



STATE OF ALASKA  
DEPARTMENT OF  
**COMMERCE**  
COMMUNITY AND  
ECONOMIC DEVELOPMENT

*Sean Parnell, Governor*  
*Susan K. Bell, Commissioner*  
*T.W. Patch, Chairman*

**Regulatory Commission of Alaska**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**Telecommunications Relay Service State Recertification Application  
Submitted by the  
Regulatory Commission of Alaska**

The Regulatory Commission of Alaska hereby applies for recertification of Alaska's Telecommunications Relay Service program pursuant to 47 C.F.R. § 64.606 and in response to Public Notice DA12-1187, CG Docket No. 03-123.

**I. Background**

**Legal Authority**

In June 1998, the Federal Communications Commission (FCC) granted our application for certification of the Telecommunications Relay Service (TRS) program in Alaska.<sup>1</sup> Our TRS program was certified again in 2003<sup>2</sup> and 2008.<sup>3</sup>

Alaska's TRS program also operates under state statutory authority. AS 42.05.296 requires the Commission to:

[a]dopt regulations to require telephone utilities to provide service to deaf, hard of hearing, and speech impaired subscribers that permits the subscriber to communicate by telephone with persons of normal hearing and that makes available reasonable access of all phases of public

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<sup>1</sup>FCC File No.: TRS-97-36

<sup>2</sup>FCC File No.: TRS-19-02. DA 03-1729 Released: May 19, 2003.

<sup>3</sup>FCC file No.: TRS-19-07. DA 08-1673: Released: July 16, 2008.

telephone service to deaf, hard of hearing, and speech impaired telephone subscribers.

### RCA TRS Regulations

The RCA adopted regulations governing the provision of TRS in Alaska.<sup>4</sup> The regulations adopt the federal TRS standards and require a TRS applicant to demonstrate the ability to meet or exceed federal requirements concerning all operational, technical, and functional minimum standards for TRS specified in 47 C.F.R. § 64.604. An Alaska TRS provider is certificated for a minimum of five years. After the initial five-year period, the RCA may select a new provider through a competitive application process or retaining the existing provider for another period of at least five years.

### Alaska's TRS Provider

In 2001, we selected Communication Service for the Deaf d/b/a CSD, CSD of Alaska, Alaska Relay, and Alaska Relay Service (CSD) as Alaska's TRS provider effective January 1, 2002.<sup>5</sup> In 2008, we continued CSD's authority to provider TRS service in Alaska until at least May 1, 2012.<sup>6</sup> We are in the process of selecting a new TRS provider in Alaska.<sup>7</sup>

## **II. Federal Certification Requirements (47 C.F.R. §64.605(b))**

### Compliance with operational, technical, and functional standards.

47 C.F.R. §64.606(b)(1) requires states seeking certification to document "that the state meets or exceeds all operational, technical, and functional minimum standards

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<sup>4</sup>Those regulations became effective on February 23, 2001.

<sup>5</sup>Order U-01-65(3) dated September 21, 2001.

<sup>6</sup>Order U-07-27(3) dated November 19, 2007.

<sup>7</sup>Order U-12-088(1) dated June 11, 2012.

contained in Section 64.604.” The RCA’s regulations specifically require the state’s TRS provider to “meet or exceed federal requirements concerning all operational, technical, and functional minimum standards for TRS specified in 47 C.F.R. §64.604.”<sup>8</sup> A detailed narrative describing CSD’s compliance with each of the standards in 47 C.F.R. §64.604 is included with this filing as Appendix A.

*Adequate procedures and remedies for enforcement.*

47 C.F.R. §64.606(b)(1)(ii) requires states seeking certification to document 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.” Our rules and Alaska statutes provide a number of ways to enforce compliance with the state’s TRS program requirements. First, as noted above, our selection process requires a TRS applicant to demonstrate that it has the ability to comply with all federal operational, technical, and functional standards.<sup>9</sup> Second, a TRS provider must file a tariff which is subject to our review and approval. The tariff incorporates the terms and conditions specified in its application. “The TRS provider shall serve in conformance with its tariff until service expires under the terms of the certificate or until the commission decides otherwise.”<sup>10</sup> Third, our rules include monthly data filing requirements to ensure compliance with state and federal service quality requirements.<sup>11</sup> Fourth, we can impose civil penalties for

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<sup>8</sup>3 AAC 51.020(e)(1).

