

DOCKET NO.

03-123

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**STATE OF DELAWARE  
PUBLIC SERVICE COMMISSION**

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February 4, 2013

**VIA UNITED PARCEL SERVICE**

Ms. Marlene Dortch  
Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
TRS Certification Program  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**With Copy To:**

Ms. Dana Wilson  
Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
445 12th Street, SW  
Room 3-C418  
Washington, DC 20554

RE: State of Delaware's Application for Renewal of Certification of the State of Delaware's  
Telecommunications Relay Services Pursuant to 47 C.F.R. §64.606(c)

**CG Docket No. 03-123**

Dear Ms. Dortch and Ms. Wilson:

Enclosed are an original and one hard copy of the State of Delaware's application for renewal of certification of its telecommunications relay services program (the "Application"). Also enclosed are two electronic disk copies of the Application in read-only format.

The Application has 13 appendices and includes a redacted version of a contract (with two amendments) (collectively, the "Contract") between Verizon Corporate Services Group Inc. and Sprint Communications Company, L.P. This contract contains the terms and conditions for the provision of telecommunications relay services ("TRS") in the State of Delaware. At the request of Sprint Communications Company, L.P. ("Sprint"), confidential pricing information set forth in the Contract has been redacted. Under 29 *Del. C.* §10002(1)(2), such commercial or financial information obtained from a person which is of a privileged or confidential nature is not

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*Letter to Ms. Dortch and Ms. Wilson  
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considered a “public record” that is open to public inspection and copying. In addition, such information is not required for the State to receive its recertification under 47 C.F.R. §64.606(c)(1). Moreover, as Sprint has explained to the State, Sprint does not in the normal course of business make such pricing information available to the public since doing so could adversely affect its position in the marketplace. 47 C.F.R. §0.457(d). In short, the redacted pricing information in the Contract is “privileged and confidential.” 5 U.S.C. §552(b)(4).

If you have any questions regarding this filing, please contact Deputy Attorney General Julie Donoghue at (302) 577-8348, Kevin Neilson, Regulatory Policy Administrator, at (302) 736-7514, or me at (302) 736-7516.

Sincerely,



Robert J. Howatt  
Executive Director  
Delaware Public Service Commission

Enclosures: Copy of Application  
2 CDs

cc: Kevin Neilson, Regulatory Policy Administrator, PSC – w/o enclosure  
Julie M. Donoghue, Deputy Attorney General – w/enclosure  
Alisa Bentley, Commission Secretary – w/enclosure  
James Strong, Public Utilities Analyst – w/o enclosure  
Angie S. Officer, Senior Program Manager, Sprint Relay/Federal Relay – w/enclosure  
Natalie Clanton, Federal Relay Agency Liaison, Sprint Relay – w/o enclosure  
Andrew Brenneman, Senior Account Executive, Sprint Nextel – w/o enclosure  
Shari E. Smith, Director, State Public Policy, Verizon Delaware LLC – w/enclosure  
Suzan D. Pavia, Esquire, Verizon Delaware LLC – w/o enclosure  
Mark R. Boswell, Counsel, Sprint Nextel – w/o enclosure

**State of Delaware, Public Service Commission's Application for  
Renewal of Certification of the State's Telecommunication Relay Services  
CG Docket No. 03-123**

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## Introduction

The State of Delaware, Public Service Commission ("DPSC"), with the assistance of Verizon Corporate Services Group Inc. and Sprint Communications Company, L.P., files this application (and the attached appendices) for the renewal of its certification of its telecommunications relay services program (the "Application") pursuant to 47 C.F.R. §64.606(c)(1) and Public Notice DA 12-1187, CG Docket No. 03-123, released on July 25, 2012, by the Federal Communications Commission ("FCC").

Currently, Telecommunications Relay Services ("TRS") are provided to the citizens of Delaware via a TRS program called "Delaware Relay." Delaware Relay provides free, full telephone accessibility services to people who are deaf, hard-of-hearing, deaf-blind, and speech-disabled. Delaware Relay allows text-telephone (TTY), computer, wireless device, or videophone users to communicate with standard telephone users through specially training relay operators. Delaware Relay offers TRS via a contract between Verizon Corporate Services Group Inc. ("Verizon") and Sprint Communications Company, L.P. ("Sprint"). Sprint provides all of the necessary TRS, and Verizon funds the services under the auspices of the State of Delaware Department of Technology ("DTI") and the DPSC. The current contract between Verizon and Sprint, including its two amendments (collectively, the "Contract"), has all of the minimum mandatory operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §§64.604 and 64.606.

Verizon has consented to the DPSC submitting the Contract as part of this Application. In addition, Sprint has consented to the DPSC submitting a redacted version of the Contract as part of this Application. As stated in the cover letter accompanying this Application, Sprint has redacted the confidential pricing information in the Contract because it is privileged and/or confidential under state and federal law. See 29 *Del. C.* §10001(l)(2), 5 U.S.C. §552(b)(4), and 47 C.F.R. §0.457(d). A copy of the redacted Contract is attached to this Application as **Appendix A**.

This Application also includes information regarding how Delaware Relay (i.e., Delaware's TRS program) makes available adequate procedures and remedies for enforcing the requirements of the State of Delaware's TRS program, including informational materials on state and FCC complaint procedures sufficient for users to know the proper procedures for filing complaints, and does not in any way conflict with federal law. Finally, this Application includes copies of exhibits regarding outreach presentations, promotional items, consumer training materials, and consumer complaint logs.

## Background

A TRS program was established to serve the State of Delaware on January 1, 1991. It has operated continuously since then to provide the citizens of the State of Delaware who have a hearing or speech disability with 24-hour, 7-day per week access to facilities which permit them to communicate with those who do not have such a disability and vice versa. On September 30, 1992, the State of Delaware applied to the FCC for initial certification of its TRS program. The FCC granted certification to the State of Delaware's TRS program on July 26, 1993. Since then, the FCC has recertified Delaware's TRS program on July 26, 1998, July 26, 2003, and on August 1, 2008.

## Definitions

**American Sign Language** or "**ASL**" is a visual language based on hand shape, position, movement, and orientation of the hands in relation to each other and the body.

**"ASCII"** is an acronym for American Standard Code for Information Interexchange which employs an eight bit code and can operate at any standard transmission baud rate including 300, 1200, 2400, and higher.

**"Baudot"** is a seven bit code, only five of which are information bits.

**"Branding"** is when Delaware Relay permanently establishes a call type as a TTY, VCO, HCO, ASCII, or deaf-blind user. A user can have their home telephone number branded to identify their calls as one of these call types. Branding cannot be done on PBX systems.

**"Customer Database Profile"** (or **"Customer Profile"**) stores an individual relay user's call preferences, which will expedite call set-up time. Any of the following information may be included: (i) **Customer Notes:** A user may indicate up to three special requests for call handling, such as preferred operator gender or not to announce the service; (ii) Up to 10 Frequently Dialed ("FD") Numbers: Allows a user to "speed dial" through relay; (iii) Preferred Local/Regional and Long Distance Carrier: Includes billing options such as collect, third party, or calling card; (iv) Branding; (vii) Outdial Information: Informs the operator of how a caller will answer the phone and whether the caller is a VCO, HCO, ASL, or deaf-blind user; and (viii) Outdial Restrictions: Allows callers to restrict certain types of calls from being made, such as long distance or international relay calls.

