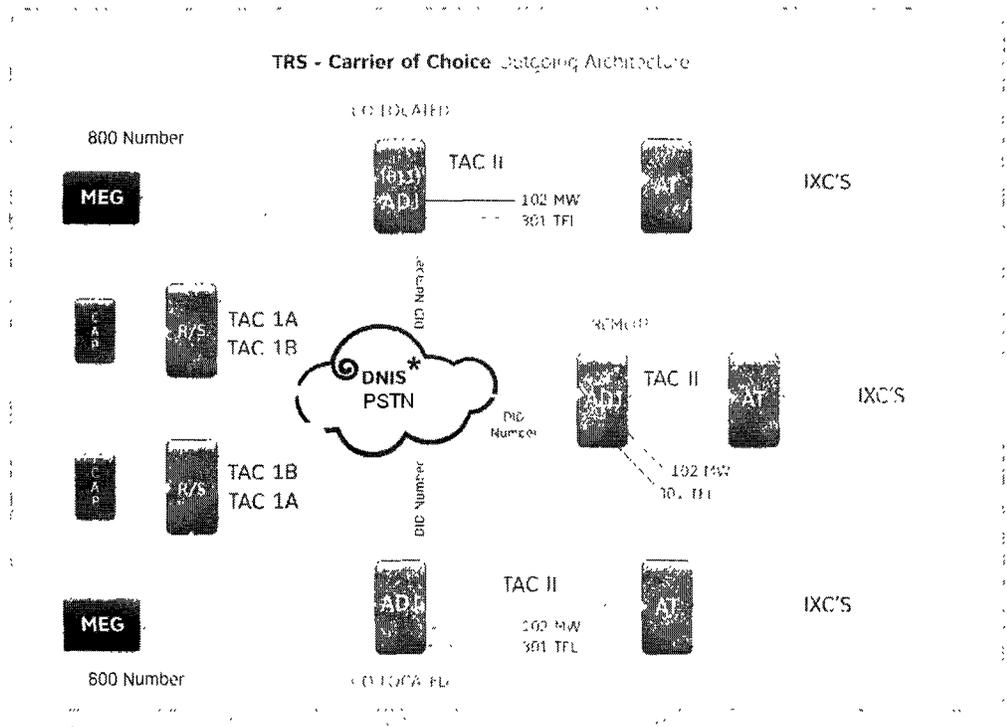
(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and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

This requirement is not applicable to the Colorado Relay Service as it does not provide VRS as part of its state relay program.

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

Relay Colorado callers may request that a specific carrier be used for billing of their toll, inter-LATA, or interstate call as long as the carrier is a participant in the industry's standard solution for carrier of choice calls. Upon receiving a request to use another carrier, the Relay Colorado CA selects the caller's choice from an available menu and then hits the call completion keys, enabling the call to be carried and billed by the requested carrier's network. The Relay Colorado platform automatically routes the call to a LEC access tandem, which forwards the call directly to the chosen carrier's network along with billing information over a special Feature Group D type circuit. The chosen carrier's network completes the call and creates a billing record. When the call is connected to the called party, the end-user billing timer starts and the CA begins to relay the conversation.

The following diagram depicts how the carrier of choice platform is provisioned for the Colorado Relay Service.



From the Communication Assistant position (CAP), the relay call goes through the relay switch to the PBX Adjunct (ADJ) and then to the Access Tandem (AT). From the Access Tandem, the call goes the Interexchange Carrier. Alternately, the call may go from the relay switch to the Public Switched Telephone Network (PSTN) and then pass to the PBX Adjunct, Access Tandem, and Interexchange Carrier.

Relay Colorado users may request to have a long distance call billed to a preferred carrier on a per call basis or it can be done for all long distance calls automatically through a Customer Profile. Calls completed through the Carrier of Choice platform will be billed by the user's carrier according to their subscriber plans.

(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.

The Colorado Relay Service is accessible and available 24 hours a day, 7 days a week and 365 days a year. The service is accessible through 711 abbreviated dialing or through one of the Relay Colorado toll free numbers. Evidence of the availability of service is provided as part of the monthly traffic and volume reports.

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

The Colorado Relay Service was designed with redundancy and the ability to self-correct and self-heal when failures occur. In the event of a power failure, the Uninterruptible Power System (UPS) will keep the relay call centers switches (PBX), peripherals, TRS platform security, CA/supervisor positions, and call detail recording active as well as security lighting, environmental controls, and limited lighting until commercial power resumes. All systems and services required to keep the call center active will not suffer a power outage, due to the call center's UPS design.

Redundancy of equipment in the call centers supports uninterrupted Relay Service, too. Within each call center is a bank of servers that manage the various resources required to complete any type (text-based) Relay call. Each call center has 4, 6, or 8 fully cloned, fully redundant service control units – or servers. The system is so intelligent that, if power were removed from a server, its workload would be automatically re-allocated among the remaining servers in that call center, all without losing even one call.

These call centers are also equipped with redundant network circuit feeds; redundant controllers; and redundant power supported by large battery banks that auto-switch to a diesel generators during long commercial power outages. Our software engineers for Relay service are always on call for assistance when needed, as well.

