



the calling or called party has completed their part of the conversation (typed or stated GA). Prior to transferring, CAs will 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 will be honored whenever possible.

When it is necessary to transfer a relay call, AT&T's sophisticated relay platform allows for a fully electronic transfer of the call. This takes only seconds and is done at non-intrusive junctions on a call that has already met minimum time requirements. Other relay provider platforms do not have the ability to transfer a call electronically. A manual relieve takes much longer to occur given that CAs must change seats and plug in new headsets before assuming the call. 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.

4.2.1.6 CA gender preferences. TRS providers must make best effort to accommodate TRS user's request for CA gender when a call is initiated and if a transfer occurs, the TRS provider must make best effort to accommodate the user's request.

AT&T Response:

AT&T has read and meets this requirement.

AT&T recognizes that relay users may desire a CA of a specific gender to relay their call. We have been accommodating gender requests for many years and will continue to make our best effort to honor all requests. Call transfers for gender accommodation, and other





transfers are smooth and non-intrusive for the customer. Our electronic call transfer process is efficient and easy for our CAs as well.

TRS user requests specific CA Gender

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.

Call Details stay with the transferred call

During call transfers, call detail information that has been provided by the TTY user and the Customer Profile information remain available to the relief CA.

AT&T has a sophisticated relay platform that allows for an expedient and fully-electronic transfer of relay calls to a relief CA. Other relay providers platforms may not have this electronic functionality.

AT&T CAs only transfer calls when necessary. As shared above, prior to transferring a call, CAs will 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 – as in requests for CA gender accommodation.

4.2.1.7 STS called numbers. Relay providers must offer STS users the option to maintain a list of relay contact names and telephone numbers. Each STS user will be able to dial the STS user response code of the number to the CA to request the name and telephone number to call STS user. This information must be made available to the STS user.

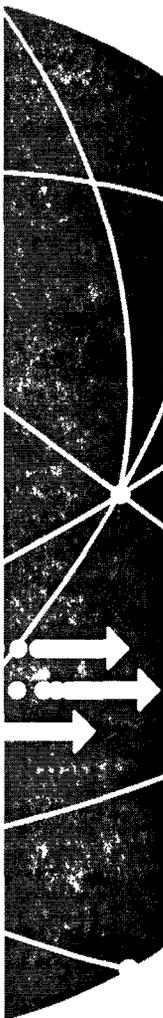
AT&T Response:

AT&T has read and meets this requirement.

STS users 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 the ability 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 will state the name and number of the requested person to the STS user prior to dialing the number.

4.2.2 Additional Colorado Operational Standards

4.2.2.1 Standard Relay Product Features. The State and TRS will currently offer a list of services listed in Appendix B to the standard features. Offerors should ensure that they can provide all of these services and they should provide the essential information to the TRS user for TRS offers include all of these services. To manage a complete list of services, offerors should review the list of features and indicate which services they would like to offer and which they do not provide. Offerors should also list additional services they would like to offer standard features that are not included in the list.





AT&T Response:

AT&T has read and meets this requirement.

Please see Appendix 3 for our demonstration of providing the required standard product features.

4.2.2.2 Placing Calls. Offers shall be able to place a call in response to a call placed by any method which results in a TRS caller's call being placed on hold. The call shall be placed on hold for a period of time not to exceed 10 minutes.

Offers shall be able to place a call in response to a call placed by any method which results in a TRS caller's call being placed on hold for a period of time not to exceed 10 minutes. The call shall be placed on hold for a period of time not to exceed 10 minutes. The call shall be placed on hold for a period of time not to exceed 10 minutes. The call shall be placed on hold for a period of time not to exceed 10 minutes.

AT&T Response:

AT&T has read and will comply.

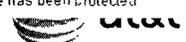
We utilize a proprietary system called "Upfront Automation" which allows a user to immediately begin entering call details and/or the number they wish to call as soon as they are connected with the relay service. The call is then sent to the first available CA for processing. It is rare occasion when a caller is placed in queue. As stated in our response to Section 4.1.2, we have a track record of exceeding the FCC rule that requires 85% of calls to be answered within ten seconds. We normally achieve an average of over 98% of our state relay calls answered within ten seconds as reflected in the following chart.

File Source: Answer Performance Summary Report

Contract	October 2011 - % Service Level Performance																															ASA
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	
AT&TLD	100	99	97	95	99	100	100	100	100	100	99	99	99	99	100	99	100	99	99	100	99	100	100	99	98	99	99	95	100	100	100	
AT&T1	98	96	91	91	97	97	99	99	99	100	97	95	90	94	99	95	98	94	96	99	97	100	98	98	93	96	96	96	98	100	100	
AT&T2	99	96	92	89	94	98	99	98	99	100	96	93	89	94	98	95	98	94	95	99	96	99	98	97	92	96	95	95	98	99	100	
AT&T3	99	99	99	99	99	100	100	100	99	100	100	99	99	100	100	100	100	100	100	100	100	100	100	98	99	100	100	99	99	98	99	100
AT&T4	98	100	97	100	98	100	100	100	100	100	100	98	100	100	100	100	100	100	100	99	98	97	100	99	100	100	95	99	95	100	100	
OSD	99	98	98	99	98	98	100	100	100	100	99	95	97	100	100	100	99	99	100	99	100	100	99	95	99	97	98	100	100	100		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	ASA
	S	S	M	T	T	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	
AT&T6	0.2	1.2	3.1	3.9	1.5	0.7	0.4	0.2	0.4	0.9	0.8	2.7	7.3	0.9	0.3	1.2	0.3	1.0	0.6	0.2	0.8	0.4	0.5	0.7	0.7	1.2	1.8	0.7	0.5	0.2	0.2	1.2
AT&T Span	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

January

These are actual results from October 2011 which considered normal month with 5 weekends and no holidays. The actual state name has been protected.





