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November 5, 2014

Via Hand Delivery

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor – Room N201
Harrisburg, PA 17120

Re: Application of Hamilton Relay, Inc. for Approval to Offer, Render, Furnish or Supply Telecommunications Relay Services to the Public in the Commonwealth of Pennsylvania; Docket No. A-2014-2447601

Dear Secretary Chiavetta:

We are counsel to Hamilton Relay, Inc. (“Company”) in the above-referenced Application proceeding. Staff of the Public Utility Commission (“Commission”) has reviewed the proposed Telecommunications Relay Services (“TRS”) Tariff, which was submitted as part of the Application, and has asked the Company to revise certain of the language included in it. Accordingly, enclosed for filing please find a **Proprietary Version** and a **Public Version** of the Company’s revised TRS Tariff. The **Proprietary** and **Public Versions** of the Tariff replace and supersede in their entirety the proprietary and public forms of the tariff which were appended to the Application as Exhibit B.

The **Proprietary Version** of the revised TRS Tariff includes confidential information and is being filed under separate seal. We ask that the Commission not allow any public disclosure of the **Proprietary Version**. The confidential information that is part of the **Proprietary Version** is redacted from the **Public Version** consistent with 52 Pa. Code § 1.32.

Should any additional information be required to perfect the Application, please contact me directly at (717) 255-7611. Thank you for your assistance.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

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Encls.

cc: Certificate of Service
Eric Jeschke, TUS (via email)
Beth Slough (via email)

TELECOMMUNICATIONS RELAY SERVICES

HAMILTON RELAY, INC.

TELECOMMUNICATIONS RELAY SERVICES

FOR THE COMMONWEALTH OF PENNSYLVANIA

By: Dixie Ziegler, Vice President
1001 12th Street
Aurora, NE 68818
(402) 694-5101

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TELECOMMUNICATIONS RELAY SERVICES

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TELECOMMUNICATIONS RELAY SERVICES

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY HAMILTON RELAY, INC.

1.1 General

Hamilton Relay, Inc. (Hamilton) will provide for the uniform and coordinated provision of Pennsylvania TRS on a statewide basis. Hamilton ensures Pennsylvania TRS will be available at all times (24 hours a day, 7 days a week, 365 days a year).

Hamilton's relay service is designed to provide the means whereby a person who is deaf, deaf-blind, hard of hearing or who has difficulty speaking can communicate over the existing telecommunications network with a standard phone user (and vice-versa) through the voice assistance of the relay service (Communication Assistant).

The Telecommunications Relay Service in Pennsylvania, which is provided by Hamilton, will accept calls originating from within the Commonwealth of Pennsylvania to any point in the world and from all points outside the Commonwealth of Pennsylvania to any point within the Commonwealth of Pennsylvania.

[Paragraph Expurgated]

TELECOMMUNICATIONS RELAY SERVICES

**1.1 TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC.(Cont'd)****1.2 Description and Method of Operation**

Hamilton allows individuals who are deaf, hard of hearing or have difficulty speaking to communicate over the telecommunications network through the following call types and methods:

- A. **TTY/ASCII.** This call type allows an individual utilizing a TTY to place or receive calls. The Communications Assistant (CA) voices the TTY conversation from the TTY user to the other party, and types the conversation from the other party back to the TTY user.
- B. **Voice Carry Over (VCO).** VCO provides people who can communicate with their voice but have difficulty hearing, the ability to place or receive calls. The VCO caller speaks his or her own message directly to the caller without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. *Hamilton allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and Hamilton connects the call. Voice users do not hear tones during a VCO call.*
- C. **Hearing Carry Over (HCO).** This feature allows people who have difficulty speaking to place and receive calls. The HCO caller hears the communication directly from their caller without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party. Hamilton allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode.
- D. *A variety of HCO and VCO calls types are available through Hamilton relay including, but not limited to: VCO to HCO, HCO to HCO, VCO to VCO.*
- E. **Spanish.** Hamilton provides Intrastate Spanish to Spanish and Interstate Spanish to Spanish service. Hamilton bills Intrastate Spanish to Spanish minutes to the Commonwealth of Pennsylvania and bills Interstate Spanish to Spanish minutes to the Interstate TRS Fund. Relay users can select "Spanish" as an option on the TRS Provider's Customer Profile. This information is presented to the CAs at the workstation for proper call processing.

In addition, Hamilton also provides Intrastate Spanish to English and English to Spanish call handling and bills these minutes of use to the Commonwealth of Pennsylvania.

- F. **Customer Profile.** Relay users may indicate how their calls are handled by completing a customer profile form. This feature allows Hamilton to customize the relay service for each relay user. Once activated, the customer profile appears on the CA's screen each time the relay user calls the relay so that the CA can properly process the call according to the user's preferences.