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

This requirement is not applicable to the Colorado Relay Service as it does not provide VRS as part of its state relay program.

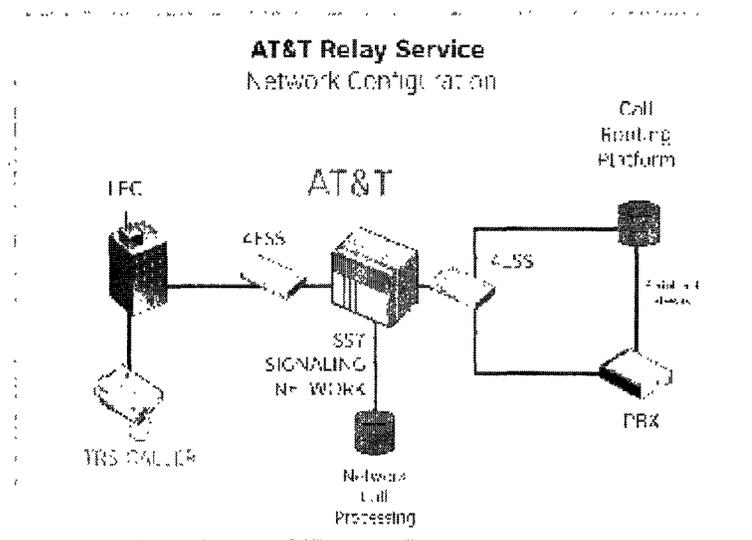
(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two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

This requirement is not applicable to the Colorado Relay Service as it does not provide VRS as part of its state relay program.

(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.

The Colorado Relay Call center uses Signaling System 7 (SS7) as an out-of-band signaling method, ensuring that all calls are routed quickly and accurately. In addition, we use Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI) protocol between the 4ESS switch and the relay center's PBX and Automatic Call Distributor (ACD). The communication between the Intelligent Call Router (ICR) and the network used by the relay provider is all SS7.

This protocol provides Automatic Number Identification (ANI), calling party number (CPN), originating line screening (OLS), and privacy or blocking information for all inbound calls in the same manner as non-relay callers who reach the regular “0” or “00” operator. The TRS caller’s phone number is not passed on to the called party if the calling party has Caller ID blocking invoked by his/her local telephone company. Following is a diagram which further illustrates the call flow we describe here.



(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.

The Colorado Relay Service fully supports and transmits True Caller ID to relay call receivers who subscribe to Caller ID services from their provider. Additionally, the Colorado Relay Service offers profiled callers the option to select which number they wish to be transmitted to the called party. Profiled callers may have their telephone number sent or the Relay Service’s generic telephone number sent.

**FEDERAL COMMUNICATIONS COMMISSION
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(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.

The Colorado Relay provider has a special database which stores every customer contact received by the Relay Customer Care Team. The database called (CICS) for the Commendation, Inquiry & Complaint System houses all contacts received from customers during a given month, enabling the provider to provide detailed monthly summaries to the Colorado Relay State Administrator regarding contacts received from relay customers in Colorado. The database captures all elements required under the terms of the contract which includes, at a minimum:

- 1) This record shall include the name and/or address of the complainant**
- 2) The date and time received**
- 3) The CA identification number if provided or known**
- 4) The nature of the complaint**
- 5) The result of any investigation**
- 6) The disposition of the complaint and the date of such disposition.**

This helps the state gauge how well the relay provider is providing relay to the constituents of Colorado. This database also assists the State of Colorado in preparing the FCC's TRS Annual Consumer Complaints Summary log each year.

INFORMATION RETENTION: All customer contacts including complaints received about the Colorado Relay Service are required to be retained for the life of the contract, and for a minimum of twelve months upon expiration of the contract.

(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.

The State of Colorado has submitted a summary of the customer complaints to the Commission by July 1st of each year. Our most recent filing was made on June 15, 2012.

(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:

Contact information for the Colorado Relay Service and its contracted relay provider, AT&T, are available on the Commission's website with the appropriate contact person and office for TRS consumer complaints and for any inquiries about the state's relay program.

(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 following information is currently available on the Colorado Public Utilities Commission's website:

For further information or assistance, please contact Joe Benedetto, the Public Utilities Commission Relay Administrator, at TTY 303-894-2512.

Voice calls can be dialed at 303-894-2000 or via the nationwide Relay number, 711.

Emails may be directed to: Joe.Benedetto@state.co.us.

The Public Utilities Commission (PUC) is available to assist consumers. If you have a question about or are experiencing a problem with a PUC regulated industry, staff is available to talk to you and offer assistance between 8 a.m. and 5 p.m., Monday through Friday. Please call the PUC Consumer Line at 303-894-2070 or 1-800-456-0858, if calling outside the Denver metro area.

Consumers are invited to click the **Consumer Comments** button (on the CO PUC Website) to share their opinions, comments and concerns. In the past, consumers have provided their thoughts about rate change proposals or modifications to existing rules.