The contract labeled “AT&T 5” has a more stringent answer requirement where all calls must be answered within 3 seconds. As illustrated on the chart provided, we averaged a **1.2 second speed of answer for all calls in the month of October 2011.**

AT&T has a feature which allows for reverse 9-1-1 priority routing of relay calls. This allows calls from emergency dispatchers who have a need to call back to a relay user, to have their calls receive immediate priority over other calls.

We also comply with FCC rules that require any internet based relay user who requests an emergency call to 9-1-1 to have their call receive priority routing over other calls allowing the call to be connected to the nearest 9-1-1 Public Safety Answering Point (PSAP).

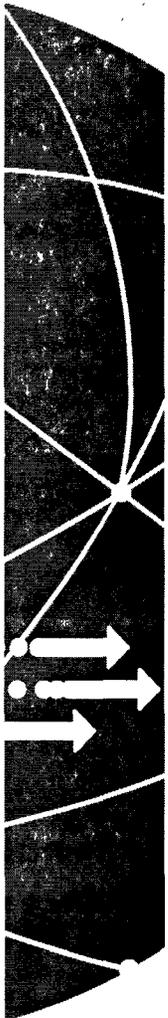
4.2.2.3 Relaying the full content of communication. CAs will convey the full content, context and intent of the communication they translate. CAs shall, to the extent of their abilities, let the deaf or hearing-impaired user know the tone of voice the hearing caller is conveying. For example, they can type in parenthesis that a person is being rude, is yammering, is being sarcastic, is laughing, is impatient, or other emotive situations. CAs shall also keep the user informed on the status of the call, such as if the hearing caller is disconnected, on hold, or explaining the relay to a hearing caller. When speaking to the relay user, the CA shall adopt a conversational tone of voice appropriate to the type of call being made. CAs shall indicate to the relay user if a person is not a relay user on the line. CAs shall also announce to both parties to the call when they board the call, and again during the call.

AT&T Response:

AT&T has read and meets this requirement.

AT&T CAs will convey the full content, context, and intent of all communication. Colorado Relay CAs will relay verbatim unless requested otherwise by the caller and/or recognized by the relay CA as an ASL call requiring translation. Our CAs receive extensive training on the absolute necessity of relaying verbatim without changing the intent of the communication process.

Informing TT User of Voice Person’s “Tone of Voice”





AT&T CAs let the TT user know the non TT user's tone of voice whenever possible. Our CAs describe the person's tone of voice based on concrete sounds. They are trained to put this type of information in parenthesis to the TT user. Acceptable descriptions would include, for example, (sounds mad speaking very loud), (sounds happy laughing), or (sounds impatient sighing talking to someone else). This ensures that the TT user understands the tone of voice being used by the voice person on the call.

CA Relays With Appropriate Conversational Tone

AT&T CAs adopt conversational tones for intonation, content, and spirit. We require our CAs to sign a Code of Ethics statement which includes "CAs will convey the content and the spirit of the speaker." We train CAs extensively on these skills. We use role-playing during initial and subsequent training to help CAs develop an appropriate conversational tone of voice and pace so they read with intonation and fluency. We train our CAs to use an appropriate tone for the subject matter being discussed on a relay call. TTY users always have control of the call and, if necessary, may request a CA to use a different tone while relaying.

Call Status

AT&T uses macros (pre-programmed keys) to provide the quickest and most efficient process for informing Relay callers of the progress of their calls. Our list of macros includes more than 30 phrases in both English and Spanish to notify callers of a wide variety of circumstances affecting call progress, e.g. (ringing 1), (number busy), (holding), (hung up), (waiting to select your menu option), (entering numbers now please hold). We will gladly provide a full list of our macros at your request.

For situations not covered by our automated messages, CAs will manually type the information to the TTY user. CAs will also keep Voice customers informed of causes for apparent delay, such as, "Your caller is still typing."

We train our CAs to keep the caller informed throughout periods of holding. CAs focus on their call and will follow any instructions typed by the TT user while holding for the hearing person to return to the line.

AT&T CAs inform the TTY user any time a different person (hearing) comes on the line. This includes the gender of the voice/hearing person. CAs provide the Relay Announcement Phrase including their CA ID number to every different person that comes on the line.



If it is necessary for the originating CA to be relieved of the call, the relief CA will notify both parties of the relief and will provide their CA ID and gender.

4.2.2.4 Prohibited communications. CAs shall not counsel, advise, or interject personal opinions or additional information into any relay call. CAs are explicitly trained to be neutral and non-participative in all relay conversations, as specified in the CA Code of Ethics. They are also trained not to release any personal information about themselves or other relay center employees. If a customer (usually a customer new to relay) persists in attempting personal conversation, CAs are trained in strategies to avoid conversation in a courteous fashion.

AT&T Response:

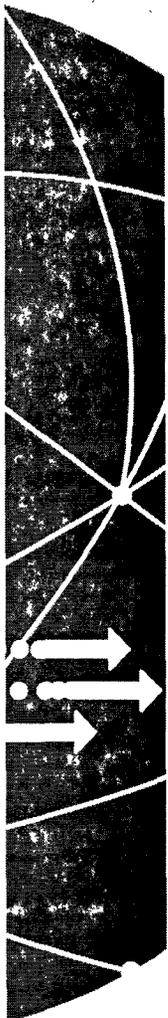
AT&T has read and meets this requirement.

AT&T CAs do not counsel, advise, or interject personal opinions or additional information into any relay call. CAs are explicitly trained to be neutral and non-participative in all relay conversations, as specified in the CA Code of Ethics. They are also trained not to release any personal information about themselves or other relay center employees. If a customer (usually a customer new to relay) persists in attempting personal conversation, CAs are trained in strategies to avoid conversation in a courteous fashion.

AT&T CAs do not make judgements regarding legality or obscenity of the content of a relay call. AT&T CAs understand that they are transparent conduits and they relay calls verbatim regardless of the content.