**"Hearing carry over"** or **"HCO"** is a form of TRS where the person with the speech disability is able to listen to the other end user and, in reply, the CA speaks the text as typed by the person with the speech disability. The CA does not type any conversation.

**"Speech-to-speech relay service"** or **"STS"** is a telecommunications relay service that allows individuals with speech disabilities to communicate with voice telephone users through the use of specially trained CAs who understand the speech patterns of persons with speech disabilities and can repeat the words spoken by that person.

**"Text telephone"** or **"TTY"** is a machine that employs graphic communication in the transmission of coded signals through a wire or radio communication system.

**"Video relay service"** or **"VRS"** is a telecommunications relay service that allows people with hearing or speech disabilities who use sign language to communicate with voice telephone users through video equipment. The video link allows the CA to view and interpret the party's signed conversation and relay the conversation back and forth with a voice caller.

**“Voice carry over”** or **“VCO”** is a form of TRS where the person with the hearing disability is able to speak directly to the other end user. The CA types the response back to the person with the hearing disability. The CA does not voice the conversation.

## I. OPERATIONAL STANDARDS

### A.1. Communications Assistants (CAs)

***47 C.F.R. §64.604(a)(1) Communications assistant (CA). (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.***

The Contract for TRS in the State of Delaware sets forth the details of the hiring, training, and oversight of Communications Assistants (“CAs”) who provide TRS for Delaware Relay. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint’s Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of TRS and the importance of providing quality services to the consumers they serve throughout their employment as a CA. Preference is given to CA applicants with TRS experience, knowledge of American Sign Language, or experience working with individuals who are deaf, hard of hearing or have a speech disability.

All applicants for CA positions are required to submit an employment application that details the applicant’s educational and employment history. After an applicant’s educational history, employment history, and typing test results are reviewed, a determination is made as to whether the applicant meets the minimum CA requirements. A human resources representative then screens potential candidates through face-to-face and telephone interviews to evaluate the applicant’s communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the human resource screening interview will not be considered for employment for Delaware Relay.

Once an applicant passes the initial screening interview, he/she is interviewed in person by an operations supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality. If the supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories. This process ensures that only qualified applicants are hired to work as a CA.

Sprint provides an extensive process for hiring CAs who provide STS. CA applicants must successfully achieve the following:

- Six months of employment as a CA.
- Recommendation and/or approval from supervisor or manager.

- Attend and complete speech to speech specialized STS training program, including a written evaluation.
- Proficiency in all areas of relay call processing, including grammar, enunciation and vocabulary.
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on STS services. STS applicants who meet certain qualifications receive additional STS training. The STS training program was developed during the initial STS trial and was based on direct experience and consultation with Dr. Bob Segalman and based on adult learning theories. It was also developed through eight years of experience in processing STS calls. Individuals with professional experience related to speech disabilities and/or consumer experts provide this STS training. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call, including retention of information at the user's request and verification of what is said to verify accuracy.

The STS training outline is displayed in the following figure:

<b>STS TRAINING OUTLINE</b>	
<b>Sprint Values and Goals</b>	
Objectives / Training Outline Introduction and History Video Service Description Characteristics of Customers Stereotypes	Speech-Disabilities Attributes of Speech-to-Speech Relay CAs Speech-to-Speech versus Traditional Relay FCC Requirements Speech-to-Speech Variations Assessment
Basic Call Processing Call set up Customer Database Frequently Dialed Numbers Customer Requests Emergency Call Processing	Confidentiality Transparency Personal Conversations Developmental Skill Practice Audio Observation
CA training Taking over calls – 15 minute CA work performance	Call Focus Teamwork – support peer

<b>STS TRAINING OUTLINE</b>	
<b>Sprint Values and Goals</b>	
<ul style="list-style-type: none"> <li>• Discuss call speech patterns</li> <li>• Discuss techniques customer uses</li> <li>• Have two CAs on one call, if necessary or customer requests.</li> </ul>	<ul style="list-style-type: none"> <li>• Unacceptable to:</li> <li>• Have conversation regarding information discussed on calls</li> <li>• Discuss customers in general</li> </ul>

**STS and TRS Training:** Sprint puts control of the call with the users.

- CAs accept their being involved only to the point of facilitating communication as a “human telephone wire.”
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

CAs also receive training on various levels of interpretation of typewritten ASL during their initial training as well as throughout their employment. In order to successfully complete initial training, a CA must demonstrate competent skills to accurately reflect the TTY user’s intent and the CA’s role in the relay process.

Sprint’s TRS and STS Training Outlines are attached to this Application as **Appendix B**. These outlines provide more information on Sprint’s training schedule and topics.

**CA Quality Assurance Programs**

Sprint’s Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is maintained throughout the TRS network of relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in seven relay centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: To provide excellent service to our customers. In addition, Sprint listens to customer’s feedback and takes proactive steps to implement suggestions and feedback. Sprint does not develop training and consumer education programs for TRS alone. Sprint contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training all TRS programs.

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

The CAs hired by Sprint have shown that they have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. In addition, all CAs must possess clear and articulate voice communications.

All CAs are given five written and three hands-on performance evaluations demonstrating the ability to process calls. CAs also must demonstrate TRS skill level in all aspects of call processing prior to graduation from training. Therefore, all CAs must demonstrate their ability to:

- Type 60 WPM prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Demonstrate a professional and courteous phone image.
- Process calls using live training terminals in an efficient and knowledgeable manner.
- Role-play scenarios written in varying levels of ASL.

The CAs used by Delaware Relay are required to have a high school diploma or GED. This ensures that the applicants have at least a twelfth-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute on an auditory-based test, clear articulation, and an intelligible, pleasant speaking voice. In addition, CA applicants are required to pass a valid and unbiased 12th grade level spelling test and grammar test to be considered for employment.

CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80% or better before being allowed to complete training and process Delaware Relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

The training program for CAs also includes diversified culture training that gives the CAs information about understanding TRS users, including deaf users and their culture, history, and communication needs. The diversified culture program training includes the characteristics and hard-of-hearing and late deafened users, deaf/blind and speech disabled users.

***47 C.F.R. §64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.***

#### **Transmission of 60 WPM**

Sprint's has a comprehensive Quality Assurance program that focuses strictly on typing speed and accuracy. As a part of this program, Sprint conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the relay environment. Internal testing on typing speeds demonstrated that the CAs typed an average of 83.9

words per minute (wpm), with at least 95% accuracy. In fact almost a third of the CAs type over 90 wpm!

***47 C.F.R. §64.604(a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A “qualified interpreter” is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.***

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

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

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

The Delaware Relay program exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice, calls are not taken over unless it is absolutely necessary to do so. CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of ten minutes include:

- The customer requests a CA of the opposite gender or different CA;
- End user verbal abuse or obscenity towards the CA;
- Call requires a specialist (STS, Spanish, etc.);
- CA illness;
- At the request of the customer for any reason; and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of ten or fifteen minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to the caller, including the following:

- There are attempts to honor any requests for a specific gender during call transitions;  
or
- The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

**47 C.F.R. §64.604(a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.**

As stated above, CAs honor the requests of all callers when they request a specific CA gender. Delaware Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available.

