

Notice released July 16, 2018 (DA 18-733), the PA TRS Program is currently certified by the FCC through July 25, 2023.

I. The PA TRS Program Fully Complies with Applicable FCC Regulations

FCC regulations, 47 C.F.R. § 64.606(a) (“Documentation”), provides:

Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit documentation to the Commission [.] All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program.

Pursuant to 47 C.F.R. § 64.606(b)(1) (“Requirements for state certification”):

[T]he Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in § 64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in § 64.604, the state establishes that its program in no way conflicts with federal law.

The PA TRS Program fully complies with applicable FCC regulations, as set forth herein.

A. Description of the PA TRS Program

In September 1989, the Pennsylvania Telephone Association (PTA) transmitted a White Paper Summary of Findings to the PA PUC relative to the provision of relay service. In it, PTA iterated the needs of the hard-of-hearing and deaf community and advocated the establishment of a statewide relay system. In October 1989, the PA PUC responded to PTA, agreeing with PTA's suggestion to establish a statewide relay system. The PA PUC requested that PTA submit a definite plan in the form of a Petition to Establish a Pennsylvania Relay System. In February 1990, PTA submitted a Request for Proposal (RFP) for Relay Service, which was reviewed and accepted by the PA PUC.

Formal offers (applications) to provide the contemplated PA TRS were submitted by four prospective service providers and reviewed by a Bid Committee. On May 29, 1990, the PA PUC, at Docket No. M 00900239, granted the PTA Petition and established the PA TRS. The PA PUC also granted AT&T's application at Docket No. A-310125 for a Certificate of Public Convenience (CPC) to provide PA TRS, in response to the RFP. AT&T continued, until December 16, 2014, to provide PA TRS under a CPC at PA PUC Docket No. A 311163, consistent with its AT&T PA PUC Tariff No. 24.

In conjunction with establishment of the PA TRS, the TRS Advisory Board was formed to provide the PA PUC with constituent input on relay matters. The PA PUC's May 29, 1990 Order further established a uniform monthly surcharge (TRS surcharge) based on total access lines in service as the funding mechanism to recover costs associated with the operation of the PA TRS. Pennsylvania's Local Exchange Carriers (LECs) collect the TRS surcharge from residential and business wireline access line customers. The funds are remitted monthly to a Fund Administrator. The TRS surcharge is recalculated at least annually by the PA PUC.

In 1995, the PA TRS and the TRS Surcharge were codified at 35 P.S. § 6701.4. At the same time, the Pennsylvania Telecommunication Device Distribution Program (PA TDDP or PA TDD Program) was created by 35 P.S. § 6701.3. The PA TDDP provides free customer premises equipment to low-income relay service users in Pennsylvania. The TDD Program is operated by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry. Pennsylvania's Initiative on Assistive Technology (PIAT), Institute on Disabilities at Temple University (IDT) located in Philadelphia, Pennsylvania, is the current PA TDD Program manager under contract to OVR. The PA TDDP is funded through the TRS Surcharge.

In 2003, the PA PUC began a trial of captioned telephone relay service (CTRS). The trial progressed to interim service, and in 2006, a contract CTRS provider was selected through an RFP process. The contract was finalized in 2007, and Hamilton Relay, Inc. (Hamilton) began providing PA CTRS. The PA TDDP also provides free customer premises equipment to low-income CTRS users in Pennsylvania. Hamilton's current contract runs through June 30, 2024.

In 2014, AT&T advised the PA PUC that it wished to abandon its CPC to provide TRS in Pennsylvania. An RFP for a new TRS provider was issued. On December 4, 2014, at Docket No. A 2014-2447601, the PA PUC approved the application of Hamilton to operate as Pennsylvania's certificated intrastate TRS provider pursuant to its responsive bid. A CPC to provide TRS was issued to Hamilton Relay on January 9, 2015. AT&T's CPC to provide TRS was cancelled. As of December 16, 2014, Hamilton received the hand-off from AT&T and began providing the Pennsylvania intrastate TRS.

Today, Hamilton is certificated by the PA PUC as the service provider for PA TRS. Hamilton also contracts with the PA PUC to provide the Pennsylvania captioned

telecommunications relay service (PA CTRS). Besides Pennsylvania, Hamilton provides telecommunications relay services in several other states.