<sup>9</sup>3 AAC 51.020(e)(1).

<sup>10</sup>3 AAC 51.030(a).

<sup>11</sup>3 AAC 51.030(a).

violations of the statutes, regulations, orders, or written requirements.<sup>12</sup> Fifth, we note that our TRS provider selection process will take place every five years. We can and will replace the existing provider if another applicant proves to be better qualified.<sup>13</sup> Sixth, we can modify, suspend, or revoke the certificate of a TRS provider for good cause.<sup>14</sup> Finally, we have established procedures to handle any complaints regarding intrastate TRS service, including informal complaints,<sup>15</sup> alternative dispute resolution for appeals of informal complaints,<sup>16</sup> and formal complaints.<sup>17</sup> These RCA procedures are in addition to the complaint resolution procedures outlined in section 3.4 of CSD's intrastate TRS tariff.

In 47 C.F.R. 64.606(b)(1)(ii), the FCC specifically requires states to document that the state program "makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints." We have a web page that generally describes our complaint procedures. The web page includes a tab for TRS complaints with links to the TRS provider and to the FCC.<sup>18</sup> Brochures containing the same information are available to the public upon request. CSD provides outreach and promotional materials describing intrastate and interstate complaint procedures.

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<sup>12</sup>AS 42.05.571.

<sup>13</sup>3 AAC 51.020(d).

<sup>14</sup>AS 42.05.271.

<sup>15</sup>3 AAC 48.120.

<sup>16</sup>3 AAC 48.121.

<sup>17</sup>3 AAC 48.130.

<sup>18</sup><http://rca.alaska.gov/RCAWeb/ForConsumers/InformalComplaints.aspx>.

Conflicts with federal law.

47 C.F.R. §64.606(b)(1)(iii) states that where a state program exceeds the FCC's mandatory minimum standards, the state must establish that its program in no way conflicts with federal law. As described above, we have adopted, by reference, the FCC's own minimum operational, technical, and functional standards. As a result, there is no conflict between state and federal standards.

47 C.F.R. §64.606(d) states, in part, that a state's funding mechanism "shall be labeled in a manner that promote[s] national understanding of TRS and do[es] not offend the public." The FCC has previously approved funding for TRS service in Alaska through a surcharge on basic local exchange customers' bills, labeled the "Universal Access Surcharge." We are aware of no potential conflicts with federal law.

**III. Appendix**

The following appendix is attached to this application:

**Appendix A** *CSD Compliance with Operational, Technical, and Functional Minimum Standards for TRS.*

Respectfully submitted this 4<sup>th</sup> day of March 2013.



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## Appendix A

### CSD Compliance with Operational, Technical, and Functional Minimum Standards for TRS<sup>1</sup>

#### A. OPERATIONAL STANDARDS<sup>2</sup>

##### (1) COMMUNICATIONS ASSISTANT (CA)

*§64.604(A)(1)(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*

##### CA EMPLOYMENT STANDARDS

CSD's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging work of 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. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a twelfth-grade level of English grammar and spelling skills, and they are tested to ensure their ability to type 60 words-per-minute on an auditory-based test, are interviewed to make certain he or she has the ability to clearly articulate and possesses an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language (ASL), 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 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. CSD TRS CA applicants are required to pass valid and unbiased 12th grade level spelling and grammar tests to be considered for employment. Once the applicant passes the HR 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 to 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. The employment process described above ensures that only qualified applicants are hired to work at CSD Relay centers as CAs.

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<sup>1</sup>47 C.F.R. §64.604(a) – 47 C.F.R. §64.604(c).

<sup>2</sup>47 C.F.R. §64.604(a).

## CapTel CA

CSD provides an enhanced Voice-Carry-Over (VCO) service called Captioned Telephone (CapTel) Services. CSD requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job. CSD ensures that all CapTel Operators are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill levels in all aspects of call processing prior to graduating from training. CapTel Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel Operator Trainees spend 2 to 3 weeks training in a classroom setting.
- A final proficiency exam must be passed in order to move into a live call environment.
- New CapTel Operators undergo a week of transition training, during which they are monitored and supported by another CapTel Operator or an Instructor.
- CSD CapTel Operators are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel Operator is evaluated on a minimum of one call each shift.
- Each CapTel Operator must pass a test each month in order to remain qualified to caption live calls.

