

COMMONWEALTH OF PENNSYLVANIA PUBLIC UTILITY COMMISSION 400 NORTH STREET HARRISBURG, PA 17120

GLADYS BROWN DUTRIEUILLE CHAIRMAN October 1, 2019

The Honorable Tom Wolf Governor of Pennsylvania Room 225 Main Capitol Building Harrisburg, Pennsylvania 17120

Dear Governor Wolf:

In accordance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA), the Pennsylvania Public Utility Commission (Commission) respectfully submits this 2019 Annual Report regarding the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program, also known as "Newsline"). The TDD Program and the PMAS Program are operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry pursuant to Sections 6701.3 and 6701.3(a) of UTPMAA, respectively. Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge. The Commission administers the TRS surcharge fund pursuant to Section 6701.4(c) of UTPMAA.

The attached report discusses the following aspects of the programs: 1) Calculation and Statement of the TRS surcharge pursuant to Section 6701.4(c); 2) TDD Program, account balances, revenues, disbursements, and expenses; 3) PMAS Program, account balances, revenues, disbursements, and expenses; 4) OVR reported information; and 5) Commission Conclusion. An electronic version of this report is available on the Commission's website.<sup>2</sup>

Yery truly yours,

Gladys Brown Dutrieuille

Chairman

Enclosure

cc:

Pennsylvania Telecommunications Relay Service, Docket No. M-00900239 2019 TRS Annual Legislative Report, Docket No. M-2019-3006853

Act 34 of 1995, as amended by Act 174 of 2004, 35 P.S §§ 6701.1 – 6701.4.

http://www.puc.pa.gov/utility\_industry/telecommunications/telecommunications\_relay\_service\_aspx



#### COMMONWEALTH OF PENNSYLVANIA PUBLIC UTILITY COMMISSION 400 NORTH STREET HARRISBURG, PA 17120

October 1, 2019

GLADYS BROWN DUTRIEUILLE
CHAIRMAN
The Honorable John Fetterman
Lieutenant Governor of Pennsylvania
Room 200 Main Capitol Building
Harrisburg, Pennsylvania 17120

#### Dear Lieutenant Governor Fetterman:

In accordance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA), the Pennsylvania Public Utility Commission (Commission) respectfully submits this 2019 Annual Report regarding the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program, also known as "Newsline"). The TDD Program and the PMAS Program are operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry pursuant to Sections 6701.3 and 6701.3(a) of UTPMAA, respectively. Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge. The Commission administers the TRS surcharge fund pursuant to Section 6701.4(c) of UTPMAA.

The attached report discusses the following aspects of the programs: 1) Calculation and Statement of the TRS surcharge pursuant to Section 6701.4(c); 2) TDD Program, account balances, revenues, disbursements, and expenses; 3) PMAS Program, account balances, revenues, disbursements, and expenses; 4) OVR reported information; and 5) Commission Conclusion. An electronic version of this report is available on the Commission's website.<sup>2</sup>

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#### COMMONWEALTH OF PENNSYLVANIA PUBLIC UTILITY COMMISSION 400 NORTH STREET HARRISBURG, PA 17120

GLADYS BROWN DUTRIEUILLE CHAIRMAN October 1, 2019

### TO THE MEMBERS OF THE GENERAL ASSEMBLY OF THE COMMONWEALTH OF PENNSYLVANIA:

In accordance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA), the Pennsylvania Public Utility Commission (Commission) respectfully submits this 2019 Annual Report regarding the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program, also known as "Newsline"). The TDD Program and the PMAS Program are operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry pursuant to Sections 6701.3 and 6701.3(a) of UTPMAA, respectively. Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge. The Commission administers the TRS surcharge fund pursuant to Section 6701.4(c) of UTPMAA.

The attached report discusses the following aspects of the programs: 1) Calculation and Statement of the TRS surcharge pursuant to Section 6701.4(c); 2) TDD Program, account balances, revenues, disbursements, and expenses; 3) PMAS Program, account balances, revenues, disbursements, and expenses; 4) OVR reported information; and 5) Commission Conclusion. An electronic version of this report is available on the Commission's website.<sup>2</sup>

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<sup>&</sup>lt;sup>2</sup> http://www.puc.pa.gov/utility\_industry/telecommunications/telecommunications\_relay\_service.aspx

# ANNUAL REPORT ON THE FISCAL STATUS AND OPERATIONS OF THE TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM AND THE PRINT MEDIA ACCESS SYSTEM PROGRAM

## SUBMITTED BY THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

#### **OCTOBER 1, 2019**

In compliance with Section 6701.4(e) of the Universal Telecommunications and Print Media Access Act (UTPMAA),<sup>1</sup> the Pennsylvania Public Utility Commission (Commission or PUC) respectfully submits this 2019 Annual Report<sup>2</sup> relating to the Telecommunication Device Distribution Program (TDD Program) and the Print Media Access System Program (PMAS Program).

Both the TDD Program and the PMAS Program are currently funded by the Telecommunications Relay Service (TRS) surcharge.<sup>3</sup> The Commission administers the TRS Fund pursuant to Section 6701.4(c) of UTPMAA. The monthly per access line TRS surcharge is collected from the customers of local landline incumbent and competitive telecommunications companies and from some customers that receive retail fixed wireline Voice over Internet Protocol (VoIP) communications services in Pennsylvania.4

The TDD Program provides telecommunication devices for people with disabilities who qualify under the UTPMAA. The TDD Program is overseen by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry (L&I), pursuant to Section 6701.3 of the UTPMAA. OVR contracts with the Institute on Disabilities at Temple University (IDT), in Philadelphia, Pennsylvania, to manage the TDD Program. Pennsylvania's Initiative on Assistive Technology (PIAT), an IDT program, provides assistive technology services and resources.<sup>5</sup>

The PMAS Program provides access via telephone to print media for persons who are blind. The PMAS Program is operated by L&I's Bureau of Blindness and Visual

<sup>&</sup>lt;sup>1</sup> Act 34 of 1995, as amended by Act 174 of 2004, 35 P.S §§ 6701.1 – 6701.4

<sup>&</sup>lt;sup>2</sup> An electronic version of this report is available on the Commission's website: http://www.puc.pa.gov/utility\_industry/telecommunications/telecommunications relay\_service.aspx

<sup>&</sup>lt;sup>3</sup> 35 P.S. § 6701.4(c) provides that the TDD Program *shall* be funded by the TRS surcharge and that the PMAS Program *may* be funded by the TRS surcharge. Initially funded through special grants, since July 2006, the PMAS Program has been funded entirely from the TRS surcharge. Print media does not contribute to the TRS Fund.

<sup>&</sup>lt;sup>4</sup> 73 P.S. § 2251.6(1)(ii) (PUC jurisdiction over VoIP for purposes of TRS fees is preserved under the 2008 VoIP Freedom Act).

<sup>5</sup> https://www.temple.edu/instituteondisabilities/programs/.

Services (BBVS) and overseen by OVR pursuant to Section 6701.3(a) of the UTPMAA. Access is currently provided through the National Federation of the Blind (NFB) reading service, known as "NFB Newsline."

The Commission provides assistance to OVR, BBVS, and PIAT in accordance with the UTPMAA.

On May 25, 2015, at Docket No. P-2015-2484229, OVR filed a Petition with the Commission seeking funding from the TRS surcharge to fund a two-year wireless pilot program entitled "Wireless Expansion Initiative: Promoting Telecommunications Equity for People with Disabilities in Pennsylvania" (WEI Pilot). OVR asserted that the WEI Pilot would provide needed data for a potential expansion of the TDD Program to include the availability, distribution, and funding of adaptive wireless equipment to income-eligible persons with disabilities within Pennsylvania.

By Order entered July 8, 2015, the Commission granted OVR's Petition, allowing the WEI Pilot to proceed as a funded component of the Pennsylvania TRS and TDD Program.<sup>6</sup> Following completion of the WEI Pilot and its review by OVR and Commission Staff, the Commission, by Opinion and Order entered February 27, 2019, adopted the WEI as a permanent and ongoing program.<sup>7</sup> A copy of that Opinion and Order is attached as Public Utility Commission Attachment A.

## CALCULATION OF THE TRS SURCHARGE AND USE OF THE TRS FUND FOR THE TDD PROGRAM AND THE PMAS PROGRAM

The Commission sets the residential and business monthly access line TRS surcharge. The TRS surcharge is reviewed annually and adjusted as necessary based on the number of wireline telephone access lines in service, the financial status of the TRS Fund, and the projected expenses of the TRS, the TDD Program, and the PMAS Program. Local Exchange Carriers (LECs) report their respective wireline access line counts as of December 31<sup>st</sup> by filing an Annual Access Line Summary Report with the Commission. While Commission jurisdiction over VoIP services is preserved for purposes of TRS fees, currently only Verizon and Comcast report their fixed VoIP lines to the Commission. OVR submits projected budgets for the TDD Program and the PMAS Program. The current surcharge is set at \$0.08 per access line per month effective from July 1, 2019, through June 30, 2020.

Section 6701.4(c) provides, in pertinent part, that:

<sup>&</sup>lt;sup>6</sup> Petition of Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania et al., Docket Nos. P-2015-2484229, M-00900239, and M-2015-2460700 (Order entered July 8, 2015).

<sup>&</sup>lt;sup>7</sup> Petition of Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania et al., Docket Nos. P-2015-2484229, M-00900239, and M-2018-2640814 (Order entered February 27, 2019).

<sup>8</sup> See 73 P.S. § 2251.6(1)(ii).

(c) Additional use of [TRS] surcharge. – The [TDD] Program shall be funded and the [PMAS] program may be funded by the [TRS] surcharge, as calculated by the commission on an annual basis under the methodology established by the commission in order[s] entered May 29, 1990, and July 9, 1990, at Docket Number M-00900239, and as subsequently modified by the commission. . . . A portion of the surcharge may be used to fund the [PMAS] Program. The surcharge shall not be used to fund administrative costs of [TRS], [the TDD] Program or the [PMAS] Program.

The Commission calculates the TRS surcharge component for each program separately on a per wireline access line percentage basis. A copy of the Commission's Order entered on May 23, 2019, at Docket No. M-2019-3006851, approving the current TRS surcharge and TDD Program and PMAS Program allocation percentages of the surcharge rate, is attached as Public Utility Commission Attachment B.

#### TDD PROGRAM

On May 6, 2019, OVR filed a budget with the Commission for the TDD Program for the ensuing year. The TDD Program budget for July 1, 2019, through June 30, 2020, as submitted by OVR, is \$477,316, compared to \$272,917 for the budget year 2018-2019. OVR's 2019-2020 budget proposal estimated that the costs for the TDD Program will be \$86,360 for traditional equipment and \$191,063 for traditional consumer education and outreach services. The 2019-2020 TDD Program budget also includes WEI expenses of \$62,390 for equipment and \$137,503 for consumer education and outreach. In addition, the budget calculations showed the unit cost and quantity of each type of telecommunications device projected to be distributed in the prospective budget year.

Based on the bills submitted to and paid from the TDD Program sub-account for the 2018-2019 TDD Program year, the TDD Program account began the 2019-2020 program year with a sufficient surplus to provide for the statutory TDD Program elements and maintain an adequate cash flow reserve.

## TDD Program Sub-Account For the period of July 1, 2018 to June 30, 2019

Beginning Balance on July 1, 2018	\$843,477.47
Revenue from the TRS surcharge	\$423,630.42
Earned net investment income	\$20,177.09
Distributed equipment costs	(\$60,147.09)
Consumer education and outreach	(\$149,406.78)
WEI pilot program equipment	(\$0.00)
WEI pilot program education & outreach	(\$0.00)
Fiduciary fees (US Bank Institutional Trust & Custody)	(\$2,553.63)
Ending Balance on June 30, 2019	\$1,075,177.48

The Commission is allocating 10 percent of the total TRS surcharge revenues to the TDD Program for the 2019-2020 TRS surcharge recalculation year. *See* Public Utility Commission Attachment B.