PA TRS Program services include nationwide access, Spanish relay, customer profile, text telephone (TTY), voice carry over (VCO), hearing carry over (HCO), deaf-blind service (DBS), speech-to-speech service (STS), voice relay and captioned telephone (CapTel). PA TRS is accessible via 711 abbreviated dialing or toll-free numbers. PA CTRS users can be reached by calling a toll-free number for English language service and a separate number for Spanish language service. All relay connection options are available in English and Spanish.²

Since inception of the PA TRS, PA LECs have remitted the monthly TRS surcharge collections to a Fund Administrator which disburses the fund monies necessary for the operation of the PA TRS, CTRS, TDDP, PMASP, and TRS Board operations. In 2008, the PA PUC modified its policy guidelines relative to the TRS surcharge and codified the TRS surcharge process in regulations at 52 Pa. Code § 63.37. The modification and codification added specific penalties for the failure of a LEC to comply with TRS surcharge requirements. Hamilton is compensated monthly by the Fund Administrator based on the reported call volumes for the preceding month. Currently, the PA TRS Fund Administrator is US Bank Institutional Trust & Custody in Philadelphia, PA.³

B. The PA TRS Program Meets or Exceeds All of the FCC’s Applicable Operational, Technical and Functional Minimum Standards

The documentation included in the **Appendix A** to this Application (Statement of Hamilton Relay, Inc.) details the PA TRS Program’s compliance with the FCC’s emergency calling requirements, 47 C.F.R. § 9.14 (Emergency calling requirements) and its operational,

² <https://hamiltonrelay.com/downloads/states/pennsylvania/brochure-relay-pa.pdf>.

³ Additional information about the PA TRS Program is available online at: <https://www.puc.pa.gov/telecommunications/telecommunications-relay-service/>.

technical, and functional minimum standards at 47 C.F.R. § 64.604 (Mandatory minimum standards).

C. The PA TRS Program Makes Available Adequate Procedures and Remedies for Enforcing its Requirements, Including Informational Materials on PA PUC and FCC Complaint Procedures

The PA PUC is committed to ensuring that there are adequate procedures and remedies available for enforcing PA TRS Program requirements and thereby ensuring compliance with FCC requirements. Hamilton operates the PA TRS pursuant to its certificate of public convenience issued by the PA PUC and a tariff filed with the PA PUC. Hamilton operates the PA CTRS pursuant to a contract that was negotiated with the PA PUC after Hamilton was selected in a competitive request-for-proposal process. Hamilton is obligated by its certificate, its tariff and its contract to comply with federal and state laws and regulations applicable to telecommunications relay service. Hamilton's failure to provide TRS equal to or better than the requisite minimum standards could result in sanctions up to and including loss of the privilege to provide the service. Pursuant to the provisions of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 101 - 3316, the PA PUC has the power to revoke a public utility's certificate of public convenience and impose civil penalties for violation of the Public Utility Code, PA PUC regulation, final direction, or order. *See, e.g.*, 66 Pa. C.S. §§ 501 – 502. The PA PUC also has the power to cancel or to decline to renew the PA CTRS contract for violation of the Public Utility Code, PA PUC regulation, final direction, order, or contract non-conformance.

The PA TRS Program has a significant consumer education component, including information on how to file a complaint at the PA PUC and FCC. Consistent with its Statement, Hamilton responds to TRS and CTRS customer issues and complaints in accordance with federal and PA PUC requirements. All PA TRS and PA CTRS users have access to the full array of the PA PUC's consumer protections and complaint procedures if

there are unresolved issues with either relay service. Hamilton publishes its customer contact information online, including links to the PA PUC and the FCC.⁴ Similarly, the PA PUC publishes links to Hamilton's website, the PA PUC's own informal and formal complaint procedures, a toll-free number for the PA PUC's Bureau of Consumer Services and links to the FCC's Consumer Information Bureau.⁵

In addition to ensuring that the PA TRS and PA CTRS providers comply with state requirements, PA PUC staff regularly participate in National Association for State Relay Administration (NASRA) functions to ensure the highest level of conformance with national TRS and CTRS standards and to ensure that there are no conflicts with federal law in the operation of PA TRS and PA CTRS. Further, the PA TRS Program is subject to audit by the PA PUC.

D. The PA TRS Program in No Way Conflicts with Federal Law

Nothing in Pennsylvania law or the PA PUC regulations conflicts with federal law relating to relay services. Hamilton is not authorized to operate or provide TRS, CTRS or related services in any way that conflicts with federal law or regulation.

