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State of Colorado

Public Utilities Commission

Telecommunications Relay Services

2013 Application

Renewal of Current TRS Certification

CG Docket No. 03-123

Federal Communications Commission

Washington, District of Columbia

Application for Renewal of Current TRS Certification

State of Colorado

Submitted to:

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Federal Communications Commission

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Statewide TRS Provider of Record:

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Telecommunications Relay Service
Application for Renewal of Current Certification
State of Colorado

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Exhibits

Exhibit A – Copy of Relay Colorado 2012 – 2013 Outreach Plan & Budget
Exhibit B – Copy of Outreach Media Samples, Items B.1 through B.20
Exhibit C – Copy of Colorado TRS RFP of November 23, 2011
Exhibit D – Copy of AT&T Response to the Colorado TRS RFP
Exhibit E – Copy of Colorado State TRS Statutes and CO PUC TRS Rules
Exhibit F – Copy of Colorado PUC Rate Order Setting TRS Surcharge at 20 Cents
Exhibit G – Copy of Annual Message from the SRA and SRAC Bylaws
Exhibit H – Copy of DEX Phone Directory w/ TRS, CRS, 911 & TEDP Information
Exhibit I – Copy of Century Link Telephone Invoice with TRS Surcharge Line Item
Exhibit J – Copy of 2011-2012 Consumer Complaint Log Summary
Exhibit K – Copy of Notice of Substantive Changes to FCC
Exhibit L – Copy of FCC Public Notice of July 25, 2012 on TRS Recertification

INTRODUCTION

This is an application on behalf of the State of Colorado is submitted by the Colorado Public Utilities Commission to have the Colorado Telecommunications Relay Service and Program re-certified under the regulations set forth under 47 C.F.R. § 64.605; 47 U.S.C § 225(c) and (d)(3)(B). The State of Colorado was last certified for the time period beginning July 26, 2008 through July 25, 2013.

Official notices, documentation and correspondence related to this application should be directed to:

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Questions or concerns related to the technical, operational or functional requirements of this application may be directed to:

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Relay Colorado

Colorado's Telecommunications Relay Services Program, ***Relay Colorado***, was first established in 1989 by Colorado General Assembly Senate Bill 171 to enable citizens who could not use regular telephones to use Telecommunications Relay Services (TRS). Relay Colorado provided telecommunications access to our citizens though the use of a relay communications assistant.

Senate Bill 89 - 171 also created the Colorado Disabled Telephone Users Fund (DTUF) to reimburse providers for Telecommunications Relay Services and to provide for the administration of the program. The bill also created a Commission for Disabled Telephone Users.

Colorado is proud of her status as the second state in America to provide relay services, which later became mandatory with the passage of the 1990 Americans with Disabilities Act (ADA). The ADA requires functional equivalency in accessing telecommunications services.

In 1992 Colorado General Assembly House Bill 92 -1071 modified Colorado's program to conform to the exact requirements of the ADA, to transfer the program to the Public Utilities Commission and to eliminated the Commission for Disabled Telephone Users.

The Colorado Public Utilities Commission, by legislative statute, administers the relay program, and has prescribed rules for the implementation of TRS as set in Article 17 of Title 40, C.R.S.

In 2004, a very significant milestone in telecommunications was achieved when the TRS Program inaugurated captioned telephone TRS, utilizing Cap Tel®.

Since 1992, the Colorado PUC has appointed three Deaf State Relay Administrators, all of whom have utilized relay services daily in their professional and personal lives.

The Commission has a State Relay Advisory Committee (SRAC), appointed by the State Relay Administrator. The SRAC Bylaws provide for diversified representation from the Deaf, the hard of hearing, and the speech disabled communities, and is charged with advising the State Relay Administrator on TRS.

For over twenty years, Relay Colorado has been fully compliant with all Federal Communications Commission rules for traditional and captioned telephone TRS, and has consistently achieved FCC TRS certification since the implementation of TRS in Colorado.