#### **PMAS PROGRAM**

On May 6, 2019, OVR BBVS filed a budget with the Commission for the PMAS Program for the ensuing year. The PMAS Program budget for July 1, 2019, through June 30, 2020, as submitted by BBVS, is \$195,676, as compared to \$182,615 for the budget year 2018-2019. BBVS' 2019-2020 budget proposal estimated that the costs will include twenty-five participating newspapers, annual service fee, annual newspaper maintenance and distribution fee, Pennsylvania Specific Alerts service, marketing and outreach, and a one-year telecommunications subscription fee for the system over which users can hear selected print media being read aloud.

Based on the bills submitted to and paid from the PMAS Program sub-account for the 2018-2019 PMAS Program year, the PMAS Program sub-account began the 2019-2020 year with a sufficient surplus to provide for the statutory PMAS Program elements and maintain an adequate cash flow reserve.

### PMAS Program Sub-Account For the period of July 1, 2018, to June 30, 2019

Beginning Balance on July 1, 2018	\$595,804.65
Revenue from the TRS surcharge	\$211,592.50
Earned net investment income	\$12,092.06
NFB Newsline annual element costs	(\$214,661.75)
Fiduciary fees (US Bank Institutional Trust & Custody)	(\$1,533.99)
Ending Balance at June 30, 2019	\$603,293.47

The NFB Newsline invoice payment historically was made annually in October for the entire contract year. BBVS now has a quarterly invoice and payment arrangement with NFB Newsline. This new payment arrangement spreads the expense over the contract year which requires a lower fund balance at the start of a PMAS Program year. The Commission is allocating 5 percent of the total TRS surcharge revenues to the PMAS Program for the 2019-2020 TRS surcharge recalculation year.

#### **OVR INFORMATION**

Pursuant to Section 6701.4(e)(2), OVR submitted to the Commission information on the TDD Program. The OVR submission is attached as Public Utility Commission Attachment C.

#### PUBLIC UTILITY COMMISSION CONCLUSION

The Commission has been responsive to the needs of the residents of Pennsylvania who depend upon the TDD Program and the PMAS Program and is compliant with the directives of

the UTPMAA. The Commission will continue to be attentive to OVR's implementation of the TDD Program and PMAS Program and the Commission's funding oversight and responsibilities relative to the TDD Program and PMAS Program.

The Commission's Bureau of Audits, with the assistance of OVR, conducts audits of the TDD Program and the PMAS Program. The objectives and scope of the audits are to determine that only qualified individuals received TDD Program equipment; that the consumer educators properly and accurately charged the fund for services provided; that only qualified bidders were awarded contracts through the Request for Proposals process; that equipment and service contractors properly invoiced the TRS Fund; and that all monies withdrawn from the TDD Program sub-account and PMAS Program sub-account were only used for qualifying TDD Program and PMAS Program services and equipment.

On April 24, 2018, at Docket No. D-2018-3001207, the Bureau of Audits initiated an audit of the TDD Program and the PMAS Program for the twelve-month periods ended June 30, 2016, June 30, 2015, and June 30, 2014. The report was released at Public Meeting on August 29, 2019. The report included one procedural finding.

#### **ATTACHMENTS (3):**

**Public Utility Commission Attachment A:** Commission Opinion and Order entered February 27, 2019, adopting a permanent and ongoing wireless expansion initiative program as a funded component of the Pennsylvania TRS and TDD Program (Docket Nos. P-2015-2484229, M-00900239, and M-2018-2640814)

**Public Utility Commission Attachment B**: Commission Order entered May 23, 2019, approving the current TRS surcharge and TDD Program and PMAS Program allocation percentages of the surcharge rate (Docket No. M-2019-3006851)

**Public Utility Commission Attachment C:** TDD Program Information Submitted by OVR

## PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, PA 17105-3265

Public Meeting held December 20, 2018

#### Commissioners Present:

Gladys M. Brown, Chairman Andrew G. Place, Vice Chairman Norman J. Kennard David W. Sweet John F. Coleman, Jr.

Petition of the Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania Docket No. P-2015-2484229

Petition of the Pennsylvania Telephone Association Requesting the Commission to Approve Implementation of Pennsylvania Relay Service for Deaf, Hearing, or Speech-Impaired Community within the Commonwealth of Pennsylvania Docket No. M-00900239

Recalculation of the Pennsylvania Annual Telecommunications Relay Surcharge

Docket No. M-2018-2640814

#### **OPINION AND ORDER**

#### BY THE COMMISSION:

By this Opinion and Order, the Commission adopts a permanent and ongoing wireless expansion initiative program (WEI) as a funded component of the Pennsylvania Telecommunications Relay Service (TRS) and the Telecommunications Device Distribution Program (TDDP).

#### I. Background

On July 8, 2015 the Commission entered its Order (*July 2015 Order*) in the above-referenced proceeding at Docket No. P-2015-2484229.<sup>1</sup> The *July 2015 Order* granted a Petition (Petition) from the Office of Vocational Rehabilitation (OVR), Department of Labor and Industry (L&I) authorizing the funding of a pilot project involving the distribution of wireless equipment to income-eligible persons with disabilities within Pennsylvania.

The *July 2015 Order* approved a WEI Pilot within the legal and policy framework of the existing telecommunications device distribution program that is administered by OVR-L&I and is funded by the Pennsylvania Telecommunications Relay Service Fund (TRS Fund or Fund).<sup>2</sup> As contemplated in the *July 2015 Order*, following completion of the WEI Pilot and its review by the OVR and Commission staff, the Commission takes the next step to make permanent and ongoing the WEI program as set forth below.

The Commission does this by granting OVR's initial budget in its entirety as set out in the OVR Report that was filed with the Commission in June 2018.<sup>3</sup> Such an action relies on the public interest and legal findings we made in the *July 2015 Order* 

Petition of Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunication Relay Service Wireless Equipment to People with Disabilities in Pennsylvania et al., Docket Nos. P-2015-2484229, M-00900239 et al., (Order entered July 8, 2015) (July 2015 Order).

The Commission administers the Pa. TRS Fund. *See also* 35 P.S. § 6701.4(c).

In re: Petition of the Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania, Docket No. P-2015-2484229, Amended Report of Department of Labor and Industry, Office of Vocational Rehabilitation (June 13, 2018) (hereinafter OVR Report).

establishing the WEI Pilot and reflects OVR's experience with the WEI Pilot addressed in the OVR Report.

OVR proposed a three-year budget in which the distributed equipment is proposed to be replaced every three years.<sup>4</sup> OVR proposes a budget of \$199,393 for the first year of the program consisting of \$70,750 for initial start-up costs and another \$129,143 of which \$62,390 is for equipment and \$66,753 is for non-equipment costs. Budget Years 2 and 3 would remain at the \$129,143 with identical allocations of \$62,390 for equipment and \$66,753 for non-equipment costs.

At an anticipated cost of \$547 per wireless device, this translates to providing roughly 114 devices annually. OVR's proposed incremental increase in device distribution is based on programs in Missouri and Colorado, which, when expanding their TRS programs to include wireless communications, encountered increases in device distribution of approximately 30%. Based on those states' experiences, OVR proposes a similar increase for Pennsylvania's TDDP to include wireless devices, although those states have half the population of Pennsylvania.

The Commission accepts this initial OVR budget recommendation at this time for two reasons. First, there is a need to focus on implementation and outreach at the outset. Thereafter, however, OVR should be looking to lower the expense related to administration of the program and increase the proportion of expense associated with the distribution of equipment, effectively lowering the non-equipment costs as a percentage of the overall budget. Second, this is the only budget proposed in support of OVR's Petition. The Commission believes that it is appropriate to require OVR to commit to evaluating the budget with those parameters in mind and submitting the same to the

<sup>4</sup> OVR Report at 33.

Commission timed to coincide with the Commission's evaluation of a TRS and TDDP budget and the annual TRS surcharge recalculation, typically in May/June of each year.

The OVR budget the Commission adopts today is an initially small but important step towards enhancing communications capabilities to low-income Pennsylvanians with disabilities given Pennsylvania's demographics. However, given the potential universe of persons in Pennsylvania that may be eligible to participate in WEI,<sup>5</sup> the Commission will require OVR to review its budget and assess its program annually to evaluate how well it is effectuating its purpose. The Commission will also require that OVR operate the program on a more geographically balanced basis across Pennsylvania as proposed in using the Assistive Technology Resource Centers (ATCRs) or a functional equivalent. OVR shall present its findings and proposals in conjunction with the Commission's annual calculation of the TRS surcharge in May/June of each year.

A wireless equipment distribution program better ensures compliance with Pennsylvania law requiring the Commission to support a TRS program to facilitate communications for persons with disabilities by wire or radio. This is warranted because communications for impaired citizens by wire or radio must be reasonably comparable to the communications by wire or radio available to non-impaired citizens. Under this program, the Commission is supporting a wireless device distribution program in which the qualified consumer must still buy the underlying wireless access service. Like the current TDDP, however, the Commission is approving a budget that provides equipment

As one example, the Pennsylvania demographic and economic information from the 2016 American Community Survey data of the U.S. Census Bureau shows that for a poverty determination Pennsylvania's population of 12,369,671 citizens, 30.2%, or 3,736,519, are at or below 200% of poverty and 3.7%, or 469,694 from a 12,579,598 non-institutionalized population have hearing difficulties. Applying the 30.2% poverty level figure to the population with hearing difficulties, about 141,847 Pennsylvanians could be eligible to participate in the WEI expanded program.

with adaptations to qualified individuals that is necessary to provide equal access to communications in today's market.

To appreciate this action in context, it is important to summarize the development of TRS in Pennsylvania over the past 28 years. That summary explains why this incremental proposal is the logical extension of the Commission and Commonwealth commitment to TRS in Pennsylvania. The proposal to limit spending to the OVR budget in the initial phase is fiscally responsible because it can be funded from the existing access line surcharge and budget and be adjusted as OVR provides additional information based on its actual experience in Pennsylvania.

#### History of the TRS Fund

Our *July 2015 Order* addressed the history and implementation of the current TRS program up until that time. As we stated then, the Commission established TRS service in response to a petition by the Pennsylvania Telephone Association (PTA) urging the Commission to create a program because that was consistent with the law and the public interest. The TRS service established by the Commission has been supported by a monthly fee on wireline access lines. This ensures the delivery of adequate and equivalent access to services by end-user consumers with physical impairments under applicable federal law.<sup>6</sup> Thereafter, Act 34 of 1995, 35 P.S. §§ 6701.1-6701.4 (Act 34), codified the operation of relay service and the Commission's oversight of the TRS Fund and surcharge mechanism in Pennsylvania.

Federal Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101 *et seq*.

Act 34 also established the TDDP, a device distribution program funded by the TRS Fund. TDDP supports the distribution of equipment to facilitate telecommunications although neither the rates or operations for that equipment are regulated by, or subject to, the Commission's jurisdiction. Responsibility for managing the TDDP is vested with OVR. The responsibility for financial oversight and disbursements in support of the TDDP program rests with the Commission pursuant to the submission of annual budgets from OVR.

Act 174 of 2004, 35 P.S. § 6701.3a, moreover, established the Print Media Access System Program (PMASP) that is also funded by the TRS Fund. PMASP is a service that facilitates access to printed media information for consumers although neither the rates nor related services are regulated by, or subject to, the Commission's jurisdiction. The statutory provisions addressing this information service are now referred to as the Universal Telecommunications and Print Media Access Act (UTMPAA). The UTMPAA also requires the Commission to report annually on the TRS Fund, the TDDP, and the PMASP programs supported from the TRS surcharge to the General Assembly. 35 P.S. § 6701.4.

TDDP provides equipment to enable eligible low-income persons to use telecommunications relay services. The statute was amended by Act 181 of 2002 to be more inclusive of persons with disabilities by expanding the definition of "persons with a disability" to include all disabilities that prevent a person from using standard telecommunications equipment.

PMASP is a newspaper reading service for persons with certain vision and physical disabilities. Administrative responsibility is vested in OVR. The Commission is responsible for the financial oversight and disbursements supporting this newspaper access program under relevant OVR budgetary submissions although the Commission does not the regulate rates or delivery of newspapers in Pennsylvania or similar information services.

<sup>9</sup> See 35 P.S. § 6701.

The Commission subsequently established Captioned Telephone Relay Service (CAP-Tel), a telecommunications service, in Pennsylvania in response to suggestions from our Telecommunications Relay Advisory Board (TRS Board) about consumer need for this service. The Commission did so by contract pursuant to a request for proposals process. Cap-Tel permits consumers to communicate using modern technology that relies, in part, on Internet Protocol (IP). The Commission also issued an advisory letter on July 9, 2014 that authorized funding for the distribution of IP-enabled wireline devices through the TDDP to eligible end-users in response to changing technology.