⁴ <https://hamiltonrelay.com/pennsylvania/contact-information.html>.

⁵ <https://www.puc.pa.gov/telecommunications/telecommunications-relay-service/trs-contact-information/>.

II. Conclusion

Based on the foregoing, the PA PUC, on behalf of the Commonwealth of Pennsylvania, seeks recertification of Pennsylvania TRS Program for the period from July 26, 2023, until July 25, 2028. If you have any questions concerning this application for certification renewal, please feel contact Christopher Van de Verg, PA PUC Law Bureau, cvandeverg@pa.gov, or Eric Jeschke, PA PUC Telecom Group, Bureau of Technical Utility Services, ejeschke@pa.gov.

Respectfully submitted,

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Dated: December 1, 2022

Appendix A

**Statement of Hamilton Relay, Inc. in Support of the Application for Recertification of
the Pennsylvania Telecommunications Relay Service Program**

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Section 1 Introduction

This Statement is made by Hamilton Relay, Inc. (Hamilton) in support of the **Application for Recertification of the Pennsylvania Telecommunications Relay Service Program for 2023-2028** (the “Application”) being filed with the Federal Communications Commission (FCC or Commission) by the Pennsylvania Public Utility Commission (PA PUC) on behalf of the Commonwealth of Pennsylvania.

Hamilton currently provides the services that implement telecommunications relay service (TRS) and captioned telecommunications relay service (CTRS) and related services (collectively “PA TRS Program”). In summary, the PA TRS Program provides traditional (TTY-based) TRS, Spanish language traditional TRS, voice carry over (VCO), hearing carry over (HCO), deaf-blind service (DBS), speech-to-speech service (STS) and CTRS to users throughout Pennsylvania.

Operational questions about the PA TRS Program may be directed to the following:

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As set forth in the remaining sections of this Statement, Hamilton provides PA TRS and CTRS to users throughout Pennsylvania in compliance with the emergency calling requirements of 47 C.F.R. § 9.14 and with the operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604 (Mandatory minimum standards), as described more fully in the following narrative. The narrative lists each standard that is applicable to TRS and/or CTRS, followed by a plain language description of how Hamilton’s operations and services comply therewith.

Hamilton notes that the FCC has waived many of its otherwise applicable TRS standards for CTRS (also known as “CapTel”). *See, Order, In the Matter of Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123 (Aug. 14, 2006) Where pertinent, Hamilton has indicated “Waived for CapTel” next to the otherwise applicable standard for TRS.

Section 2 Contract Status

Hamilton provides the PA TRS service pursuant to a certificate of public convenience issued by the PA PUC and a TRS tariff filed at the PA PUC.

Hamilton operates the PA CTRS service under contract with the PA PUC. The current term of the CTRS contract term is September 1, 2019 – June 30, 2024.

Section 3 – Emergency Calling Requirements

47 C.F.R. § 9.14 Emergency calling requirements.

(a) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if the caller had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

TRS

Procedure for Handling TRS Emergency Calls

The key to providing the best TRS service in emergency situations is to maintain an updated list of PSAP numbers. Our service provider partners with Bandwidth, a national provider of emergency calling telephony services. They ensure that relay users are automatically and immediately connected to an appropriate PSAP through the use of Bandwidth’s PSAP database.

In the event that a caller instructs us to dial 911 through relay, the CA immediately initiates an emergency call with a few simple keystrokes. The call is automatically routed through Bandwidth’s system, which automatically routes the call to an appropriate PSAP. The CA then relays the call in the same manner as any other relay call.

Our service provider emergency call procedures follow:

- In the event that a callers instructions are to dial 911 through relay, the CA accesses Bandwidth’s database through a single stroke on the keyboard, which immediately routes the call to an appropriate PSAP.
- The CA relays the call in the same manner as any other relay call.
- If the caller is using a cellular or wireless phone, the ANI is not a good indication of the caller’s location. In such case, the CA asks for the caller’s location and initiates an automated search for an appropriate PSAP.

TTY to TTY Communications Between PSAP and Caller

Our service provider processes direct TTY to TTY communications between the PSAP and the TTY caller, and will “release” these calls if directed.

If a Caller Disconnects Before Being Connected to the PSAP

If a caller disconnects before being connected to a PSAP, our service provider passes the caller's telephone number to the PSAP. Their advanced technology initiates a software command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information, so no matter when the caller hangs up, they can send the correct ANI information to the 911 center and give the dispatcher any pertinent information collected on the call. This

allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

While it is never our service provider's intent to be a substitute 911 center, they will not turn away an emergency call and will take reasonable steps to get the call placed and summon the necessary help.