**47 C.F.R. §64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.**

All conversations relayed between voice and TTY callers are transmitted in real-time. Delaware Relay uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

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

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

## **A.2. Confidentiality and Conversation Context**

**47 C.F.R. §64.604(a)(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.***

### **Confidentiality Policies and Procedures**

As stated earlier, Delaware Relay uses Sprint to oversee all TRS CAs for the State of Delaware's TRS program. In accordance with the FCC regulations, all information provided for the call set-up, including customer database records, remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes. The only exception to this policy relates to STS calls. STS CAs may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Confidentiality expectations are strictly enforced with the CAs, and CAs are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint relay centers have security key access.
- Visitors are not allowed in relay work areas.
- Supervisors are present in the work area to observe behavior.
- All relay center personnel are required to sign and abide by the "Sprint TRS Relay Centers Agreement Regarding Confidential Customer Information" (the "Confidentiality Agreement"). This document is attached to this Application as **Appendix C**.
- All employees attend annual confidentiality meetings wherein the Confidentiality Agreement is reviewed and re-signed.

The Confidentiality Agreement requires CAs to:

- Keep all TRS call-related information confidential;
- Not edit or omit any content from the conversation or the spirit of the speaker;
- Not add or interject anything into the content of the conversation or the spirit of the conversation;

- Assure maximum user control; and
- Continuously improve their skills and knowledge through continued training, workshops, and reading of current literature in the field.

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

At the request of a caller, STS CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA.

***47 C.F.R. §64.604(a)(2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.***

### **Verbatim Relay and the Translation of ASL**

CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered and at all times during the conversation, unless either a relay user specifically requests summarization or ASL interpretation. At the request of a relay user, CAs will translate written ASL into conversational English.

### **STS Facilitation of Communication**

STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands that each STS user may also find one technique to be most comfortable. STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify--especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise, the STS CA may use a tactic listed below (for example) to clarify the STS user's message if the meaning or context is unclear:

- STS CAs may simply ask STS user to repeat the word or phrase;
- STS CAs may ask “yes” or “no” questions;
- STS CAs may ask the STS user to use the word in another sentence;
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word;  
and
- STS CA may ask the user to spell the word.

To ensure that STS CAs follow established call processing procedures, Sprint evaluates STS CAs through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available, and observed by supervisors who are available in the STS CA work area to monitor performance. If a development area is identified in any area of call processing, the STS CA will receive specific feedback and additional training. If the STS CA's performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for Delaware Relay, and this Section of the minimum mandatory standards would not apply to the State of Delaware's TRS program.

### **A.3. Types of Calls**

***47 C.F.R. §64.604(a)(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.***

Delaware Relay provides to users 24 hour, 7 day-a-week TRS for standard (voice), TTY, wireless, or personal computers so that users can place local, intrastate, interstate, and international calls. Delaware Relay also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Delaware Relay retain full control of the length and number of calls placed anytime through relay.

***47 C.F.R. §64.604(a)(3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.***

Sprint works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of the Delaware Relay TRS. Sprint processes collect and person-to-person calls, calls charged to a third-party, as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Delaware Relay will also process calls to or from restricted lines, e.g. hotel rooms and payphones. In addition, Delaware Relay provides traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and STS services.

All TRS users are billed in the same manner that a non-relay user is be billed. The relay user will only be billed for conversation time on toll calls, which does not include call setup time, time in between calls and wrap-up time. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling card. Sprint works with the LECs and IXCs to compile and make available to all TTY users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options and also handles the rating and invoicing of toll calls placed through the Delaware Relay.

**47 C.F.R. §64.604(a)(3)(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.**

If a long distance provider declines to complete a call because credit authorization is denied, Sprint will relay the message verbatim to the relay user and follow the user's instructions.

**47 C.F.R. §64.604(a)(3)(iv) Relay services shall be capable of handling pay-per-call calls.**

Sprint was the first provider to process pay-per-calls, beginning in 1996. Callers to the Delaware Relay can access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Currently, Delaware Relay users may make 900 calls through 1-900-230-7896 ([www.delawarerelay.com/900](http://www.delawarerelay.com/900)).

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

Delaware Relay provides access to all available relay call types. Through Sprint, the State of Delaware meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of standard services that are provided by Delaware Relay:

- Text-to-Voice (TTY to Voice);
- Voice-to-Text (Voice to TTY);
- VCO Attribute-Based Routing;
- VCO with Privacy/No GA;
- VCO Branding;
- Standardized or personalized VCO call announcement and explanation;
- Two-Line VCO;

- VCO-to-HCO;
- VCO-to-TTY;
- VCO-to-VCO;
- Reverse Two-Line VCO;
- Voice Call Progression;
- HCO with Privacy;
- HCO Branding;
- Standardized or personalized HCO call announcement and explanation;
- Two-Line HCO;
- Reverse Two-Line HCO;
- HCO-to-VCO;
- HCO to TTY; and
- HCO to HCO.

Via 7-1-1 dialing, Sprint connects all communication modes for Delaware Relay. For each of the following call types, the 7-1-1 calls are either handled by the CA or transferred to the appropriate CA:

- TTY to Voice;
- Voice to TTY ;
- STS;
- VCO;
- HCO;
- Spanish Relay; and
- TeleBraille

More information about 7-1-1 dialing for Delaware Relay is available at:  
[http://www.delawarerelay.com/assets/pdfs/DelawareRelay\\_Booklet\\_LOW.pdf](http://www.delawarerelay.com/assets/pdfs/DelawareRelay_Booklet_LOW.pdf)

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

#### **Call Release Functionality**

Delaware Relay's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call, and the conversation is removed from the CA's screen, which ensures confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line.

Delaware Relay, through Sprint, adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a relay call and is no longer subject to the per-minute reimbursement.

### **Speed Dialing Functionality**

Delaware Relay speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their TRS Customer Profile. Customers who wish to store more numbers can simply register multiple Customer Profiles, which translates to an unlimited number of entries. When the customer calls into the relay center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number.

### **Three-Way Calling**

Delaware Relay provides three-way calling capability in which the voice or STS relay users, through TRS (if the customer has purchased this feature from his/her LEC), can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her Local Exchange Carriers (LECs) can use this feature when placing a call through Delaware Relay. This feature allows the user to place the call to the relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

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

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

Delaware Relay has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen after the call has

ended. The only information that is retained is information in the call detail record necessary to bill the call.

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

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

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

Delaware Relay, through Sprint, has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA follows the following process:

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes, the CA will follow the user's instructions. Sprint will use the touch-tone capability embedded in Sprint's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call so the end user is not imposed charges for additional calls. If the CA needs to redial local calls, they are free. If the call is long distance, the customer is only charged long distance calls for the first call.
- Sprint's platform provides the technology necessary to retrieve voice mail or answering machine messages, including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information, including a caller's personal information, is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

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

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

Delaware Relay, through Sprint, accepts incoming emergency calls and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (“PSAP”). Delaware Relay, through Sprint, has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call; and
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

**Call Processing Procedures**

Delaware Relay, through Sprint, uses the following procedures to ensure that TRS users who need emergency services receive prompt assistance with their call.