AT&T CAs will convey the full content, context, and intent of all communication. Colorado CAs will relay verbatim unless requested otherwise by the caller and/or recognized by the relay CA as an ASL call requiring translation. Our CAs receive extensive training on the absolute necessity of relaying verbatim without changing the intent of the communication process.

4.2.2.5 Preserving confidentiality. Proposals shall describe the policies and procedures to preserve confidentiality. Such policies may include mechanisms that may be used to use to prevent confidential information from being relayed to persons who are not authorized to receive it. We have identified family members of our staff as individuals who may have confidential information and we have identified policies and procedures for handling violations of confidentiality.





AT&T Response:

AT&T has read and meets this requirement.

AT&T has a strong corporate history of protecting customer privacy and customer information. Protecting customers and honoring their privacy is a value that is deeply embedded in all we do, in every job performed at AT&T. Our corporate guidelines for business ethics and behavior, called the AT&T Code of Business Conduct, specifically cite protection of customer information and privacy as a paramount responsibility of every employee. We re-train and re-commit every AT&T employee every year regarding the confidentiality of our customers' information; all our employees serving relay callers make this commitment.

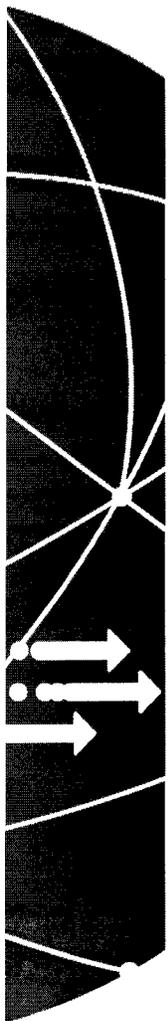
AT&T is proud of a record that is clear of any allegation of confidentiality breach. AT&T views any breach of confidentiality as an extremely serious matter. An AT&T CA or supervisor who after a thorough investigation is found to have violated the confidentiality rules and regulations will either be terminated immediately or given a disciplinary warning, depending on the severity of the violation. In the event of a second occurrence, we will immediately terminate the employee.

4.2.2.6 Spanish-to-Spanish calls. In view of the global significance of U.S. service providers in providing English and Spanish to Spanish-speaking customers, English-to-Spanish and Spanish-to-English translation are considered standard features within Colorado TRS and should be included in the contract proposal.

AT&T Response:

AT&T has read and meets this requirement.

AT&T will offer relay services in English and Spanish as required. We will offer English-to-English and Spanish-to-Spanish relay, as well as English-to-Spanish and Spanish-to-English translation as standard features 24/7 365 days a year through our bilingual call center located in San Antonio, Texas. To be apply for a position as a bilingual AT&T CA, the applicant is required to meet all of our standard pre-hire screening and testing requirements and then must also pass one of the highest and most rigorous language screening tests in the industry. The bilingual CAs are tested prior to their employment and are further evaluated during initial training in order to ensure





they are able to meet the specific needs of the Spanish-speaking Relay community. Once qualified as a fluently bilingual CA, they must first complete and successfully pass all prerequisites of our English-speaking CAs (i.e. typing, training, proficiency assessments, etc.) which is then followed by a specific 4 hour training dedicated to relaying in Spanish and the culture and unique characteristics of deaf Hispanics.

All call types processed through our English relay service are also available through our Spanish Relay. This includes TTY, VCO, HCO, ASCII, STS and 900 calls.

4.2.2.7 Internet relay calls. The technical capabilities of our TTY service are not available to our Internet Relay Service. Several regulatory issues remain to be resolved at the state level before our Internet Relay Service can be processed and paid for appropriately at the state level.

AT&T Response:

AT&T has read and meets this requirement.

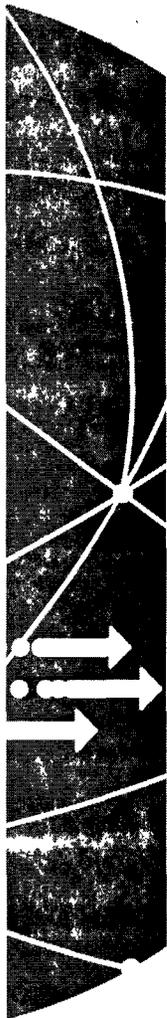
AT&T understands the regulatory authorities have not yet resolved the jurisdictional and financial issues pertaining to Internet Relay Services. **AT&T will offer, but not bill the State of Colorado for a Colorado IM Relay Service.**

We are proud of the IP Relay Service, also known as Instant Message Relay Service, we have developed with our talented IT Relay engineers. Please see the description of our Internet Relay offering for the TRS users in Colorado:

IP Relay Service

AT&T not only has the capability of providing internet relay – **WE INVENTED IT** and we have the patents to prove it. It was AT&T who first introduced IP Relay to the relay industry back in Portland, Oregon at the National Association of State Relay Administrators conference held in October 2000. One of the inventors of IP Relay is the current Director of the engineering and technology team that supports our relay service.

Currently, the IP Relay Service we provide is through AOL’s Instant Messenger Service (“AIM”). **If requested by the State of Colorado, we would be happy to provide a branded buddy for Colorado Relay.** Additionally, we would work closely with the State and the Advisory Board on developing a specific report for Colorado.





Our IM Relay Service has features that are not available through any other relay provider. For example, the AT&T IM Relay Service provides:

- **Real Time IM Relay.** Instead of getting blasts or chunks of typed message, Real Time users will get word for word transmission providing a more even and smoother flow of conversation.
- **Font Size:** Ability to change font size to meet user preference
- **Voice Mail Retrieval:** Obtain Voice Mail messages left on the user's IM account
- **CALL HISTORY:** History feature which allows users to view history of recent calls placed and received

AT&T will include all of these features as part of the Colorado Relay IM Service as a standard feature, at no cost to the State of Colorado.

4.2.2.8 CA community contacts. Interest staff plans to monitor and identify CA community contacts to identify CA's who have a complaint or need for assistance. Staff will work with the CA to identify the problem and provide the necessary support. Staff will also provide the CA with information on the state center and how to contact the center. Staff will also provide the CA with information on the state center and how to contact the center.