Direct Dial for Emergency Numbers

Relay users can add local emergency numbers to their speed dialing list on their Customer Profile. This feature can save valuable time when time is of the essence. A relay user could simply type call Fire or call 911 and the CA will automatically connect the caller to an appropriate PSAP. Callers may also provide a specific emergency number on a per-call basis.

PSAP Database Redundancy

In the event that Bandwidth should experience technical difficulties resulting in its database becoming unavailable, our service provider has established multiple modalities in which to access their database. This redundant process ensures that Relay users are connected to an appropriate PSAP.

Educating the Public about Calling 911 Direct

Through outreach programs and educational materials, our service provider strives to inform relay users about how to use 911 services, encouraging them to call 911 direct. They also encourage relay users to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly if there ever were an actual emergency. Outreach Coordinators routinely give presentations to 911 centers, providing training to emergency dispatchers on how to handle TTY or relay calls correctly.

Training for Emergency Call Handling

Our service provider thoroughly trains CAs and Supervisors on the proper handling of 911/emergency calls. They use proficiency exams to measure CA skill levels for 911 emergency calls and handle emergency calls as expeditiously and effectively as possible.

Captioned Telephone Service

Dialing 911 in an Emergency – Two-Line Captioned Telephone

When calling 911 using 2-Line Captioned Telephone, one line is routed directly to the appropriate 911 center which receives the caller's ANI information directly from the network in the same way as a non-CTS call. The second line is routed through the captioning center. This allows the user to receive captions on one line and hear the conversation on the other line.

Dialing 911 in an Emergency – Single Line Captioned Telephone

When calling 911, the single line Captioned Telephone user's call is automatically routed to the appropriate 911 center because the call was placed from the user's home line. Single Line Captioned Telephone 911 calls are not routed through the captioning service. This means:

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- There are no delays in accessing emergency personnel, as calls are directly connected to a 911 call center.
- Emergency 911 Services will know the ANI of the caller and be able to locate the individual and send appropriate help, based on the location from which the Captioned Telephone call is placed.
- Emergency 911 calls are not captioned in the same manner that regular CTS calls are.
 - The CTS user speaks directly into the handset as with any other CTS call.
 - The 911 dispatcher is able to hear everything the CTS user says but the CTS user may not be able to hear the dispatcher.
 - The dispatcher can type instructions on a TTY, which will appear on the CapTel display screen.

Section 4 Operational Standards

47 C.F.R. § 64.604 Mandatory minimum standards.

(a) Operational standards –

(1) Communications assistant (CA).

(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Waived for CapTel.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Waived for CapTel.

TRS Proficiency

CAs are effectively and sufficiently trained to meet the specialized communications needs of individuals who are deaf, hard-of-hearing, or have difficulty speaking. Every CA must possess clear and articulate voice communications and pass an oral-to-type test at a minimum of 60 words per minute. CAs are proficient, not only in their typing, but also in their grammar, spelling, and interpretation of typewritten ASL. They are also very well versed on the culture, languages, and etiquette of individuals who are deaf, hard-of-hearing, or have difficulty speaking.

TRS Basic Skills in Reading, Speaking, and Writing English

Prior to employment, every potential CA must meet the necessary proficiency requirements including reading, speaking, and writing English grammar; demonstrating basic spelling; and English grammar skills at a minimum of a 12th grade level. They must possess a high school diploma (or grade equivalent diploma) and are required to demonstrate basic telephone etiquette.

During the application process, each applicant is tested for diction; clear, articulate voice communications; and a neutral accent by requiring each prospective CA to complete a reading exam.

TRS Spelling Skills

The minimum spelling skills required of CAs is the ability to spell words that are equivalent to a beginning college level conversation. Applicants must achieve at least 90% accuracy on their spelling skills exam to be eligible to work for the Relay. Similar testing is required for Spanish CAs.

TRS Proficiency Examinations

Our service provider uses a variety of testing mechanisms, including proficiency tests, to ensure the highest quality standards in the industry for our CAs. Each CA must pass these exams before relaying calls on their own.