The quality of service provided by our certificated TRS provider is subject to the Commission's jurisdiction. Hamilton Relay Service, Inc. <sup>10</sup> (Hamilton Relay), the current certificated traditional relay provider, submits the estimated annual traditional relay minutes of use (MOUs) and charges. Hamilton Telecommunications Company <sup>11</sup> (Hamilton Telecommunications), an affiliate of Hamilton Relay, provides Cap-Tel pursuant to a contract with the Commission and submits the estimated annual Cap-Tel MOUs. OVR submits the annual TDDP and PMASP budgets. The TRS Fund covers the TRS Board activities and Fund Administrator costs as well.

The Pennsylvania relay service costs (including the intrastate Cap-Tel) are recovered through the monthly TRS surcharge set by the Commission and currently assessed by the Local Exchange Carriers (LECs) on wireline residence and business customers. <sup>12</sup> The TRS Fund and the monthly surcharge are reviewed by staff and set by

See Application of Hamilton Relay, Docket No. A-2014-2447601 (December 4, 2014).

See RFP-2012-2, Bp8=2304702 (May 24, 2012).

<sup>&</sup>lt;sup>12</sup> See 52 Pa. Code §§ 63.31-63.37.

the Commission annually, typically to be effective in June of each year. Additionally, the Commission's Bureau of Audits periodically audits the TDDP pursuant to the Memorandum of Understanding executed between L&I and the Commission at Docket No. M-00900239F0004. 14

The WEI Pilot was part of the Commission's long-standing commitment to support the communications needs of disabled persons in Pennsylvania. The *July 2015 Order* adopting the WEI Pilot program reflected a determination that a wireless device distribution program furthered the statutory mandate to facilitate communications by eligible impaired consumers using wire and radio in the Commonwealth and was in the public interest. The Commission recognized that any program established following the results of the WEI Pilot must also be consistent with that Pennsylvania law and could be supported from the current TRS Fund and surcharge in Pennsylvania.

#### The WEI Pilot

Among other duties, the OVR is responsible for providing services designed to increase the independence and employability of individuals in Pennsylvania

Staff shall include the wireless device program in their review and calculation of the surcharge presented for disposition at Public Meeting.

See, e.g., A Report on the Telecommunications Device Distribution Program and Print Media Access System Program Audits for the Twelve-Month Period Ended June 30, 2015 and June 30, 2012, Docket No. D-2014-2406981.

On May 24, 1990, the Commission entered an Opinion and Order approving the joint petition of the PTA and AT&T Communications, Inc. for approval to implement a Telecommunications Relay Service for Deaf, Hearing and/or Speech impaired citizens of the Commonwealth of Pennsylvania and to issue AT&T a certificate of public convenience authorizing the delivery of TRS service supported by a surcharge on consumer's telephone bills. The Telecommunication Act of 1996 (TA-96) subsequently clarified that Section 153 encompassed intrastate communications within the authority of the Federal Communications Commission (FCC), effectively authorizing the FCC to certify that Pennsylvania TRS programs comply with federal mandates.

with hearing, visual, speech, or other disabilities. Recent American Community Survey (ACS) data indicate that approximately 3.7 percent of Pennsylvanians have difficulty hearing and, of that number, approximately 30.2% would be eligible for support because they are at or below 200% of the federal poverty level. This translates into 469,694 Pennsylvanians with hearing difficulties and, of those, approximately 141,847 are below the 200% poverty level and are eligible to benefit from this program.

As part of those responsibilities to multiple communities, OVR is also in charge of administering the TRS TDDP. <sup>16</sup> In its Petition, OVR requested approval to use the TRS Fund support to conduct a two-year, two-phase TDDP Pilot that would distribute wireless devices to eligible participants to obtain more data on public interest and benefit attributable to a wireless equipment program. <sup>17</sup> The OVR averred that expanding the TRS to include modern technology would increase communications options using both standard wireline as well as specialized wireless features and applications. <sup>18</sup> A wireless device distribution program would also allow participants to receive emergency notifications in real time. In short, they asserted that a wireless distribution program would provide equivalent communications capabilities through more modern technology and that a pilot project might potentially be useful as a way of examining how to establish a permanent program on a statewide basis consistent with Pennsylvania law. <sup>19</sup>

<sup>&</sup>lt;sup>16</sup> 35 P.S. § 6701.3a.

Qualified participants in the pilot program had to be a disabled resident of the Commonwealth who was not younger than six, should have had telephone service, was able to learn how to use a telecommunications device, and had an income not more than 200% of the federal poverty level (FGPI). These requirements were consistent with other requirements imposed under Pennsylvania law. 35 P.S. § 6701.3.

At the time, wireless equipment distribution programs were already underway in 11 states. This has grown to 17 states since then. The OVR Report relies, in part, on experiences in two of those states.

<sup>35</sup> P.S. § 6701.2 authorizes a program to distribute equipment that operates by wire or radio (wireless) and provide eligible persons the ability to communicate by wire or radio as discussed in more detail below.

The Commission published the Petition in the *Pennsylvania Bulletin* for comment. Comments in favor of the pilot were filed by the Office of Consumer Advocate (OCA), the Honorable Representative Edward C. Gainey, 24<sup>th</sup> Legislative District, L&I's Advisory Council for the Deaf and Hard of Hearing (L&I Advisory Council), the Commission's TRS Advisory Board, L&I's Office of the Deaf and Hard of Hearing (ODHH), and the Hearing Loss Association of Pennsylvania (HLAA-PAA). No comments opposed the legality or overall purpose and substance of the pilot.

#### The July 2015 Order

The *July 2015 Order* established the WEI Pilot implemented through Temple University as Administrator of the TDDP on behalf of OVR under Commission oversight. The WEI Pilot was a two-year pilot project designed to test the availability and use of wireless devices by a limited number of eligible Pennsylvanians with disabilities for a limited timeframe in which wireless devices would be supported from and distributed to eligible end-users through the existing TDDP.<sup>20</sup>

The WEI Pilot, *inter alia*, provided for:

- Recruitment and selection of 60 eligible participants over the two-year, two-phase project;
- Distribution of selected wireless/mobile devices equipped with appropriate applications and software;
- Outreach, training, surveys, and personal interview evaluation activities;

<sup>&</sup>lt;sup>20</sup> See generally 35 P.S. § 6701.3.

- Remote system software updating for the distributed wireless devices by an equipment administrator; and
- Monitoring, measurement, and evaluation of the use of these devices and their use.

OVR sought, and the *July 2015 Order* approved, funding from the TRS Fund for the relevant costs of the WEI Pilot. This included the costs of the wireless device equipment distribution and the costs for managing the overall TDDP WEI Pilot through its two-year duration. The estimated costs of the pilot were approximately \$85,000 for the first year of the WEI Pilot<sup>21</sup> in which Phase I would seek to enroll 30 eligible<sup>22</sup> individuals. The *July 2015 Order* established Phase II based on the results of Phase I which also would seek to enroll 30 eligible individuals based on slightly different selection criteria. Temple University held mandatory meetings to explain the pilot and provide training to assist pilot participants. Temple University also conducted case studies and "longitudinal" surveys to assess the needs and trends that surfaced during the TDDP Pilot.

As with the current distribution program, participants were responsible for some costs. Like the TDDY program, the WEI Pilot still required the participant to pay for the cost of the underlying wireless connectivity service(s) to enable the wireless devices to function.<sup>23</sup> Participants were also responsible for any travel expenses

The budget table in the WEI Proposal disclosed a projected outlay requirement of \$83,233.38 for "Grant Year 1" or Phase I of the TDDP Pilot.

The criteria for eligibility in the TDDP pilot are those that are statutorily mandated at 35 P.S. § 6701.3.

The WEI Proposal explicitly states "Individuals [TDDP Pilot participants] will need to describe how they will access wi-fi service (in their home or in the community e.g., public library) and understand that the program will not pay for such wireless access services." OVR Petition, WEI Proposal at 8.

associated with program orientation and training in Darby and Philadelphia, Pennsylvania. This latter requirement negatively impacted OVR's ability to fulfill the full proposed enrollment.

The July 2015 Order and OVR Report demonstrate universal support regarding the merits of the WEI Pilot and the desire for statewide access to wireless technologies, communications, and devices by eligible persons with disabilities. The Commission recognized that federal authority over TRS mandates availability within a state and that federal certification of such programs requires corresponding compliance with federal requirements. These requirements include a prohibition on actions that discourage or impair the technology providing TRS.

The Commission agreed with the comments that public benefits accruing to eligible participants under the proposed WEI Pilot promoted the public interest and satisfied Pennsylvania's obligation under federal and state law to provide adequate and equivalent access to communications access for Pennsylvanians with disabilities. The Commission recognized that it possessed the necessary administrative flexibility to deal with these matters and to seek timely and appropriate legislative changes if and when such changes become necessary.

The Commission concluded that the TRS program serves the public interest and that such action was consistent with Section 225(d)(2), 47 U.S.C. § 225(d)(2), of federal law and ensured compliance with the certification requirements under Section 225(f), 47 U.S.C. § 225(f). After commending L&I, OVR, and Temple University in their efforts to refine policies for increased TRS access to wireline and wireless telecommunications services under Pennsylvania and federal law, the Commission noted that an advisory letter had been issued on July 9, 2014 which also authorized the funding of IP-enabled wireline devices to eligible end-users.

The Commission also concluded that a WEI Pilot fit within the definitions of TRS services by radio and wire under Pennsylvania law and that the scope of the WEI Pilot was consistent with the applicable statutory parameters of the UTPMAA as well as federal law.

Based on those determinations and conclusions, the *July 2015 Order* authorized TRS funding for the WEI Pilot for actual costs up to \$85,000 for Phase I and up to \$90,000 for Phase II. The *July 2015 Order* added the caveat that if there were cost overruns OVR could petition for additional TRS funding, curtail the scope of the pilot program to stay within the approved funding or find alternate funding. The Commission recognized certain concerns with the future funding for the TRS Program but declined to address future funding of a TDDP wireless device program on a permanent statewide basis from the TRS Fund but agreed to address that in collaboration with OVR and Temple University.

The *July 2015 Order* also established a subaccount within the TRS Fund for the WEI Pilot given that neither of these sums impaired the solvency of the TRS Fund on a one-time basis. The TDDP portion of the TRS Fund had an appropriate monetary reserve that was sufficient to absorb the projected implementation cost of the proposed wireless pilot.<sup>24</sup>

Moreover, consistent with the Commission's statutory oversight of the TRS Fund and the public interest in this program, and to ensure compliance with federal law, the *July 2015 Order* required monthly billing detailing the costs incurred. OVR was required to submit detailed monthly bills for costs incurred for the TDDP Pilot to Commission staff in a manner that followed the current TDDP bill payment procedures.

<sup>24 2014</sup> Annual Report pursuant to the UTPMAA to the General Assembly, dated October 1, 2014, <a href="http://www.puc.pa.gov/Telecom/pdf/TDD\_Program\_Legis\_Rpt2014.pdf">http://www.puc.pa.gov/Telecom/pdf/TDD\_Program\_Legis\_Rpt2014.pdf</a>.

Commission staff would submit TDDP Pilot bills for payment in the same manner in which TDDP bills are currently paid. The TDDP Pilot expenses were subject to the Memorandum of Understanding between L&I and the Commission. The Commission required submission of the OVR Report on the Pilot Program from OVR and further instructed staff to submit a report following submission of the OVR Report.

#### **Subsequent Developments**

On June 13, 2018, following completion of the WEI Pilot established by the *July 2015 Order*, OVR filed an amended response and recommendations in an OVR Report. The OVR Report provided detailed amended information requested by the Commission on monetary support, the practices in other states, and on the feasibility of creating a permanent wireless equipment distribution program based on the recently completed WEI Pilot.<sup>25</sup> The OVR Report outlined the public interest in a wireless distribution program relying, in part, on the benefits and experiences documented by the pilot participants. OVR recommends making the program permanent.<sup>26</sup>

The Commission staff identified several options: (1) provide standard wireless equipment without special adaptations or training through the TDD Program; (2) provide the adaptations for standard wireless equipment and provide specialized wireless equipment and training through the TDD Program; or (3) decline to provide wireless equipment through the TDD Program and maintain the TDD Program as it was prior to the pilot.