AT&T Response:

AT&T has read and meets this requirement.

AT&T does not plan an in-state center as part of its proposal and therefore, the possibility of social contact with our CAs and breach of confidentiality is almost non-existent. AT&T has an established process for receiving and resolving customer inquiries, contacts and complaints. Customers can identify every CA by the CA ID and gender provided on every relay call.

Each CA has a unique number assigned to them at the start of their employment with AT&T Relay. AT&T is able to quickly identify any CA to praise, or coach as required. . . Additionally, with AT&T's sophisticated tracking and reporting system, we have the ability to determine the CA who handled/processed a call even without the CA





number as long as the relay user is able to provide other specifics such as calling or called telephone, date and approximate time of call.

AT&T has always placed a strong emphasis on customer privacy, protection and customer confidentiality. Confidentiality and customer protection is at the forefront of our corporate ethics and values. Confidentiality of Relay Service is as strong a priority for AT&T as it is for the Colorado Relay users.

AT&T recognizes Colorado Relay callers must know their confidentiality and privacy is protected at all times. When a CA or manager is hired by AT&T, **we require all AT&T CAs and managers sign and comply with a Pledge of Confidentiality and a CA Code of Ethics.** We emphasize the critical nature of confidentiality, adherence to FCC regulations, and State contractual requirements in our 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.

We are proud to share that in over 23 years in the relay community we've never received a concern about CA confidentiality. AT&T is proud of a record that is clear of any allegation of a breach of confidentiality.

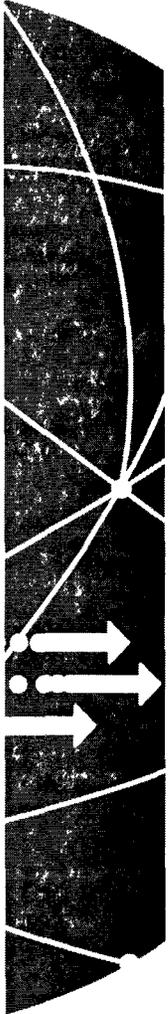
AT&T views any breach of confidentiality as an extremely serious matter. Albeit rare and unlikely, a CA or supervisor who after a thorough investigation, is found to have violated the confidentiality rules and regulations will either be terminated immediately or given a disciplinary warning, depending on the severity of the violation.

4.2.3 FCC Technical Standards

4.2.3.1 ASCII and Baudot. The system shall be capable of communicating in ASCII and Baudot format at any speed generally in use.

AT&T Response:

AT&T has read and meets this requirement.





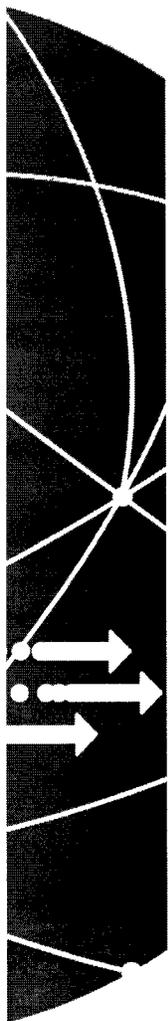
We use Ultratec™ modems exclusively. These modems were designed in joint cooperation between Ultratec™ and AT&T Bell Laboratories to meet the stringent AT&T data transmission quality requirements. By partnering with Ultratec™, the industry leader in ASCII/Baudot modems, attributes such as TurboCode® become available to our customers immediately after introductions. AT&T relay centers are equipped and capable of handling any modem speed generally in use.

AT&T's Relay platform automatically detects the customers mode of communication (turbo code, baudot, ascii) and connects appropriately so that communication can occur.

AT&T has a long and successful relationship with Ultratec, the industry leader in manufacturing and providing ASCII/Baudot modems. This partnership enabled us to be the first relay provider to provide enhanced modalities like TurboCode® and the "interrupt" capability to all our customers across all our contracts. We did this without incidental charges that would "nickel and dime" our state customers. AT&T will continue to explore opportunities to enhance the communication modalities of TTY users and relay users to improve their relay call experience and move them closer to functional equivalence.

Our Ultratec modems support the auto-detect feature which lets them switch back and forth between TurboCode and TTY modes as necessary. The modems auto-detect the end user's equipment for TurboCode; if Turbo Code is found, we automatically connect in TurboCode to the relay user.

4.2.3.2 Speed of answer. All providers shall ensure adequate TRS facility staffing to provide calls with efficient service under projected calling volume to ensure the availability of a busy response dial tone. An indication shall be provided every effort to answer calls. If a call is not answered, an attempt shall be made to reach party through the telephone network. TRS facilities shall accept direct network failure, answer 5 seconds or less, and 10 seconds, if any further, which could be the caller's call from directly being placed, not put in a queue or on hold. The ten second beginning of the time base shall apply to the TRS facility's network. A TRS facility malfunction or an indication of a problem shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to equipment congestion shall be one percent. An indication of a busy response shall be provided to the caller. An attempt shall be made to reach party through the telephone network.





For call to be considered delivered when the TRS facility is not meeting the service level of the local exchange carrier (LEC) and the public switched network (PSN) and the call is not delivered to the TRS facility.

Abandoned calls will be included in the speed of answer calculation.

A TRS provider's compliance with this rule shall be measured on a daily basis. The system shall be assigned to a P.O.I. standard.

A TRS provider shall provide the call answer rates and the rates of calls blocked received from the LEC and the TRS facility to SRA and TRS providers upon request.

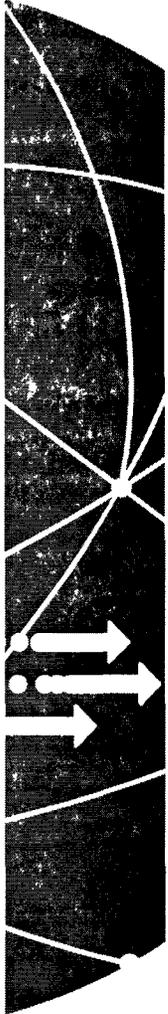
AT&T Response:

AT&T has read and meets this requirement.