***§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.***

CSD requires all CAs to possess clear and articulate voice communications. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. CSD CAs must demonstrate adequate skill levels in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Type 60 words per minute (WPM) prior to taking live calls. Post training CAs must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Demonstrate an understanding of TRS users including deaf users and their culture, history and communication needs. CSD's diversified culture program incorporates training that includes information on characteristics of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.
- 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

CSD has an extensive process for hiring CAs to provide Speech-To-Speech (STS) service. CA applicants must successfully achieve the following:

- Six months of employment as a CA
- The recommendation and/or approval of his or her supervisor or manager
- The completion of the STS training program, including a written evaluation.
- Proficiency in all areas of TRS call processing including grammar, enunciation and vocabulary

- Passing a hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. CSD's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on STS Services. CSD's STS training program has been developed based on direct experience and consultation obtained during the initial STS trial along with eight years of experience processing STS calls.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call. This includes retention of information at the user's request and verification of what was said in order to verify accuracy.

All CapTel Operators are tested and competent in typing, grammar, and spelling to ensure skills meet the Federal Communications Commission (FCC) Guidelines. CapTel Operator training provides familiarity with hearing, deaf, and speech-disabled cultures.

Personnel supporting CapTel must have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Services in a professional manner. CapTel Operator Trainees are screened on several skill-sets to be considered for hire. Tests are administered to evaluate skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary
- Error Recognition - CapTel Operators must be able to recognize a mistake in voice recognition software and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during CapTel calls; therefore it is not necessary for the Operator to interpret typewritten ASL.

#### **CA QUALITY ASSURANCE PROGRAMS**

CSD Relay Quality Assurance Managers coordinate all training curricula 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 CSD Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and concerns and how to address them. The training team is located in seven (7) Relay Centers across the country. In addition, CSD listens to customer's feedback and takes proactive steps to implement suggestions and feedback. CSD does not develop training and consumer education programs for TRS alone. CSD contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present instruction at TRS trainings.

***§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

CSD CAs type a minimum of 60 WPM. CSD conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the TRS environment. Internal testing on typing speeds demonstrated that CSD's CAs typed an average of 83.9 words per minute (wpm), with at least 95% accuracy.

***§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.***

#### Qualified Video Relay Service<sup>3</sup> (VRS) interpreters

CSD does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, CSD no longer provides VRS services.

***§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

CSD exceeds all FCC minimum requirements regarding changing CAs during a call. CSD calls are not assumed by another CA unless it is absolutely necessary to do so. CSD CAs are trained to use on-screen clocks to identify the total call time elapsed. After 10 minutes with a TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is necessary. 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 a different CA,
- End user verbal abuse or obscenity towards the CA
- Call requires a specialist (STS, Spanish, etc)
- CA illness
- Customer request 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:

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<sup>3</sup>A video relay service 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 (47 C.F.R. § 64.601(a)(27)).

- Shift change, and/or
- CA fatigue such as may result from a call in progress more than 30 minutes with difficult call content or speed or a call that lasts longer than 60 minutes.
- If transition of a CA is unavoidable, the change occurs with minimal disruption to either call participant by observing the following procedures:
  - CSD attempts to honor any requests for a specific gender during call transitions.
  - The second CA silently observes the call long enough to understand the nature of the call and reviews any customer call-handling preferences provided during the call and as a part of the Customer Profile.

***§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.***

CSD honors the requests of all callers when they request a specific CA gender. TRS users may request a specific CA gender through the Customer Profile or on a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as a CA of that gender is available. This requirement has been waived by the FCC for CapTel CAs.<sup>4</sup>

***§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. CSD uses a 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)
- Background descriptions (over 250)

CapTel is a transparent service. CapTel CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes his or her own voice to transmit, no transmission occurs from the CA to the voice caller.