Part of the exam process is performance based – the CA must successfully complete several relay call scenarios. All other sections are quantifiable. The exams measure skill levels in:

- Typing
- Spelling
- Dictation
- Relay procedures
- Characteristics of ASL as it may be reflected in the written language of TTY users, cultures of those who are deaf, hard-of-hearing, or have difficulty speaking
- Ethics and confidentiality
- Professional judgment

A CA who cannot pass this examination within the probationary period is not utilized as a relay CA. To ensure CAs do not “learn” the test, tests are not available to CAs prior to testing (tests are kept under lock and key) and portions of the tests are changed routinely.

TRS Relay Culture Training

All relay staff receive Culture Training. Training for CAs includes topics devoted to a variety of deaf and hard-of-hearing perspectives such as:

- ASL “gloss”
- ASL style and grammar
- Cultures of people who are deaf, hard-of-hearing, and who have difficulty speaking
- Considerations and accommodations for people who are deaf, hard-of-hearing, or who have difficulty speaking
- Accessibility and communication within the communities of deaf, hard-of-hearing, and those who have difficulty speaking
- Relay etiquette
- CA role (including sensitivity training)

TRS CA Performance Monitoring

Utilizing an advanced relay platform, our service provider has established a unique remote call monitoring system to continually monitor call performance. Such things as proficiency and professionalism, procedures, language, voice quality, and professional knowledge and skills are evaluated daily to ensure quality call processing. Our service provider conducts both formal and

informal call evaluations, in which a live call is observed from start to finish and used to confirm quality expectations are being met and maintained. Formal evaluations are scored and tracked for each CA.

Our service provider performs additional informal spot-checking to ensure CAs are performing properly on every call. A call is observed, and the CA is given a score based on the information that was collected during the session.

Captioned Telephone Training

Captioned Telephone CAs are required to have the requisite experience, expertise, skills, knowledge, and education; and are adequately trained to accurately caption in a professional manner the words spoken by the hearing party without intervening in the communication between the parties. Our service provider has a detailed CA training plan in place to ensure that all standards as applied by the FCC to the provision of CTS are met by each Captioned Telephone CA.

Captioned Telephone Training Overview

Captioned Telephone Captioning Assistant (CA) training includes comprehensive training on the CapTel workstation equipment and other instruction including live call handling experience. Prospective CAs are required to meet all standards for becoming a CapTel CA. These standards include the ability to consistently meet call-handling skills such as word per minute averages, accuracy averages as well as attendance and attitude standards as set by management.

Training consists of ten days of classroom and hands on training. If all CapTel captioning standards are met, training continues with five days of transition training being mentored by a qualified CA monitor. At any time if a CA Trainee does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminate employment.

Captioned Telephone Orientation

Captioned Telephone Orientation includes Training Team introductions, building tour, required employment paperwork, introduction to call center policies, confidentiality requirements, and expected standards that must be met to pass training.

Captioned Telephone Training Class

Captioned Telephone training is an interactive class combining video and hands on instruction. Each class introduces a new skill set and allows the trainee time to apply those skills. Skills are introduced starting with building a basic voice profile and incorporating more complex skills each day that build on the previous day's information.

A simulation program is used to provide the CA Trainee with a live captioning experience. The simulator allows individuals to listen to various pre-recorded scripts that simulates the conversation or voice of the hearing person and allows the CA Trainee to practice the appropriate captioning skills. Once all of the skills sets have been taught, CA Trainees are

provided an opportunity to shadow live calls and gain exposure to actual speed and content of calls being made by clients.

Standardized timings are given to CA Trainees to determine the aptitude of the CA Trainee's captioning skills. Each CA Trainee is required to successfully pass two rounds of timings consecutively prior to handling live calls. Timings allow trainers to evaluate the level of accuracy and speed to determine if they are able to meet and maintain our quality standards. They are timed each day and progress is reviewed until they meet the expected standards or it is determined the individual is not suited for the position.

Captioned Telephone Customer Awareness Training

Captioned Telephone training includes Customer Awareness Training, including training related to meeting the communication needs of consumers who are deaf, hard of hearing and who have difficulty speaking and operations of telecommunications equipment.

Captioned Telephone Training Transition & Graduation

CA Trainees that meet the required quality standards through the standardized timing program are placed on the production floor with an experienced and qualified CA Coach. The CA Coach provides 1-on-1 coaching for every call processed by the CA Trainee. Trainees are evaluated on live call processing and are required to meet a progression of quality standards throughout the week before graduating to the call floor to process calls independently.