AT&T commits to answering 85% of calls within 10 seconds or less. We currently comply with FCC rules in ensuring that abandoned calls are included in the speed of answer calculation. As has been stated in other sections of our response, we consistently average a better speed of answer than what is required under the Colorado requirements. Currently we average over 98% of our state relay calls answered within 10 seconds. This is attributed to our experienced Operations Force Management team that is tasked with ensuring we have the right amount of CAs on staff and scheduled to handle the forecasted volume of calls on any given day AND meet the service level requirement. Our goal is to have every caller answered as expeditiously as possible. For this reason, many of our user's calls are answered within a few seconds.

The network and facilities that support our Relay Service will meet all the following measures and standards for transmission characteristics:

- American National Standards Institute/Electronic Industries Association (ANSI/EIA) PBX standard TIA/EIA – 464B.
- American National Standards Institute- Network Performance- Switched Exchange Access Network Transmission Specifications (ANSI T1.506- 1997)
- ANSI T1.508-1998 Revision, re-designation and consolidation of ANSI T1.508-1992 and ANSI T1.508a- 1993 << American National Standards for





Telecommunications Loss Plan for Evolving Digital Networks Secretariat
Alliance for Telecommunications Industry

The circuits that we will provide 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.

We will work with the SRA in requesting the LECs in Colorado to provide call attempt rates and the rates of call blocked between the LECs and the AT&T TRS facilities.

4.2.3,3 Equal access to interexchange carriers. TRS users should have access to the carrier of choice for their calls. TRS users of the carrier of choice should be provided the same service as provided to other

AT&T Response:

AT&T has read and meets this requirement.

AT&T has been the providing carrier of choice since July 26, 1993 and was one of the original carriers who worked on the industry solution for providing carrier of choice for TRS calls.

Callers may request that a specific carrier be used 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 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 AT&T Relay 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.

AT&T will work with all the registered carriers in Colorado to become industry participants for carrier of choice. This will be accomplished through:

- Educating carriers on the FCC Order



- Frequent and ongoing contacts (e.g. via phone, email, letter)
- Providing a collaborative effort and technical support, as needed

We will provide all operator service type of requests through relay including, but not limited to, Collect, Bill to Third, Person to Person, Bill to Calling Card, and requests for Time and Charges. Additionally, we provide Operator Services for the Deaf (OSD) to allow TTY users to complete “operator assisted” type calls directly to another TTY user.

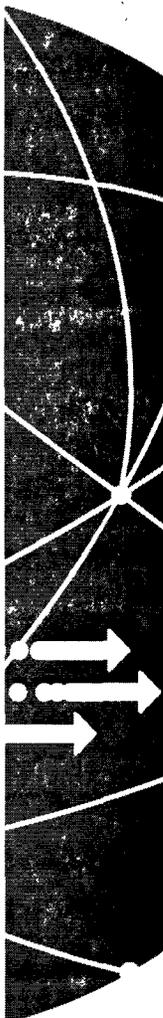
4.2.3.4 TRS facilities. TRS shall operate every day, 24 hours a day. TRS shall have redundancy features. The primary center shall be capable of handling calls, even in the event of a power loss, to ensure service. TRS shall maintain coverage for all TTY and voice callers in real time. Adequate network resources shall be used in conjunction with TRS so that under protected calling volume the probability of a busy response due to congestion shall be functionally equivalent to what a caller would experience in attempting to reach a party through a voice telephone service. TRS that are not mandated by the FCC are not required to be available 24 hours a day. This definition is more detailed than the FCC requirement.

AT&T Response:

AT&T has read and meets this requirement.

We will transmit conversations between relay callers in real time. We have been providing TRS 24 hours a day, 7 days a week, longer than any other relay provider in the industry. We will continue to ensure that Colorado Relay is available and operable 24 hours a day/ 7 days a week. We have enough capacity and redundancy in our Relay network infrastructure and in our call centers to continue to provide services even if we were to lose one or more centers.

AT&T has a long history of maintaining a most responsive network design. AT&T Network Services continues this tradition with networks that are redundant and have the ability to self-correct and self-heal when failures occur. As a matter of fact, AT&T was the first telecommunications company to adopt both the Grade-of-Service (GoS) and the Quality-of-Service (QoS) as key performance metrics.





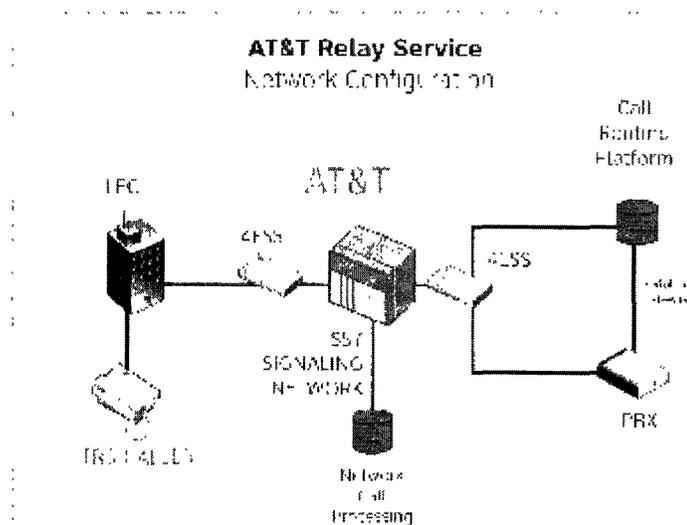
of a party, at least one of the following: the number of the TRS caller, the number of the called party, or the calling party.

AT&T Response:

AT&T has read and meets this requirement.

The communication between our Intelligent Call Router (ICR) and the AT&T network 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.