State legislative statutes authorize the Public Utilities Commission to adjust the TRS surcharge as needed to meet the requirements of the relay program. The Commission initially set the TRS surcharge at ten cents per local telephone exchange access line per month; today the surcharge is twenty cents per line per month.

Relay services have always been conducted via the State of Colorado BIDS system and in compliance with state contractual requirements.

In 1990 Sprint was selected to provide TRS for Colorado.

The TRS RFP beginning in F.Y. 1995 - 1996 resulted in competitive bids from AT&T, MCI, Sprint, and Hamilton Communications. Sprint was awarded the relay contract for a second time by the State.

The next TRS RFP for a three to five year contract was announced in 2001, resulting with the exact same vendors - AT&T, MCI, Sprint, and Hamilton - bidding for this contract.

The State awarded Sprint this new three-year contract, commencing on April 19, 2002, with options for two one-year renewals on January 1, 2005 and January 1, 2006.

In 2006, the TRS RFP resulted in bids from Hamilton, Nordia, Sprint Nextel, and Verizon. Sprint was awarded this contract by the State for three and one-half years, commencing on January 1, 2007. The contract also had provisions for two one-year renewals, of which were scheduled to end on June 31, 2012.

Colorado's most recent TRS RFP was awarded by the State of Colorado to AT&T Corp., which commenced TRS on July 1, 2012.

Since the commencement of the relay program, the State of Colorado has benefited from several factors that have resulted in a healthy fund surplus in the DTUF.

The Federal Communications Commission created a separate funding mechanism to cover relay costs nationwide for interstate long distance calls. Proposals for relay services were significantly less per call minute than previously due to increased competition for State relay business. Technological efficiencies and partnerships by vendors with non-profits for relay services provided additional cost benefits. The widespread popularity of electronic mail, text and IM transmissions have lead to a decline in traditional relay call volume. Recently, the FCC funded, via the Interstate TRS Fund - at no cost to the states - IP Relay, IP Video Relay and IP Wireless Relay. All of these factors, including the extraordinary population and economic expansion in Colorado since 1989, with its subsequent growth in access line count, has resulted in continuous DTUF surpluses.

It is important to note that while the Tabor Amendment to the Colorado state constitution has had a significant effect upon surplus funds in the DTUF, the General Assembly has decided to appropriate the surpluses for other worthwhile and beneficial programs for the Deaf, hard of hearing, deaf-blind, blind, and speech challenged community.

Funding from the Disabled Telephone Users Fund has been appropriated by the General Assembly for the Reading Services for the Blind Program, the Colorado Commission for the Deaf and Hard of Hearing (CCDHH), the Telecommunications Equipment Distribution Program (TEDP) under the administration of the CCDHH, and the Commission for the Blind and Visually Impaired.

Our Colorado citizens, under our newly selected TRS provider, AT&T Corp., have benefited from AT&T's state-of-the art TRS innovations and technical advances, including their new platform. AT&T's Colorado services include Cap Tel® relay services, Spanish Relay, Speech to Speech services, E-Turbo, enhanced VCO / HCO, and direct 711 dialing. These Colorado services are enhanced, at no cost to the state, by AT&T's national Internet Protocol TRS, which is funded by the FCC's Interstate TRS Fund. These state and national relay services are indicative of AT&T's commitment to modern and quality TRS for all of our Deaf, hard of hearing, deaf-blind, and speech challenged citizens, their families, friends, and business and professional colleagues.

CONTRACT STATUS

At the time of this application for re-certification, the contracted relay provider for the Colorado Relay Service is AT&T, d/b/a AT&T Corp. with its principal offices located at 208 S. Akard St, Dallas, TX 75202-4206. The current agreement with AT&T became effective on July 1, 2012 and will expire on June 30, 2015.

