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February 28, 2014

BY HAND DELIVERY AND ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Kris Monteith
Chief, Consumer and Governmental Affairs Bureau
TRS Certification Program
Federal Communications Commission
Washington, DC 20554

Re: Update and Verification of Internet-Based TRS Certification Application, and Request for Confidential Treatment Pursuant to 47 C.F.R. §§ 0.457 and 0.459; Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Ms. Dortch and Ms. Monteith:

Sorenson Communications, Inc. ("Sorenson") hereby updates and verifies its application for certification as a provider of Internet-based telecommunications relay service (the "Update"). Sorenson's updated Application is attached as Exhibit A in confidential form and as Exhibit B in redacted form. Sorenson is also filing an electronic copy of the redacted version via ECFS.

Sorenson requests pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, that the Commission withhold from any future public inspection and accord confidential treatment to the highly confidential, business sensitive information contained in the Update and its exhibits, including: numbers of subscribers; details of training provided to communications assistants; call-handling capacity; internal compliance communications; contact information for Sorenson employees; data related to the number of employees involved in TRS operations; descriptions of the technology and equipment used to support Sorenson's call center functions; identities of entities with ownership interests; descriptions of Sorenson's ownership structure; names of Sorenson's executives, officers and board members; sponsorship agreements; and descriptions of Sorenson's complaint procedures (collectively, the "Confidential Information"). All of the Confidential Information has been redacted from the version of the Annual Update attached as Exhibit B and filed electronically.

The Confidential Information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"). Exemption 4 of FOIA

provides that the public disclosure requirement of the statute "does not apply to matters that are ... (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential." 5 U.S.C. § 552(b)(4). Because Sorenson is providing commercial information "of a kind that would not customarily be released to the public" in accordance with the application requirements in Section 64.606 of the Commission's rules, this information is "confidential" under Exemption 4 of FOIA. *See Critical Mass Energy Project* v. *NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

The Confidential Information related to individual employees also constitutes personally identifiable information that could, if disclosed, jeopardize the safety of the employees involved. This information merits confidential treatment under FOIA Exemptions 6 and 7(C), which protect information that "could reasonably be expected to constitute an unwarranted invasion of personal privacy" and that "would constitute a clearly unwarranted invasion of personal privacy." 5 U.S.C. § 552(b)(6), (7)(C); *see also Dep't of State v. Wash. Post Co.*, 456 U.S. 595, 601-02 (1982).

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, Sorenson hereby states as follows:

1. Identification of the Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

Sorenson seeks confidential treatment with respect to the Confidential Information—all of which has been redacted from the version of the Update attached as Exhibit B and filed electronically.

2. Description of the Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

Sorenson is updating and verifying its application for certification as a provider of Internet-based telecommunications relay service.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information described above is protected from disclosure for two reasons. First, the Confidential Information constitutes highly sensitive information about Sorenson's operations, costs, and strategic decisions, including as they relate to staffing, call center operation, redundancy and the ability to manage variable call volumes. This information constitutes highly sensitive commercial information "which would customarily be guarded from competitors." 47 C.F.R. § 0.457. Second, the Confidential Information related to individual employees constitutes personally identifiable information that could, if disclosed, jeopardize the safety of the employees identified. Disclosure of this information would result in an unwarranted privacy breach.

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4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The Internet-based Telecommunications Relay Services market is highly competitive throughout the United States.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure of the Confidential Information would result in two kinds of harm. First, disclosure would provide Sorenson's competitors with sensitive insights related to Sorenson's operations, costs, and strategic decisions—all of which would work to Sorenson's severe competitive disadvantage. Second, disclosure of information related to specific employees would result in privacy breaches that would impact the safety of those employees directly.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

Sorenson does not make the Confidential Information publicly available.

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

Sorenson does not make the Confidential Information publicly available.

Sincerely,

Stephen W. Miller
Counsel to Sorenson Communications, Inc.

Attachments

cc: Gregory Hlibok (email)

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

In the Matter of	)	
	)	
	)	
Structure and Practices of the Video Relay Service Program	)	CG Docket No. 10-51
	)	
	)	

Update and Verification of Internet-Based TRS Certification Application

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February 28, 2014

TABLE OF CONTENTS

PAGE

I. INTRODUCTION AND SUMMARY 1

II. FORMS OF iTRS TO BE PROVIDED (47 C.F.R. § 64.606(a)(2)(i)) 2

III. MEETING NON-WAIVED MINIMUM STANDARDS (47 C.F.R. § 64.606(a)(2)(ii)) 2

IV. VRS CALL CENTER LEASES (47 C.F.R. § 64.606(a)(2)(ii)(A)) 17

A. Leases for U.S. Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(2)) 17

B. Leases for Call Centers Outside of the United States (47 C.F.R. § 64.606(a)(2)(ii)(A)(3)) 17

C. List of Call Center Leases (47 C.F.R. § 64.606(a)(2)(ii)(A)(2)) 18

V. DESCRIPTION OF TECHNOLOGY AND EQUIPMENT USED TO SUPPORT VRS CALL CENTER FUNCTIONS (47 C.F.R. § 64.606(a)(2)(ii)(A)(4)) 18

A. Description of Technology and Equipment (47 C.F.R. § 64.606(a)(2)(ii)(A)(4)) 18

B. Technology and Equipment in U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(6)) 19

C. Technology and Equipment in Non-U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(7)) 20

D. ACD Lease or License Agreement (47 C.F.R. § 64.606(a)(2)(ii)(A)(8)) 21

VI. ENTITIES WITH OWNERSHIP / CONTROL INTEREST (47 C.F.R. § 64.606(a)(2)(ii)(B)) 21

VII. DESCRIPTION OF ORGANIZATIONAL STRUCTURE (47 C.F.R. § 64.606(a)(2)(ii)(B)).....21

VIII. NAMES OF EXECUTIVES, OFFICERS, MEMBERS OF BOARD (47 C.F.R. § 64.606(a)(2)(ii)(B)) 22

IX. NUMBER OF TRS EMPLOYEES (47 C.F.R. § 64.606(a)(2)(ii)(C)) 22

X. LIST OF SPONSORSHIP AGREEMENTS (47 C.F.R. § 64.606(a)(2)(ii)(E)).....23

XI. DESCRIPTION OF COMPLAINT PROCEDURES (47 C.F.R. § 64.606(a)(2)(iii)).....23

XII. STATEMENT REGARDING ANNUAL COMPLIANCE REPORTS (47 C.F.R. § 64.606(a)(2)(iv)).....24

XIII. CERTIFICATION 25

LIST OF EXHIBITS.....26

ADDENDUM: COMPLIANCE PLAN

I. Introduction and Summary

In accordance with the Commission's rules, and its orders released on July 28 and October 17, 2011, Sorenson Communications, Inc. ("Sorenson") submits this update and verification of its December 2, 2011 application for certification as a provider of Internet-based telecommunications relay service ("iTRS").[1]

Sorenson is the industry-leading provider of communications services and products designed to enable deaf and hard-of-hearing individuals to communicate with the hearing world. By offering consumers cutting-edge equipment and applications, and by staffing its network of 111 call centers (103 VRS and 8 IP CTS) with highly skilled communications assistants ("CAs"), Sorenson has demonstrated its commitment to working closely with the deaf and hard-of-hearing community to ensure that communications services continue to meet their needs. Since 2003, Sorenson has provided its award-winning iTRS offerings, which have earned a reputation for quality, reliability, and efficiency. Indeed, Sorenson has established a proven record of meeting and exceeding the Commission's minimum standards, and it continues to set the pace among iTRS providers with respect to robust internal compliance systems and efforts to combat fraud. By virtually any measure, Sorenson has proven itself to be the industry leader in terms of service quality, equipment innovations, efficiency, ease-of-use, fraud prevention, and consumer responsiveness.