AT&T provides fully functional SS7 capability for calls within our network, thereby possessing the ability to transfer calls in full compliance with 47CFR §64.1600 of the FCC's Rules to achieve functional equivalence.

We offer one additional feature with our True Caller ID solution -- this feature is not currently available through any other relay provider. Profiled callers may 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. We





developed this feature because many relay customers prefer to give the called party a "forewarning" that the call is coming through relay.

4.2.3.6 Voice mail and interactive menus. Callers take the 12 seconds to hear a recorded message and interactive menu through the relay. At the end of the recorded message, the relay operator will ask the caller if they want to hear the recorded message or if they want to speak to a live representative. The relay operator will then transfer the call to the appropriate department or live representative. The relay operator will also provide the caller with the option to hold for a live representative or to type the options for the recorded message.

AT&T Response:

AT&T has read and meets this requirement.

AT&T has been processing calls to Interactive Menus and Voice Mail for many years. AT&T was one of the first providers to begin asking customers if they wanted to have the entire recording typed or if they preferred to hold for a live representative. We recognize that Relay callers are looking for an efficient call that meets their requirements for information and access to a live representative.

Macros

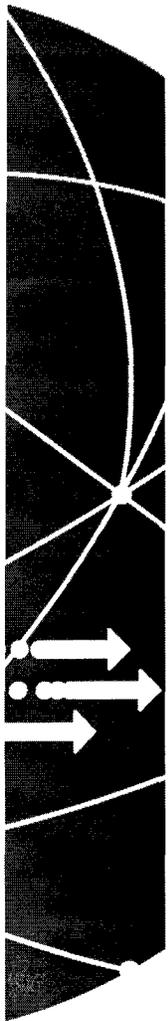
All CA positions are equipped with macro keys (pre-programmed messages) that are used when a recorded message is reached. When CAs reach a recorded message, they transmit a macro indicating (recorded msg). If the recorded message is an interactive menu, CAs transmit this macro:

(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).

Keeping Caller Informed





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.

Answering Machine Retrieval

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.).

If a caller requests to leave a message, CAs will always leave the message in the format of the called messaging system. Customers with voicing capabilities (VCO/Speech to Speech/Voice) will be permitted to voice their messages. Customers with hearing ability will be able to hear the recorded message and will then be able to provide their message for the CA to voice on the answering machine.

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.

No Additional Charge

AT&T will 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.

Confidentiality

In keeping with confidentiality requirements, all recorded messages are deleted after the completion of a relay call. AT&T's sophisticated relay architecture removes all call information from the CA position after a call has been completed. No records of the call are kept other than the basic billing records that are stored and transmitted electronically immediately following the completion of the relay call.



4.2.3.7 Pay-per-call calls. TRS shall complete handling of pay-per-call

AT&T Response:

AT&T has read and meets this requirement.

AT&T Relay Services is able to process calls to 900, 976, and other Pay-Per-Call numbers as requested by customers. We process these call types through our traditional relay service number without requiring the customer to dial a special access number for Pay-Per-Call service.

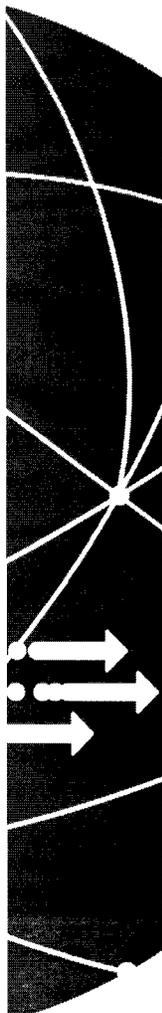
STS and TTY customers may dial the toll free number or 711 to access FRS and request 900 Pay-Per-Call. If the caller has a 900 block, then the CA will not complete the call. If the caller does not have a 900 block, the CA will inform that there may be a charge to complete the call. Once the 900 number is dialed, the call will be processed as any other relay call. If a preamble is heard stating there will be a charge to continue the call, the forward line will be dropped before billing begins. The preamble message will be typed to the caller "pay per call msg, you will be charged for each redial do you want to continue q ga." The CA will follow the caller's instructions. Alternate billing is not accepted for 900 Pay-Per-Call Service.

4.3 CAPTIONED TELEPHONE REQUIREMENTS

Offeror shall provide the equipment used by Offeror to provide captioned telephone service.

4.3.1 Captioned Telephone TRS

Captioned Telephone TRS is an essential service for Colorado's hearing impaired population. Colorado's hearing impaired population is one of the largest in the country and to provide this service Captioned Telephone TRS is a necessary service. Offeror shall provide service and is required to use Offeror's proposed equipment to consider the utilization of other approved telephone equipment in this service including captioned TRS. Offeror shall provide service on communications. Offeror must include in their response to this proposal that they clearly state what they should





FCC's position change on captioned telephone waivers and standards and/or standards we will adhere to FCC captioned telephone policy.

AT&T Response:

AT&T has read and meets this requirement.

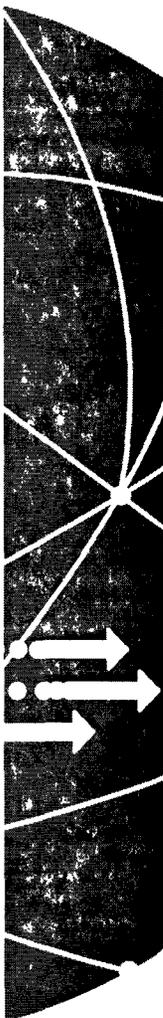
AT&T will provide the captioned telephone relay service (CTS) required in this RFP through an existing agreement with Ultratec / CapTel, Inc. We look forward to providing CTS as AT&T works with the same subcontractor utilized by other CTS providers. Ultratec is the leading provider of caption telephone service. They have years of experience in both the development of their product called *CapTel* and the day to day management of the CTS call center operation. Their CapTel experience combined with AT&T's extensive history as a first-class relay provider makes us the ultimate choice for delivering a quality CTS experience.