Under the terms of the agreement, AT&T provides traditional (TTY-based) TRS, Spanish language traditional TRS, and Speech-to-Speech (STS) service through its own call centers located within the United States. Additionally, AT&T provides traditional Captioned Telephone Service (CapTel ®) through call centers operated by Ultratec® and located within the United States.

A copy of the Request for Proposal that was used to select our current vendor has been included with this application as Exhibit C. Also attached is a copy of AT&T's response in Exhibit D.

The following page provides a checklist of the FCC Mandatory Minimum Standards current as of December 13, 2011 as listed on the FCC website at http://transition.fcc.gov/cgb/dro/4regs.html and as provided by AT&T.

CHECKLIST OF FCC MANDATORY MINIMUM STANDARDS

CURRENT AS OF DECEMBER 13, 2011

§ 64.604 Mandatory minimum standards.	Traditional TRS	Captioned Telephone
(a) Operational Standards		
(1) Communications assistant	MEETS	MEETS
(2) Confidentiality and conversation content	MEETS	MEETS
(3) Type of calls	MEETS	MEETS
(4) Emergency call handling requirements	MEETS	MEETS
(5) STS called numbers	MEETS	n/a
(6) Visual privacy screens/idle calls.	n/a	n/a
(7) International calls.	MEETS	n/a
(b) Technical Standards		
(1) ASCII and Baudot	MEETS	n/a
(2) Speed of Answer	MEETS	MEETS
(3) Equal access to interexchange carriers	MEETS	MEETS
(4) TRS Facilities	MEETS	MEETS
(5) Technology	MEETS	MEETS
(6) Caller ID	MEETS	MEETS
(c) Functional Standards		
(1) Customer Complaints	MEETS	MEETS
(2) Contact persons	MEETS	MEETS
(3) Public access to information	MEETS	MEETS
(4) Rates	MEETS	MEETS
(5) Jurisdictional separation of costs	MEETS	MEETS
(6) Complaints	MEETS	MEETS
(7) Treatment of TRS customer information	MEETS	MEETS

FEDERAL COMMUNCIATION COMMISSION
TRS 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.

All Relay Colorado CAs are required to complete a comprehensive and extensive TRS training curriculum which includes diagnostic modules that assess the capabilities for CAs to effectively meet the specialized needs of individuals with hearing and speech disabilities.

Core components of training include, but are not limited to, the following:

- **Disability awareness**
- **Deaf culture**
- **ASL gloss**
- **American With Disabilities Act**
- **Section 225 of the Telecom Act**
- **All TRS Call Types including Emergency calls**
- **Speech to Speech**
- **Spanish Relay**

All training packages, which have been designed and developed by AT&T for Relay Colorado are considered proprietary, but are available for review and inspection upon submission of executed nondisclosure documents. For purposes of this application, we have included outlines of the required training.

Initial Training of Relay Colorado Communication Assistants, Days One & Two		
Schedule for Initial Training of Communication Assistants		
Day One	**Day Two**	**Days Three through Ten**
Introduction to the Communicatively Challenged Community	Methods of Communication for the Communicatively Challenged Community	Fundamental Instruction in Technology and Procedures for Relay Service
I. Introduction to the Deaf Community and Relay: Day One		
A. The Role of the CA and Customer Diversity		
B. History of Deaf Culture, Education, and Sign Language		
C. In The Spotlight: Notable Deaf individuals and their accomplishments		
D. Common Questions about Deafness		
E. Americans with Disabilities Act (ADA)		
1 ADA & FCC Requirements for Relay Service		
2. FCC Requirements – 64.604 for Relay Personnel		
II. Methods of Communication: Day Two		
A. Introduction to American Sign Language (ASL)		
B. ASL Guidelines and Grammar Rules		
C. ASL Gloss		
D. Understanding ASL Translation/Interpretation		
1. ASL Translation/Interpretation as the Default		
2. Identifying Translation/Interpretation preferences - Relay Choice Profile		
E. Idioms in Deaf Culture - English and ASL		
F. Procedures for obtaining Relief		
Additional Resources: Books, Tapes and Websites Related to Deafness/Hard of Hearing		