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[1] Sorenson's updated application consists of this document, the exhibits submitted with the December 2011 application, the December 2012 update, and the December 2013 update, and the exhibits submitted herewith. Sorenson hereby adopts and incorporates the exhibits accompanying the 2011 application, the 2012 update, and the 2013 update to the extent they are not replaced by the updated exhibits submitted today unless otherwise noted. Due to their sensitive nature, the exhibits have been redacted from the public version of the application.

Sorenson began providing Video Relay Service ("VRS") in 2003. Sorenson began providing IP Relay services in 2005 and IP Captioned Telephone Service ("IP CTS") in 2011. As of February 25, 2014, Sorenson serves *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL***** Sorenson discontinued IP Relay service in 2013 and is no longer applying for certification as an IP Relay service provider.

II. Forms of iTRS to Be Provided (47 C.F.R. § 64.606(a)(2)(i))

Pursuant to the Commission's July 28, 2011 Order, Sorenson currently provides VRS and IP CTS under a grant of interim eligibility.[2] Sorenson, which formerly operated under contract with the State of Utah's FCC certified TRS program, timely filed its Certification Application on December 2, 2011, and updated that application on December 3, 2012 and December 3, 2013. This filing also serves as an update to the 2011 application.

III. Meeting Non-Waived Minimum Standards (47 C.F.R. § 64.606(a)(2)(ii))

As explained in the chart that follows, Sorenson's services meet all of the non-waived minimum standards applicable to VRS and IP CTS.[3]

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[2] *See Structure and Practices of the Video Relay Service Program*, Second Report and Order, 26 FCC Rcd. 10,898, 10,922, ¶ 59 (2011) (granting interim eligibility for "any iTRS provider currently eligible to receive compensation directly from the TRS Fund via a means other than Commission certification," to expire "(1) 35 days after this application deadline, in the event no application is timely filed; (2) 35 days after Commission dismissal or denial of the application for certification in the event of Commission dismissal or denial; or (3) upon Commission grant of the application for certification in the event of Commission grant").

[3] With respect to some of the non-waived minimum standards, the Commission's requirements are ambiguous and the Commission has not provided additional guidance as to their meaning. In those cases, Sorenson provides the following enumeration utilizing its understanding of the scope or substance of these requirements.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
CA Training 47 C.F.R. § 64.604(a)(1)(i)	VRS IP CTS	--	Sorenson has developed a robust in-house training program in which its VRS and IP CTS CAs are instructed in depth on meeting the needs of deaf and hard-of-hearing consumers, complying with the regulatory standards applicable to CAs, and the operational and technological aspects of Sorenson's services and equipment. VRS CAs are trained for an average of *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****. IP CTS CAs are trained for an average of *****BEGIN CONFIDENTIAL**** [redacted] *****END CONFIDENTIAL*****.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	VRS IP CTS	Partial waiver for IP CTS[4]	As part of its robust training program, Sorenson ensures that its CAs handling VRS and IP CTS calls are sufficiently skilled in typing, grammar, spelling, and interpretation of typewritten ASL (where applicable); that they are familiar with hearing and speech-disability cultures, languages and etiquette; and that they possess clear and articulate voice communications skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	IP CTS	Not applicable to VRS	Sorenson's IP CTS CAs are all able to type more than 60 words per minute (including with the use of technological aides).[5]

[4] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Declaratory Ruling, 22 FCC Rcd. 379, 392 ¶ 30 n.105 (2007) ("*IP CTS Waiver Order*") (waiving in certain circumstances the requirement that IP CTS CAs are competent in interpreting written ASL).

[5] *See IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement to test typing speeds of IP CTS CAs).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	Not applicable to IP CTS	Through its applicant screening and in-house training systems, Sorenson ensures that all of its VRS video interpreters ("VIs" or "CAs") are "qualified interpreters" — that is, that they are able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary.
Ten Minute Rule 47 C.F.R. § 64.604(a)(1)(v)[6]	VRS	Not applicable to IP CTS	Sorenson's procedures provide that VIs must stay with any given call for a minimum of ten minutes once the VI reaches the called party, unless (a) the VRS end user terminates the call earlier or requests another VI, or (b) either the VRS user or VI finds that they are not communicating effectively given the nature of the call.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	VRS	Waived for IP CTS[7]	As part of its operating procedures, Sorenson makes its best efforts to accommodate its customers' requests regarding the gender of the VI handling their calls — both at call initiation and in the event of a transfer to another VI.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	VRS IP CTS	--	Sorenson bars its CAs from disclosing the content of any relayed conversation, except as authorized by 47 U.S.C. § 605.
Accuracy Rule 47 C.F.R. § 64.604(a)(2)(ii)	VRS IP CTS	--	Sorenson bars its CAs from intentionally altering the conversations they relay, except to the extent (i) the iTRS end user requests summarization or similar alterations, (ii) necessary to comply with federal, state and local law regarding use of telephone company facilities for illegal purposes; or (iii) necessary to provide information to emergency responders.

[6] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Order, 21 FCC Rcd. 6733, 6736 ¶ 9 (2006) ("If the party using sign language or the VRS CA find that they are not communicating effectively given the nature of the call, the VRS provider may have another CA handle the call without violating the 10-minute in-call replacement rule.").

[7] *See IP CTS Waiver Order* ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	VRS	Waived for IP CTS[8]	Sorenson bars its VIs from refusing single or sequential calls.
Call Length 47 C.F.R. § 64.604(a)(3)(i)	VRS IP CTS	--	Sorenson does not limit the length of calls.
Types of Calls 47 C.F.R. § 64.604(a)(3)(ii)	VRS IP CTS	Waived for VRS and as applied to operator assisted calls and long distance calls[9]	Except to the extent the requirement has been waived, Sorenson's iTRS services are capable of handling any type of call normally provided by telecommunications carriers.
Pay-Per-Call Calls 47 C.F.R. § 64.604(a)(3)(iv)	--	Waived for VRS and IP CTS[10]	--
Text-to-voice and voice-to-text 47 C.F.R. § 64.604(a)(3)(v)(1)	IP CTS	Not applicable to VRS	Sorenson's IP CTS CAs handle voice-to-text communications.
VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO 47 C.F.R. § 64.604(a)(3)(v)(2)	Two-line VCO applies to IP Relay	Full waiver for IP CTS;[11] partial waiver for VRS[12]	Sorenson's VRS services support two-line VCO.