AT&T has been a provider of state-wide relay service (TRS) for more than 24 years. No other relay provider equals our record. We were the first telecommunications company to establish a 24 hour/7 days a week service under a state funded program in State of California back in January 1987. We set the benchmark that other relay providers followed.

We understand that should the FCC's position change on captioned telephone waivers and/or standards we will adhere to FCC captioned telephone policy.

4.3.2 Captioned Telephone TRS Facilities

captioned telephone TRS shall operate every day 24 hours and be a regional service. TRS shall have real-time features, functionally equivalent to voice telephony, including call transfer, including call transfer, power, and other features. TRS shall consist of conversation between captioned telephone users and a relay operator. A separate network interface shall be used in conjunction with captioned telephone TRS so that under preferred calling volume the probability of a call being dropped is minimal. All items shall be the non-discretionary which are a result of AT&T's experience in attempting to reach a party. Even though the captioned telephone services are not provided by the FCC are not required to be provided by providers, that is, say, this definition is more detailed than the FCC requirement.





AT&T Response:

AT&T has read and meets this requirement.

24/7/365

The state's TRS and CapTel service provided by AT&T will be accessible and operational twenty-four (24) hours a day, seven (7) days a week, and three hundred and sixty-five (365) days a year. AT&T was the first to offer and provide a statewide Relay Service that was available 24 hours a day and 7 days a week. AT&T is proud of providing relay services for more than 24 years around the clock. No other provider equals this record. We set the benchmark that other relay providers followed.

Redundancy/Uninterruptible Power

The switching system for CapTel centers includes a redundant Central Processing Unit (CPU) on "hot stand-by" to ensure that no calls are dropped due to processor failure, a full Maintenance and Administrative Terminal with keyboard, screen and printer capabilities, on-line monitoring, real time programming capabilities which will not take the system off-line, the ability to perform preventative maintenance without taking the system off-line, and an inventory of spare critical components which are maintained on site to ensure the required levels of service are met.

CapTel provides a combination of battery backup, commercial UPS supply, and/or auxiliary generator to supply uninterruptible power to the CapTel Centers for a minimum of twelve (12) hours.

CapTel provide TRS Provider with a complete plan for dealing with all types of natural and man-made problems including but not limited to terrorism and phone line cut accidents. CTI will notify TRS Provider within 15 minutes if a major problem or total loss of service in excess of 15 minutes occurs. The plan shall detail the level of escalation, which will be employed to deal with the problem and restore service. The plan shall be designed to ensure that no aspect of CapTel Service is impaired.

The CapTel Service Relay Center is equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Real Time





The AT&T Mobile CapTel service transmits in nearly real time the captions of the standard voice user's conversation through a specially trained communication assistant also known as a "CA". The captions are displayed on the user's computer screen or other Internet-enabled device while allowing the Mobile CapTel user to also simultaneously hear the standard telephone users voiced conversation.

CapTel Facilities/Functional Equivalence

The CapTel service depends on interaction between the CapTel phone, a telecommunications platform to route the calls to a captionist, and a special transcription application that allows the CA to transcribe the call in real-time.

The CapTel platform automatically accepts calls from the PSTN, enforces the appropriate state's jurisdiction rules, locates an available CapTel CA with the appropriate skills, places the outbound call, and creates a CDR for each call to support the state's billing and reporting requirements.

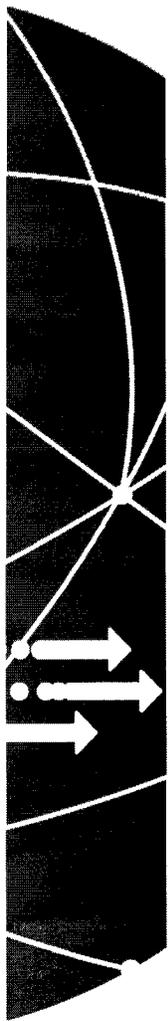
Calls arrive from the PSTN at a CapTel Data Center. A CapTel Data Center houses the SS7 network interface equipment, the databases that check and enforce the state jurisdiction rules, ACD gear to select and route the call to an appropriate agent, and databases that collect call detail records for billing and reporting. CapTel operates two data centers one located in Madison Wisconsin and the other in Brookfield Wisconsin in a telecommunications collocation facility (telecom bunker). Each of these data centers includes redundant equipment so that should one piece of equipment fail or need routine maintenance the data center can continue to service calls. Each CapTel Data Center also has connections to various network providers, access tandems to support carrier of choice selections, and specialized monitoring equipment to issue alarms and report problems that develop.

CapTel calls flow from the PSTN cloud to a CapTel Data Centers and then to a CapTel Call Center. CapTel Call Centers provide the captioning for each call. The call centers include the CA workstations, CA recruiting and training facilities, quality monitoring personnel, and management offices. Each CapTel Call Center is connected to both of the CapTel Data Centers. Should a CapTel Call Center loose its connection to a CapTel Data Center it can continue to process calls using the other data center.

The CapTel platform also includes a Network Operations Center (NOC) that monitors the health of the equipment, facilities, and service level performance. The NOC uses specialized software applications to issue alerts, alarms, and informational messages to



the Captel Operations staff. The staff also uses the NOC to control the routing of Captel calls between the data centers and call centers.