## **(2) CONFIDENTIALITY AND CONVERSATION CONTENT**

***§64.604(A)(2)(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***

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<sup>4</sup>CC Docket No. 98-67, FCC 03-190, released August 1, 2003.

*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

In accordance with FCC regulations, all information provided for the call set-up, including customer database records, remain confidential and are not used for any other purposes. Once the inbound party disconnects, CSD 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. 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. At the request of the caller, CSD STS Relay Agents will retain information from the call in order to facilitate the completion of consecutive calls. Such information will only be retained for the duration of the inbound call.

CSD's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. CSD strictly enforces confidentiality policies including 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 results 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 they wear special noise-reducing headsets.
- All CSD Relay Centers have security key access.
- Visitors are not allowed in Relay Center work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the CSD Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings during which the confidentiality agreement is reviewed and re-signed.

CSD Relay Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

CSD CapTel CAs must comply with the same rules that TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to CapTel CAs.

Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, "vent", or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving a situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or other details that could in some way identify a consumer.

A CapTel CA may have problems, complaints or stress from handling the call. The CA may request to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of CapTel depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all CapTel CAs understand and abide by the confidentiality policy. Any CapTel CA who breaks this policy will be disciplined, up to and including termination.

#### **STS LIMITED EXCEPTION OF RETENTION OF INFORMATION**

At the request of a caller, CSD 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 position.

*§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**

CSD 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 the TRS user specifically requests either summarization or ASL interpretation.

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

- CAs accept their role of facilitating communication as a "human telephone wire."
- CAs understand the TRS user is to remain in control of the call.
- CAs do not make decisions or comments on behalf of TRS users.

- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

At the request of the TRS user, CSD CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the call process. 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 TRS 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.

CSD CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

### **STS Facilitation of Communication**

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

CSD STS CAs will not guess what the STS user is saying and will request the STS user to repeat or provide clarification when unsure, 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 multiple techniques to clarify a STS user's message. Many times STS users have a preference on which technique works best for him or her and the STS CA will use it. Otherwise the STS CA may clarify by asking:

- The STS user to repeat the word or phrase
- "Yes" or "no" questions
- The STS user to use the word in another sentence
- The STS user to provide a word that rhymes with the misunderstood word
- The user to spell the word

To ensure that STS CAs follow established call processing procedures, they are evaluated 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 need for improvement is identified in any area of call processing, the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

### (3) TYPES OF CALLS

***§64.604(a)(3)(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.***

CSD provides 24 hour, 7 day-a-week TRS for standard (voice), Text Telephone (TTY), wireless, or personal computer (PC) users to place local, intrastate, interstate, and international calls. CSD also processes calls to directory assistance and toll free numbers. There are no restrictions on the duration or number of calls placed by any TRS user. All TRS users accessing CSD retain full control over the length and number of calls that can be placed and calls can be placed at any time.

CSD CapTel CAs are currently waived by the FCC from complying with this requirement for outbound calls because the CapTel CA is not involved in the call set up and cannot refuse the call. CapTel users dial sequential calls directly therefore it is not possible for a CapTel CA to refuse sequential calls or limit the length of calls.

CSD CapTel CAs are not waived by the FCC from complying with this requirement for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to call.

***§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.***

CSD works in conjunction with local exchange carriers (LEC) to provide additional functionality for users of TRS. CSD processes collect and person-to-person calls and 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. CSD will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

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

***§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, CSD will relay the message verbatim to the TRS user and follow the user's instructions.

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

Callers to CSD can access 900 services by dialing a free 900 number to access relay service. 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 circumventing LEC restrictions.

This process ensures that the LEC will only complete those calls 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, CSD users may make 900 calls through 1-900-230-2121.

Because 900 blocking information is not available with CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

***§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.***

CSD provides access to all available TRS call types. In addition to voice-to-text and text-to-voice services, CSD provides Voice-Carry-Over (VCO), two-line VCO, VCO-to-TTY, VCO-to-VCO, Hearing-Carry-Over (HCO), two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of standard services that are provided by CSD:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy
- 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

***§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**

CSD'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, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line.

CSD 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 TRS call and is no longer subject to the per-minute reimbursement. With 2-Line CapTel service, a CapTel user can release or receive captions at any time during a call.