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8 *See IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement that IP CTS CAs may not refuse sequential calls).

9 *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Order, 26 FCC Rcd. 9449, 9456 ¶ 17 (2011) ("*2011 Waiver Order*").

10 *See IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 15 (VRS).

11 *IP CTS Waiver Order* ¶ 30.

12 *2011 Waiver Order* ¶ 9.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO 47 C.F.R. § 64.604(a)(3)(v)(3)	Two-line HCO applies to VRS	Waived for IP CTS;[13] partial waiver for VRS[14]	Sorenson's VRS supports two-line HCO on most platforms.
Call Release 47 C.F.R. § 64.604(a)(3)(vi)(1)	--	Waived for VRS and IP CTS[15]	--
Speed Dialing 47 C.F.R. § 64.604(a)(3)(vi)(2)	VRS	Waived for IP CTS[16]	Sorenson makes speed-dialing functionality available to its VRS customers.
Three-way Calling 47 C.F.R. § 64.604(a)(3)(vi)(3)	VRS	Waived for IP CTS[17]	Sorenson makes three-way-calling functionality available to its VRS customers.
Voice Mail 47 C.F.R. § 64.604(a)(3)(vii) & (viii)	VRS IP CTS	--	Sorenson makes voice mail and/or video mail available to its VRS and IP CTS customers. Sorenson's voice mail and SignMail® (video mail) offerings include interactive menus and, where applicable, hot keys to access the services.

[13] *IP CTS Waiver Order* ¶ 30.

[14] *2011 Waiver Order* ¶ 11.

[15] *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 13 (VRS).

[16] *IP CTS Waiver Order* ¶ 30.

[17] *IP CTS Waiver Order* ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Privacy Screen 47 C.F.R. § 64.604(a)(6)	VRS	Not applicable to IP CTS	Sorenson's call management system does not allow CAs to use privacy screens. Sorenson's VRS CAs are required to disconnect a VRS call if either the calling or called party employs a privacy screen or similar feature for more than five minutes or is otherwise unresponsive for more than five minutes, except in the case of a 911 call or in circumstances where the calling or called party has legitimately been placed on hold. Sorenson's VRS CAs disconnect calls in these circumstances only after announcing the upcoming disconnection.
International Calls 47 C.F.R. § 64.604(a)(7) (rule applicable to VRS)	VRS	Not applicable to IP CTS	Sorenson does not seek compensation for VRS calls that originate from an international IP address, with the exception of calls made by a U.S. resident who has pre-registered with Sorenson prior to leaving the country, as required under the FCC's rules.
ASCII / Baudot Format 47 C.F.R. § 64.604(b)(1)	--	Waived for IP CTS;[18] not applicable to VRS	--
Speed of Answer for IP CTS 47 C.F.R. § 64.604(b)(2)(ii)	IP CTS	Not applicable to VRS	As reflected in its monthly data submissions to the Fund administrator, Sorenson's IP CTS routinely exceed the speed-of-answer requirement that 85% of all calls are answered within 10 seconds measured on a daily basis.
Speed of Answer for VRS 47 C.F.R. § 64.604(b)(2)(iii)	VRS	Not applicable to IP CTS	As reflected in its monthly data submissions to the Fund administrator, Sorenson's VRS complies with the current speed-of-answer requirement that 85% of all calls are answered within 60 seconds measured on a daily basis.
Equal Access to IXCs 47 C.F.R. § 64.604(b)(3)	--	Waived for VRS and IP CTS[19]	--

[18] *IP CTS Waiver Order* ¶ 30.