1.	Delaware Relay CAs act upon the word “emergency.” Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key (i.e., “hot key”) which designates the call as an Emergency. This key also prompts the system to use the caller’s NPA/NXX to automatically route the call to the E-911 center which is closest to the caller’s rate center. This hot-key also “freezes” the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller’s information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify a Sprint Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller’s Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: “This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Delaware Relay program. They are calling from (caller’s telephone number). This is CA # 1234, one moment please.”
6.	The CA advises the inbound caller that the emergency services is on the line. For example, “(POLICE ON LINE NOW)” and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an “Emergency Incident Form” which documents the call.

10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.
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### **Back up Procedures**

Delaware Relay, through Sprint, has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. If a valid number is not available, the CA will contact Directory Assistance for support.

### **Variations**

There are many things that can happen during an emergency call which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed.

#### ***Caller Disconnects Before Connecting to 911 Center***

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Sprint Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, a CA will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint ALWAYS connects the caller to the POLICE. The CA will notify the Sprint Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

#### ***Voice Emergency Calls***

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: *"You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance."*

When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read, the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services. One moment please."

### **A.5. STS Called Numbers**

***47 C.F.R. §64.604(a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls.***

***When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.***

Delaware Relay, through Sprint, offers the ability for STS users to maintain a record of regularly-called names and telephone numbers. Delaware Relay's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the relay center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated ten-digit telephone number without delay.

***47 C.F.R. §64.604(a)(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.***

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

***47 C.F.R. §64.604(a)(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.***

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

## II. TECHNICAL STANDARDS

### B.1. ASCII and Baudot

**47 C.F.R. §64.604(b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.**

Delaware Relay, through Sprint, provides provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use.

Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected.

Outbound calls are dialed out in voice mode so that both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA. If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

### B.2. Speed of Answer

**47 C.F.R. §64.604(b)(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.**

Delaware Relay, through Sprint, currently has seven (7) TRS centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center ("TMCC") is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day;
- Total number of CAs scheduled for each-15 minute period;
- The number of CAs over or under the requirement needed to meet forecast call volumes;
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to

- ensure that Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations; and
- Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

***47 C.F.R. §64.604(b)(2)(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.***

One requirement of the Contract for Delaware Relay TRS is that 85% of all calls be placed within ten (10) seconds. "Speed of answer" identifies the number of seconds required to answer a call.

Delaware Relay expects that Sprint will continue to review TRS data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint develops a network forecast for each upcoming scheduling week.

Sprint also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint ensures that total network traffic is accounted for by each of the centers.

By continually monitoring current capacity regarding trunking, CA workstations, staffing, and equipment, lag time between anticipated need and actual need will be minimized.

***47 C.F.R. §64.604(b)(2)(ii)(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.***

Delaware Relay considers the call delivered when the relay center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

**47 C.F.R. §64.604(b)(2)(ii)(B) Abandoned calls shall be included in the speed-of-answer calculation.**

Through its contract with Sprint, Delaware Relay includes abandoned calls in its daily speed-of-answer performance calculations.

**47 C.F.R. §64.604(b)(ii)(C) A TRS provider's compliance with this rule shall be measured on a daily basis.**

Sprint measures its compliance with average speed-of-answer times on a daily basis and reports this information to the Delaware Relay on a monthly basis.

**47 C.F.R. §64.604(b)(ii)(D) The system shall be designed to a P.01 standard.**

Delaware Relay, through Sprint, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's relay system ensures that an excess of 99.99% of all calls reach the call center and are answered or receive a ringing signal.

**47 C.F.R. §64.604(b)(ii)(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.**

Performance of inbound traffic on each Delaware relay toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the State of Delaware.

**47 C.F.R. §64.604(b)(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.**

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

### **B.3. Equal Access to Interexchange Carriers**

***47 C.F.R. §64.604(b)(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.***

Delaware Relay users have equal access to their chosen inter-exchange carrier through the relay to the same extent access is provided to voice users.

TRS users are encouraged to register their preferred Carrier-of-Choice with Sprint's Customer Service. Users who have not registered their preferred Carrier-of-Choice are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration.

Delaware Relay relies on Sprint to provide its relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate relay calls. Sprint routes calls to the designated carrier in as efficient a manner as possible. Sprint includes the identification of the call as a relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone, etc.). Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the relay call.

Sprint encourages all carriers to participate in its Carrier of Choice ("COC") program. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier is notified, verbally and in writing, of its obligation to provide access to relay users and encourage their participation.

Outlined below is the process used by CAs to process Carrier-of-Choice calls and subsequent instructions to relay callers:

- CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred carrier information either registered in the user database or for a specific call.

- If the preferred carrier is not available through the relay, the CA informs the caller with the standard phrase: "I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK." The user may choose to have another carrier handle the call. Sprint then informs the unavailable carrier of its obligation to provide access through the relay service.
- The CA outdials the call utilizing the preferred carrier. If no carrier is specified, the call will be carried over the Sprint network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint currently has 240 carriers participating in Sprint TRS Carrier-of-Choice program. Participation of Carriers in Delaware is dependent on whether a carrier is authorized to provide service in Delaware and connectivity to the Sprint Access Tandem. Currently, the list of providers in the State of Delaware includes the following:

<b>Carrier Name</b>	<b>Out COC</b>	<b>COC Index</b>	<b>Carrier Code</b>	<b>Operator Flag</b>	<b>ETurbo RIB</b>
10-10-220 Telecom USA	0220	0220	0220	N	220
10-10-321 Telecom USA	0321	0321	0321	N	321
10-10-432 Qwest	0432	LGT2	0432	Y	432
10-10-502 WorldxChange	0502	0502	0502	Y	502
10-10-636 Clear Choice	0636	0636	0636	Y	636
10-10-752 EXCEL	0752	EXL1	0752	Y	752
10-10-811 Vartec	0811	0811	0811	Y	811
10-10-834 WorldxChange	0834	0834	0834	Y	834
10-10-987 AT&T	0987	0987	0987	N	987
Adelphia	0288	0288	0288	Y	ATT
All Others	0001	5485	5485		
Broadwing Communications	0001	0001	0001	N	
Broadwing Telecom	0948	0948	0948	Y	SSM
CP Telecom	0071	0071	0071	Y	WSN
Comcast	0444	ALN9	0444	Y	PDF
Cox Communications	0386	0386	0386	Y	BPH
Global Crossing	6269	6269	6269	N	CJI
LDDS	0444	0444	0444	Y	ALN
MCIWorldCom	0222	MCI2	0222	Y	LDD
	0222	0222	0222	Y	MCI

McLeod USA	0725	0725	0725	Y	IOR
Metromedia	0222	MCI3	0222	Y	MTR
OPEX LD	0444	ALN1	0444	Y	OPX
SBC Long Distance	5792	5792	5792	Y	SBZ
Sprint	0333	0333	0333	Y	SPT
TCG Minnesota Inc.	0292	0292	0292	Y	TPM
Verizon LD	5483	5483	5483	Y	GOP
Wiltel	0222	MCI1	0222	Y	WLT
Working Assets	0649	0649	0649	Y	WRK
WorldCom	0555	0555	0555	Y	WTL

Please see **Appendix D** for a copy of the COC invitational letter sent to carriers.