### **Speed Dialing Functionality**

CSD speed dialing functionality (also known as frequently dialed numbers) allows TRS 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. When the customer calls into the center, he or she provides the CA with the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can 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. The CapTel Consumer Premises Equipment (CPE, or CapTel phone) is equipped with the ability to program in 3 speed dial numbers, as well as a recently dialed number.

### **Three-Way Calling**

CSD provides three-way calling capability. 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 a third party directly into the conversation or to tie the third party in by making a second call to the Relay Center. TRS 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 CSD. This feature allows the user to place the call to the CA and then conference in a voice called party. This is also known as the Two-Line VCO method.

TTY users may also use three-way calling capability 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 would also apply if there were two voice customers and one TTY user on the line.

CSD provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

***§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.***

CSD provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message

and/or interactive menu. CSD's hot key sends text to the user which says "(RECORDING)." CSD's hot keys are available in all supported languages, including English and Spanish.

CSD 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.

CSD does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. CSD's sophisticated Phoenix feature incorporates "function keys" which allow 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 quickly by 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.

CSD CapTel users are able to hear and interact directly with a recorded message and make the selections request by an interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is understood. The user can stay on the line as long as desired until the message is heard in its entirety or replayed as requested by the user. The CapTel user interacts with the recorded message system directly. This is treated as one call.

***§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**

CSD has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through CSD'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 will do the following, as needed:

- Inform the caller that an answering machine has been reached.
- Follow the user's instructions if any have been provided. CSD will use the touch-tone capability embedded in CSD'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).
- Use advanced recording technology to slow down the playback of the messages.
- CSD's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys.
- Once all customer instructions have been followed and the caller disconnects, all information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

Like TRS users, CSD CapTel users can retrieve answering machine messages from an answering machine that is near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users, including the following:

- Press the CapTel menu button until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

#### **(4) HANDLING OF EMERGENCY CALLS**

***§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.***

CSD accepts incoming emergency calls, and automatically and immediately transfers the call to an appropriate Public Safety Answering Point (PSAP).

#### **Call Processing Procedures**

CSD uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call.

1.	CSD CAs perform specific actions in response to the word "emergency". Calls placed to fire, police, ambulance and rescue service 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 still available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the 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 Florida Relay Service. 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 TRS 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.

### Back up Procedures

CSD 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. In the event a valid number is not available, the CA will contact Directory Assistance for support.

### CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

- The CapTel phone automatically converts to a VCO phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone will display the typed responses from the PSAP and the caller will use his or her voice to communicate with the PSAP.
- The user will be connected to the proper 911 Center promptly and the telephone number (ANI) will automatically be passed to the 911 Center.
- The 911 system renders the appropriate emergency response.

### Two-Line CapTel Emergency Calling

Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with captions.

### Training and Support Materials

CSD CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures.

Supervisors or Operations Administrators are available 24/7/365 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

## 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 the PSAP/emergency call center. The CA or 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, we will treat this as an Emergency call. Since the customer does not give an emergency service name, CSD ALWAYS connects the caller to the POLICE. The CA will notify the 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."

### (5) STS CALLED NUMBERS

***§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.***

CSD offers the ability for STS users to maintain a record of regularly called names and telephone numbers. CSD's speed dialing functionality (also known as frequently dialed numbers) allows STS 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 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.

#### **(6) VISUAL PRIVACY SCREEN/IDLE CALLS**

*§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.*

This section does not apply as CSD does not provide, contract to provide, or oversee VRS services.

#### **(7) INTERNATIONAL CALLS**

*§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.*

This section does not apply as CSD does not provide, contract to provide, or oversee VRS services.

### **B. TECHNICAL STANDARDS<sup>5</sup>**

#### **(1) ASCII AND BAUDOT**

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

CSD is capable of receiving and transmitting in voice, Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and ASCII codes. When a call is 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.

#### **(2) SPEED OF ANSWER**

*§64.604(b)(2)(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*

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<sup>5</sup>47 C.F.R. §64.604(b).

***CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.***

CSD currently has ten (10) TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. CSD samples the average answer time a minimum of every 15 minutes for each 24-hour period. CSD's 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 satisfactory service.