Petition of Department of Labor & Industry, Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania, Docket No. P-2015-2484229 (July 8, 2015); OVR Additional Information on Wireless TDDP Program (June 13, 2018).

OVR Report at 33.

Option 2 was thought to more closely mirror the existing TDD Program by providing adaptations and specialized equipment needed to make telecommunications capabilities accessible although the program does not provide the underlying service or basic equipment available off the shelf. It was further noted that when the adaptation or accommodation is intrinsic to the device, such as an IP-enabled captioning telephone that works with IP-enabled circuits and services — with a regular captioning telephone capable of working only with traditional wireline connections — then the IP-enabled captioning telephone equipment is provided.<sup>27</sup>

#### II. Disposition

The Commission hereby creates a permanent and ongoing wireless distribution program in Pennsylvania supported from the current TRS fund. The *July 2015 Order* concluded that the pilot wireless equipment distribution program was within the existing TDDP program and was fully consistent with applicable Pennsylvania and federal statutes, effectively obviating concerns with Commission jurisdiction. It is worth reiterating, again, that Pennsylvania's Universal Telecommunications and Print Media Access Act that also governs the operation and funding of TDDP, includes the following definitions:

**"Telecommunication device."** Equipment necessary for a person with a disability to engage in communication by wire *or radio* with another person with a disability or with a hearing individual.

\* \* \*

Report of staff at 14.

"Telecommunications relay service." Telephone transmission services that provide the ability for a person with a disability to engage in communication by wire *or radio* with a hearing individual in a manner that is functionally equivalent to the ability of a person who does not have a disability to communicate using voice communication services by wire *or radio*. The term includes services that enable two-way communication between an individual who uses a telecommunication device or other nonvoice terminal device and an individual who does not use such a device.

35 P.S. § 6701.2 (emphasis added).

We concluded in the *July 2015 Order*, and reiterate today, that the availability of wireless devices under the TDDP mechanism for eligible persons with disabilities meets the statutory standard for communication by "radio" or "wire" under our statute. This is because mobile wireless devices for end-user consumers operate on the basis of available radio frequencies that are managed by commercial wireless service providers.<sup>28</sup>

These provisions and our precedent clearly establish the Commission's legal authority to support a permanent and ongoing wireless device distribution program under Pennsylvania and federal law.

The Commission recognizes the challenge of supporting wireless and wireline device distribution programs solely by surcharging wire access lines with no accompanying support from wireless services even though Pennsylvania law requires the

<sup>&</sup>lt;sup>28</sup> See also July 2015 Order at 12-13.

Commission to facilitate communications by wire and radio. However, the resolution of whether wireless service providers can be required to fund a wireless device program under this existing statutory language should not preclude action today. The Commission has a separate legal mandate to facilitate communications by wire or radio irrespective of funding sources. The Commission has authority to support a wireless device program, particularly given the clear public interest and support for such a program determined in the *July 2015 Order* and the results from the WEI Pilot, the OVR Report, and staff review.

Today's action simply effectuates a state-mandated communications assistance program, including equipment, through wire or radio to a very discrete class of beneficiaries – low-income, deaf, hearing, speech impaired, or some combination thereof, to citizens of Pennsylvania. The WEI Pilot we adopted in the *July 2015 Order* simply updates the ways of meeting that mandate to recipients of the program given the statute, changing consumer needs, and technology. Our *July 2015 Order* recognized that a permanent device program might be necessary and appropriate although we deferred action on that issue until we had completed the WEI Pilot and further considered the experience from that pilot.

Although a permanent wireless distribution program is legal and clearly consistent with the public interest, the Commission's implementation of that mandate must be prudent. The initial budget for a permanent program requested by OVR stays well within the funding parameters of the existing monthly \$0.08 per access line surcharge and avoids imposing unacceptable or unsustainable burdens on the existing Fund or those consumers who support that Fund. For these reasons, we believe that approving OVR's initial budget proposal in the OVR Report is appropriate. While that

budget may change if the need demonstrated by OVR changes, the initial OVR budget approval supports a permanent program within the existing surcharge.<sup>29</sup>

The Commission agrees with the OVR Report that support for a suite of wireless equipment and adaptations is necessary, given the intertwined nature of wireless equipment and the adaptations needed to use that equipment. The OVR Report properly addresses the change in consumer expectations, technology, and the proliferation of devices in the market for non-impaired citizens.

The fact that different adaptations are already provided in Cap-Tel wireline distributed equipment today supports a similar approach for wireless devices. Consumers will receive the device with the needed adaptations to operate it, but they must buy the underlying wireless access service. Given the lower-incomes required for participation in the TDDP, it is worth reiterating our support for the FCC's Lifeline Program because it provides \$9.25 in monthly support so that low-income consumers can buy voice or broadband Internet access service.

This action is not without precedent. Our *July 2015 Order* formally authorized the funding of the WEI pilot project in the following:

In our evaluation of the proposal for a TDDP Pilot to explore accessible wireless options, we are guided by the UTPMAA, which vests administrative oversight of TDDP operations in OVR. *See* 35 P.S. § 6701.3. We are also guided by federal law governing TRS [telecommunications

If future developments indicate otherwise, OVR can address those developments in conjunction with submission of their annual budget for TRS-supported operations. While supplemental budgets in the interim may be appropriate, it is better to submit any adjustments in the OVR budget to coincide with our review and approval of a TRS program budget and the surcharge ancillary to supporting that budget.

relay service], particularly the prohibition contained in Section 225(d)(2) of the federal Communications Act of 1934 as amended, 47 U.S.C. § 225(d)(2), against discouraging or impairing the development of new technology.

July 2015 Order at 5. Our July 2015 Order found that the WEI pilot project was fully "within the applicable statutory parameters of the UTPMAA" and that it was also "entirely consistent with applicable federal law." July 2015 Order at 13.

The OVR Report has been formally endorsed by the Commission's TRS Advisory Board during its formal May 9, 2018 meeting.<sup>30</sup> OVR's recommendation contains projected costs that assume a 30% increase in equipment distribution related costs based on prior experience in Colorado and Missouri or a total of 402 wireline and wireless devices. The OVR Report estimate relies on states who implemented a wireless equipment distribution program that are far smaller than Pennsylvania. OVR's estimate for a total of 402 devices of which at least 114 will be for new wireless devices is a good start given that the device cost has dropped to a projected average figure of \$547 compared to the pilot-program cost of \$1,273 per device although both are higher than the average wireline device cost of \$135.<sup>31</sup>

A Kay Tyberg, Chair of the TRS Advisory Board stated the following in her July 5, 2018 letter communication to the Commission: "After due consideration of the findings and recommendations in the report [OVR Report], the Board advises the Public Utility Commission of its desire that the TDDP be expanded statewide to include wireless telecommunications devices – only; (NOT voice or data services) for Pennsylvanians with disabilities who meet all other TDDP eligibility criteria."

The significant cost difference was attributed to the wireless devices in a permanent program compared to the pilot program and traditional devices arises because wireless devices, particularly devices with support/service plans, cost 90% more than traditional landline equipment. As indicated in the table below, Pennsylvania's TDDP program averages \$135 per participant in equipment cost. The wireless initiative averaged \$1,273 per participant in equipment costs. By providing equipment without service/support packages, OVR's expects to reduce this average equipment cost to \$547 per recipient. *See* OVR Report at 34.

The OVR Report also provides data supporting the need to support additional administrative costs, demonstration equipment, and an Assistive Technology Lending Library at regional ATRCs. The projected equipment distribution totals \$70,750 in one-time start-up costs and \$129,143 in yearly program-related expenses for a total of \$199,893 for the first year of operation. This estimate contains an annual \$13,000 cost for Education Outreach and focuses on information sessions, online access, and a modestly staffed customer service operation.

The eligibility requirements are identical to those for the existing TRS Program. They require Pennsylvania residency, 200% or less of the federal poverty guideline, access to Wi-Fi or a wireless service with a data plan (purchased by the consumer), and the ability to learn how to use the equipment. There are no direct public awareness and outreach costs to inform the public about this program although there are Education Outreach costs that will apparently focus on the eligible population. OVR anticipates replacing the equipment distributed on a 3-year cycle.

While the Commission can consider several options to move this program forward, for the reasons stated, the Commission concludes that the option to create a permanent program using the very modest incremental need projected in the OVR Report is best. This option relies on OVR's research and data. While this does not reflect specific and more recent ACS census data for Pennsylvania's population, a modest program is preferable at the outset unless and until OVR provides more robust reporting and budgetary analyses.

The Commission also believes that OVR's budget must extend to a broader geographic reach in Pennsylvania. We agree with the OVR Report that the program must support funding ATRCs or their regional equivalent. This ensures that eligible citizens in those areas have access to information and training as easily as those residing in urban

areas. Unlike the WEI Pilot, where the funding and distribution was operated from Darby and Philadelphia, the ATRCs operate throughout Pennsylvania and their input and expertise will be critical to ensuring a Commonwealth-wide program.

Our decision to approve the OVR budget for the initial three years recognizes two facts. First, in approving this program on a permanent basis, the Commission is acting between the annual recalculations of the TRS surcharge that occurs in June of each year. Second, any budgetary change may be reflected in these annual recalculations. Any resource need arising in the future can be addressed by filings timed to coincide with the Commission's annual establishment of a TRS budget and the surcharge recalculation that occurs in time for the establishment of a surcharge in June. Any need arising under the approved OVR budget that occurs under the existing surcharge before the next surcharge recalculation can be met by using any surplus that has arisen this year and then from any accumulated surplus. The use of any accumulated surplus must be tempered by possible FCC regulatory developments, including the allocation of federal TRS program costs to Pennsylvania, and a prudent reserve.

At a minimum, however, the OVR budget for continuation and expansion of the WEI approved today will be used for future funding with the opportunity to consider additional requests, along with supporting information, as the need arises; **THEREFORE**,

#### IT IS ORDERED:

1. That the Commission hereby adopts a permanent and ongoing wireless equipment distribution program as a funded component of the Pennsylvania Telecommunications Relay Service and the Telecommunications Device Distribution Programs;

- 2. That the Department of Labor & Industry Office of Vocational Rehabilitation has the funding authority to implement the wireless equipment distribution program on the initial and subsequent 3-year cycles presented in the Office of Vocational and Rehabilitation Report of the Wireless Expansion Initiative Pilot dating from entry of this Opinion and Order in the current funding year and thereafter timed as part of the Commission's annual TRS surcharge recalculation, unless interim adjustments are presented and adopted;
- 3. That the funding for the initial 3-year cycle of this permanent and ongoing wireless equipment distribution program as proposed in the OVR Report is approved as filed unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;
- 4. That the funding total for the wireless equipment distribution program in the initial 3-year cycle is approved at \$458,179 unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;
- 5. That the annual budget for a wireless equipment distribution program in any subsequent year that is proposed will be considered as part of the Commission's annual TRS surcharge recalculation;
- 6. That the Office of Vocational Rehabilitation projected one-time start-up non-equipment costs of \$70,750 for the initial year of the 3-year cycle is approved as proposed in the OVR Report unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;
- 7. That the Office of Vocational Rehabilitation projected anticipated costs of \$129,143 for the initial year of the 3-year cycle is approved as proposed in the OVR Report unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;

- 8. That the Office of Vocational Rehabilitation projected anticipated cost of \$129,143 for Year 2 and Year 3 of the initial 3-year cycle is approved as proposed in the OVR Report unless adjusted by the Commission in consultation with the Office of Vocational Rehabilitation;
- 9. That the funding and the actions hereby authorized for the distribution of wireless equipment to eligible persons with disabilities does not preclude or otherwise prohibit the simultaneous availability or distribution of wireline devices to the same persons under the Telecommunications Device Distribution Program;
- Advisory Board and the Office of Special Assistants, in consultation as necessary with the Bureaus of Technical Utility Services and Law, continue to monitor and report to the Commission on the operation and surcharge funding for Pennsylvania's Telecommunications Relay Service and Telecommunications Device Distribution Programs under state and federal law, including this ongoing and permanent wireless equipment distribution program;
- 11. That the Office of Vocational Rehabilitation prepare an annual evaluation of the budget for Commission consideration with the goal of increasing within the overall budget the proportion of the TRS budget related to the distribution of wireless devices and decreasing the proportion related to administration;
- 12. That the Office of Vocational Rehabilitation prepare an annual evaluation of the budget for Commission consideration with the goal of increasing the geographic reach of the wireless device distribution;

- 13. That this Opinion and Order be served upon the Secretary of the Department of Labor and Industry, the Office of Vocational Rehabilitation, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Commission's Telecommunications Relay Service Advisory Board; and
- 14. That a copy of this Opinion and Order be published in the *Pennsylvania Bulletin* and posted on the Commission's website.