#### **B.4. TRS Facilities**

**47 C.F.R. §64.604(b)(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.**

Delaware Relay and Sprint's Customer Service are both available 24 hours a day, every day of the year for all TRS services. Delaware Relay, through Sprint, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours.

**47 C.F.R. §64.604(b)(4)(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.**

Delaware Relay, though Sprint's relay centers, is equipped with an Uninterruptible Power Supply (UPS), generator and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available.

Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint relay system and routes the calls to other operating call centers. Delaware Relay customers will be unaware of any system fault.

If there is a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals,

switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored..

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities. Sprint's "Disaster Recovery Plan and the Network Support Plan" is attached as **Appendix E**.

***47 C.F.R. §64.604(b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.***

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

***47 C.F.R. §64.604(b)(4)(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.***

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

**B.5. Technology**

***47 C.F.R. §64.604(b)(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.***

Delaware Relay is in full compliance with 47 C.F.R. §64.1600 et seq. regarding SS7 technology and capability. In order to achieve functional equivalence, Delaware Relay provides Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Delaware Relay receives calling party identifying information, including blocking information, from all relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as:

- Calling Party Number;
- Charge Number;
- Originating Line Information; and
- Sprint passes through the calling party information (rather than 711 or the number of the relay center).

**State-of-the-Art Technology**

Delaware Relay, though Sprint, offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours);
- STS Called Numbers;
- Privacy Option;
- STS Contact Information;
- STS Email Call Set-up;
- STS with VCO;
- Specialized STS Customer Service (including Training Line); and
- Wireless Access - STS (\*787).

**Wireless Access – STS (\*787)**

Since early 2012, Sprint wireless customers have been able to dial \*STS (i.e., \*787) to reach a STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the State of Delaware will automatically be connected to a STS CA. This service is available to both callers with and without a speech disability who need to place a STS call. Voice callers who need to place a call to a STS user may also use this service.

When Delaware Relay customers travel outside of the state, callers will automatically connected to STS based on their physical location. If they are in a state where Sprint is the relay provider, the caller is connected to the Delaware's STS services. If not, callers are automatically transferred to Sprint's interstate STS services, where callers will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

### **STS Message Retention**

Sprint has expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message, and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

### **STS Called Numbers**

Sprint offers the ability for STS users to maintain a record of regularly-called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently-called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay.

Please see the graphic below for the written Customer Profile form, which encourages STS users to register speed dial entries.

#### **Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):**

*Note: Limit 30 characters per name.*

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

*If you need to add more information, use the **Additional Information** section on the page.*

### **STS with Privacy Option**

Sprint offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

### **STS Contact Information**

Communicating telephone numbers may be difficult for some STS users. STS Contact Information is a feature that allows STS users to simply advise friends, family and others to dial 7-1-1 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.

### **Emergency Numbers**

In most emergency situations, STS callers dial 9-1-1 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

### **B.6. Caller ID**

***47 C.F.R. §64.604(b)(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.***

Delaware Relay provides true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint will receive calling party identifying information, including blocking information, from all TRS users.

### **Customer Control**

With Sprint's TRS Caller ID, the relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis.

The TRS user can view the calling party's information before picking up the phone. The relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen. With Sprint's Caller ID, there are numerous benefits for TRS users, including:

- Increased privacy;
- Documentation of calls received;
- A count of incoming calls on the display screen;
- Phone numbers of hang-up callers; and
- Prompt emergency call processing.

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

### **Technology**

Sprint offers True Caller ID for all local and long distance calls to carriers who have SS7 connectivity with Sprint. Sprint's SS7 network interfaces with all national long distance carriers and major LECs, CLECs, and ILECs.

Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

### **Caller ID Enhancements**

Many Caller ID enhancements are compatible with the relay service and can be accessed by TRS users.

### **Selective Call Acceptance**

Selective Call Acceptance allows a user to create a list of phone numbers so that the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says, "The number you have dialed is not accepting calls at this time." If this recording is reached by relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

### **Selective Call Rejection**

Selective Call Rejection enables the user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by relay, it will be typed or spoken to the inbound caller.

### **Selective Call Forward**

Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

### **Privacy ID (Anonymous Call Rejection)**

Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls a user is unknown, the caller hears a recorded message, such as: "The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected." This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voice mail. Realizing that not all users will be able to hear this recording by the calling party, some companies have implemented additional enhancements outlined below.

### **Instant Access List (Preferred Caller List)**

Users may designate a list of up to 10 numbers that can bypass the Sprint Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

### **Caller's Access Code**

Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

## **III. FUNCTIONAL STANDARDS**

### **C.1. Consumer Complaint Logs**

***47 C.F.R. §64.604(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. (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.***

Delaware Relay, via Sprint, has established policies regarding complaints, inquiries, comments and commendations related to TRS and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution, and will offer to follow-up with the customer. Sprint ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, the result of any investigation, and the date of resolution.

Delaware Relay works closely with Sprint to identify contact particulars such as: Consumer type (TTY, VCO, HCO, Voice, or STS), customer contact information (when given), CA identification numbers, the call handling center, and over forty-five contact categories including complaints, inquires and unsolicited commendations.

Sprint submits reports detailing the information above. Each report includes the following information:

- Name of the complainant or commendation;
- The date of the contact, complaint or compliment;
- The nature of the complaint or comment; and
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Sprint's Customer Service, Supervisors, and Account Management are documented in Sprint's customer contact database.

### **Customer Contacts Online Database (CCOD)**

To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD) which serves as a seamless and timesaving device for documenting customer contacts. The CCOD will automatically notify the TRS Sprint program manager assigned to the State of Delaware via email of any complaint entry, which ensures that they receive timely notification of consumer concerns. The CCOD tracks consumer contact information as required by the FCC.

By approximately June 15th of each calendar year, Sprint submits a copy of a 12-month complaint log report for the period of June 1 to May 31 to the State relay administrator, which is Verizon. Verizon reviews the log and then passes the complaint log to the FCC by July 1<sup>st</sup> of each year. See the attached **Appendix F** which has copies of the last five years of complaints and commendations that the Verizon has submitted to the FCC.