CSD'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 requirements for each 15-minute period of the day
- Total 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 CSD is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements are made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

***§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.***

CSD's speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within ten (10) seconds. CSD will continue to review TRS and CapTel data to determine trends, taking into account any call-affecting issues such as weather, holidays or technical problems. Utilizing this information, CSD develops a Network forecast for each upcoming scheduling week.

CSD 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, CSD 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.

***§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.***

A call is delivered when CSD's Relay Center equipment accepts the call from the LEC, and the public switched network actually delivers the call to the Relay Center. CSD begins tracking time for performance calculations at this point.

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

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

CSD includes abandoned calls in its daily speed-of-answer performance calculations.

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

CSD measures its compliance with average speed-of-answer times on a daily basis and reports this information to RCA on a monthly basis.

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

CSD ensures that all Relay 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. CSD's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

***§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 a Relay toll-free number where it enters the CSD 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 RCA.

***§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.***

CSD does not oversee VRS services or contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

### **(3) EQUAL ACCESS TO INTEREXCHANGE CARRIERS**

***§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.***

CSD TRS and CapTel users have equal access to their chosen interexchange carriers through TRS to the same extent access is provided to voice users. TRS and CapTel users are encouraged to register their preferred Carrier-of-Choice with Customer Service. Users who have not registered their preferred Carrier-of-Choice (COC) are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of

registering their COC preferences for CapTel calls. Voice-in users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, voice users receive a verbal announcement stating that their call may include long distance charges.

CSD provides its TRS customers with both the technical and operational capability to send and receive COC calls to and from other providers. CSD's network permits a user to select the IXC or LEC of his or her choice in accordance with State and Federal law.

CSD 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 TRS calls. CSD routes calls to the designated carrier in as efficient a manner as possible. CSD includes the identification of the call as a TRS 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, CSD 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 TRS call.

CSD encourages all carriers to participate in its COC program. When the requested carrier is not a COC participant, CSD Relay has established a procedure whereby the carrier is notified, verbally and in writing, of its obligation to provide access to TRS users and encourage the carrier's participation.

Outlined below is the process used by CAs to process COC calls and subsequent instructions to TRS callers:

- The CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either as registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay Center, 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. CSD then informs the unavailable carrier of its obligation to provide access through the TRS.
- The CA dials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the CSD network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

CSD currently has 240 carriers participating in the CSD's TRS Carrier-of-Choice program. Participation of carriers in Alaska is dependent on whether carrier is authorized to provide service in Alaska and whether it can connect to the CSD Access Tandem.

#### (4) TRS FACILITIES

***§64.604(b)(4)(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.***

CSD Relay Customer Service is available 24 hours a day, every day of the year for all TRS services. CSD 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. CapTel Relay Services are also available 24 hours a day, seven days a week.

CSD does not provide or contract with a VRS provider to provide VRS service.

***§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.***

CSD's Relay Centers are equipped with an 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 CSD's Intelligent Call Router, which instantly recognizes a problem anywhere in the CSD Relay system and routes the calls to other operating call centers. CSD Relay customers will be unaware of any system fault.

In the event of 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 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. CSD also has a Disaster Recovery Plan and a Network Support Plan to cope with specific disasters.

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

CSD does not oversee VRS services or contract with a VRS provider to provide VRS services to customers.

***§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.*

CSD does not oversee VRS services or contract with a VRS provider to provide VRS services to customers.

## **(5) TECHNOLOGY**

*§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.*

CSD is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability. CSD will continue to provide 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. CSD receives calling party identifying information including blocking information, from all TRS users. CSD's Caller ID SS7 solution includes receiving the privacy bit information from the inbound TRS caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information

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

CSD offers several enhanced features to improve the telecommunications access of STS 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 Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (\*787)

### **Wireless Access – STS (\*787)**

CSD offers wireless short-code solution for STS users. CSD wireless customers are able to dial \*STS (i.e., \*787) to reach a Speech to Speech CA quickly and easily from anywhere in the nation. All callers who are physically located within Alaska 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 needing to place a call to a STS user may also use this service.

When Alaska TRS customers travel outside of the state, callers will automatically be connected to STS based on their physical location. If they are in a state where CSD is the TRS provider, the caller is connected to the State's STS service. If not, callers are automatically transferred to CSD's interstate STS service, where they will be able to place interstate calls only. The additional service enhancement provides additional mobility and flexibility for STS users.