CapTel Call Flow Diagrams

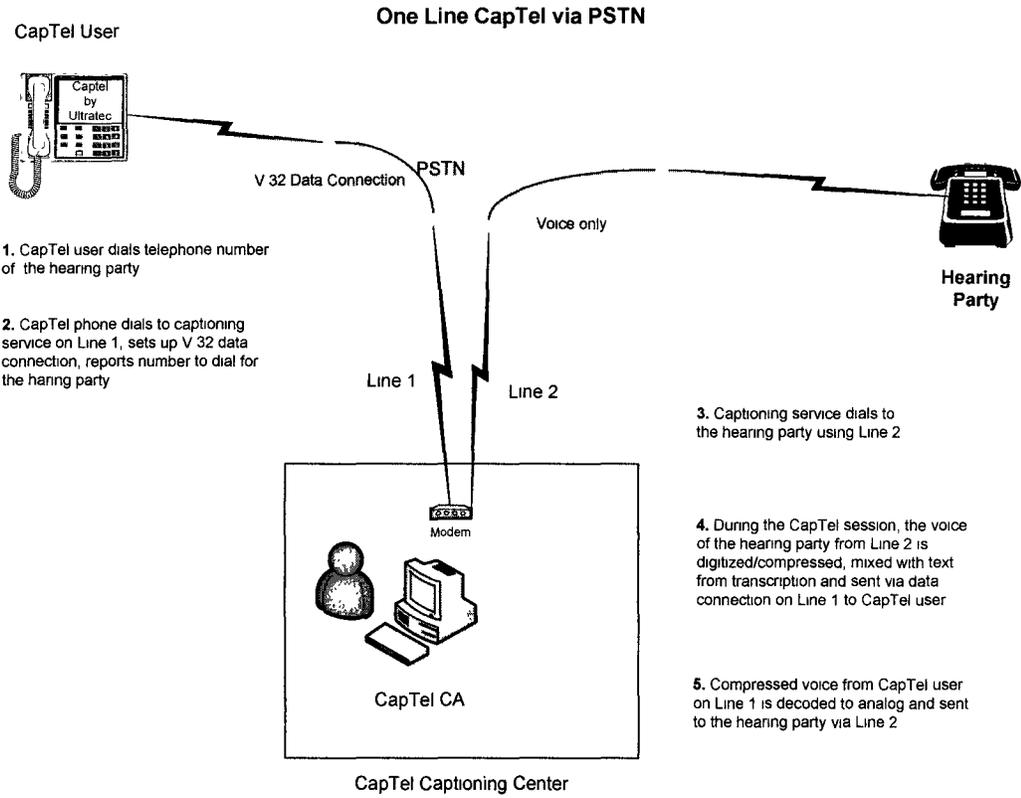


Figure 1

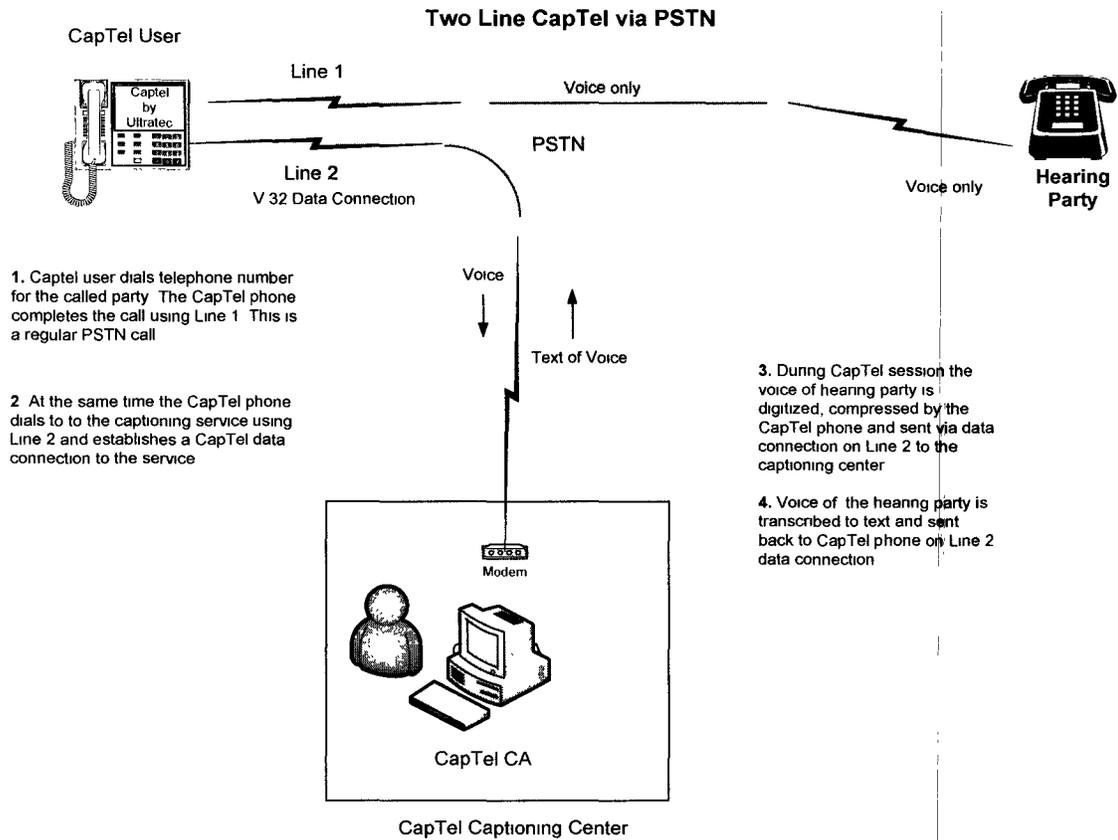


Figure 2

SUMMARY OF DYNAMIC CALL ROUTING

The Captel platform is normally configured to balance the call traffic between the two Captel Data Centers and the Captel Call Centers. In this mode each Captel Call Center receives approximately fifty percent of the traffic from each of the two Captel Data Centers. Captel uses preconfigured automatic routing rules or can manually adjust how the calls flow from the PSTN to the Data Centers and from the Data Centers to the Call Centers. These routing controls are used to respond to network failures, equipment issues, local emergencies, or for maintenance events. Captel will use these facilities and tools to control how Colorado Captel calls are distributed to the Captel call centers.

CTI began consumer testing on CapTel throughout the United States in 2002. In 2003 CapTel technology was approved by the FCC enabling individual states to offer CapTel