Captioned Telephone Ongoing Training and Monitoring

Captioned Telephone CAs receive ongoing training throughout their employment. This includes:

- Monitoring on each shift. If they need additional training or re-training, they are taken off line and given the necessary training.
- Training on new features and capabilities of the service platform including new or improved voice recognition systems used.
- Ongoing testing through the administration of Timing Scripts in a test environment.

CAs are also monitored while processing live calls. The scores of each CA are maintained in a database. No other information regarding conversations is kept at any time.

Captioned Telephone Testing

CAs are tested through the administration of Timing Scripts in a test environment. Only the scores of each CA are maintained in a database. The CA testing program requires a proficiency level for Captioned Telephone CAs of 130 WPM speed of transcription with a 98% accuracy requirement in a testing environment. Accuracy is the percentage of error subtracted from 100% of text received. Errors are words that materially change the context of the sentence, including missing words of sentences.

(v) CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period

shall begin to run when the CA reaches the called party. The obligation of the CA to stay with the call shall terminate upon the earlier of:

(A) The termination of the call by one of the parties to the call; or

(B) The completion of the minimum time period.

Change of TRS and CTS CA During a Call

Our service provider complies with the State and FCC's requirement regarding change of CAs for all forms of Relay including TRS, STS and CapTel. They adhere to the 10-minute requirement prior to changing TRS and CapTel CAs.

In the event of any call take over (CTO) our goal is to minimize disruption to customers. The CA keeps both parties informed during this process. Several examples where a CTO may occur are; a CA has been on a call for at least 30 minutes and is at the end of a shift; a CA needs urgent relief; or the CA has been on a call over 2 hours and feels fatigued.

Change of an STS CA During a Call

Our service provider's 30-minute requirement prior to changing STS CAs exceeds the FCC's 20-minute requirement. STS CAs understand the difficulties involved in changing CAs and only request a relief under emergency circumstances.

STS call takeovers are only allowed in between outbound calls. In the event of an urgent need for relief while an outbound caller is still on the line, with Supervisor approval, the CA may release the outbound caller and transfer the inbound caller to another CA. The CA keeps both parties informed during this process.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

Waived for CapTel.

Our service provider makes best efforts to accommodate a TRS user's request for a specific CA gender whether the request occurs at the onset or mid-call, the call is transferred to a CA who is of the gender requested by the caller.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Our service provider transmits all conversations between TTY and voice callers in real time.

(viii) STS providers shall offer STS users the option to have their voices muted so that the other party to the call will hear only the CA and will not hear the STS user's voice.

Waived for CapTel.

STS Customer Profiles contain an option titled “Open Line/Mute Transmission of STS User”. This feature provides an open line, with no switching, so that the CA, the caller and the called party can all either speak or listen. STS users can choose, on a call-by-call basis or in their customer profile, whether or not the calling party can hear the speech disabled person’s voice.

(2) Confidentiality and conversation content.

(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality

All relay personnel, not just CAs, are required to sign a Pledge of Confidentiality promising not to disclose the identity of any callers or fellow CAs, or any information learned during the course of relaying calls, regardless of content; either during or after their period of employment. Our service provider diligently protects all information from unauthorized use and disclosure.

CAs understand the importance of maintaining the privacy and confidentiality of all parties who use relay services. Our service provider:

- maintains no written or electronic script or record of any type of call content beyond the duration of the call
- collects only that personal information necessary to resolve complaints
- does not use this information for any other purpose.

Policies and procedures ensure the protection of electronically collected information as well as information obtained by the CA in the course of relaying a call. They ensure that relay users have the same high level of confidential and legal protections accorded to standard public telephone network users regarding security and freedom from unwarranted collection of information by unauthorized parties.

Speech-to-Speech CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. They are given the ability to keep records of the content of any conversation and to retain information from a particular call in order to facilitate subsequent calls if requested. STS CAs will also repeat any information (without the Speech-to-Speech user having to say the same thing each time) during subsequent calls if requested to do so. Speech-to-Speech CAs only retain this

information for as long as it takes to complete the subsequent outbound calls related to the same inbound call.

Violation of Confidentiality

Our service provider's policy requires that any relay employee who, after an investigation, have been found to violate the confidentiality rules and regulations are terminated immediately.

CapTel Confidentiality Policy

CapTel CAs adhere to strict policies of confidentiality which comply with all FCC confidentiality requirements. The success of CapTel depends on quality and complete confidentiality as consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence. CapTel CAs do not discuss the contents of captioned calls, caller identifying factors, calling points, or other information about captioned calls other than what is necessary to train other CAs. CapTel CAs are also prohibited from intentionally altering a relayed conversation.