[19] *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 19 (VRS).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
24/7 Operations 47 C.F.R. § 64.604(b)(4)(i)	VRS IP CTS	--	Sorenson VRS and IP CTS are available 24 hours per day, 7 days per week. Sorenson's equipment has the technical capacity to handle up to ***BEGIN CONFIDENTIAL*** [redacted] ***END CONFIDENTIAL*** Sorenson also has the ability to scale these capacities upwards to meet growing demand.
Redundancy 47 C.F.R. § 64.604(b)(4)(ii)	VRS IP CTS	--	Sorenson's operations include multiple redundancy features and safeguards, including emergency generators to ensure uninterruptable power for emergency use.
At-Home Interpreting 47 C.F.R. § 64.604(b)(4)(iii)	VRS	Not applicable to IP CTS	Sorenson does not permit or enable its VRS CAs to relay calls from their homes (or from any location other than a Sorenson call center).
Caller ID 47 C.F.R. § 64.604(b)(6)	VRS IP CTS	--	On all VRS calls that originate with a Sorenson iTRS customer, Sorenson passes through the number of the iTRS facility, 711, or the calling party's number. For IP CTS calls, the customer's underlying carrier, not the IP CTS provider, handles all call routing and passes through data to the interconnecting carrier. Accordingly, Sorenson (like other IP CTS providers) is not in a position as a matter of call architecture to pass through any IP CTS call or numbering data.
Complaint Logs and Procedures 47 C.F.R. § 64.604(c)(1), (6)	VRS IP CTS	--	Sorenson maintains logs of all complaints it receives that allege violations of the federal TRS mandatory minimum standards. The logs include the date the complaint was filed, the nature of the complaint, the date of resolution, and the nature of resolution. Sorenson annually submits to the FCC a summary of its complaint logs. Sorenson's complaint procedures are detailed in § XI below.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Complaint Contact Point 47 C.F.R. § 64.604(c)(2)	VRS IP CTS	--	Sorenson's contact person for iTRS consumer information and complaints is: Michael D. Maddix Director of Government and Regulatory Affairs 4192 South Riverboat Road Salt Lake City, UT 84123 Voice: (801) 287-9461 Fax: (801) 287-9401 Email: mmaddix@sorenson.com
Publicity re iTRS 47 C.F.R. § 64.604(c)(3)	VRS IP CTS	--	Although the FCC has initiated a pilot program to perform TRS outreach and no longer allows IP Relay and VRS providers to include the cost of outreach in their yearly cost submissions, Sorenson publicizes the availability of iTRS through print promotional materials, web-based promotional materials, sponsorship arrangements, and other means. Sorenson does not include the cost of these activities in its yearly cost submissions.
Rates 47 C.F.R. § 64.604(c)(4)	VRS IP CTS	--	Sorenson does not charge its customers anything for its iTRS. Per FCC rules, IP CTS customers may obtain equipment at no cost by obtaining a third party certification that complies with the requirements in 47 C.F.R. § 64.604(c)(9), or otherwise are required to pay $75.
Cost Information and other Data Submissions 47 C.F.R. § 64.604(c)(5)	VRS IP CTS	--	Sorenson maintains and submits required cost data and other data to the FCC and to the Fund administrator.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(iii)(M)	VRS IP CTS	--	Sorenson has provided a complete description of the iTRS whistleblower protections to all of its employees. Sorenson includes instructions for reporting noncompliance as part of its TRS Compliance Manual and TRS Compliance Training, which is on the home page of the company HR Intranet site. This includes the URL and phone number for the FCC's whistleblower hotline.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
VRS Service Name 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(ii)	VRS	Not applicable to IP CTS	Sorenson's primary VRS services (known as "SVRS") and its Spanish-language sub-brand (known as "RAPIDO.SVRS.TV") clearly identify Sorenson as the provider of the service.
URL Routing 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(ii)	VRS	Not applicable to IP CTS	All of Sorenson's VRS traffic is routed through IP addresses to which Sorenson's URL (svrs.tv) resolves.
Contracting 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(iii)	VRS	Not applicable to IP CTS	Sorenson does not contract with or otherwise authorize any third party to provide interpretation services or call center functions for VRS.
Written Contracts 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(v)	VRS	Not applicable to IP CTS	For VRS, all of Sorenson's contracts with third parties are in writing. Copies of all such contracts are available to the Commission and the iTRS Fund administrator upon request.
Call Center Reports 47 C.F.R. § 64.604(c)(5)(iii)(N)(2)	VRS	Not applicable to IP CTS	Sorenson files the required call center reports with the FCC and the Fund administrator.
CA Compensation 47 C.F.R. § 64.604(c)(5)(iii)(N)(3)	VRS	Not applicable to IP CTS	Sorenson does not compensate, provide preferential work schedules, or otherwise benefit its VRS CAs based on the number of VRS minutes or calls that the CA handles, either individually or as a group.
Remote Training Calls 47 C.F.R. § 64.604(c)(5)(iii)(N)(4)	VRS	Not applicable to IP CTS	Sorenson acknowledges that it is not entitled to compensation for VRS calls to remote training sessions or comparable activities when it (or its affiliates or related parties) has been involved in any manner with the session or activity. Sorenson removes any such minutes from its data submissions before submitting them to the TRS Fund administrator when seeking compensation.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
TRS Customer Information 47 C.F.R. § 64.604(c)(7)	VRS IP CTS	--	Sorenson does not use its subscribers' profile data for any purpose other than to connect TRS calls.[20] Neither Sorenson nor its employees sell, distribute, share, or reveal the profile data unless compelled by law to do so.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS	Not applicable to VRS	Sorenson prohibits its officers, directors, employees, contractors, and agents from offering or providing to any person or entity that registers to use IP CTS any form of direct or indirect incentives, financial or otherwise, to register for or use IP CTS. Sorenson prohibits its officers, directors, employees, contractors, and agents from offering or providing to a hearing health professional any direct or indirect incentives, financial or otherwise, that are tied to a consumer's decision to register for or use IP CTS, nor does it have joint marketing arrangements with any hearing health professionals.
IP CTS Registration and Certification 47 C.F.R. § 64.604(c)(9)	IP CTS	Not applicable to VRS	As of the date of this application, Sorenson complies with the interim rule requiring the collection of each new customer's name, address, and telephone number. In addition, in anticipation of the final registration requirement, which is not effective as of the date of this application, Sorenson has begun the process of collecting each new and existing customer's date of birth and last four social security digits, in addition to the information listed above. Sorenson also collects a separate, self-certification from the consumer before requesting compensation from the TRS fund. For new users, Sorenson collects the self-certification required by the rules adopted in the FCC's August 26, 2013 order.

[20] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5173-76 ¶¶ 77-84 (2000) (defining "profile data" and limitations on its use).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
IP CTS Registration Records and Confidentiality 47 C.F.R. § 64.604(c)(9)	IP CTS	Not applicable to VRS	Sorenson maintains records of any registration and certification information for a period of at least five years after the consumer ceases to obtain service, and does not disclose such registration and certification information or the content of such registration and certification information except as required by law or regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS	Not applicable to VRS	The default setting for Sorenson hardware and software is to have captions off, so that all IP CTS users must affirmatively turn on captioning, a process that requires only one step for the consumer.
IP CTS Equipment Fee 47 C.F.R. § 64.604(c)(11)	IP CTS	Not applicable to VRS	Sorenson does not seek compensation for minutes of IP CTS use by consumers who enrolled and began receiving service after March 6, 2013, and have not either (1) paid at least $75 for equipment, software, and applications or (2) submitted a third-party certification that complies with the requirements set forth in 47 C.F.R. § 64.604(c)(9). Sorenson maintains a record (for a minimum period of five years after the consumer ceases to obtain service from Sorenson) of IP CTS equipment provided to consumers, other than consumers that obtained equipment through a federal, state or local governmental program.
IP CTS Equipment Label 47 C.F.R. § 64.604(c)(11)	IP CTS	Not applicable to VRS	Sorenson labels the IP CTS equipment it distributes with the following label: "FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING THIS DEVICE WITH THE CAPTIONS ON." Sorenson has distributed this label to consumers who have Sorenson equipment without the label. For consumers of Sorenson software, this language appears each time the consumer logs into the application.
VRS Non-Discrimination 47 C.F.R. § 64.604(c)(12)	VRS	Not applicable to IP CTS	Sorenson does not engage in any unjust or unreasonable discrimination with regard to its provision of VRS service.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Emergency Call Handling 47 C.F.R. § 64.605	VRS IP CTS[21]	--	Sorenson provides emergency calling service in full compliance with the FCC's rules. In the case of VRS, it provides E911 service to its customers; handles and routes emergency calls to the applicable PSAP; immediately attempts to reestablish contact in the event of disconnection; automatically places 911 calls at the front of call queues; and obtains Registered Location information from its customers. Sorenson also delivers the following to the PSAP: Sorenson's role as iTRS provider, the ANI, the caller's Registered Location, and the CA's identification number. In the case of IP CTS calls, Sorenson provides captioning for emergency calls, and the customer's underlying carrier handles call routing and delivery to and from the PSAP. Sorenson also provides its users with methods of updating their Registered Locations.
Default Provider Registration 47 C.F.R. § 64.611(a)-(c)	VRS	Not applicable to IP CTS	Sorenson provides VRS users with the capability to register with Sorenson as their default provider. Sorenson routes and delivers all such users' inbound and outbound calls unless the user chooses to place a call with, or receives a call from, an alternate provider (dial-around). Sorenson updates the TRS Numbering Directory for users that select Sorenson as their default provider as required under the FCC's rules.