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC.(Cont'd)

1.2 Description and Method of Operation (Cont'd)

- G. **Speech to Speech (STS).** STS Service allows individuals who have difficulty speaking to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.
- H. **Caller ID.** Hamilton provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. *This information is provided on all call types and on all carriers.*
- I. **Call Release.** Hamilton releases TTY to TTY calls if the operator reaches a TTY user when placing a relay call. Hamilton gives the calling party the option to communicate independent of the relay function. The CA then drops out of the call. If the call is a long distance call, the call will be billed as a normal relay call (i.e. the relay user's carrier of choice).

Hamilton provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This usually happens inadvertently. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

- J. **Speed Dialing.** Relay users may choose up to 50 numbers they would like programmed for speed dial.
- K. **Three-Way Calling.** If a three-way call is desired and three-way calling is available from the LEC and the customer has purchased this feature from his/her LEC, the customer can use the feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.
- L. **Hamilton is able to receive and transmit calls in Voice, Turbo Code, ASCII (at the correct Baud rate) or Baudot format.**

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TELECOMMUNICATIONS RELAY SERVICES

I. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY HAMILTON RELAY, INC. (Cont'd)**1.3 Regulations**

- A. Hamilton ensures Pennsylvania TRS is available at all times (24 hours a day, 7 days a week, 365 days a year). TRS may be reached by dialing 711, as well as the following toll-free access numbers that are specific to Pennsylvania TRS:

- TTY – (800) 654-5984
- Voice – (800) 654-5988
- Spanish – (844) 308-9291
- STS – (844) 308-9292
- Customer Service – (800) 974-1253
-

- B. When dialing 711, if the relay user has a customer profile and has indicated a connection preference, the call will be automatically setup in the correct connection mode and immediately delivered to the workstation for call processing (i.e. permanent branding of TTY, ASCII, VCO, etc.)

If the relay user has no customer profile associated with the number they are calling from, the call will default to a voice connection. The CA will listen for different connect tones, or speaking, in order to connect the relay call in a timely fashion (i.e., voice mode then TTY, then ASCII).

All services available from Hamilton are accessible through 711. Hamilton's network is configured to segregate 711 traffic from other 800/888 traffic.

- C. Hamilton's relay service is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the Relay Center at the busiest hour. Hamilton defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal. Hamilton ensures call blockages for Pennsylvania TRS users will be no different than experienced by voice-to-voice non TRS callers.
- D. Hamilton will answer eighty-five percent (85%) of all Pennsylvania Relay calls within 10 seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.
- E. Hamilton is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Hamilton also is able to process credit cards, any Pennsylvania local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards.

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC. (Cont'd)

1.3 Regulations (Cont'd)

- F. Hamilton does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice will then rate and bill any long distance payphone calls. Once billing has been established the call will be processed as a regular relay call.

- G. Hamilton does not and will not place any restrictions on the length or number of calls placed by customers through the relay center.

- H. Any service outage exceeding four hours in length within a twenty-four hour period will subject Hamilton to a penalty equivalent to an average of one day's (24 Hours) billing in the prior calendar month for the service, provided that Hamilton shall not be responsible for any delay or failure in performance hereunder caused by Acts of God (including fire not due to Contractor's negligence, flood, earthquake, storm, or other natural disaster), war, invasion act of foreign enemies, hostilities (regardless of whether war is declared), civil war, rebellion, revolution, insurrection, military or usurped power or confiscation, non-preventable effects of terrorist activities, nationalization, government sanction, requirements imposed by government regulations and/or civilian or military authorities, blockage, embargo, labor dispute, strike, or lockout.

- I. Hamilton will meet all FCC standards necessary to maintain certification as a "state program" under the ADA and FCC regulations, including full compliance with the intent and the existing implementation guidelines set forth in Title IV of the Americans with Disabilities Act of 1990 (ADA).

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC. (Cont'd)

1.4 Relay Service Communications Assistant

- A. Except for any information necessary for billing purposes, or gathering caller profile or 7-1-1 information when requested by the caller, Communications Assistants (CAs) will maintain the confidentiality of the call.
- B. Hamilton's CAs convey the full content, context and intent of the communication they translate without intervening in the communication process.
- C. Hamilton's CAs type everything verbatim unless one of the relay users involved in the conversation requests summarization or translation of ASL gloss to written English. At this point in time, the CA gains permission from the other party involved in the call. If both parties agree to summarization or translation, the CA will then begin to summarize or translate the call. Relay users who always want summarization or translation, can select this option on the customer profile.
- D. CAs will not counsel, advise or interject personal opinions or additional information into any communications which they are relaying.
- E. CAs will not disconnect a call against the wishes of the originating party except in those instances in which the caller becomes abusive to or if the CA is not given a number to dial. The CA will request a number to call three times, waiting approximately 20 to 30 seconds between each time.
- F. For 911 emergency calls requested through relay, Hamilton immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information. Hamilton passes along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- G. Hamilton maintains no written or electronic script or record of any type of call content beyond the duration of the call.
- H. STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls.