BY THE COMMISSION,

Rosemary Chiavetta

Secretary

(SEAL)

ORDER ADOPTED: December 20, 2018

ORDER ENTERED: February 27, 2019

## PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, PA 17105-3265

Public Meeting held May 23, 2019

#### **Commissioners Present:**

Gladys Brown Dutrieuille, Chairman David W. Sweet, Vice Chairman Norman J. Kennard Andrew G. Place John F. Coleman, Jr.

Recalculation of the Pennsylvania Telecommunications Relay Service Surcharge M-2019-3006851 M-00900239

#### **ORDER**

#### BY THE COMMISSION:

In accordance with our May 29, 1990 Order at Docket No. M-00900239 establishing the Pennsylvania Telecommunications Relay Service (TRS or Relay)<sup>1</sup> and surcharge funding mechanism (TRS surcharge) and subsequent Commission orders and legislation,<sup>2</sup> we have completed the annual recalculation of the TRS surcharge as it will apply only to residential and business wireline access lines for July 1, 2019, through June 30, 2020. The TRS surcharge rate for residential and business access lines shall be set at \$0.08 per month.

<sup>&</sup>lt;sup>1</sup> Additional information on TRS may be found at http://www.puc.pa.gov/utility\_industry/telecommunications/telecommunications relay\_service.aspx

<sup>&</sup>lt;sup>2</sup> See Act 34 of 1995, 35 P.S. §§ 6701.1 – 6701.4 (the statutory provisions were amended by Act 181 of 2002 to be more inclusive of persons with disabilities), establishing the Telecommunication Device Distribution Program (TDDP) to be funded by the TRS surcharge and which codified Relay and use of the TRS surcharge funding mechanism; and Act 174 of 2004, 35 P.S. § 6701.3a, which established the Print Media Access System Program (PMASP) which may be funded in part or in whole by the TRS surcharge. PMASP is a reading service for persons with certain vision-related physical disabilities. The law is now called the "Universal Telecommunications and Print Media Access Act."

#### Background

The annual TRS surcharge recalculation is dependent on data from several sources. Local Exchange Carriers (LECs³) submit annual wireline access line counts pursuant to 52 Pa. Code § 63.37. The traditional relay provider, Hamilton Relay, Inc.,⁴ submitted the estimated minutes of use and charges for July 1, 2019, through June 30, 2020. Hamilton Telephone Company d/b/a Hamilton Telecommunications submitted the estimated minutes-of-use report for the Captioned Telephone Relay Service⁵ (CTRS). The Office of Vocational Rehabilitation (OVR), Department of Labor and Industry, submitted the 2019-2020 TDDP budget and the 2019-2020 PMASP budget. The surcharge also funds TRS Advisory Board activities and Fund administration costs. U.S. Bank,⁶ the Fund Administrator, provided a statement of the financial status of the Fund.<sup>7</sup>

#### Calculation for 2019 – 2020

Combined residential and business wireline access lines reported by LECs for 2018 and adjusted for Centrex lines are estimated to be 4,240,000. Based upon the number of access lines, projected program costs (Relay, CTRS, TDDP, and PMASP), anticipated Pennsylvania TRS Advisory Board<sup>8</sup> expenses, TRS Fund administration costs, and the financial status of the TRS Fund, the 2019-2020 TRS surcharge rate for residential and business access lines will remain at the current rate of \$0.08 per month.

<sup>&</sup>lt;sup>3</sup> LECs include both incumbent and competitive local exchange carriers.

<sup>&</sup>lt;sup>4</sup> Hamilton Relay, Inc. (Hamilton) holds the TRS Certificate of Public Convenience to provide TRS throughout the Commonwealth of Pennsylvania. The Commission approved Hamilton's Application by order entered December 4, 2014 at Docket No. A-2014-2447601.

<sup>&</sup>lt;sup>5</sup> Hamilton Telecommunications, an affiliate of Hamilton Relay, provides CTRS pursuant to contract which ends June 30, 2019. The Commission is currently conducting RFP-2019-1 for CTRS services in Pennsylvania.

<sup>&</sup>lt;sup>6</sup> As a result of mergers, acquisitions, and name changes, Fund administration has been handled by Hamilton Bank (1990), CoreStates Bank N.A. (1995), First Union National Bank (1999), Wachovia Bank, N.A. (2002), and U.S. Bank Institutional Trust & Custody (2006).

<sup>&</sup>lt;sup>7</sup> Separate accounts are maintained for the portions of the surcharge allocated to Relay, TDDP, and PMASP. TRS Advisory Board expenses, CTRS, and outreach activities are funded from the Relay account; TRS Fund administration costs are drawn from each respective account.

<sup>&</sup>lt;sup>8</sup> The Pennsylvania TRS Advisory Board was established pursuant to Commission Order entered May 29, 1990. The TRS Advisory Board's By-Laws and quarterly meeting schedule can be found at: <a href="http://www.puc.pa.gov/utility">http://www.puc.pa.gov/utility</a> industry/telecommunications/telecommunications relay service/trs\_advisory board <a href="mailto:aspx">aspx</a>

This rate is the same as the current rate and will not require the LECs to file tariff supplements. Despite a net positive position in the TRS fund, the Commission has retained this rate over the past several years to provide for a cautious approach to uncertainty related to potential federal funding changes.<sup>9</sup> That rate also ensures that the program has adequate resources to support the Wireless Expansion Initiative (WEI). All TRS surcharge revenues shall continue to be remitted to the Fund Administrator.<sup>10</sup>

Effective July 1, 2019, the monthly surcharge allocation for each fund account will be as follows:<sup>11</sup>

		2019-2	2019-2020 Monthly Surcharge Percentage	
		Monthly Surchar		
		Residence %	Business %	
Relay		85.0	85.0	
TDDP		10.0	10.0	
<b>PMASP</b>		5.0	<u>5.0</u>	
	Total Percentage	100.0	100.0	

#### **Operations for 2019 – 2020**

We shall continue our active oversight of the operations of the Pennsylvania Telecommunications Relay Service. Further, in accordance with 35 P.S. §§ 6701.3a & 4, we shall continue to collaborate with OVR and its TDDP administrator<sup>12</sup> to ensure adequate funding for distribution of TDDP equipment to qualified Pennsylvanians.

<sup>&</sup>lt;sup>9</sup> See, e.g., Recalculation of the Pennsylvania Telecommunications Relay Service Surcharge, Docket Nos. M-2018-2640814, M-00900239 (Order entered June 13, 2018); Recalculation of the Pennsylvania Telecommunications Relay Service Surcharge, Docket Nos. M-2017-2582552, M-00900239 (Order entered June 27, 2017). See also In re Misuse of Internet Protocol (IP) Captioned Telephone Service, et al., CG Docket Nos. 13-24 and 03-123 (FCC, Rel. June 8, 2018), Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, slip op. FCC 18-79.

<sup>&</sup>lt;sup>10</sup> U.S. Bank Institutional Trust & Custody, Attn: Dina Buccieri, 50 S. 16<sup>th</sup> Street, Suite 2000, Philadelphia, PA 19102. Remittances are payable to the "PA Relay Service Fund" and designated for Relay. Bank wire instructions can be found on the remittance form.

<sup>&</sup>lt;sup>11</sup> The TRS surcharge appears as a single line item on customers' bills but actually has three components (Relay, TDDP traditional and WEI, and PMASP).

<sup>&</sup>lt;sup>12</sup> As of January 1, 2007, the TDDP is administered by Pennsylvania's Initiative on Assistive Technology, Institute on Disabilities, Temple University.

Further, we shall continue to assist OVR in its mission to ensure adequate funding for PMASP.

#### **Audits**

The Bureau of Audits (Audits) released its most recent TRS Audit Report on June 14, 2017 at Docket No. D-2016-2556222 for the twelve-month periods ended February 29, 2016, February 28, 2015, February 28, 2014, and February 28, 2013. Audits has finished an audit of the TDDP and the PMASP for the twelve-month periods ended June 30, 2016, June 30, 2015, and June 30, 2014, at Docket No. D-2018-3001207 and expects to release the audit report in May 2019.

#### Service of Paper Copies

In the past, our practice has been to serve the annual TRS surcharge recalculation order on every LEC in the Commonwealth in addition to each Relay service provider, the Office of Vocational Rehabilitation, the Office of Consumer Advocate, the Office of Small Business Advocate, the Pennsylvania Telephone Association, and the Fund Administrator. Consistent with the TRS surcharge recalculation order entered May 23, 2013, at Docket No. M-2013-2341301, we now serve paper copies of the annual TRS surcharge recalculation order only when there is a change in the TRS surcharge rate or other provision in the order requiring that the LECs file a tariff supplement or take other action. As this order does not change the TRS surcharge rate, paper copies of the order will not be served. Additionally, we will continue to publish the order in the *Pennsylvania Bulletin* and on the Commission's website.

#### Conclusion

The Commission has completed the annual recalculation of the TRS surcharge rate. Consistent with our prior determinations regarding the fund, the TRS surcharge rate for residential and business access lines to be applied beginning July 1, 2019, through June 30, 2020, will remain at \$0.08 per month. We also note that paper copies of this order will not be served on the LECs as there is no change in the set surcharge rate or to

impose new requirements on the LECs requiring tariff changes in response to this Order; **THEREFORE**,

# IT IS ORDERED:

- 1. That for the period of July 1, 2019, through June 30, 2020, the TRS surcharge rate for residential and business access lines shall be set at \$0.08 per month, unless the Commission takes further action to revise the TRS surcharge rate prior to June 30, 2020.
- 2. That all local exchange carriers are directed to use the attached blank remittance form to remit the monthly TRS surcharge collections to the Fund Administrator. The blank remittance form shall be posted to the Commission's web site. All local exchange carriers are required to collect and remit the TRS surcharge revenue with the completed remittance form monthly by the 20th of each month.
  - 3. That a copy of this Order be published in the *Pennsylvania Bulletin*.
  - 4. That a copy of this Order be posted to the Commission's website.

# BY THE COMMISSION

Rosemary Chiavetta Secretary

(SEAL)

ORDER ADOPTED: May 23, 2019

ORDER ENTERED:

# REMITTANCE FORM FOR MONTHLY TRS SURCHARGE COLLECTIONS

Effective July 1, 2019 through June 30, 2020

M-2019-3006851

All local exchange carriers are required to collect and remit the TRS surcharge revenue monthly, by the 20<sup>th</sup> of each month using the following format for the monthly remittance:

Pennsylvania TRS Surcharge

For the Month Ending		
Number of <b>Residential</b> access IX \$0.08 per line	lines	
Allocated:		
TRS Relay 85.0 percer TDDP 10.0 percer PMASP 5.0 percer	nt	# # <u>#</u>
0		
Number of Business access line	es	
X \$0.08 per line		
Allocated:		×
TRS Relay 85.0 percer TDDP 10.0 percer	nt	
PMASP 5.0 percen		2
Total Remittanc	ee	
Make check payable to: Pennsylv	vania TRS Fund	
Mail Report and payment to:	Wire Instructions:	
U.S. Bank Institutional Trust & Custody Attn: Dina Buccieri	BANK U.S. Bank N.A ADDRESS 60 Livingston Avenue, St Paul MN 55107-2292	* **
50 S. 16 <sup>th</sup> Street, Suite 2000	<b>ABA</b> 091 000 022	· · · · ·
Philadelphia, PA 19102	BNF ITC Depository South & East ACCOUNT 173 103 781 832 OBI PA Relay ATTN: Dina Buccieri	9"
Remittance for:	ATTI. Dina Davion	
Company Name:		
Utility Code:		
Contact Person:  Voice Phone Number: ()  E-mail address	FAX: ()	
Authorized Signature:		

Please direct any questions regarding the TRS Surcharge remittance to Mr. Eric Jeschke at (717) 783-3850 or ejeschke@pa.gov.