[21] *See Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order, 23 FCC Rcd. 5255, 5257 ¶ 1 n.7, 5263 ¶ 13 n.59 (2008) (describing the circumstances in which IP CTS providers must provide access to emergency services).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Ten-Digit Numbering 47 C.F.R. § 64.611(a)(1), (d)	VRS	Not applicable to IP CTS	For each user that registers with Sorenson as his or her default provider, Sorenson either (a) facilitates the user's valid porting request from another provider, or (b) assigns the user a geographically appropriate ten-digit number (or, when such numbers are not available in the user's rate center, a geographically approximate ten-digit number). Sorenson does not assign or issue proxy numbers to TRS users. For access to ten-digit numbers to assign to its subscribers, Sorenson contracts with *****BEGIN CONFIDENTIAL***** [redacted] *****END CONFIDENTIAL*****.
Toll-Free Numbering 47 C.F.R. § 64.611(e)(1)	VRS	Not applicable to IP CTS	Sorenson no longer assigns toll-free numbers to its VRS users, and has transitioned all existing toll-free numbers assigned to Sorenson's registered users to toll-free providers or terminated the provision of those toll-free numbers.
CPE 47 C.F.R. § 64.611(f)	VRS	Not applicable to IP CTS	The CPE that Sorenson provides to VRS users delivers routing information only to the user's default provider, except to the extent necessary to complete dial-around calls.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
User Notification re Ten-Digit Numbering and Toll-Free Numbering 47 C.F.R. § 64.611(g)	VRS	Not applicable to IP CTS	Sorenson's website and promotional materials related to numbering or E911 service include an advisory addressing (a) the process for obtaining a ten-digit number, (b) number portability, and (c) the process for updating Registered Location information. Sorenson has also prepared and posted an advisory explaining the process by which an iTRS user can acquire a toll-free number; transfer control of a toll-free number to the user; and/or request that a toll-free number be linked to the user's ten-digit number in the TRS Numbering Directory.
Speech-to-Speech Service	--	Waived for VRS and IP CTS.[22]	--
Interoperability and Portability 47 C.F.R. § 64.621	VRS	Not applicable to IP CTS	Sorenson's users are able to place and receive calls through any of the VRS providers' services, and Sorenson can receive calls from, and make calls to, any VRS user, to the extent it is technically possible. Sorenson does not take steps that restrict a user's unfettered access to another provider's service. Sorenson's VRS access technologies and video communication service platforms will be interoperable with the VRS Access Technology Reference Platform and the Neutral Video Communication Service Platform, including for point-to-point calls, once those platforms are developed.
Maintenance of Service After Porting Request 47 C.F.R. § 64.631(e)	VRS	IP CTS	When a Sorenson user has submitted a request to change the user's default provider, Sorenson does not reduce the level or quality of service provided to that user or reduce the functionality of any VRS access technology provided by Sorenson to the user.

[22] *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 20 (VRS).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSON'S COMPLIANCE
Impermissible Use of CPNI 47 C.F.R. § 64.5105	VRS IP CTS	--	Sorenson complies with the Commission's CPNI rules that are currently in effect. Sorenson uses or discloses CPNI only to the extent allowed by the Commission's rules, which would include providing access to CPNI to the TRS Fund administrator or the Commission for the purpose of administration and oversight of the TRS Fund, including the investigation and prevention of fraud, abuse, and misuse of TRS and seeking repayment to the TRS Fund for non-compensable minutes. Sorenson does not use, disclose, or permit access to CPNI to market to a customer TRS offerings that are within a category of TRS for which Sorenson is not currently the default provider for that customer without customer approval, unless otherwise permitted by the Commission's rules, such as for regaining former customers by marketing the same category of service from which CPNI was obtained to that former customer. Sorenson does not identify or track CPNI of customers that call competing TRS providers and does not use, disclose, or permit access to CPNI related to a customer call to a competing TRS provider. Sorenson and its affiliate CaptionCall do not share CPNI among themselves unless the customer (1) has selected Sorenson as its default provider for VRS and uses CaptionCall for IP CTS; or (2) has consented.

IV. VRS Call Center Leases

A. Leases for U.S. Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(2))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(2), copies of the leases for a representative sampling of Sorenson's U.S. VRS call centers were attached as Exhibits 2-6 to Sorenson's December 2, 2011 Certification Application. The sample includes the Sorenson call centers located in Sacramento, CA; Tucson, AZ; Kansas City, MO; Tampa, FL; and Portland, ME. Sorenson filed updated leases for these call centers with its December 2013 application update, and hereby incorporates these leases by reference and certifies they have not changed since Sorenson's December 2013 application update.

B. Leases for Call Centers Outside of the United States (47 C.F.R. § 64.606(a)(2)(ii)(A)(3))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(3), copies of the leases for all of Sorenson's VRS call centers located outside of the United States were attached as Exhibits 7-14 to Sorenson's December 2, 2011 Certification Application. Sorenson's non-U.S. call centers are located in the following cities (all in Canada): Victoria, BC; Vancouver, BC; Calgary, AB; Edmonton, AB; Winnipeg, MB; Ottawa, ON; Toronto, ON; and Halifax, NS. Sorenson filed updated leases for its call centers in Vancouver, Winnipeg, Ottawa, and Halifax in its December 2013 application update. Sorenson hereby incorporates the leases filed with its December 2011 application and December 2013 updated application by reference and certifies that they have not changed since their relevant submissions.

C. List of Call Center Leases (47 C.F.R. § 64.606(a)(2)(ii)(A)(2))

As required by 47 C.F.R. § 64.606(a)(2)(ii)(A)(2), a list of all of Sorenson's VRS call centers including the information required by 47 C.F.R. § 64.604(c)(5)(iii)(N)(2) is attached as Exhibit 1.

V. Description of Technology and Equipment Used to Support VRS Call Center Functions (47 C.F.R. § 64.606(a)(2)(ii)(A)(4))

A. Description of Technology and Equipment (47 C.F.R. § 64.606(a)(2)(ii)(A)(4))

Sorenson's VRS call center functions utilize the following technology and equipment:

- CAs' Desktop Computers and Monitors. A desktop computer and a monitor are installed at every CA's work station to allow the CA to manage and service VRS calls.

- CAs' Desktop Televisions. A television is installed at every CA's work station and connected to the CA's videophone to allow the CA to see the VRS user on the call.

- CAs' Videophones. A Sorenson videophone is installed at every CA's work station to allow the CA to communicate with the VRS user over a video link.

- CAs' Telephone Handsets. A telephone handset is installed at every CA's work station to allow the CA to speak with the hearing party.

- Custom Call Management Client. Sorenson employs a call management software system that the company developed in-house to manage call flow and routing. It is installed on every CA's desktop computer.

- ACD Servers. Sorenson's ACD servers manage inbound call queues and route VRS calls within and among Sorenson's VRS call centers. (In the documentation attached to Sorenson's December 2, 2011 Certification Application at Exhibit 16, these servers are referred to as "session border controllers.")

- Billing Servers. Sorenson's billing servers house the billing databases that store all VRS call data, including time stamps and the identity of the CA and call center that handled the call.