	Initial Training Outline For Relay Colorado Communication Assistants	
I.	***Module 1 – Introduction to Relay Service***	
	a.	Explanation of Relay Service
	b.	Identifying Customers Who Use The Relay Service
	c.	Explanation of How Relay Service Works
	d.	The Role of the Communications Assistant (CA)
	e.	The Customers' Expectations For Relay Service
	f.	Comparison of a Relay Call to a Call with an Operator
	g.	Availability of Relay Services
	h.	Code of Ethics – Rules for Relaying Calls – Relaying Verbatim, Appropriate tone for content and intent of conversation
	i.	Other Relay Operator Requirements
II.	***Module 2 – Introduction to the TTY***	
	a.	Background of the TTY
	b.	Parts of the TTY
	c.	Connecting a TTY to a Telephone System
	d.	Explanation of How a TTY Works
	e.	How to Use a TTY To Place a Call
	f.	Other Communication Devices
III.	***Module 3 – Introduction to the CA Work Station and Call Conditions***	
	a.	Equipment Used by CAs
	b.	Customer Information Displayed for Call Processing
	c.	Preparing Billing Records
	d.	Basic Call Process Steps
		1. TTY-Voice, Voice-TTY 2. In Call Replacement 3. CA Relief Procedures 4. Gender Requests 5. Relay Choice Profile (RCP) 6. Personal Memory Dial (PMD)
IV.	***Module 4 - ASL Translation/Interpretation***	
	a.	Department for the Deaf and Hard of Hearing
	b.	Relay Customers
	c.	ASL Translation/Interpretation as the Default
	d.	ASL Grammar Rules
	e.	Understanding ASL Translation/Interpretation

	f.	Explanation of ASL Gloss
	g.	CA Proficiency Requirements in ASL/PSE Translation/Interpretation
	h.	Procedures for Obtaining Relief
	i.	Identifying Translation/Interpretation Preferences in RCP
V.	***Module 5 – Introduction to Voice Carry-Over (VCO) Calls***	
	a.	Explanation of Voice Carry-Over Calls
	b.	Procedures for Processing VCO Calls
		1. Profiled 2. Not Profiled 3. TTY to Voice 4. Voice to TTY
VI.	***Module 6 – Basic Relay Calls***	
	a.	Recorded Messages/ PBD (Play Back Device) Usage
	b.	Procedures for Placing Calls to Beepers/Pagers
	c.	Toll Free Number Completion (800, 888, 866, 877)
	d.	Directory Assistance (DA) Call Completion
VII.	***Module 7 – CSIDS***	
	a.	Review of Commonly Used CSIDS Keys
	b.	CSIDS Quick Reference
	c.	Emergency Number Retrieval
	d.	Domestic "General" Rate Quote
	e.	Domestic "Computed" Rate Quote
	f.	International "General" Rate Quote
	g.	International "Computed" Rate Quote
	h.	Collect/Calling Card Billing to International Countries
	i.	Canada
	j.	Frequently Asked Questions & Key Actions
	k.	Keyword Help
VIII.	***Module 8 – Emergency Calls***	
	a.	Definition of Emergency Call
	b.	Call Steps for Securing Emergency Agency
	c.	Emergency Call Handling Procedures
IX.	***Module 9 – Alternate Billing***	
	a.	Alternate Billing Requests
	b.	Collect Calls
	c.	Third Number