OFFICE OF VOCATIONAL REHABILITATION

September 9, 2019

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

#### **Docket Number M-2019-3006853** RE:

2019 Annual Legislative Report to the General Assembly

- Telecommunication Devices Distribution Program (TDDP)
- Wireless Expansion Initiative
- Print Media Access System Program (PMASP)

Dear Ms. Chiavetta:

Attached is the information requested by the Pennsylvania Utility Commission (PUC) from the Office of Vocational Rehabilitation (OVR) for inclusion in the Annual Report to the governor and Pennsylvania Legislature.

If you have any questions, please do not hesitate to contact Howard Albrecht at

halbrecht@pa.gov or 717-787-8504.

Sincerely,

Shannon Austin **Executive Director** 

Office of Vocational Rehabilitation

JC

Attachments:

Temple University TDDP Annual Report 2018-2019

9/11/19

NFB Annual Newsline Report 2018-2019

Cc:

Kim Singleton, Temple University TDDP

Sandy McNally, Temple University TDDP

Eric Jeschke, PUC



OFFICE OF VOCATIONAL REHABILITATION

Stan Swaintek, BBVS
Jill Moriconl, HGAC
Howard Albrecht
Janice Mazzitti
NEWSLINE LOU File 2018-2019
Temple University TDDP File-Year IV (Document# 4000019493)

# ANNUAL REPORT TO THE GENERAL ASSEMBLY ACT 181-2002: TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM Docket Number M-2019-3006853

IN OVERSEEING THE TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM (TDDP), THE OFFICE OF VOCATIONAL REHABILITATION (OVR) REPORTS THE FOLLOWING FISCAL YEAR ACTIVITIES BEGINNING JULY 1, 2018 TO JUNE 30, 2019:

# Background:

Act 181-2002 provided for the creation of the Telecommunication Device Distribution Program. The Act authorizes the collection of funds as calculated by the PA Public Utility Commission (PUC) on an annual basis in order to pay for telecommunication equipment for eligible applicants. The Act identifies OVR in the Department of Labor and Industry as responsible for the oversight of the TDDP, but does not allow for administrative costs to be levied against the surcharge funds.

The Institute on Disabilities at Temple University, as designated by OVR, continues to administer the TDDP. Administrative activities are funded by OVR, with supplemental funds contributed by Pennsylvania's Initiative on Assistive Technology (federal dollars).

# ELIGIBILITY REQUIREMENTS FOR THE TDDP:

- Be a resident of Pennsylvania.
- Qualify as a person with a disability or disabilities that prevents him/her from making or
  receiving telephone calls independently. A licensed physician, audiologist, speech
  pathologist or a representative of a qualified state agency (e.g. OVR Counselor,
  Department of Human Services (DHS) or Social Security Case Worker) must certify the
  disability.
- Have current landline telephone service and be capable of using the requested device(s).
- Be six years of age or older.
- Have an individual (not including family/household income) gross income of 200% of the Federal Poverty Level (FPL) or less (currently \$24,980 per year for a single individual).

### **OPERATION OF THE PROGRAM:**

- During the fiscal year July 1, 2018 through June 30, 2019, the Institute on Disabilities provided the day-to-day operations of the TDDP. The Institute on Disabilities has a proven track record of providing assistive technology devices and services to Pennsylvanians with disabilities of all ages, as the lead agency for the implementation of the federal Assistive Technology Act in Pennsylvania (TechOWL, formerly known as Pennsylvania's Initiative on Assistive Technology) and since 2012, as the certifying entity in Pennsylvania for the National Deaf-Blind Equipment Distribution Program, funded through the 21st Century Telecommunications Act. The Institute also serves as OVR's contractor for the implementation of the state-funded program, Pennsylvania's Assistive Technology Lending Library.
- The cross-disability Assistive Technology Advisory Committee (ATAC) for Pennsylvania's Initiative on Assistive Technology serves in an advisory capacity for the TDDP program. The ATAC is established by statute under the federal Assistive Technology Act.

### **APPLICATION FORMS:**

Applications are distributed by request through the US Mail, as well as through email and in person. Applications can also be downloaded from the TechOWL website: <a href="https://techowlpa.org/service/tddp/">https://techowlpa.org/service/tddp/</a>. Applications are distributed through the statewide network of Assistive Technology Resource Centers (ATRCs) and TDDP Volunteer Centers now known as Information Centers created by TechOWL. During this program year, TechOWL received and reviewed a total of 218 individual applications. Of these, 216 were determined eligible, and 2 were determined ineligible. As of June 30, 2019, eligibility determinations were still in process on approximately 6 incomplete applications. In addition, eight (8) applicants who submitted incomplete applications and did not respond to repeated requests for information were marked inactive; this number included people from the end of the previous program year. An application is deemed inactive when the applicant does not respond to repeated contact attempts from TDDP to provide missing documentation or other information.

# **EQUIPMENT DISTRIBUTED TO APPLICANTS:**

• Equipment distributed to 180 eligible applicants between July 1, 2018 – June 30, 2019 is detailed in Attachment 1.

# **FUNDING:**

The market value of the TDDP fund as of June 30, 2019 was \$1,077,107.18. The US-Bank Account Summary for the period ending June 30, 2019 is attached and referenced as Attachment 2.

### **VENDORS:**

• From July 1, 2018 to June 30, 2019 the program used the following two (2) vendors to supply equipment for the TDDP:

o Teltex, Inc., Kearney, MO

o WCI - Weitbrecht Communications, Inc., Santa Monica, CA

 These vendors supplied equipment from the pre-approved list as well as devices approved through the Exceptions Process, as applicable. The agreements with these vendors extend until June 30, 2020. An equipment price list is included in this report as Attachment 3.

Fund disbursements to vendors during the period July 1, 2018 through June 30, 2019 are as follows:

Teltex, Inc.	\$20,430.72
WCI	\$2,709.50
Total vendor disbursements:	\$22,596.72

These disbursements also include payments for equipment ordered toward the end of the previous program year (July 1, 2017 -June 30, 2018).

# CONSUMER EDUCATION AND OUTREACH:

Subcontracts with eight (8) regional Assistive Technology Resource Centers (ATRCs) to provide "local" activities related to consumer outreach, education and training began on July 1, 2018. In addition to coordinating statewide consumer education and outreach efforts, the TechOWL serves as an ATRC for southeastern Pennsylvania. Between July 2018 and June 2019 TechOWL staff (including but not limited to, the Consumer Educator), and ATRCs participated in 114 outreach activities, including 4 statewide events, held in 38 counties, and reaching over 9,301 Pennsylvanians. The list of activities is included in this report as Attachment 4.

Total fund disbursements (July 1, 2018 to June 30, 2019) to Temple University for Consumer Education and Outreach activities were \$189,477.27. These figures include remaining amounts due for July 2017 to June 2018.

CONTINUING AND EMERGING BARRIERS TO ACCESS TO TELECOMMUNICATIONS FOR PEOPLE WITH DISABILITIES:

- TDDP limitation on distributing cellular phones and wireless devices.
- Significant barrier to the program is the required certification of disability. Many
  consumers applying to the program are unable to get this form completed without a
  financial burden, as authorized "certifiers" (e.g. primary care physicians) may charge a
  fee to complete the form. Due to transportation or other barriers, consumers may not
  be able to travel to a "certifier" and when faced with these challenges, abandon the
  application process. We would propose that a "representative of a qualified state
  agency" be interpreted to include relevant Pennsylvania-licensed professionals,
  employees of a Center for Independent Living, or credentialed Assistive Technology
  Professionals (ATP).

Both barriers were addressed this program year. TDDP received notification on February 27, 2019 that an order and opinion was published by the PUC stating the Commission adopted a permanent and ongoing wireless expansion initiative program. TDDP staff is diligently and methodically preparing for the wireless expansion initiative to launch on July 1, 2019. As of July 1, 2019 the TDDP application was revised to include the above interpretation of "certifier". This revised application will be distributed widely across the Commonwealth.

# ACCOMPLISHMENTS (July 1, 2018 to June 30, 2019):

- The application (attached) was revised, reformatted and reprinted to include updated income eligibility requirements. The application is now available in Spanish, Vietnamese, Russian, Korean, and Chinese. Volunteer Centers are now being called "Information Center." This was changed to reflect the actual nature of the relationship between TDDP consumer outreach and organizations that assist in disseminating information about the program. Due to this name change, 21 new Information Centers were added, for a total of 47 information centers statewide.
- During this program year, all of the recipients (11 consumers from 6 different counties)
  who requested assistance with their TDDP equipment received support from ATRCs.
  Altogether, 10.5 hours of device support was provided, and almost all of it was in person.
- Increased statewide outreach to the following underrepresented populations: Latinx and veterans.
- Satisfaction surveys were mailed to equipment recipients. Overall satisfaction rate is 99% (satisfied or highly satisfied).
- Articles were published in five newsletters. Two (2) press releases were submitted to
  print publications and local media outlets. Fifteen (15) mailings containing TDDP
  information were sent to organizations and professionals, including but not limited to:
  senior centers, behavioral health agencies, Area Agencies on Aging, senior citizen
  groups, community service providers, home health agencies, hearing loss
  professionals, and churches. These mailings and publications reached at least 7,740
  Pennsylvanians, and social media posts reached over 6,454 people.
- All policies and procedures were reviewed.
- Since receiving the Order and Opinion on February 27. 2019 on the Wireless Expansion, one (1) article promoting the wireless expansion was published in an agency newsletter reaching approximately 35,000 individuals, and there were 7 social media posts, reaching approximately 4,438 individuals based on the number of views. Two (2) press releases were published in local newspapers that reached 310,000 people. One (1) targeted mailing containing wireless expansion information was sent to organizations and professionals, including but not limited to: senior centers, behavioral health agencies, Area Agencies on Aging, senior citizen groups, community service providers, home health agencies, hearing loss professionals, veterans' organizations and churches. These mailings reached over 175 people.

# ATTACHMENTS:

- Attachment 1 Equipment July 1, 2018 through June 30, 2019
- Attachment 2 Activity Summary Report (US Bank)
- Attachment 3 Equipment Price List
- Attachment 4 Outreach Events July 1, 2018 through June 30, 2019
- Referenced Attachment TDDP Application Form

Attachment B

TDDP Equipment Ordered

Device Name	Unit Price	Quantity	_	Value of Equipment
	L <sup>1</sup>	Ordered		Ordered
Clarity Alto, Amplified Telephone	\$115.00	12	S	1,380.00
Clarity AltoPlus, Amplified Telephone	\$125.00	20	↔	2,500.00
Clarity HA-40, In-Line Handset Amplifier	\$15.00		S	-
Clarity JV35, Talking Amplified Telephone	\$80.00	6	<del>()</del>	720.00
Clarity JV35W, Talking Amplified Telephone	\$87.00		S	87.00
Geemarc BDP400, Talking Telephone with Large Display	\$130.68	4	₩.	522.72
Serene Innovations HD-40P, Amplified Photo Telephone	\$40.00	2	S	80.00
Serene Innovations HD-60J, Amplified Large Button Telephone	\$85.00		49	595.00
Clarity XLC2+, Amplified Cordless Telephone	\$92.00	16	₩	1,472.00
Panasonic KX-TGM430B, Amplified/Cordless/Bluetooth/Ans.Machine	\$120.00	10	ક્ક	1,200.00
Panasonic TGM450S, Amplified/Cordless/Ans. Machine	\$130.00	8	₩	1,040.00
CapTel 2400i, (Touch Screen) Captioned Telephone	\$90.25	2	₩	180.50
CapTel 840 Plus, Captioned Telephone	\$90.25	19	8	1,714.75
CapTel 840i, Captioned Telephone	\$90.25		S	451.25
CapTel 880i, Captioned Telephone	\$90.25		\$	361.00
Ultratec Superprint 4425, TTY	\$350.00	7	\$	1,050.00
Ultratec Uniphone 1140, VCO/HCO/TTY	\$210.00		₩	420.00
Ablephone 5000, Voice Activated Dialer	\$175.00	6	↔	1,575.00
Reizen, Big Button Speakerphone	\$25.00		↔	100.00
Serene Innovations RCx1000, Remote Hands-Free Telephone	\$425.00		ક્ક	1,275.00
	\$39.00		\$	897.00
Silent Call, Omni-Page Vibrating Signaler Kit	\$125.00		\$	625.00
Sonic Alert TR75VR, Flashing Light Signaler	\$30.00		8	420.00
Headset with Microphone	\$65.00	1	ઝ	65.00
Lapel Microphone	\$45.00	1	ઝ	45.00
Pillow Switch	\$35.00	1	↔	35.00
*Clarity BT914, Amplified Cordless Bluetooth Telephone	\$98.00	5	S	490.00
*Serene Innovations CL-60A, Amplified/Cordless/Ans.Machine	\$113.90	41	ક્ર	4,669.90
**Ultratec Pro80 LVD	\$ 595.00	1	↔	595.00
TOTALS		232	ઝ	24,566.12
*Discontinued-vendor completed orders with their on-site stock				
**Exception				

