

**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 which became effective upon the effective date of the plan of reorganization of Sorenson and its affiliates was attached to the December 2013 Update as Exhibit 4. Sorenson includes as Exhibit 2 to this Update a further revised ownership structure diagram. As shown in Exhibit 2, Sorenson's affiliate, CaptionCall, on such effective date, became a subsidiary of New Holdco, rather than of Sorenson. Sorenson will remain the certified IP CTS provider, with support from CaptionCall.

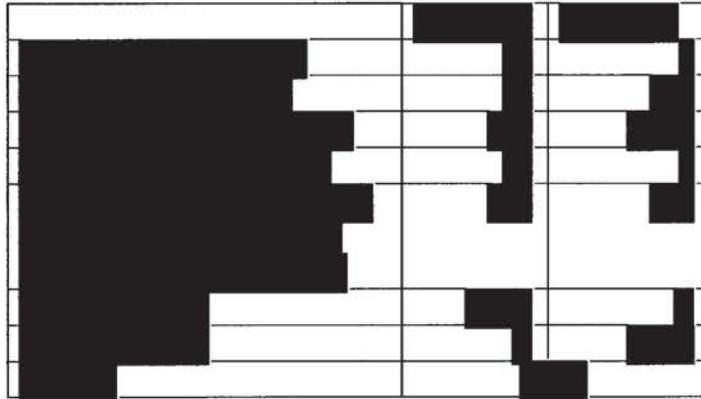
**VIII. Names of Executives, Officers, Members of Board (47 C.F.R. § 64.606(a)(2)(ii)(B))**

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 3 to this Update.

**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 May 7, 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 4. 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 [vrcomments@sorenson.com](mailto:vrcomments@sorenson.com) for VRS and [support@captioncall.com](mailto: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]

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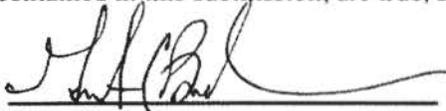
\*\*\*END CONFIDENTIAL\*\*\*

**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.

A handwritten signature in black ink, appearing to read 'G. Beckmann', written over a horizontal line.

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

**Date:** May 15, 2014

**List of Exhibits**

- |           |                                     |
|-----------|-------------------------------------|
| Exhibit 1 | Call Center List                    |
| Exhibit 2 | Revised Organizational Structure    |
| Exhibit 3 | Revised Directors and Officers List |
| Exhibit 4 | Sponsorship List                    |

## **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.

**Redacted for Public Inspection**

## **Exhibit B**

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

Accepted/Filed

MAY 15 2014

FCC Office of the Secretary

In the Matter of )

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Structure and Practices of the Video Relay  
Service Program )

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CG Docket No. 10-51

**Update and Verification of Internet-Based TRS Certification  
Application**

**Sorenson Communications, Inc.**

Michael D. Maddix  
Director of Government and  
Regulatory Affairs  
SORENSEN COMMUNICATIONS, INC.  
4192 South Riverboat Road  
Salt Lake City, UT 84123

John Nakahata  
Christopher Wright  
Mark D. Davis  
Stephen W. Miller  
HARRIS, WILTSHIRE & GRANNIS LLP  
1200 Eighteenth Street, N.W., Suite 1200  
Washington, DC 20036  
T: (202) 730-1300  
jnakahata@harriswiltshire.com

*Counsel to Sorenson Communications, Inc.*

May 15, 2014

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**I. Introduction and Summary**

In accordance with the Commission's rules, its orders released on July 28 and October 17, 2011, and its Notice of Grant of Conditional Certification released on April 24, 2014,<sup>1</sup> 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") in light of Sorenson's restructuring.<sup>2</sup>

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 112 call centers (104 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

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<sup>1</sup> In the April 24, 2014 Notice, the Commission gave Sorenson 15 days from the effective date of its restructuring to file this updated application. The effective date of the restructuring is April 30, 2014, making this update timely.

<sup>2</sup> Sorenson's updated application consists of this document; the exhibits submitted with the December 2011 application, the December 2012 update, the December 2013 update, the February 2014 update; and the exhibits submitted herewith. Sorenson hereby adopts and incorporates the exhibits accompanying the 2011 application, the 2012 update, the 2013 update, and the February 2014 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.

terms of service quality, equipment innovations, efficiency, ease-of-use, fraud prevention, and consumer responsiveness.