The only information collected is personal information necessary to provide for the Captioned Telephone Service being rendered. Information obtained during a CTS call may be shared with a member of management who has asked for specific information which may be needed to clarify technical, policy, emergency, or customer service issues. Information about call content is discussed in a private area only.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, relay all conversation in real time and verbatim with the following exceptions:

- A TTY user has a "Translator Preference" on their Customer Profile
- Either one of the relay users involved in the conversation requests translation
- The relay user requests summarization

CAs convey the full content, context and intent of the communication they translate without intervening in the communication process. All policies and procedures related to call handling incorporate this philosophy. Initial and on-going training continually emphasize the importance of intent, functional-equivalency, and how necessary it is to relay the various types of secondary activities.

In compliance with all FCC rules STS CAs are permitted to facilitate a call for a user who has difficulty speaking if the user does not oppose the intervention. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation.

(3) Types of calls.

(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Waived for CapTel.

Our service provider never places any restrictions on the length or number of single or sequential calls placed by customers through relay. They also do not request that the caller finish early.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

Our service provider's system is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls, which the FCC has determined cannot be processed through relay due to a lack of existing technology.

On August 5, 2020, the FCC released a Report and Order (FCC 20-105) in which it repealed the equal access and billing option requirements for state program telecommunications relay services (TRS) providers.

Our service provider does not charge Relay users for the service when they make local or long-distance calls. There are only four call types that may require a billing method from TRS users:

1. calls placed from payphones
 - Our service provider may use several methods to ensure proper billing of these types of calls, which may include collect calling and calling card payment methods.
 - Our service provider does not charge relay users for local calls from a payphone as stated in the FCC coin-sent paid order.
 - Relay users can make long distance calls from a payphone. If a collect call, the customer's carrier will rate and bill long distance payphone calls. Our service provider offers collect as a billing option when this service is available through carriers as collect calls and many other operator services have been phased out by many carriers.
 - Once billing has been established, the call is processed as a regular relay call.
2. calls placed to and from international locations
3. calls placed to Directory Assistance
 - Our service provider will continue to offer Directory Assistance when this service is available as many operator services have been phased out by carriers.
4. calls placed to pay-per-call services e.g., 900 numbers

Calls from Wireless Phones

Our service provider processes wireless calls identically to any other call type.

Network Access

Relay users are able to place calls from within the State to any point in the world and from all points outside the State to any point within the State. This includes access to local, intrastate (including intralata and interlata), interstate, and international calls.

Interstate and International Calls

Our service provider provides interstate and international calling to relay users. Interlata (including interstate and international) and intralata calls are recorded in the CDR. There is no cost for long distance or interstate calls. The Relay user's carrier will bill the consumer for international calls.

Our service provider reports total interstate minutes of use to the State. They bill all interstate and international relay minutes to the Interstate TRS Fund Administrator, according to FCC guidelines.

Captioned Telephone Network Access

Captioned Telephone will allow Captioned Telephone users to place all network call types commonly supported by TRS including intrastate, interstate, and toll-free and pay per call services. The only exception is single line 9-1-1. Because 911 calls placed using one-line Captioned Telephone are not routed through the captioning service, this requirement does not apply to CapTel.

CapTel users are not charged for long distance calls. Because relay is not involved in long distance for 2-line CapTel calls, users may be billed by their long-distance providers for the voice portion of the call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

In one of the 4 scenarios listed above, if a long distance provider declines to complete a call because credit authorization is denied, our service provider will relay the message verbatim to the relay user and ask if he/she wish to make another call.

(iv) Relay services other than Internet-based TRS shall be capable of handling pay-per-call calls.

Our service provider provides relay users access to pay-per-call services in which the company providing the service bills the end-user directly. A relay user calls the relay service, gives the pay-per-call number to the CA and the call is processed as a standard really call. Customers who do not want pay-per-calls made from their telephone line through relay can complete a customer profile form and restrict (block) pay-per-call relay calls from that particular telephone line. Because no 900 blocking information is automatically passed from the LEC, our service provider relies on customer profile data as the only resource for this information. It is important to recognize that this is a very rare, if ever, used service.