- Storage Area Networks ("SAN"). Sorenson's SAN is highly redundant storage hardware housed in collocation facilities used to warehouse billing, registration, and call data.

- Uninterruptible Power Supply ("UPS"). Sorenson's UPS utilizes battery resources that are engaged to keep production infrastructure online in the event of a power outage or surge.

- Switches. These are network components used to connect servers to each other, to disk resources, and to network resources.

- Routers. These are network components used to manage transmission control protocol / Internet protocol ("TCP/IP") traffic, including internal data traffic and traffic bound to or from the Internet.

- Firewall. Sorenson's firewall is a combined hardware and software network component that prevents unauthorized network access to Sorenson infrastructure.

- Load Balancer. Sorenson's load balancer assesses servers' current load levels and directs incoming and outgoing network communications to the server with the lowest current load, thereby ensuring the fastest response time.

- Call Managers. Sorenson's call managers are pieces of telephony equipment that allow the CA to manage inbound and outbound telephone conversations with the hearing party.

B. Technology and Equipment in U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(6))

Section 64.606(a)(2)(ii)(A)(6) of the Commission's rules requires providers operating more than five VRS call centers within the United States to provide a copy of each proof of purchase, lease, or license agreement for technology and equipment used to support call center functions in a representative sampling of five call centers within the United States. Section 64.606(a)(2)(ii)(A)(4) of the Commission's rules requires providers to include a statement indicating whether such technology and equipment is owned, leased, or licensed.

The call center sample Sorenson has selected mirrors the sample it selected for purposes of providing call center leases, as reflected in Section IV.A. above. The technology and

equipment documentation for these call centers was attached to Sorenson's December 2, 2011 Certification Application at Exhibit 16, and Sorenson hereby incorporates that Exhibit by reference. There is one material change to the materials submitted with Exhibit 16, which is ***** BEGIN CONFIDENTIAL ***** [redacted] ***** END CONFIDENTIAL ***** In addition, Sorenson submits with this filing Exhibit 4, which includes several updates to contracts included in the original Exhibit 16. Sorenson certifies that, other than these changes and updates, Exhibit 16 has not materially changed since Sorenson filed its December 2, 2011 Certification Application.

C. Technology and Equipment in Non-U.S. VRS Call Centers (47 C.F.R. § 64.606(a)(2)(ii)(A)(7))

Section 64.606(a)(2)(ii)(A)(7) of the Commission's rules requires providers to submit a copy of each proof of purchase, lease, or license agreement for technology and equipment used to support call center functions in each VRS call center located outside of the United States. Section 64.606(a)(2)(ii)(A)(4) of the Commission's rules requires providers to include a statement indicating whether such technology and equipment is owned, leased, or licensed.

As noted above in Section IV.B above, all of Sorenson's non-U.S. VRS call centers are located in Canada. The technology and equipment documentation for these call centers is included in Exhibit 16 to the December 2011 Certification Application, as explained in Section V.B above. In addition, Sorenson submits as part of Exhibit 4 to this updated application additional proofs of purchase, lease, or license agreements for technology and equipment used to support Sorenson's Canadian VRS call centers. With the exception of software licenses

(included in the records contained in Exhibit 16), Sorenson owns all of the technology and equipment used to support its call center functions.

D. ACD Lease or License Agreement (47 C.F.R. § 64.606(a)(2)(ii)(A)(8))

Sorenson has developed its own custom-built ACD system. Accordingly, there is no ACD lease or license agreement to submit.

VI. Entities With Ownership / Control Interests (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to list all "individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant." There ***BEGIN CONFIDENTIAL*** [redacted] ***END CONFIDENTIAL***

VII. Description of Organizational Structure (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to describe their organizational structure. A copy of a diagram presenting Sorenson's organizational structure was originally attached as Exhibit 17 to Sorenson's December 2, 2011 Certification Application, and a revised ownership structure diagram was attached to this the December 2013

Update as Exhibit 4. Sorenson hereby incorporates Exhibit 4 from the December 2013 Update and certifies it has not materially changed since December 3, 2013.

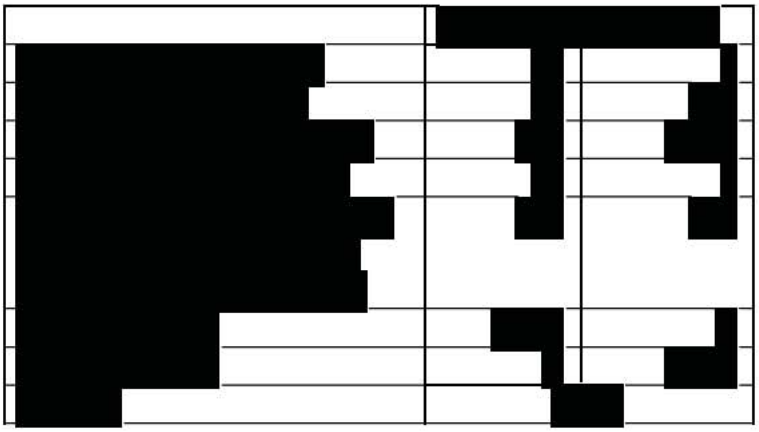
VIII. Names of Executives, Officers, Members of Board (47 C.F.R. § 64.606(a)(2)(ii)(B))

Section 64.606(a)(2)(ii)(B) of the Commission's rules requires applicants to provide "the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company)." Sorenson does not have any general partners or managing members. The names of its executives, officers, and board members are included on the list attached as Exhibit 2.

IX. Number of TRS Employees (47 C.F.R. § 64.606(a)(2)(ii)(C))

Section 64.606(a)(2)(ii)(C) of the Commission's rules requires applicants to provide "a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers (in the case of VRS), communications assistants, and persons involved in marketing and sponsorship activities." The requested information follows (effective February 25, 2014):

*****BEGIN CONFIDENTIAL*****



*****END CONFIDENTIAL*****

X. List of Sponsorship Agreements (47 C.F.R. § 64.606(a)(2)(ii)(E))

Section 64.606(a)(2)(ii)(E) of the Commission's rules requires applicants to provide "a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements." A copy of Sorenson's list of sponsorship agreements since its December 2013 updated application is attached as Exhibit 3. For each sponsorship agreement on the list, there is a written document, ranging from a one page email for simple sponsorships to documents a few pages long for more extensive sponsorships, specifying the amount of the contribution and the terms under which the contribution will be made.

XI. Description of Complaint Procedures (47 C.F.R. § 64.606(a)(2)(iii))

Sorenson directs users and employees to report complaints through the email address vrscomments@sorenson.com for VRS and support@captioncall.com for IP CTS. Sorenson applies the following process to complaints it receives related to its services.