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 May 7, 2014, Sorenson serves \*\*\*BEGIN CONFIDENTIAL\*\*\* [REDACTED]

[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))**

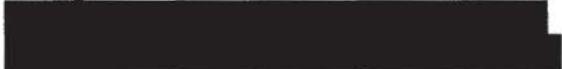
Pursuant to the Commission’s July 28, 2011 Order, Sorenson currently provides VRS and IP CTS under a grant of interim eligibility.<sup>3</sup> Sorenson, which formerly operated under contract with the State of Utah’s FCC certified TRS program, timely filed its Certification Application on December 2, 2011, and updated that application on December 3, 2012, December 3, 2013, and February 28, 2014. 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.<sup>4</sup>

<sup>3</sup> 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”).

<sup>4</sup> 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	SORENSEN'S COMPLIANCE
<p><b>CA Training</b></p> <p>47 C.F.R. § 64.604(a)(1)(i)</p>	<p>VRS IP CTS</p>	<p>--</p>	<p>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 <b>***BEGIN CONFIDENTIAL***</b>    <b>***END CONFIDENTIAL***</b>. IP CTS CAs are trained for an average of <b>***BEGIN CONFIDENTIAL***</b>    <b>***END CONFIDENTIAL***</b>.</p>
<p><b>CA Skills</b></p> <p>47 C.F.R. § 64.604(a)(1)(ii)</p>	<p>VRS IP CTS</p>	<p>Partial waiver for IP CTS<sup>5</sup></p>	<p>As part of its robust training program, Sorenson ensures that its CAs handling VRS and IP CTS calls are sufficiently skilled in typing, grammar, and spelling;<sup>6</sup> that they are familiar with hearing and speech-disability cultures, languages and etiquette; and that they possess clear and articulate voice communications skills.</p>

<sup>5</sup> 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).

<sup>6</sup> Sorenson does not separately assess VRS CAs for competence in interpretation of “typewritten ASL.” The Commission has clarified that this requirement simply does not apply to IP CTS because “the user does not type the outbound message.” See *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, 21 FCC Rcd. 9147, 9149 (2006). For the same reason, the “typewritten ASL” requirement does not apply to VRS. As with IP CTS, VRS users do not type any messages, so a CA never has an opportunity or a need to interpret “typewritten ASL.” Sorenson does not provide IP Relay or TTY services, to which this requirement would be applicable.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<b>CA Typing</b> 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). <sup>7</sup>
<b>VRS CA Qualifications</b> 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.
<b>Ten Minute Rule</b> 47 C.F.R. § 64.604(a)(1)(v) <sup>8</sup>	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.
<b>Gender Preference</b> 47 C.F.R. § 64.604(a)(1)(vi)	VRS	Waived for IP CTS <sup>9</sup>	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.
<b>Confidentiality Rule</b> 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.

<sup>7</sup> See *IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement to test typing speeds of IP CTS CAs).

<sup>8</sup> 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.").

<sup>9</sup> See *IP CTS Waiver Order* ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<b>Accuracy Rule</b>  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.
<b>Sequential Calls</b>  47 C.F.R. § 64.604(a)(3)(i)	VRS	Waived for IP CTS <sup>10</sup>	Sorenson bars its VIs from refusing single or sequential calls.
<b>Call Length</b>  47 C.F.R. § 64.604(a)(3)(i)	VRS IP CTS	--	Sorenson does not limit the length of calls.
<b>Types of Calls</b>  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 <sup>11</sup>	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.
<b>Pay-Per-Call Calls</b>  47 C.F.R. § 64.604(a)(3)(iv)	--	Waived for VRS and IP CTS <sup>12</sup>	--
<b>Text-to-voice and voice-to-text</b>  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.

<sup>10</sup> See *IP CTS Waiver Order* ¶ 30 n.105 (waiving in certain circumstances the requirement that IP CTS CAs may not refuse sequential calls).

<sup>11</sup> 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").

<sup>12</sup> See *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 15 (VRS).