## **C.2. Contact Persons**

***47 C.F.R. §64.604(c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.***

Delaware Relay callers may file intrastate complaints and commendations regarding Delaware Relay TRS through the following contacts:

### **Delaware Relay Customer Service Phone Numbers (Available 24/7 all year long)**

- TTY/ASCII/Voice/VCO/STS – English: 800.676.3777  
or
- TTY/ASCII/Voz/VCO/Relevo de voz a voz/STS por sus siglas en inglés –  
En Español: 800.676.4290

**Sprint TTY Operator Service:** 800.855.4000

**For Postal Mail**

Sprint Relay  
P.O. Box 29230  
Shawnee Mission, KS 66201-9230  
Email: [sprint.trscustserv@sprint.com](mailto:sprint.trscustserv@sprint.com)  
Website: [www.delawarerelay.com](http://www.delawarerelay.com)

**Angie Officer**

Senior Program Manager/Customer Relations Manager  
Sprint Relay/Delaware Relay  
12524 Sunrise Valley Drive  
Reston, VA 20196  
Voice: 703-592-4906  
Fax: 866-486-7858  
Email: [angela.officer@sprint.com](mailto:angela.officer@sprint.com)

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**Shari Smith**

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901 Tatnall Street, 2nd Floor  
Wilmington DE 19801  
Voice: 302-576-5312  
Fax: 302-777-0491  
Email: [shari.e.smith@verizon.com](mailto:shari.e.smith@verizon.com)

**International (For Relay Calls into the U.S. from International Locations)**

- TTY/ASCII/Voice/VCO/STS - English: 605.224.1837  
(Spanish translation is available/Traducción al español está disponible)
- TTY/Voz/ASCII - En Español: 800.676.4290
- Calls originating from a foreign destination will need to dial a U.S. access code

### **C.3. Public Access to Information**

***47 C.F.R. §64.604(c)(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 Delaware Relay outreach program has been developed according to the needs and wants of the community. The Deaf, Hard of Hearing, Speech disabled and Deaf Blind are geographically dispersed throughout the state, and they all need their own unique method to retain information about the Delaware Relay TRS program. Such methods include, but are not limited to:

- **Appendix G**: Delaware Relay Service Brochure;
- **Appendix H** : Delaware Relay Flyer;
- **Appendix I**: Screenshot of the Delaware Relay's website;
- **Appendix J**: Verizon Directory explaining Delaware Relay;
- **Appendix K**: Delaware Relay Ad in the TDI's Blue Book; and
- **Appendix L**: Flyer about the Delaware Relay's Enhanced STS Service.

### **C.4. Rates**

***47 C.F.R. §64.604(c)(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***

Delaware Relay users are not charged more for services than for those charges paid by standard "voice" telephone users. See **Appendix M**, which are the current tariff sheets for Verizon's TRS in Delaware.<sup>1</sup>

TRS users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users who select a preferred interstate carrier via the Delaware Relay COC list will be rated and invoiced by the selected interstate carrier.

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<sup>1</sup> See P.S.C. - Del. - No. 1, Section 1E (T), Fifth Revised Sheet 3 (Canceling Fourth Revised Sheet 3), Section E (effective October 16, 2000).

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates of Sprint’s Message Telephone System (MTS) rates.

	Intrastate	Interstate
<b>Day</b> (7 AM – 6:59 PM)	35%	50%
<b>Evening</b> (7 PM – 10:59 PM)	25%	50%
<b>Night/weekend</b> (11 PM – 6:59 AM; all day Saturday & Sunday)	10%	50%

**C.5. Jurisdictional Separation of Costs**

**47 C.F.R. §64.604(c)(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. (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.**

Delaware Relay costs currently are properly recovered from all subscribers for every interstate service, and interstate and intrastate services are properly separated on Sprint’s invoices. In addition, the costs of the TRS program in the State of Delaware are property separated by Sprint on its invoices.

Currently, Sprint is reimbursed for interstate and international minutes by the TRS Interstate Fund (the “Fund”). Thus, on individual customer invoices, Sprint deducts minutes for which the Fund’s administrator, Rolka Loube Saltzer Associates (“RLSA”) reimburses.<sup>2</sup> These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, states receive only a 51% deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint uses a cumulative report of

<sup>2</sup> On March 7, 2011, the FCC awarded RLSA a contract to administer the Fund. This began a transition of the Fund administration from the National Exchange Carrier Association to RLSA. The official transition date was July 1, 2011.

eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

For intrastate minutes, Sprint sends invoices to Verizon, which in turn reimburses Sprint. Verizon considers TRS charges as part of the cost of doing business in Delaware. Thus, Verizon accounts for these TRS costs as part of their normal operating expenses.

TRS funding is currently not a separate line item on the customer's bill for telephone service. However, starting January 1, 2013, a new version of 26 *Del. C.* §220 will take effect and will require that all telephone corporations or corporations supplying wireline telephone service within the State of Delaware must impose a surcharge (up to \$0.04 per month) on subscribers of communications services in Delaware to recover the cost of providing TRS. See 26 *Del. C.* §§220((b), (c)(2) and (e). This surcharge of up to \$0.04 per month will be a separately identified charge on subscribers' bills and will be subject to annual adjustment with advance notice to providers of at least 90 days before the effective date of such adjustment. 26 *Del. C.* §220(b). Also starting on January 1, 2013, DTI will be responsible for providing statewide TRS. 26 *Del. C.* §220(c)(2). In addition, the Delaware Office of the Deaf and Hard of Hearing of the Department of Labor ("Office") will administer the TRS program. 26 *Del. C.* §220(c)(1). The Office will be responsible for developing, accepting, processing, and approving applications for such TRS. The Office is also authorized to promulgate procedures, regulations, rules, and criteria necessary to implement and administer the TRS statewide program. 26 *Del. C.* §220(c)(3).

#### **C.6. Telecommunications Relay Fund**

***47 C.F.R. §64.604(c)(5)(iii) through §64.604(c)(5)(iii)(M) do not pertain to State programs.***

However, Sprint contributes and collects interstate funds through RLSA. Based on Sprint's representations, the State of Delaware believes that Sprint complies with the appropriate mandates under these sections.

***47 C.F.R. §64.604(c)(5)(N)( 1 ) to ( 4 ) pertain to VRS providers.***

It is the understanding of the DPSC that neither Federal laws nor the FCC's regulations require the State of Delaware's TRS program to include the provision of VRS services. Thus, Delaware Relay does not provide VRS services or contract to provide VRS CAs for the Delaware Relay, and this Section would not apply to the State of Delaware's TRS program.

#### **C.7. Complaints**

***47 C.F.R. §64.604(c)(6)(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.606 is in effect, the Commission shall refer such complaint to***

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

Delaware Relay works in conjunction with Sprint to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments;
- Handle all service type complaints;
- Resolve complaints with CAs; and
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with Sprint's Customer Service, a copy is faxed to the appropriate Relay Program Manager at Sprint for resolution and follow-up with the customer. Delaware customers also have the option of calling Sprint's 24-hour Customer Service department (1-800-676-3777), the Sprint Relay Program Manager, or Verizon to file complaints or recommendations.

Sprint, has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. In addition, Sprint provides the CCOD log for complaints from June 1<sup>st</sup> to May 31<sup>st</sup> to Verizon, which in turn files the complaints with the FCC by the annual July 1<sup>st</sup> deadline. To see copies of the Complaint Log Summaries from January 1, 2008, through December 31, 2012, please refer to **Appendix F**.

### **C.8. Treatment of TRS Customer Information**

***47 C.F.R. §64.604(c)(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.***

Delaware Relay, through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in Customers' Profiles. At the end of

the Contract, Sprint will transfer in a usable format all TRS database records to the next incoming relay provider at least 60 days prior to the last day of service.

Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint does not sell, distribute, share or reveal in any other way by the relay center or its employees such information, unless compelled to do so by lawful order.