### **STS Message Retention**

CSD has expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user dictates a message to be read to the called party and this feature allows the STS user to request this message be retained in the 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**

CSD will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. CSD's speed dialing functionality (also known as frequently dialed numbers) allows TRS 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.

### **STS with Privacy Option**

CSD offers STS users the option to communicate without the CA hearing the voice party. With this option, 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. This feature allows STS users to simply advise friends, family and others to dial 7-1-1 to reach them. Once connected, the person provides 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 his or her 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.

## **(6) CALLER ID**

*§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.*

CSD 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. CSD will receive calling party identifying information including blocking information, from all TRS users.

### **Customer Control**

TRS users with TRS Caller ID are able to disable or block their Caller ID information from being transmitted either a 'per-call' or a 'per-line' basis.

The TRS user can view the calling party's information before picking up the phone and 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 CSD'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
- 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**

CSD offers Caller ID for all local and long distance calls to Carriers who have SS7 connectivity with CSD. CSD's SS7 network interfaces with all national long distance Carriers and major LECs, CLECs, and ILECs. CSD's Caller ID SS7 solution includes receiving the privacy bit information from the inbound TRS caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. CSD passes through the calling party information (rather than 711 or the number of the TRS Center). Many Caller ID enhancements are compatible with the TRS 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 CSD Relay Center, 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 CSD Relay Center, 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 is unknown to the user, 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 his or her name, it will be left in a message 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, CSD has implemented additional capabilities outlined below:

## Instant Access List (Preferred Caller List)

Users may designate a list of up to 10 numbers that can bypass the CSD 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.

## (C) FUNCTIONAL STANDARDS<sup>6</sup>

### (1) *CONSUMER COMPLAINT LOGS*

*§64.604(c)(1)(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.*

*§64.604(c)(1)(ii) Beginning July 1, 2008, states and TRS providers shall submit summaries of logs*

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<sup>6</sup>47 C.F.R. §64.604(c).

*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, 2008 shall indicate the number of complaints received from the date of OMB approval through May 31, 2012.*

CSD has policies regarding complaints, inquiries, comments and commendations related to services 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. CSD 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, and the result of any investigation and the date of resolution.

CSD identifies contact particulars such as: consumer type (TTY, VCO, HCO, Voice or Speech-to-Speech), customer contact information (when given), CA identification numbers, the call handling center and over forty-five contact categories including: complaints, inquires and unsolicited commendations.

CSD submits reports detailing the information above. Each report will include the following information:

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

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

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

To further support the complaint resolution process, CSD has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts.

The CCOD automatically notifies the TRS CSD program manager assigned to the State of Alaska via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC

By approximately June 15th of each calendar year, CSD submits a copy of 12-month complaint log report for the period of June 1- May 31 to the RCA. The RCA reviews the log and then passed the complaint log to the FCC by July 1<sup>st</sup> of each year.

### **(2) CONTACT PERSONS**

***§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.*

The Regulatory Commission of Alaska's Consumer Protection Section is the office for filing intrastate consumer complaints.

Regulatory Commission of Alaska  
Consumer Protection Section  
701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501-3649  
Phone: (907) 276-6222  
TTY: (907) 276-4533  
Fax: (907) 276-0160  
Email: cp.mail@alaska.gov  
Web: <http://rca.alaska.gov/RCAWeb/Home.aspx>

### **(3) PUBLIC ACCESS TO INFORMATION**

*§64.604(c)(3) 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.*

In Alaska, CSD is responsible for "solicit[ing] input from users of the service and carriers whose customers use TRS" (3 AAC 51.020(e)(2)(A)) and for "develop[ing] and implement[ing] community outreach and education services and programs" (3 AAC 51.020(e)(2)(C)). The Outreach Program is administered locally by a full-time staffperson who meets with community, user, and business groups. CSD has an Advisory Board with statewide representation from around the state. CSD also has a Telephone Outreach Program that targets businesses for TRS education. Information on how to contact the TRS provider is included in state telephone directories. Finally, CSD maintains a web page for Alaska at [www.alaskarelay.com](http://www.alaskarelay.com).