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<b>VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO</b>  47 C.F.R. § 64.604(a)(3)(v)(2)	VRS	Full waiver for IP CTS; <sup>13</sup> partial waiver for VRS <sup>14</sup>	Sorenson's VRS services support two-line VCO.
<b>HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO</b>  47 C.F.R. § 64.604(a)(3)(v)(3)	Two-line HCO applies to VRS	Waived for IP CTS; <sup>15</sup> partial waiver for VRS <sup>16</sup>	Sorenson's VRS supports two-line HCO on all platforms.
<b>Call Release</b>  47 C.F.R. § 64.604(a)(3)(vi)(1)	--	Waived for VRS and IP CTS <sup>17</sup>	--
<b>Speed Dialing</b>  47 C.F.R. § 64.604(a)(3)(vi)(2)	VRS	Waived for IP CTS <sup>18</sup>	Sorenson makes speed-dialing functionality available to its VRS customers.
<b>Three-way Calling</b>  47 C.F.R. § 64.604(a)(3)(vi)(3)	VRS	Waived for IP CTS <sup>19</sup>	Sorenson makes three-way-calling functionality available to its VRS customers.
<b>Voice Mail</b>  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 customers. Sorenson's voice mail and SignMail® (video mail) offerings include interactive menus and, where applicable, hot keys to access the services. For IP CTS customers, Sorenson offers an "answering machine" mode, which allows customers to see captions when listening to messages recorded on an answering machine.

<sup>13</sup> IP CTS Waiver Order ¶ 30.

<sup>14</sup> 2011 Waiver Order ¶ 9.

<sup>15</sup> IP CTS Waiver Order ¶ 30.

<sup>16</sup> 2011 Waiver Order ¶ 11.

<sup>17</sup> IP CTS Waiver Order ¶ 30 (IP CTS); 2011 Waiver Order ¶ 13 (VRS).

<sup>18</sup> IP CTS Waiver Order ¶ 30.

<sup>19</sup> IP CTS Waiver Order ¶ 30.

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STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<b>Privacy Screen</b>  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.
<b>International Calls</b>  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.
<b>ASCII / Baudot Format</b>  47 C.F.R. § 64.604(b)(1)	--	Waived for IP CTS; <sup>20</sup> not applicable to VRS	--

<sup>20</sup> *IP CTS Waiver Order* ¶ 30.

STANDARD	APPLIES TO	WAIVED OR N/A	SORENSEN'S COMPLIANCE
<b>Speed of Answer for IP CTS</b>  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. <sup>21</sup>
<b>Speed of Answer for VRS</b>  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.
<b>Equal Access to IXCs</b>  47 C.F.R. § 64.604(b)(3)	--	Waived for VRS and IP CTS <sup>22</sup>	--
<b>24/7 Operations</b>  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 <b>***BEGIN CONFIDENTIAL***</b> <b>***END CONFIDENTIAL***</b> Sorenson also has the ability to scale these capacities upwards to meet growing demand.

<sup>21</sup> There are pending requests to waive the speed-of-answer requirements, which, in effect, constitute an industry-wide waiver request. *See* Petition for Waiver, ASL Services Holdings, LLC, CG Docket Nos. 10-51 and 03-123 (filed Oct. 24, 2013); Supplement, ASL Services Holdings, LLC, CG Docket Nos. 10-51 and 03-123 (filed Nov. 4, 2013); Letter from Jeff Rosen, General Counsel, CSDVRS, LLC, et al., to the Honorable Tom Wheeler, Chairman, FCC, et al., CG Docket Nos. 03-123 and 10-51 (filed Dec. 6, 2013) ("Collective Providers Letter"); Letter from Monica S. Desai, Counsel to Purple Communications, Inc., to Marlene H. Dortch, Secretary, FCC (filed Dec. 24, 2013); Letter from Claude L. Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc., to Marlene H. Dortch, Secretary, FCC (filed Dec. 28, 2013) ("Consumer Groups Letter"). Sorenson's certification herein regarding compliance with mandatory minimum standards is made subject to the Commission's action on the pending speed-of-answer waiver request.

<sup>22</sup> *IP CTS Waiver Order* ¶ 30 (IP CTS); *2011 Waiver Order* ¶ 19 (VRS).

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<b>STANDARD</b>	<b>APPLIES TO</b>	<b>WAIVED OR N/A</b>	<b>SORENSEN'S COMPLIANCE</b>
<b>Redundancy</b>  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 uninterrupted power for emergency use.
<b>At-Home Interpreting</b>  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).
<b>Caller ID</b>  47 C.F.R. § 64.604(b)(6)	VRS IP CTS	--	<p>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.</p> <p>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.</p>
<b>Complaint Logs and Procedures</b>  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.
<b>Complaint Contact Point</b>  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: <a href="mailto:mmaddix@sorenson.com">mmaddix@sorenson.com</a>