	d.	De-tariffing Order
	e.	Person to Person
	f.	Calling Cards
	g.	Commercial Credit Cards
	h.	Prepaid Calling Cards
	i.	Coin Phone
	j.	Special Treatment Windows (STW)
X.	***Module 10 – Carrier of Choice***	
	a.	Indentifying Carrier of Choice (COC) Calls
	b.	Relay Choice Profile Includes COC
	c.	COC Requested During Call Set Up
	d.	Using COC Calling Card
	e.	Current Listing of COC
	f.	Procedures for Non-participating COC
	g.	Billing Procedures for COC
XI.	***Module 11 – Specialty Call Types/ Call Processing***	
	a.	711 Dialing
	b.	Spanish Voice and TTY Transfers
	c.	900 Pay Per Call
		1. 900 Number Requests 2. 900 Number Terminates to Recorded Message 3. 900 Number Answered by Live Person 4. Calls That Can Not Be Completed to 900 Numbers
	d.	511 Calls
	e.	STS Overview
		1. Identifying Speech-To-Speech Calls 2. Processing STS Calls
	f.	Telebraille Customers (Pacing)
	g.	Hearing Carry-Over (HCO)
		1. Explanation of HCO Calls 2. Comparison of HCO to VCO 3. Procedures for Processing HCO Calls
	h.	Specialty Call Types
		1. Two-Line VCO or Voice Translation 2. Reverse Two-Line VCO or Voice Translation 3. Two-Line HCO or Hearing Translation

		4. Voice to Voice (VTV) 5. Voice to TTY (VTT) 6. VCO Privacy 7. HCO Privacy 8. Hearing to Hearing (HTH) 9. VCO to HCO (VTH) 10. Touch Tone Carry-Over (TCO) 11. 3-way Calling 12. Revised SLAM Procedures 13. SLAM Procedures
	i.	International Calls
	j.	Calls Terminating to Another Relay Center
	k.	Hold Guidelines
	l.	Customer Contact Process (Requests for Supervisor or Customer Care)
	m.	Internet Relay
	n.	Instant Message Relay
XII.	***Module 12 – DNIS Switched Calls***	
	a.	Procedures for TTY to TTY Calls
		1. Relay to OSD 2. Relay to OSD to Relay 3. OSD to Relay
XIII.	***Module 13 – Introduction to OSD***	
	a.	Explanation of Operator Services for Deaf (OSD)
	b.	Comparison of OSD to Relay Service
	c.	Type of Calls That are Permitted Through OSD and Availability

(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.

The State of Colorado recognizes the importance of selecting highly-qualified individuals for the Communication Assistant position. Prior to being hired, perspective CA candidates must qualify on several tests including a Telephone Ability test, an Oral Typing Skills Test, and an Oral Proficiency Interview.

After being selected during a rigorous employment screening process, Relay Colorado CAs are observed and tested (either pre or post employment) to ensure they

- **Possess clear and articulate voice communication**
- **Type a minimum of 60 words per minute on an oral typing test**
- **Have required grammar and spelling skills**
- **Are able to interpret typewritten ASL**
- **Are familiar with speech disability culture, languages, and etiquette**

Relay Colorado CAs undergo extensive training to ensure that all relay calls are handled accurately, courteously, efficiently, and in a manner that is sensitive to the needs of relay users. CAs are specifically trained to provide a functionally-equivalent service to what a voice user would experience without the use of relay. During initial training, important foundational relay principles such as "relaying verbatim regardless of content" are introduced and emphasized so that our new employees understand that they need to relay ALL calls regardless of content or intent, and in a tone of voice appropriate for the subject matter being relayed. CAs are taught to be as transparent as possible on calls and do not intervene in the communication process. CAs are given macros to assist in informing the caller of background noise and other activities that may occur during a relay call.

CA Training

Relay Colorado CAs participate in a minimum 80 hours of initial training period. The training stresses all the basic steps for processing relay calls, Disability/Cross-Cultural Training, and a variety of other related topics. The training encompasses simulated calls to help the CAs learn the material and follow appropriate call-handling steps. Prior to graduating from initial training, CAs are required to pass a series of written and skills-demonstration tests before they are allowed to process live calls unassisted. If a trainee cannot pass these tests and demonstrate proficiency, they will not be permitted to process live relay calls. CAs will be given additional instruction and coaching until they are ready to place live relay calls.