*****BEGIN CONFIDENTIAL*****

- [redacted]
- [redacted]
- [redacted]
- [redacted]

- [redacted]
  - [redacted]
  - [redacted]
- [redacted]
- [redacted]

*****END CONFIDENTIAL*****

XII. Statement Regarding Annual Compliance Reports (47 C.F.R. § 64.606(a)(2)(iv))

Pursuant to 47 C.F.R. § 64.606(a)(2)(iv), Sorenson states that it will file annual compliance reports demonstrating continued compliance with the Commission's rules governing Telecommunications Relay Service.

XIII. Certification

I declare under penalty of perjury that I am Grant Beckmann, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

Grant Beckmann
Vice President of Engineering and Compliance Officer
Sorenson Communications, Inc.

Date: February 28, 2014

List of Exhibits

Exhibit 1	List of VRS Call Centers
Exhibit 2	Names of Sorenson's Executives, Officers, and Board Members
Exhibit 3	Sponsorship Agreements
Exhibit 4	Updated Documentation Related to Call Center Technology and Equipment

Addendum

Sorenson Regulatory Compliance Plan

Sorenson Regulatory Compliance Plan

As a provider of Telecommunications Relay Services ("TRS"), Sorenson Communications, Inc. ("Sorenson") is committed to full and complete compliance with the rules and regulations of the Federal Communications Commission ("FCC"). This Regulatory Compliance Plan describes Sorenson's policies, procedures, and practices for complying with the Communications Act (47 U.S.C. § 151 *et seq.*), FCC rules (47 C.F.R. § 64.601 *et seq.*), and the FCC's *Report and Order and Further Notice of Proposed Rulemaking*, dated June 10, 2013 (¶ 134).

Compliance Office and Staff

Sorenson's compliance program is led by a Compliance Officer and a Senior Compliance Analyst (together, the "Compliance Office"). The Compliance Officer chairs Sorenson's Compliance Committee and is the senior officer responsible for implementing and overseeing Sorenson's compliance with FCC rules. Sorenson's Senior Compliance Analyst is a full-time, dedicated compliance analyst who reports to the Compliance Officer and meets monthly with the Compliance Committee. The Senior Compliance Analyst has direct responsibility for the development, production, and maintenance of the compliance tools, reports, plans, tasks and activities for the management of the Sorenson regulatory compliance system. The Compliance Office:

- Develops and maintains compliance policies, procedures, training materials, and compliance records;
- Performs compliance analysis and leads the development, production, and maintenance of reporting methods to detect and monitor any significant compliance deviations;
- Works with department executives to ensure knowledge of and compliance with company policies and procedures;
- Prepares regular compliance reports detailing observance of company policies and regulatory requirements;
- Investigates and reports compliance matters to Sorenson management; and
- Monitors corrective and preventive actions relating to non-compliance issues and findings.

The Compliance Office has the authority to monitor ongoing Company activities as they relate to FCC Rules, and has unlimited access to all Company files, records, and information needed to fulfill its compliance responsibilities. This includes the right to interview Company employees in connection with potential instances of non-compliance. The Compliance Office has access to sufficient internal and external resources, including outside counsel, to execute its compliance duties.

Sorenson's Compliance Committee is composed of department executives from across the company, including Engineering, Information Systems, Operations, Sales and Outreach, Marketing, and Finance. The Committee meets monthly to review any FCC-related issues, including regulatory changes and any compliance related policies or procedures. At each meeting, the Committee: (1) reviews the status of customer registration, certification, and

verification for TRS services; (2) receives updates from department executives on the status of compliance with terms of FCC orders; (3) reviews any outstanding items from the previous Committee meeting; and (4) makes assignments on compliance action items for the next meeting. Sorenson's Compliance Analyst documents and maintains records of the Committee meetings.

Compliance Manual

Sorenson's Compliance Office has developed and adopted a TRS Compliance Manual ("Compliance Manual"). The Compliance Manual is distributed to all Sorenson personnel who perform, supervise, oversee, or manage any activities that relate to Sorenson's responsibilities under Section 225 of the Communications Act and the TRS rules ("Covered Personnel"). An electronic copy of the Compliance Manual is posted on Sorenson's internal intranet site in the compliance section. All Sorenson employees have access to the Compliance Manual on the intranet site. The Compliance Office has responsibility for revising and updating the Compliance Manual, in consultation with outside counsel, to maintain compliance with all FCC rules and regulations.

Compliance Training

Working with the necessary company departments, Sorenson's Compliance Office has developed and implemented training on Sorenson's Compliance Manual and the department-specific policies and procedures for compliance with FCC Rules. The Senior Compliance Analyst reviews and approves all training materials, tracks all completed and outstanding training, and coordinates training updates to address any changes to FCC Rules or Sorenson's policies and procedures.

Officer Training:

Sorenson's senior executives and officers have been trained on the Compliance Manual and the department-specific policies and procedures for compliance with FCC Rules. At the committee's monthly meetings, members of the Committee receive updated training from the Senior Compliance Analyst on any new FCC Rules and any new Sorenson policies or procedures.

Employee Training:

To conduct employee training, the Compliance Office meets with each department's executive individually to review the FCC Rules applicable to the department. The departments customize the Compliance Office's base compliance training presentation to emphasize the department-specific policies and procedures that apply to their staff. The Compliance Office reviews and approves all customized department training materials before training is provided. Sorenson's department executives conduct the majority of employee training through live group sessions, with the remaining portion being conducted online through a learning management system. Training takes place annually or as TRS Rules are changed. Upon completion of the training, employees sign an electronic acknowledgment indicating receipt of the Compliance Manual and

completion of compliance training. The acknowledgements are tracked and maintained centrally by the Compliance Office.

New Hire Training:

All newly hired employees receive compliance training within 30 days of their start date. For every hiring period, Sorenson's Human Resources Manager provides the Senior Compliance Analyst a list of new employees. The list includes each new employee's start date, the employee's department, and the employee's supervisor. The Senior Compliance Analyst maintains that information in order to track the completion of new-hire compliance training. The Senior Compliance Analyst informs each new employee's supervisor of the requirement to train the new employee on both (1) Sorenson's Compliance Manual, and (2) the department-specific policies and procedures for compliance with FCC Rules. All compliance training materials are reviewed, approved, and maintained by the Senior Compliance Analyst. When the supervisors have confirmed that the new-hire training is completed, the Senior Compliance Analyst updates the tracking spreadsheet.

Contractor Training:

The Compliance Office trains any contractor who perform, supervise, oversee, or manage any activities that relate to Sorenson's responsibilities under, and compliance with, Section 225 of the Act and the TRS Rules. The training covers Sorenson's Compliance Manual as well as the specific Sorenson policies and procedures that are applicable to the contractor's compliance with FCC Rules.

Training Updates:

The Senior Compliance Analyst coordinates training of employees when a rule change impacts Sorenson's TRS services. The Compliance Office identifies the affected departments and works with the departments to modify or create a procedure to address the rule change. The Compliance Office reviews and approves all new policies and procedures. The Compliance Office ensures that the departments impacted by the new policy or procedure train their staff accordingly. The Compliance Office reviews the training materials, and tracks completion of the training.