Mailing and Contact Information:

Colorado Public Utilities Commission, 1560 Broadway, Suite 250, Denver, Colorado 80202,
Telephone 303-894-2000, Fax 303-894-2065

(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.

The Colorado Relay Service has a very active and effective outreach program which provides information about the availability of all forms of TRS. Outreach includes, but is not limited to, the following: The Colorado Public Utilities Commission Website link to TRS and CTS, including an outside link to the Relay Colorado Website, an annual TV PSA media campaign, community website and newspaper advertising, various print media, community organizational sponsorships, community forums, Relay Colorado Day at the Ballpark, State Relay Advisory Committee meetings and distribution of promotional items.

The Relay Colorado 2012-2013 Outreach Plan and Budget is located under Exhibit A. Evidence of outreach and examples of public access to information can be found in Exhibit B, Items B.1 through B.20. A copy of the DEX Phone Directory with TRS, CRS, 911 and TEDP Information is located under Exhibit H. Exhibit G contains the Annual Message from the SRA.

(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.

Requirements for the Colorado Relay Service provider mandates that any TRS end user pay no more for non-message toll relay calling than would be charged for the same call if billed by the end user's local exchange or competitive local exchange company.

The Colorado Relay RFP requires the relay provider to bill Intrastate toll calls placed through the relay system and billed to the voice or TDD Caller at 50 percent of the provider's rate for non-relay calls. An additional 10 percent discount (60 percent total discount) shall apply to calls to or from the dual-sensory impaired. Additionally, the RFP requires the provider to develop a system for identifying such users and applying the discount to their calls.

The current relay provider, AT&T, bills all toll or intrastate long distance call at a flat \$0.07 a minute unless the user subscribes to an

AT&T optional calling plan that provides a better rate. The flat rate applies to users who are not subscribed to AT&T and to those AT&T subscribers who do not have an optional calling plan. The rate would apply to any relay call carried and billed by AT&T.

(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.

Costs for intrastate relay call minutes, including CapTel, are supported by a monthly surcharge that is assessed and appears on the bill for each access line a subscriber obtains from a local exchange telecommunications company. The surcharge is assessed to recover the costs associated with the relay provider charges, outreach, equipment and distribution, and the administrative costs associated with the Colorado Telecommunications Relay Services for Disabled Telephone Users Program. Effective October 1, 2010, the uniform charge was increased from twelve cents per access line per month to twenty cents per access line per month, to comply with the requirements of 40-17-103(3) CRS. The local exchange companies are responsible for collecting and remitting the surcharge to the Colorado Public Utilities Commission. The Commission, in turn, is responsible for maintaining an operational fund and making payments to the relay provider for service rendered.

All interstate relay call minutes, including CapTel, are reported separately by the relay provider. The cost for providing interstate service is then submitted by the provider to the interstate TRS fund administrator for payment.

(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.

Not applicable to the Colorado State Relay Program.

(iii) Telecommunications Relay Services Fund. Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

Not applicable to the Colorado State Relay Program.

(A) Contributions. Every carrier providing interstate telecommunications services (including interconnected VoIP service providers pursuant to §64.601(b)) and every provider of non-interconnected VoIP service shall contribute to the TRS Fund on the basis of interstate end-user revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

Not applicable to the Colorado State Relay Program.

(B) Contribution computations. Contributors' contributions to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to the contributors' revenues subject to contribution. In the event that contributions

exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject contributor that has revenues subject to contribution must contribute at least \$25 per year. Contributors whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Contributors whose contributions total \$1,200 or more may divide their contributions into equal monthly payments.

Not applicable to the Colorado State Relay Program.

Contributors shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer and Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

Not applicable to the Colorado State Relay Program.

**FEDERAL COMMUNICATIONS COMMISSION
CAPTIONED TELEPHONE - OPERATIONAL STANDARDS**

Current as of December 13, 2011

(a) Operational standards —(1) Communications assistant (CA). (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

As the current CapTel provider for the State of Colorado, AT&T and its subcontractor, CTI®, require all CapTel CAs to have a minimum of a 12th grade level education or equivalency in order to qualify for the job of CapTel CA. Once hired, the applicant must successfully complete and pass a comprehensive training curriculum which includes training on the specialized needs of people with hearing or speech disabilities. Post hire assessments are provided continually throughout the term of employment to ensure CAs maintain a high level of skill and competency in completing calls for CapTel users.

(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.

Colorado CapTel CAs are tested for competency in typing, grammar, and spelling structure skills. Training also includes familiarity with hearing, hard of hearing, deaf, and speech loss community and users. Although waived by the FCC, oral-to-text tests are administered to CapTel CAs. They are assessed on their ability to interact with the voice recognition technology used for converting voice to text. This technology transmits text to the captioned telephone user at more than 100 words per minute.

CapTel CAs do not communicate directly with either party on a CapTel call. The CapTel user speaks directly to the standard telephone user in the same way that a standard telephone user speaks to the CapTel user. This is done through a direct audio connection. The CapTel CA does not directly speak or communicate with either party.