After this initial training program, CAs receive subsequent instruction and are coached while processing live calls in the relay environment. Readily available trainers and coaches will field any questions and provide feedback to the new CAs.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

The typing test for potential employment as a Relay Colorado CA requires applicants to successfully type at a minimum of 60 words per minute with a maximum error rate of no greater than five percent using an oral typing test.

CAs are tested <u>three times per year</u> on an oral typing test and also observed during live calls by Supervisors to ensure they maintain a typing speed above the required 60 wpm.

Although permitted under Commission rules, the typing tests administered do not use technological aids to assist in meeting the required wpm scores. The software counts the total number of characters including spaces and divides that number by five to determine the words per minute.

If a CA does not meet the 60 wpm requirement, the CA is taken off line for further training that includes various typing exercises to improve typing speed and accuracy.

The average typing speed of our current CA Team that supports the Colorado Relay Service is over 73 – without technological aids.

(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

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

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

As a matter of practice, the Colorado Relay Service minimizes transfers and reliefs to the extent possible. CAs only transfer calls when necessary. A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA). Prior to transferring, CAs ensure that they have been processing a call for a minimum of ten (10) minutes for traditional relay and fifteen (15) minutes for Speech-to-Speech Service. The only exception is when a customer requests to be transferred to a different CA. Requests for the same CA to relay the entire conversation are honored whenever possible

When it is necessary to transfer a relay call, the sophisticated relay platform used by the Relay Colorado CAs allows for a fully electronic transfer of the call. This takes only seconds and is done at not-intrusive junctions on a call that has already met minimum time requirements. Our electronic transfer ability allows for full transition of the call including any notes indicated by the CA in their scratchpad for processing of the call. This is a highly efficient process that does not disrupt the call underway.

Due to the complexity of Speech-to-Speech calls, CA reliefs are "manual" reliefs only. The relief STS CA will go to the CA position to complete the remainder of the call.

When a call is transferred to a relief CA, TTY customers are notified by the macro bearing the relief CA's identification number and gender. Voice customers are notified by the announcement, "relief ca XXXX continuing your call." These notifications are provided promptly when the call is transferred, which takes place only at non-disruptive junctures between the TTY and Voice parties' conversation.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

The Colorado Relay Service has a good mix of male and female CAs allowing for the ability to accommodate most user's request for a preferred gender prior to the start of a relay call or upon transferring the call to a relief or different CA.

When the TRS user requests a specific gender, the CA will type or say:

"Please hold while I check to see if a male/female CA is available"

If the requested gender CA is available, the CA will inform caller,

"Thank you for holding. We are able to accommodate your request. I am transferring your call now. One moment please."

The CA will *electronically* transfer the call to the relief CA of the requested gender.

When the call is transferred to a relief CA, the TTY user will be notified and see a message (macro key used) showing the relief CA's identification number and gender:

(relief ca XXXX M/F)

Voice customers are notified by the announcement "relief ca XXXX continuing your call."

These notifications are provided promptly when the call is transferred in a non-disruptive manner. The TRS user can then commence their conversation with the CA of their requested gender.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All Relay Colorado calls are transmitted in real time to the extent possible. There may be times when calls terminate to a voice processing system or answering machine, when the caller is permitted to provide information upfront in order to be responsive to the recordings.

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

Relay Colorado callers must know their confidentiality and privacy is protected at all times. All Relay Colorado CAs and managers are required to sign and comply with a Pledge of Confidentiality and a CA Code of Ethics. The critical nature of confidentiality, adherence to FCC regulations, and State contractual requirements are emphasized during training and coaching discussions. The Pledge of Confidentiality is posted in each Relay Center. The CA Code of Ethics and Pledge of Confidentiality are regularly reviewed as part of CA performance plans. These codes have served to underscore the importance of customer privacy and protection.