#### IV. STATE CERTIFICATION

***47 C.F.R. §64.606(b)(1) Requirement for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.***

##### **D.1. State Program Meets or Exceeds All Minimum Standards**

Delaware's TRS program meets or exceeds all minimum standards required by the FCC's regulations as set forth above in this Application. The existing Delaware Relay TRS program that currently exists is the same TRS program that the FCC approved in the 2007 recertification process. Now, as then, the TRS program complies with 47 C.F.R. §64.604.

##### **D.2. Enforcement**

As shown above in III.C.1 to C.2, the Delaware Relay provides adequate procedures and remedies for enforcing the requirements of the State of Delaware's TRS program, including making available for TRS users informational materials on state and FCC complaint procedures sufficient for users to know the proper procedures for filing complaints. In addition, the Delaware Relay makes available to TRS users contact information for those persons who can assist TRS users with any complaints or issues. In addition, 26 Del. C. §218(a) provides for enforcement of the TRS program (as well as other violations in Chapter 1, Subchapter II of Title 26), as follows:

“Whoever knowingly performs, commits, or does, or participates in performing, committing or doing, or knowingly causes, participates or joins with others in causing any public utility to do, perform or commit, or advises, solicits, persuades, or knowingly instructs, directs or orders any officer, agent or employee of any public

utility to perform, commit or do any act or thing forbidden or prohibited by this chapter, shall be fined not more than \$1,000 or imprisoned not more than 6 months or both.”

### **D.3. No Conflict with Federal Law**

The minimum mandatory standards set forth in 47 C.F.R. §64.604 of the FCC Regulations for the Provision of TRS are the basis for the State of Delaware’s TRS program. Therefore, the Delaware TRS program, as described above, does not conflict with federal laws by imposing Delaware standards that exceed those mandated by the FCC.

### **D.4. Notification of Substantive Changes**

***47 C.F.R. §64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.***

The Contract for the provision of TRS in the State of Delaware is in effect until December 31, 2014, unless terminated earlier or extended by mutual agreement of Verizon and Sprint. Because the laws regarding TRS in Delaware will change as of January 1, 2013, it is anticipated that Verizon will assign the Contract to the State of Delaware or DTI. In addition, as stated in Section III.C.5., there will be changes in Delaware laws regarding the administrator and surcharges for the TRS program.

## **STATE CERTIFICATION REQUEST**

Based upon the foregoing description of the State of Delaware’s TRS program and the supporting attachments, the FCC can, and should, determine that the State of Delaware’s TRS program meets or exceeds all operational, technical, and functional minimum standards contained in 47 C.F.R. §64.604, makes available to TRS users adequate procedures and remedies for enforcing the requirements of the TRS program, does not exceed the mandatory minimum standards contained in 47 C.F.R. §64.604, and therefore does not conflict in any way with federal law.

## Appendices

- Appendix A: Contract for TRS between Verizon Corporate Services Group Inc. and Sprint Communications Company, L.P. (redacted version)
- Appendix B: Sprint's TRS and STS Training Outlines
- Appendix C: Sprint "TRS Relay Centers Agreement Regarding Confidential Customer Information"
- Appendix D: Sprint's Carrier of Choice Letter of Invitation
- Appendix E: Sprint's "Disaster Recovery Plan and Network Support Plan"
- Appendix F: Copies of the last five years of complaints and commendations that were submitted to the FCC
- Appendix G: Delaware Relay Service Brochure
- Appendix H: Delaware Relay Flyer
- Appendix I: Screenshot of the Delaware Relay's website
- Appendix J: Verizon's Directory explaining Delaware Relay
- Appendix K: Delaware Relay Ad in the TDI's Blue Book
- Appendix L: Flyer about Delaware Relay's Enhanced STS Service
- Appendix M: Current tariff sheets for Verizon's TRS in Delaware

**Appendix A**

**Contract for TRS between  
Verizon Corporate Services Group Inc. and  
Sprint Communications Company, L.P. (redacted version)**



**AMENDMENT NUMBER 02 TO AGREEMENT# C0506749  
BETWEEN  
VERIZON CORPORATE SERVICES GROUP INC AND  
SPRINT COMMUNICATIONS COMPANY, L.P.**

This Amendment No. 2 ("Amendment") to the Services Agreement, Contract No. C0506749, (the "Agreement"), originally dated January 1, 2006, and its prior Amendment 1 (collectively the "Agreement") is between Sprint Communications Company, L.P., a Delaware limited partnership with offices at 12502 Sunrise Valley Drive, Reston, VA 20196 (hereinafter referred to as "Supplier") and Verizon Corporate Services Group Inc. ("Verizon"), a New York corporation having an office at One Verizon Way, Basking Ridge, New Jersey 07920, on behalf of itself and for the benefit of its affiliates, each a Party and collectively referred to as the "Parties".

NOW THEREFORE, in consideration of the mutual premises and obligations set forth herein, and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties, intending to be legally bound, agree as follows:

**1. EFFECTIVE DATE**

This Amendment is made and entered into by the Parties on and as of the date of execution by the last signing Party ("Effective Date").

**2. SCOPE OF CHANGE**

The purpose of this Amendment is to

- (i) Extend the term of the Agreement to December 31, 2014
- (ii) Modify the payment terms of the Agreement
- (iii) Replace Exhibit B "Price Schedule"

**3. TERM**

Section 5. "Term" of the Agreement is hereby replaced with the following:

"Effective date and Term. This Agreement shall be effective on January 1, 2006 and shall continue in effect until December 31, 2014 unless earlier terminated or extended by mutual written agreement of the parties. This Agreement shall be automatically terminated unless renewed by the mutual written agreement of the parties prior to the expiration of the term."

#### **4. BILLING AND PAYMENT**

Section 6. The second sentence of "Billing and Payment" in the Agreement is hereby deleted and replaced with the following:

"Payment by Verizon for Services performed under this Agreement shall be made within sixty (60) days after receipt of undisputed invoices, provided such Services have been performed."

#### **5. EXHIBIT B - PRICE SCHEDULE**

Exhibit B is hereby replaced in its entirety with the attached Exhibit B, Price Schedule.

#### **6. OTHER TERMS UNCHANGED**

Unless amended hereby, all terms and conditions of the Agreement shall remain in full force and effect.

#### **6. ENTIRE AMENDMENT**

This Amendment, together with the Agreement, constitutes and embodies the entire agreement by and between the parties hereto and supersedes all prior oral or written agreements or understandings, if any, between them with respect to the subject matter of this Amendment.

In the event of a conflict between a specific term or condition of this Amendment and a corresponding specific term or condition in the Agreement, the specific term or condition in this Amendment shall take precedence and control. Neither the Agreement nor this Amendment shall be modified or amended except in writing, signed by authorized representatives of both parties.

IN WITNESS WHEREOF, the Parties hereto have caused this Amendment 2 to be executed by their duly authorized officers or representatives.