Compliance Reporting Mechanisms

Sorenson has established several mechanisms for employees to report fraud, waste, or abuse. Each of these is described in the Compliance Manual, and explained to employees as part of their compliance training.

To report any compliance concern, employees may contact their supervisor or the executive officer of their department who are instructed to contact the Compliance Office. Alternatively, employees may contact a "Compliance Hotline" anonymously through a toll-free number. Employees may also email the Compliance Office directly via a dedicated email address. The Senior Compliance Analyst monitors all reports made through the Compliance Hotline and the

compliance email inbox. The Senior Compliance Analyst is responsible for responding to concerns, including elevating them to the Compliance Officer and/or the Compliance Committee as may be appropriate.

The Compliance Manual informs employees that they have the right to report compliance concerns to the FCC's Office of Inspector General, and provides the website address and hotline phone number to make such reports.

Sorenson does not tolerate retaliatory conduct. Employees are informed in the Compliance Manual and in their training that Sorenson will never take action against employees for reasonably reporting information related to potential compliance violations.

Monitoring and Auditing Compliance with FCC Rules

Sorenson's Compliance Office regularly monitors and audits company departments regarding compliance with FCC rules and will make any necessary changes to the Compliance Plan in response to these evaluations. The following describes (1) Sorenson's monthly review and audit of minutes for submission to the TRS Administrator, (2) Sorenson's routine review of compliance with customer registration, certification, and verification requirements; and (3) Sorenson's standard audit process for compliance checks on all departments.

(1) Monthly Review of Minutes:

Each month, Sorenson conducts a monthly, multi-department review of the detailed call records prior to submission to the TRS Administrator. As part of this monthly review process, members of Sorenson's Quality Assurance staff and database administration team review and analyze the FCC's and TRS Fund Administrations guidelines used to prepare the report of compensable minutes. The engineering team then meets with the executives of the Finance, Engineering, Information Technology (IT), and Sales and Outreach departments, as well as the Compliance Office to review the draft submission. The IT and Engineering departments maintain detailed operating procedures that document the monthly submission preparation and review process.

(2) Compliance with Customer Registration, Certification, Verification Requirements:

The Senior Compliance Analyst works with the Sales and Outreach department to obtain reports on the customer registration, certification, and verification for all TRS services. Each month, the Senior Compliance Analyst prepares a "Registration, Certification, and Verification Process Review" report for the Compliance Committee. The report identifies the total installed accounts and the percentage of those accounts that have completed registration, self-certification, verification, professional verification (if applicable), and other relevant metrics. The Senior Compliance Analyst works with the Sales and Outreach department to ensure (i) compliance with the TRS registration, certification, and verification requirements for each TRS service, and (ii) that only properly registered, certified, and verified customers' minutes are billed to the TRS Administrator.

(3) Routine Compliance Office Audits

The Compliance Office coordinates an internal audit process for conducting compliance reviews in order to help minimize risk to the organization and strengthen internal controls. The internal audit process: (1) identifies risks within each department that relate to compliance with FCC rules; (2) ensures that each department has department-specific procedures in place to comply with relevant FCC rules; (3) regularly reviews each department to ensure that procedures and processes are being followed; (4) provides feedback and remedial action items following the reviews; and (5) monitors and enforces completion of action items.

The Senior Compliance Analyst conducts periodic audits of all departments with responsibility for providing TRS services, including: Sales and Outreach; Marketing; Information Systems; Operations; Finance; and Human Resources. The audits utilize the following protocol:

Planning:

The Senior Compliance Analyst has responsibility for carrying out internal audits under Sorenson's audit plan. The Senior Compliance Analyst conducts a preliminary risk assessment, gathers the relevant department's executives input on the preliminary risk assessment, and prepares an audit scope based on the results of the risk assessment process.

Once the audit plan is finalized, the Senior Compliance Analyst collects any relevant documentation and information necessary for the audit.

Fieldwork:

The Senior Compliance Analyst is responsible for conducting the audit fieldwork and has access to both internal and external resources, including outside counsel, to complete the audit. A typical audit includes a review of the department's policies and procedures, performance of tests against those procedures, and verification that the department is conducting its own testing for compliance with the relevant TRS requirements.

Findings and Reporting:

The Senior Compliance Analyst communicates preliminary findings immediately to the affected department executives, and prepares an initial draft report for discussion with them. The department executives are required to provide responses to the audit findings and recommendations for remediation. The Senior Compliance Analyst has authority to consult outside counsel regarding any preliminary audit findings and potential instances of non-compliance with FCC rules and regulations. The audit findings are finalized to include the department executive's responses to audit findings and proposed recommendations. The final audit report is provided to the Compliance Office and Committee, and discussed as needed during the Committee's monthly compliance meetings.

Remedial Measures:

Following the completion of the audit, the Senior Compliance Analyst performs a follow-up review to verify that the agreed upon actions have been implemented and completed.

Compliance Policies, Procedures, and Practices

Sorenson's senior management has communicated a strong message to all employees that Sorenson is committed to 100% compliance with all FCC rules and regulations. To effectuate that commitment, Sorenson has developed and implemented its Compliance Manual as well as a comprehensive and robust set of policies and procedures to prevent fraud, waste, and abuse of the TRS Fund.

The Compliance Manual describes Sorenson's commitment to compliance and its expectation that all employees will do their part. It describes permitted and prohibited activities in the following areas: working with customers; providing TRS services; determining qualifying calls; providing equivalent and innovative services; and reporting and record keeping.

Sorenson's policies and operating procedures detail the specific requirements that each department must follow to comply with FCC rules for TRS providers. All policies are maintained on Sorenson's internal intranet site, and employees have access to the policies and procedures applicable to their department. All policies implemented to ensure compliance with TRS Rules were reviewed and approved by the Compliance Office. The TRS policies cover a variety of topics with detailed operating procedures implementing the policies. The following are examples of these topics: Customer Data Access and Use, Whistleblower, CPNI, User Registration, Verification and Certification, No Direct and Indirect Inducements.

The Compliance Office, in coordination with outside counsel, monitors developments in FCC rules and evaluates whether those developments require a modification to Sorenson's policies and procedures. If a change is required, the Compliance Office identifies the affected departments and works with them to modify or create a policy or procedure to address the rule change. The Compliance Office reviews and approves all new policies and procedures, and works with outside counsel as needed to ensure that the new policy or procedure appropriately addresses FCC rules.

Enforcement of Compliance Plan

If Sorenson determines that one or more of its employees have engaged in conduct that violates FCC Rules, the Compliance Office – in consultation with outside counsel – will take appropriate disciplinary measures up to and including suspension, termination, and referral to the appropriate governmental authorities.

If Sorenson determines that minutes have been billed improperly to the TRS Fund, it will advise the TRS Administrator at its earliest opportunity through the submission of a revised or corrected billing submission.