Following is a copy of the Pledge of Confidentiality and the CA Code of Ethics that are used with the Colorado Relay Service.

AT&T Relay Services

CA CODE OF ETHICS

1. Communications Assistants will keep all call information strictly confidential. The only exception to this is if a call has to be transferred to another CA or the In-Charge Desk.

2. Communications Assistants must never give out telephone numbers.

3. Communications Assistants must never give out information about themselves except their gender and CA number.

4. Communications Assistants will convey the content and spirit of the speaker.

5. Communications Assistants will not counsel, advise nor express personal opinions except the tone of voice of the voice person.

6. Communications Assistants, as employees of AT&T, will strive to maintain high professional standards in compliance with the Code of Ethics and AT&T's Code of Business Conduct.

I have read and understand each of the Codes and I hereby pledge to abide and uphold the Code of Ethics.

Name *(sign)* _____

Name *(print)* _____

Date _____

Relay Service

Confidentiality Agreement

I _____ do hereby recognize the serious and confidential nature of Relay Service. I recognize the responsibility this places upon me and its bearing on my continued employment. By agreeing to employment in a Communications Assistant, supervisor or customer service role, I agree to the following conditions:

1. I will not disclose to any individual, including fellow Communication Assistants (CAs) Customer Service Representatives and supervisors, the identity of any caller or information I may acquire about a caller while relaying his/her conversation, except if the user is in life threatening circumstances or causes an emergency situation, or in instances of resolving a complaint.
2. Under no circumstances will I act upon any information I may acquire while relaying conversations.
3. I will not allow any individual to watch or listen while processing actual calls, except for authorized training and quality monitoring purposes.
4. Except when performing Speech-to-Speech, I will not bring any recording devices, including but not limited to, pens, pencils and Personal Digital Assistants (PDAs), into relay workspace.
5. I will not keep any written or electronic form of a conversation beyond the duration of the call, except as allowed for Speech-to-Speech Relay service.
6. Except for any information necessary for billing purposes or gathering caller profile or 7-1-1 information when requested by the caller, I will not collect nor use a caller's personal information.
7. California Relay - I will not register my company as the caller's CRS relay provider of choice without the expressed permission of the caller. When explaining about a caller's choice of relay providers I will strive to ensure that the caller receives a clear, accurate and forthright understanding of his or her options and of the registration process. I will not engage in deceptive practices that result in obtaining a caller's permission deceitfully.
8. Under no circumstances will I reveal my relay operator number in conjunction with my name, or disclose to anyone the names, schedules or personal information of any fellow CA or supervisor working at the relay service.
9. I understand that the FCC requires me to relay everything that is said by either party even if portions of the conversation are offensive to me personally.
10. In the event of my resignation or termination of my employment, I will continue to hold in strictest confidence all information related to the work I have performed as a relay operator.

I understand further that any of the above breaches in confidentiality will lead to disciplinary action up to and including immediate dismissal.

Signature: _____

Print Name: _____

Position: _____ Date: _____

Every Relay Colorado CA is required to adhere to the rules of confidentiality during all training sessions. Trainers are trained to present scenarios and procedures without revealing names or specifics about the callers.

All CAs are then required to sign the Pledge of Confidentiality previously discussed, promising not to disclose the identity of any caller, fellow relay operator, or any information learned during the course of relay calls. This applies to all Relay Service personnel during the period of employment and after termination of employment.

The Pledge of Confidentiality, along with the Code of Ethics, is posted at each workstation within the call center and in all reference tools. The Relay Colorado Team fully understands the serious ramifications for violations of the Confidentiality responsibilities placed upon them. The relay call center does not maintain a written or electronic script of any type beyond the duration of the call. All typed text scrolls off of the CA workstation screen, so that nothing is retrievable after a call is complete. Billing records are sent electronically by through the automated CA platform, and thus no billing records are retained onsite or at the CA position. This eliminates any possibility for a confidentiality breech of this type of information.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.