Attachment 3 Equipment Price List

Device Name	Unit Price
Clarity Alto, Amplified Telephone	\$115.00
Clarity AltoPlus, Amplified Telephone	\$125.00
Clarity HA-40, In-Line Handset Amplifier	\$15.00
Clarity JV35, Talking Amplified Telephone	\$80.00
Clarity JV35W, Talking Amplified Telephone	\$87.00
Geemarc BDP400, Talking Telephone with Large Display	\$130.68
Serene Innovations HD-40P, Amplified Photo Telephone	\$40.00
Serene Innovations HD-60J, Amplified Large Button Telephone	\$85.00
Clarity XLC2+, Amplified Cordless Telephone	\$92.00
Panasonic KX-TGM430B, Amplified Cordless Bluetooth Phone with Answering Machine	\$120.00
Panasonic TGM450S, Amplified Cordless Phone with Answering Machine	\$130.00
CapTel 2400i, (Touch Screen) Captioned Telephone	\$90.25
CapTel 840 Plus, Captioned Telephone	\$90.25
CapTel 840i, Captioned Telephone	\$90.25
CapTel 880i, Captioned Telephone	\$90.25
Ultratec Superprint 4425, TTY	\$350.00
Ultratec Uniphone 1140, VCO/HCO/TTY	\$210.00
Ablephone 5000, Voice Activated Dialer	\$175.00
Reizen, Big Button Speakerphone	\$25.00
Serene Innovations RCx1000, Remote Hands-Free Telephone	\$425.00
Clearsounds CR2000, Loud Ring Signaler	\$39.00
Silent Call, Omni-Page Vibrating Signaler Kit	\$125.00
Sonic Alert TR75VR, Flashing Light Signaler	\$30.00
Headset with Microphone	\$65.00
Lapel Microphone	\$45.00
Pillow Switch	\$35.00
*Clarity BT914, Amplified Cordless Bluetooth Telephone	\$98.00
*Serene Innovations CL-60A, Amplified/Cordless/Ans.Machine	\$113.90
**Ultratec Pro80 LVD	\$595
*Discontinued	
**Exception	

Attachment A
TDDP Consumer Education Outreach Events

Consumer					
Outreach				Estimated	
Event	ATRC	Date(s) Held	Event Name/Sponsor	Attendance	County of Event
Presentation	CLASS	7/10/2018	Armaugh Senior Center	16	Indiana
Presentation	CLASS	7/19/2018	Home City Senior Center	22	Indiana
Expo	LIFT	7/25/2018	Disability & Senior Expo	250	EIK
Expo	LIFT	8/3/2018	Martin Causer Expo-Bradford	300	McKean
Presentation	TRPIL	8/6/2018	Heritage Library	4	Washington
Presentation	NCPNE	8/14/2018	Falls Lions Club	21	Wyoming
Expo	RTF	8/23/2018	AT Demo Day	17	Lycoming
Presentation	UCPNE	8/28/2018	Voices of Ability (CIL group)	15	Lackawanna
Expo	CRI	8/28/2018	R Lee James Senior Expo	150	Venango
Expo	RTF	8/30/2018	Rep. Wheeland Senior Fair	266	Lycoming
Expo	RTF	9/2/2018	Rep. Hanna Senior Fair	151	Clinton
Expo	CRI	9/6/2018	Living Well Expo	150	Erie
Training	LIFT	9/6/2018	Potter Co LINK Collaborative	ω	Potter
Expo	CLASS	9/7/2018	Senator Vogal Senior Expo	375	Beaver
Presentation	CLASS	9/10/2018	Chestnut Hills Senior Center	20	Indiana
Presentation	UCPNE	9/10/2018	WIN/LINK	24	Wayne
Presentation	UCPNE	9/11/2018	NANA Human Services	32	Lackawanna
Expo	RTF	9/13/2018	Rep. Everette Senior Fair	276	Lycoming
Expo	RTF	9/13/2018	Rep. Masser Senior Fair	426	Northumberland
Expo	CRI	9/13/2018	Parke Wentling Senior Expo	100	Regional
Expo	LIFT	9/14/2018	Martin Causer Expo-Kane	320	McKean
Presentation	UCPNE	9/18/2018	Susquehanna IAC	11	Susquehanna
Expo	TRPIL	9/20/2018	Washington County Senior Fair	477	Washington
Expo	UCPCPA	9/22/2018	N. Dauphin Co. Resource Fair	120	Dauphin
Presentation	CLASS	9/25/2018	Two Lick Senior Center	17	Indiana
Presentation	CRI	9/27/2018	Edinboro University Presentation	35	Erie
Expo	PIAT	9/27/2018	Senator Tartaglione Senior Expo	200	Philadelphia
Expo	CRI	10/4/2018	Park Wentling Senior Expo	100	Erie
Expo	PIAT	10/4/2018	Senator Tartaglione Senior Expo	200	Philadelphia
Presentation	UCPNE	10/9/2018	Interagency Meeting (NANA)	35	Lackawanna

Attachment A TDDP Consumer Education Outreach Events

Presentation	UCPNE	10/10/2018	Area Agency on Aging	28	Lackawanna
Expo	TRPIL	10/11/2018	Sen. Stefano Senior Fair	78	Fayette
Expo	PIAT	10/11/2018	Senator Tartaglione Senior Expo	200	Philadelphia
Expo	LIFT	10/12/2018	Marti Causer Expo-Roulette	150	Potter
Expo	TACIF	10/15/2018	Parkland HS	15	Lehigh
Expo	LIFT	10/15/2018	Bradford Library	22	McKean
Presentation	UCPCPA	10/16/2018	HLAA Lancaster	11	Lancaster
Expo	LVCIL	10/23/2018	OVR	20	Lehigh
Expo	RTF	10/24/2018	Rep. Milard Senior Fair	300	Columbia
Expo	LVCIL	10/24/2018	CLIU 21	85	Lehigh
Training	LIFT	10/24/2018	UPB Bradford	150	McKean
Presentation	TRPIL	10/25/2018	OVR Job Fair	5	Washington
Expo	RTF	10/27/2018	Rep. Milard Veterans Fair	250	Columbia
Expo	UCPNE	10/29/2018	Active Adult Health Fair	100	Lackawanna
Presentation	CRI	10/31/2018	Presentation on CRI Services	25	Erie
Expo	LVCIL	10/31/2018	PADES Conference	150	Statewide
Expo	LVCIL	11/5/2018	Northampton Comm, College	75	Northampton
Presentation	LVCIL	11/6/2018	Parental Info Presentation	15	Lehigh
Presentation	UCPNE	11/6/2018	Interagency Meeting	33	Wyoming
Presentation	TRPIL	11/7/2018	Somerset County Assistance Office	38	Somerset
Expo	UCPCPA	11/7/2018	Vision Corp York	80	York
Presentation	LVCIL		Lehigh U. Dining in the Dark	80	Lehigh
Expo	LIFT	11/8/2018	DuBois AT Awareness Day	120	McKean
Expo	LVCIL	11/14/2018	Stroudsburg HS	20	Monroe
Expo	LVCIL	11/20/2018	Kutztown U. Special	31	Berks
Expo	CRI	11/26/2018	Students with Disabilities Expo	50	Erie
Presentation	TRPIL	11/28/2018	Washington County Blind Assoc.	22	Washington
Expo	PIAT	12/7/2018	St.Martin of Tours Senior Group	28	Philadelphia
Presentation	LVCIL	12/20/2018	CLIU 21	11	Lehigh
Presentation	CLASS	1/9/2019	New Hire Orientation	29	Allegheny
Presentation	RTF	1/17/2019	CAO Networking Group	35	Lycoming
Presentation	LIFT	1/29/2019	AT	က	EK
Presentation	LIFT	2/1/2019	AT	3	McKean

Attachment A

TDDP Consumer Education Outreach Events

Presentation	LVCIL	2/4/2019	Good Shepherd PT (SW)	12	Statewide
Presentation	UCPNE	2/5/2019	Wyoming IAC	34	Wyoming
Presentation	LIFT	2/11/2019	TDDP Demo	က	Jefferson
Presentation	LVCIL	2/14/2019	Info Session	30	Lehigh/Northampton
Senior Expo	CRI	2/19/2019	Venango County Senior Expo	100	Venango
Presentation	LIFT	2/20/2019	Intro AT collaborative board	12	Potter
Presentation	LVCIL	2/21/2019	Info Session	30	Lehigh/Northampton
Presentation	LIFT	2/21/2019	Intro AT to local transition board	13	McKean
Presentation	LIFT	2/22/2019	TDDP Demo	9	EIK
Presentation	LIFT	2/25/2019	Local Task Force Intro AT	10	EK
Presentation	LIFT	2/26/2019	TDDP LTC	2	McKean
Presentation	CLASS	2/28/2019	U of Pbg Audiology Students	43	Allegheny
Presentation	LIFT	2/28/2019		12	Potter
Presentation	LIFT	3/6/2019	Intro to PA LINK on AT	29	Potter
Presentation	TRPIL	3/7/2019	Portage Senior Center	22	Cambria
Presentation	UCPNE	3/12/2019	NANA Meeting	37	Lackawanna
Presentation	UCPNE	3/13/2019	Bradford IAC	15	Bradford
Presentation	TRPIL	3/20/2019	Broad Top Senior Center	26	Bedford
Presentation	LIFT	3/20/2019	Intro AT collaborative board	22	Cameron
Presentation	LIFT	3/21/2019	TDDP Demo	5	Potter
Presentation	LIFT	3/22/2019	Staff Develop/Preparedness	28	Potter
Presentation	TRPIL	3/26/2019	Nanty Glo Senior Center	23	Cambria
Expo	LVCIL	3/30/2019	Transition Fair	80	Lehigh/Northampton
Expo	LVCIL	4/2/2019	Disabilities Expo at E. Stroudsburg University	20	Monroe
Presentation	PIAT	4/4/2019	Free Special Phones for Liberty Resources	20	Philadelphia
Presentation	JCPNEPA	4/8/2019	Dunmore Senior Center Activity Hub	20	Lackawanna
Expo	UCPCPA	4/9/2019	Perry County Health and Wellness Expo	300	Perry
Expo	LVCIL	4/10/2019	Transition/Community Fair at E.Stroudsburg University	70	Monroe
Expo	PIAT	4/11/2019	PSHA Convention Expo	90	Lancaster (SW)
Presentation	PIAT	4/15/2019	Free Special Phones for French Creek Manor CRC	12	Chester
Expo	UCPCPA	4/17/2019	Latino Health Summit	80	York (USC)
Expo	CLASS	4/18/2019	University or Pittsburgh-Hearing Health Fair	20	Allegheny
Drocontation	PIAT	4/23/2019	Free Special Phones for Kendal at Longwood CRC	25	Chester