### **(4) RATES**

*§64.604(c)(4) 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*

CSD users are not charged more for services than standard "voice" telephone users. The caller is only billed for conversation time. Those users, who select a preferred interstate carrier via the Alaska COC list, are rated and invoiced by the selected interstate carrier.

### **(5) JURISDICTIONAL SEPARATION OF COSTS**

*§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 §64.605, 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.*

All Alaska TRS intrastate and interstate minutes are reported separately to the state. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State in accordance with 3 AAC 51.040.

On individual customer invoices, CSD deducts minutes reimbursed by Rolka Loube Saltzer Associates (RLSA), the Interstate Telecommunications Relay Services Fund administrator. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, states only receive a 51% deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, CSD uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RLSA for reimbursement.

#### **§64.604(c)(5)(iii) Telecommunications Relay Fund**

§64.604(c)(5)(iii)(A) through §64.604(c)(5)(iii)(M) do not pertain to State programs. However, the State of Alaska contracts with CSD to contribute and collect interstate funds through RLSA. It is the State's understanding that CSD complies with the appropriate mandates under this section.

**§64.604(c)(5)(iii)(N)(1-4) pertain to VRS providers.**

CSD does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

#### **(6) COMPLAINTS**

**§64.604(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.**

CSD has 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 Communication Assistants.

- 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. CSD's Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

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

CSD 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. The RCA submits all complaints from June 1-May 31<sup>st</sup> to the FCC by the annual July 1<sup>st</sup> deadline.

#### **(7) TREATMENT OF TRS CUSTOMER INFORMATION**

***§64.604(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.***

CSD'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 ensuing contract(s) CSD will transfer all TRS database records to the next incoming TRS provider, at least 60 days prior to the last day of service, in a usable format.

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

## CSD Directory Examples

### ACS of Anchorage Directory 2011-2012

## TTY/TDD/Text

### ALASKA RELAY

TELECOMMUNICATIONS RELAY SERVICE

*Connecting deaf, hard-of-hearing, speech disabled and hearing people*

DIAL 7-1-1 TO PLACE A RELAY CALL

or

1 (800) 770-8973 (TTY)

1 (800) 770-8255 (Voice)

(800) 770-3919 (ASCII)

(866) 355-6198 (Speech to Speech)

(866) 355-6199 (Spanish)

#### **Alaska Relay:**

Alaska Relay service provides telephone accessibility to people who are deaf, hard-of-hearing or speech disabled. Alaska Relay is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or the length of the calls. Alaska Relay provides state-of-the-art technology; a full range of features, and highly trained, professional communication assistants (CAs) to ensure that users are able to communicate easily and effectively – every time they place a relay call. This 24-hour relay service is provided at no cost to callers. Long distance calls will be billed accordingly.

#### **Confidentiality and Ethics:**

Alaska Relay is strictly confidential. All calls will be kept private, and no records of any conversations will be maintained. CAs will not share information regarding the content of any relay calls. All calls and information are 100 percent confidential.

For more information – Check our web site at: [www.AlaskaRelay.com](http://www.AlaskaRelay.com)

ACS of the Northland Directory  
2012-2013

## Additional Customer Information

**ALASKA RELAY**  
TELECOMMUNICATIONS RELAY SERVICE  
Connecting deaf, hard-of-hearing, speech  
disabled and hearing people

DIAL 7-1-1 TO PLACE A RELAY CALL

or

(800) 770-8973 (TTY)

(800) 770-8255 (Voice)

(800) 770-3919 (ASCII)

(866) 350-6198 (Speech to Speech)

(866) 350-6199 (Spanish)

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Alaska Relay service provides telephone accessibility to people who are deaf, hard-of-hearing or speech disabled. Alaska Relay is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or the length of the calls. Alaska Relay provides state-of-the-art technology; a full range of features, and highly trained, professional communication assistants (CAs) to ensure that users are able to communicate easily and effectively - every time they place a relay call. This 24-hour relay service is provided at no cost to callers. Long distance calls will be billed accordingly.

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For more information - Check our website at:

[www.AlaskaRelay.com](http://www.AlaskaRelay.com)

or