**VERIZON CORPORATE SERVICES  
GROUP INC.**

**SPRINT COMMUNICATIONS COMPANY,  
L.P.**

  
Signature

  
Signature

Robert Rios  
Printed Name

Michaela Clairmonte  
Printed Name

Contract Manager  
Title

Manager, Contract Negotiations  
Title

12/19/2011  
Date

12/14/2011  
Date

Sprint — Approved as to Legal Form
MRB - 14 Dec 2011

**Exhibit B**

**REDACTED**

**AMENDMENT NUMBER 01 TO AGREEMENT # C0506749  
BETWEEN  
VERIZON CORPORATE SERVICES GROUP INC  
AND  
SPRINT COMMUNICATIONS COMPANY, L.P.**

This Amendment 01 to Agreement C0506749 dated January 1, 2006 (the "Agreement") between Sprint Communications Company, L.P. (Supplier) and Verizon Services Corp., is entered between Supplier and Verizon Corporate Services Group Inc., a New York corporation, having an office at One Verizon Way, Basking Ridge, NJ 07920 on behalf of itself, and its Affiliate Verizon Services Corp. ("Verizon") and for the benefit of its other Affiliates, each of Verizon and Supplier a Party and together the Parties hereto. This Amendment is made and entered into by the Parties on and as of the date of execution by the last signing Party (the "Effective Date").

NOW THEREFORE, in consideration of the mutual premises and obligations set forth herein, and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties, intending to be legally bound, agree to amend the Agreement as follows:

**1. Substitution of Parties.**

- (a) Verizon Corporate Services Group Inc. is hereby established as the Verizon contracting party under the Agreement.
- (b) Verizon Corporate Services Group Inc. ("Verizon") is hereby substituted for and replaces Verizon Services Corp. in Section 1 and in all references to Verizon Services Corp. in the Agreement for all purposes and all matters arising, occurring or transpiring on or after the Effective Date of this Amendment.

The Parties understand and agree that this Amendment is not an assumption agreement and that Verizon is not liable for obligations or liabilities of any type or character occurring, arising or transpiring prior to the Effective Date of this Amendment, unless otherwise stated herein.

**2. TERM**

Section 5. of the Agreement entitled TERM is hereby replaced with the following:

This Agreement shall be effective on January 1, 2006, and shall continue in effect through December 31, 2011 unless earlier terminated or extended by mutual agreement of the parties. This Agreement shall be automatically

terminated unless renewed by the mutual written agreement of the parties prior to the expiration of the term.

**3. Exhibit B – Price Schedule**

Exhibit B is hereby replaced in its entirety with the attached Exhibit B, Price Schedule

**4. Background Checks**

Section 17, "Work Rules and Rights of Access" is hereby modified by the addition of a new subsection as follows:

"d) Background Checks

(1) For each of the employees that Supplier wishes to assign to perform Services for Verizon, which employees are provided Access, as defined below, Supplier shall certify to Verizon that it has conducted (or used an agency to conduct) an initial criminal history checking, drug testing, and verification of education, employment history, Social Security Number and legal right to work, as described herein (collectively referred to as "background checking"). For purposes of this Section, "employee" shall include Supplier's employees and any of Supplier's contract personnel. For purposes of this Section, "Access" shall mean direct or indirect access, whether physical, virtual or otherwise, to any Verizon employee or customer information or any of Verizon's or its customers' premises, systems, software or networks.

- a. The criminal history check shall consist, at minimum, of a federal and state check for felony and misdemeanor criminal convictions (or the equivalent thereof under relevant non-US law) in all locations where the assigned employee has resided, has been employed, or has attended school in the immediately preceding seven (7) years, and a check of U.S. Government Specially Designated National and export denial lists. Supplier shall contract with a recognized national background investigation company, approved by Verizon in writing, to conduct a criminal database check of information from all fifty states for federal and state convictions to the extent available, including to the extent available, a check for outstanding warrants and a check for pending felony charges in all such locations. Statewide county searches shall be performed in all states where such search mechanism is available without requiring specialized data (such as fingerprints or DNA). The criminal history check shall also include an all states check of available national and state sex offender registries.

- b. Drug testing shall be or have been performed at the time of initial hire and shall consist of a ten-panel urine analysis drug screen used to test for the presence of marijuana, cocaine, amphetamines, PCP, opiates/metabolites, barbiturates, benzodiazepines, propoxyphene, methadone and methaqualone. All specimens shall be tested at Department of Health and Human Services (DHHS)/Substance Abuse Mental Health Services Administration (SAMHSA)-certified labs, and the screening service shall include confirmation of all positive test results.
  - c. The highest diploma, degree or certificate earned shall be verified.
  - d. Employment history shall be verified for at least the previous seven (7) years of employment and military service, or less if the employee was a full-time student during that period.
  - e. The name to which employee's Social Security Number is attributed shall be verified.
  - f. The employee's citizenship, most recent country of permanent residence, and legal right to work in the jurisdiction in which the employee will be performing Services for Verizon shall be verified.
- (2) For any period of time encompassed in the foregoing background check requirement when the employee was resident outside of the United States, such background checking shall be conducted by an investigative agency approved by Verizon, and in a manner approved by Verizon.
- (3) Supplier shall secure from each employee who provides Services to Verizon such employee's written consent to perform the background checking specified in this Section and to disclose to Verizon the foregoing results upon request from Verizon.
- (4) Supplier represents and warrants that it will not assign any employee to provide Services to Verizon, if such employee:
- a. has been convicted of a felony or misdemeanor (or the equivalent thereof under relevant non-US law), or for whom a warrant is outstanding, or for whom a felony or misdemeanor charge is currently pending, or is on a U.S. Government Specially Designated National or export denial list. The foregoing shall not apply to a minor traffic violation (a moving traffic violation other than reckless driving, hit and run, driving to endanger, vehicular homicide, driving while intoxicated or other criminal offense involving gross negligence, recklessness, intentional or willful misconduct while operating a

motor vehicle), to a conviction that has been legally expunged, or to a conviction for a misdemeanor that occurred while the employee was under the age of twenty-one years; or

- b. has a confirmed positive test result from the drug screening in Section (a)(ii) above; or
- c. does not have the legal right to work in the jurisdiction in which the employee will be performing Services for Verizon.

(5) Supplier shall certify to Customer that Seller has caused the foregoing background checking to be performed on each employee currently assigned to provide Service for Customer; further, Seller shall thereafter certify to having met the foregoing requirements upon assigning any additional employees to perform Services for Customer.

(6) Supplier shall, in its contracts with all permitted subcontractors and agents in the provision of Services to Verizon, flow down the foregoing requirements. Such flow down shall include the requirement that such subcontractors and agents secure consent, from each employee providing services to Verizon, to perform the background checking and, to the extent permitted by law, to disclose the results thereof to Verizon at Verizon's request.

## 5. Confidential Information

Section 12. "Intellectual Property" is hereby modified by the addition of a new subsection as follows:

### g) Offshore Restrictions.

1) Except with Verizon's advanced written consent, Supplier represents, warrants, and covenants that in no event shall confidential information regarding or pertaining to Verizon's systems, infrastructure, employees, or customers be stored, transmitted, or accessed at, in, through, or from a site located outside the United States nor made available to any person who is located outside the United States unless such confidential information relates solely, directly and independently (i) to Verizon employees or customers located outside of the United States, or (ii) to voice or data communications of Verizon or its customers that originate and terminate outside the United States, or (iii) to Verizon systems and/or infrastructure dedicated to the provision of Verizon's voice or data