Attachment A TDDP Consumer Education Outreach Events

Presentation	JCPNEP#	4/23/2019	Lutherwood Apartments: TDDP	9	Lackawanna
Presentation	PIAT	4/24/2019	Free Special Phones for Limerick Green CRC	14	Montgomery
Expo	PIAT	4/28/2019	HLAA Lunch and Learn	100	Montgomery (SW)
Expo	LIFT	5/8/2019	Annual Youth Conferences: all counties in region	250	Regional (6 counties)
Expo	JCPNEPA	5/8/2019	Elder Justice Day:Ladore Conference Ctr	100	Wayne
Presentation	CLASS	5/9/2019	TDDP-Seneca Nursing Home	8	Allegheny
Expo	PIAT	5/9/2019	Rep. Morgan's Chat and Chew-Senior Event	40	Philadelphia
Expo	LIFT	5/10/2019	Kane Community Center Connections & Resource Exp	153	McKean
Presentation	JCPNEPA	5/14/2019	NEPA Aging Network Alliance: TDDP	35	Lackawanna
Expo	TRPIL	5/16/2019	Deaf/HoH Expo-CILSCPA	24	Blair
Presentation	LIFT	5/16/2019	Elk County Youth Safety Day/AT Day	102	Elk
Presentation	CRI	5/23/2019	IU5 Deaf and Hard of Hearing Presentation	30	Erie
Expo	JCPNEPA	5/23/2019	Wayne/Pike Retired Senior Volunteer Program	92	Wayne
Expo	UCPCPA	5/29/2019	Adams County Spring Fling	300	Adams
Expo	CRI	5/29/2019	UPMC for Life Senior Expo	100	Erie
Expo	CRI	6/3/2019	Senior Expor at UPMC Park	150	Erie
Presentation	JCPNEP4	6/4/2019	Hamlin Senior Center: TDDP	37	Wayne
Presentation	JCPNEP#	6/5/2019	Scranton Chamber of Commerce: TDDP	40	Lackawanna
			Total Attendance (estimated)	9301	
			Number of Events	114	1
	ш	vents reaching	Events reaching underserved nonulations (USC)	-	
			Counties Reached	38	
			Statewide Events (SW)	4	1 1
l ogond. Acciet	oloudoe Technolo	Londond: Assistive Technology Resource Centers	prifere		
regella. Assis		as incomine of			
PIAT=PA Initative on Assistive Technology	on Assistive To	echnology	UCPNE=United Cerebral Palsy of Northeastern PA		
CRI=Community Resources for Independence	Resources for I	ndependence	LIFT≍Life and Independence for Today		
CLASS=Community Living and Support Services	ify Living and S	Support Services	LVCIL=Lehigh Valley Center for Independent Living		
UCPC=United Cerebral Palsy of Central PA	rebral Palsy of	Central PA	TRPIL=Transitional Paths to Independent Living		
RTF=Roads to Freedom	eedom				

# **TDDP**

Pennsylvania's Telecommunication Device Distribution Program

**Application Packet** 





It may be the answer to your telecommunication needs.

TDDP is implemented by Pennsylvania's Initiative on Assistive Technology (PIAT), a program of the Institute on Disabilities at Temple University, in conjunction with the PA Office of Vocational Rehabilitation (OVR) and the PA Public Utility Commission (PUC).





Institute on Disabilities

# **TDDP Application Form**

Your eligibility will be determined when you have submitted a <u>completed</u> application and all documentation. To avoid delay, please type or print clearly and make sure all sections of the application have been completed. If questions do not pertain to you, write "N/A" in the space provided.



We strongly encourage you to try equipment first. Have you had a phone demonstration or borrowed a phone to try?



+ 1

You CANNOT exchange TDDP equipment after you receive it.

Please contact your Assistive Technology Resource Center (ATRC) (see ATRC list) to schedule an

equipment demonstration or to request a short-term loan. Please check one: Q YES. I will call to schedule an equipment demonstration or loan. □ NO. I do not want an equipment demonstration or loan, I acknowledge that TDDP has a no exchange policy and I WILL NOT BE ABLE TO EXCHANGE EQUIPMENT I receive from TDDP. DO NOT SEND IN YOUR APPLICATION UNTIL YOU HAVE DECIDED ON EQUIPMENT THAT WILL MEET YOUR NEEDS. SECTION 1: APPLICANT EQUIPMENT INFORMATION Do you already own telecommunication equipment like what you are requesting from TDDP? □ YES If YES, please check the correct answer below (IMPORTANT: If you have working equipment that meets your needs you are not eligible for the program.) My equipment  $\square$  is broken or only works sometimes  $\square$  is borrowed  $\square$  does not meet my needs **SECTION 2: APPLICANT INFORMATION** APPLICANT First name Middle initial Last name Date of birth (month/day/year) Street address IMPORTANT: No deliveries to PO Box; you must provide a street address. City State Zip County (e.g. Allegheny, Snyder) Name of person assisting applicant with this application, if any and their relationship to you. Phone Email Name of parent or guardian (for applicant under age 18) Phone APPLICANT ANNUAL INCOME AND FAMILY MEMBERS Applicant's gross annual income only, including Social Security and/or pension \$ income if applicable and excluding family/household income. If applicant has no income, please write NONE.

Number of family members (excluding applicant)

Total members in family unit (including applicant)

Applicant counted as family member

	OTHER APPLICA	ANT INF	DRMATION		
My primary reason for using t ☐ I cannot afford equipment ☐ I could use other programs	☐ Equipment is availa	ble to me	only through TD and the wait is to	DP oo long	
	r (specify)	nerican	☐ Asian ☐ L☐ Prefer not to a	atino answer	
OPTIONAL Gender:   Male	☐ Female				
Please tell us how you heard ☐ brochure/flyer ☐ present		friend/rel	ative suppor		eb
	APPLICANT'S STATE it application no later the				ed it.
I certify that all information pro I understand that if I purposel officials have my permission t and accept all conditions set t selected.	y provide false information verify the information	ation I ma n provide	y be subjected to d. I certify that I h	o legal action. P nave read, unde	erstand
Applicant signature	3			Date	
Parent or legal guardian signa	ture	y.		Date	
	CERTIFICATION C				
IMPORTANT: This section me pathologist, or a representative Counselor, or Department of	e of a qualified agend	cy, such a	s an Office of Vo	cational Rehabi	litation (OVR)
	ABOUT TH				
Last name		First name	е		Middle initial
Check the type of disability being certified  □ cognitive □ deaf □ deaf blind □ hard of hearing □ low vision/blind □ physical □ speech  I am a: □ licensed audiologist □ licensed speech-language pathologist □ licensed physician  □ representative of a qualified state agency					ech n
CERTIFYING PROFESSIONAL					
Full Name			Title		
Agency			PA Professional License Number (if applicable)		
Phone	Fax		Email		
I certify that the applicant nar independently access telecor	med above has the dis nmunications services	sábility ind s.	dicated, and that	s/he requires te	chnology to
Signature of professional	R)		Date	= 0 ₩	

# **FINAL CHECKLIST**

Read this list and check the boxes to ensure your application is complete.

Complete Applicant Equipment Information (Section 1).
Answer all of the Applicant Information and sign the Applicant's Statement (Section 2).
Have the Certification of Disability (Section 3) completed and signed by a qualified professional: physician, audiologist, speech pathologist, or representative of a qualified state agency (e.g. Office of Vocational Rehabilitation Counselor, or Department of Human Services Case Worker).
Submit photocopies (originals cannot be returned) of documents with the following information:
1. Proof of applicant's (including minors) residence in Pennsylvania. Submit ONE of the following: copy of <u>current</u> driver's license, non-driver I.D., utility bill, dated Social Security correspondence, copies of W-2's, school report card, or other documentation pre-printed with the applicant's name and current street address.
2. Proof of applicant's income. Submit a copy of each item of the current tax year that applies to you: Income statements including W-2's, 1099s or award letters for retirement and/or Social Security income If you do not have a copy of your Social Security income statement you can call 1-800-772-1213 and request a "Benefits Verification Letter". Bank statements, pay stubs or checks cannot be accepted. If applicant has no income write "NONE". Note: If the applicant is a minor child, income requirements are based on the child's income only, not family or household income.
3. Proof of telephone service. Submit a copy of ONE page of your most recent telephone bill with your telephone number appearing on it. If phone service is shared in a residential facility, submit a statement about your access to phone service on facility letterhead signed by the Administrator or Social Worker and include the applicant's name and phone number.
Select ONE piece of equipment and/or ONE signaler that is right for you on the Equipment Selection sheet.
Make and keep a photocopy of your completed application (including Equipment Selection sheet) for your records.
Detach and return your completed application. Send the completed ORIGINAL application (including Equipment Selection sheet and copies of required documentation) to TDDP at the address below.

# **RETURN COMPLETED APPLICATION TO:**

TDDP Program Coordinator Institute on Disabilities at Temple University 1755 N. 13th Street Student Center Room 411 S Philadelphia, PA 19122

# FOR MORE INFORMATION:

Phone:

800-204-7428 voice

866-268-0579 TTY

Fax:

215-204-6336

Email:

tddp@temple.edu

www.disabilities.temple.edu/tddp

# COMMONWEALTH OF PENNSYLVANIA'S TELECOMMUNICATION DEVICE DISTRIBUTION PROGRAM

The Telecommunication Device Distribution Program (TDDP) established by Act 34-1995 and amended by Act 181-2002 provides telecommunication devices to qualified applicants. These devices enable eligible individuals with disabilities to access telephone services independently. To be eligible, individuals must complete this application and meet all criteria listed below.

# Criteria

# Person with a disability

A person with a disability or disabilities that prevents him/her from making or receiving telephone calls independently. Disability must be certified on the application by a qualified professional.

# Income limits

Applicant's gross income of 200% or less of federal poverty guidelines (not including family/household income).

	ELIGIBILITY CRITERIA GUIDELINES f February 1, 2019)
size of family unit	GROSS INCOME (200% of federal poverty guidelines)
1	\$24,980
2	\$33,820
3	\$42,660
4	\$51,500
5	\$60,340
6	\$69,180
7	\$78,020
8	\$86,860

# M Age

Six (6) years or older.

# **■** Residence

A resident of Pennsylvania.

### ■ Resources

Must have existing landline telephone service and be able to learn how to use the requested device(s).

- Information will be kept confidential Except as required by law.
- Equipment ownership and responsibility Your equipment selection is FINAL and equipment cannot be exchanged. Equipment will be delivered to your home. It then becomes YOUR PROPERTY and YOUR RESPONSIBILITY.

NOTE: There is a Limited Manufacturer
Defect Warranty on all equipment obtained
through this program. If your equipment
is defective or if it stops working, it will be
your responsibility to contact the equipment
vendor for warranty repair. Repairs for
damages due to abuse or neglect are not
covered under any warranty and are YOUR
RESPONSIBILITY. Stolen equipment can
only be replaced upon receipt of a copy of
the police report of the theft.

# **IMPORTANT**

Make a copy of your completed application for your records. Send completed ORIGINAL application (including Equipment Selection sheet and copies of required documentation) to TDDP at the address listed on the front of the application.

If you need help completing this application, or need it in an alternate format, please contact us. Phone: 800-204-7428 voice / 866-268-0579 TTY / Fax: 215-204-6336 / Email: tddp@temple.edu

# TDDP Equipment Selection (February 2019)

You must submit your equipment selection with your application.



For detailed information about these products, go to www.disabilities.temple.edu/tddp
If none of the listed equipment will meet your needs, please contact the TDDP:

# APPROVAL FOR EXECUTIVE DIRECTOR'S SIGNATURE

DATE: SEPTEMBER 9, 2019	
SUBJECT: TEMPLE UNIVERSITY-TELECOM DEVICE DISTRIBUTION PROGRAM	ANNUAL REPORT
PURPOSE: REVIEW & APPROVAL - SIGNATURE APPROVAL ON ANNUAL	REPORT TO THE GENERAL
ASSEMBLY REQUIRED	
Surface Control Contro	
FUNDING (AMOUNT AND SPLIT, IF APPLICABLE):	
	Á
EXECUTIVE SUMMARY:	à
THE PART OF THE PA	DEPORT TO THE CENERAL
ENCLOSED FOR YOUR REVIEW AND APPROVAL PLEASE FIND AN ANNUAL I ASSEMBLY REGARDING THE TEMPLE UNIVERSITY TO ADMINISTER THE TEL DISTRIBUTION PROGRAM AS DESIGNATED AND FUNDED BY OVR.	ECOMMUNICATION DEVICE
	SE 201
Bueur Van VV No	
Rush: Yes XX No	RAPA E CA
	PUR SUPE
PLEASE SIGN AND DATE WHERE TABBED, IF APPROVED.	URE SK
	31 AU
SUBMITTED BY: LISA J. PLETZ	,
9/10	
Ozh M	119