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC. (Cont'd)

1.5 End User Billing Information

- A. To the relay user, a relay call bill looks like it was placed from his or her primary location to the call destination. Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier of choice.

If the call is a toll call, the caller's carrier of choice terminates the outbound portion of the call and the necessary information digits, calling and called number are forwarded over the circuit so that that interexchange carrier can bill the customer directly.

- B. Interlata (including interstate and international) and intralata and intrastate long distance toll charges are billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for other long distance calls not made through the relay. On each toll call, Hamilton forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer at the correct rate through their normal billing mechanisms.

For Relay Customers who are not subscribed to a carrier of choice, Hamilton defaults that caller to AT&T Corp.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call.

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC. (Cont'd)

1.6 *Hamilton's Process for Billing the Commonwealth of Pennsylvania*

Records are made for each call and this data is transmitted daily from the relay platform to the toll processing computer system. Within this system, call jurisdictions are defined again by linking the calling and called numbers to geographic data tables that contain NPA-NXX information. Calls are then identified as intralata, interlata or local/EAS. This also is done at the workstation during the actual call. (Interstate and Intrastate toll calls are sent immediately to the customer's carrier of choice for billing via the tandem while the relay call is taking place.) Local/EAS, intrastate and interstate call information is retained for calculation of billable minutes. Hamilton then takes the conversation time as recorded for each record and uses it to make its billable amount calculation to the Pennsylvania Public Utility Commission (Commission) and to the Interstate TRS Fund Administrator for interstate relay calls.

Hamilton's relay switch generates a call detail record for each relay call (call detail records include call set-up and wrap-up time) and records each call to the nearest second. For reporting purposes, minutes are rounded to the nearest hundredth of a minute. All call minutes within a calendar month are then added to determine the amount of time to be billed to the Pennsylvania TRS Fund Administrator.

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY HAMILTON RELAY, INC. (Cont'd)

1.7 Pricing

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TELECOMMUNICATIONS RELAY SERVICES

I. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY HAMILTON RELAY, INC. (Cont'd)

1.8 Reporting Requirements

Hamilton is responsible for maintaining all records and reports relating to the operation of the Relay Service. Such reports will include, but are not limited to, the following:

Monthly invoice showing:

- total session minutes
- intrastate and interstate minutes
- net session minutes
- applicable rate
- total monthly usage billing
- outreach services cost
- total billing

Traffic reports detailing:

- Blockage rates, defined as the number of calls reaching a busy signal when calling the relay service.
- Average number of calls waiting for system or operator answer.
- Average length of time waiting for system or operator answer.
- Area codes and state from which the calls originate.

Jurisdictional summary spreadsheet which includes, at a minimum, the following:

- Columns = session minutes, number of calls, percent of total calls
- Rows = general assistance minutes, outbound calls sub grouped by intrastate, interstate, international, two line, toll free, 900 info service, total outbound and general assistance.
- Completed calls sub grouped by intrastate, interstate, international, two line, toll free, 900 info service, total completed.
- The report must also have a weekly summary of the call count and session minutes by day and date.
- A separate spreadsheet section must show the Originating NPA in the row and column showing; answered, outbound, completed, and busy.

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TELECOMMUNICATIONS RELAY SERVICES

1. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY
HAMILTON RELAY, INC. (Cont'd)

1.8 Reporting Requirements (Cont'd)

- A separate section will show the month's summary of consumer service complaint logs regarding TRS in the Commonwealth, regardless of the entity fielding or resolving the complaint call, and must retain the log for the duration of the service arrangement. The log must include, at a minimum, the filed date of the complaint, the nature of the complaint, the date of resolution, and an explanation of the resolution.
- The reports are due the 15th day of the month following the month being reported and sent through the Commission Secretary to the Bureau of Technical Utility Services, *Telecommunications Section – TRS*.

By March 10th each year, Hamilton will supply the Commission's Bureau of Technical Utility Services, Telecommunications Section - TRS with a statement of the estimated session minutes of TRS use and the annual charges for the ensuing 12-month period from July 1st through June 30th.

Hamilton is also responsible for maintaining the accounting and financial records, in accordance with accounting procedures and generally accepted accounting principles, of expenses that are incurred in providing intrastate TRS services as stand-alone entity/entities.

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TELECOMMUNICATIONS RELAY SERVICES

I. TELECOMMUNICATIONS RELAY SERVICES IN PENNSYLVANIA PROVIDED BY HAMILTON RELAY, INC. (Cont'd)

1.9 TRS Revenue Not Subject to Assessments

Intrastate operating revenues generated and earned by Hamilton in connection with the provision and operation of the TRS in the Commonwealth shall not be subject to any Commission or other regulatory assessments.

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CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of November, 2014, served a true and correct copy of the foregoing document, upon the persons listed below as follows:

First Class Mail, Postage Prepaid:

(Public Version Only)

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

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300 North Second Street
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Office of Attorney General
Office of Consumer Protection
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