Captioned Telephone Pay-Per-Call

The CapTel platform is set to block out-bound pay-per-call-use call types by default. Additionally the CapTel profile contains call blocking of up to five specific blocked numbers per type.

- (v) TRS providers are required to provide the following types of TRS calls:*
- (A) Text-to-voice and voice-to-text;*
 - (B) One-line VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; and*
 - (C) One-line HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.*

TTY to Voice

Our service provider's system can accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. If the called party has not received a relay call before and the TTY user has not requested otherwise, the CA explains what relay is and how it works before beginning to relay the call. The TTY user then types the initial message, and the CA verbally repeats this to the called party.

Voice Call Processing

The system can accept a call from a hearing and voice capable caller, place a call to a TTY equipped caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Carry Over

VCO users are able to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are available.

Two-Line VCO

Two-line VCO allows for the user to have a more interactive and uninterrupted conversation. By using two telephone lines the caller, if they have some hearing available, can listen to the conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the relay user must have two telephone lines and 3-way calling. The TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says and is virtually invisible to the voice customer.

Reverse Two-Line VCO

Our Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. In this case, it is called Reverse Two-line VCO.

VCO-TTY and TTY-VCO

With this service VCO users can call a TTY user (or vice versa) through relay. The VCO user voices his/her conversation that the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

VCO-VCO

This service allows two VCO users to contact each other through relay. With VCO to VCO service the CA types to both parties, saving the VCO users from having to type their part of the conversation.

Hearing Carry Over (HCO)

HCO users are able to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are available.

Two-Line HCO

Two-line HCO allows the relay user to listen to the conversation on one line while typing on the other. To place a two-line HCO call, the TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

HCO-TTY and TTY-HCO

This feature allows HCO users to contact TTY users (or vice versa) via relay. The CA voices the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

HCO-HCO

This service allows two HCO users to contact each other through the relay. Providing HCO to HCO service where the CA voices to both parties, saves the HCO users from having to read the other party's conversation.

Captioned Telephone calls

Captioned Telephone users place a call in the same way as dialing a traditional phone. As they dial, the CapTel phone automatically connects to a captioning service. When the other party answers, the CapTel phone user hears everything that is said, just like a traditional telephone call.

Voice-In Calls via Captioned Telephone

All voice-in calls to the CapTel Captioning Service receive the following voice greeting:

"Thank you for calling the Captioned telephone service. Please enter the area code and phone number of the person you are calling followed by the pound sign."

2-Line Captioned Telephone Service

By using two telephone lines, the Captioned Telephone users listen to their conversation on one line while receiving typed text from the captioning service on the other line. 2-Line Captioned Telephone Service truly enhances the functional equivalency and quality of Captioned Telephone Service, including:

- There is no separate telephone number for voice callers to remember because calls are direct between parties; standard phone user's simply dial the user's phone line directly instead of dialing an 800 number and accessing the captioning service.
- 2-Line CapTel supports enhancements that users have purchased from their local telephone company, including call waiting and Automatic Call Back (*69)
- Captions can be turned on or off at any time during the call
- Multiple users in the same location can enjoy a conversation via another extension in the home or office.
- Captioning is available on emergency 911 calls; when calling 911 the 2-Line CapTel users' call is routed through the captioning center allowing the user to receive captions on one line and hear the conversation on the other line.

Requirements for 2-Line Captioned Telephone Service

- A CapTel telephone
- Two analog telephone lines with separate telephone numbers are required. The second line cannot merely be an extension line.
- Individuals must configure the CapTel phone in order for 2-line CapTel service to be enabled. It will not automatically switch to 2-Line mode.

Single-Line Captioned Telephone versus Two-Line Captioned Telephone

	1-Line CapTel	2-Line CapTel
<p>Number of Lines For those with only digital phone service, additional options are available. For more information visit www.hamiltoncaptel.com or call 888-514-7933.</p>	<p>Requires one standard (analog) telephone line or DSL with an analog filter.</p>	<p>Line 1 (voice) can be an analog telephone line or DSL with an analog filter, Digital Cable or VoIP line. Line 2 (captions) must be an analog telephone line or DSL with an analog filter.</p>

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	1-Line CapTel	2-Line CapTel
How Calls are Managed	Spoken conversations and captions provided through one telephone line.	Spoken conversation is provided on one line; captions are provided on the second line.
Captioning	Captions must be turned on prior to dialing the number to call. A red light indicates that captions are "on".	Captions can be turned on or off at any point in the conversation.
Outgoing Calls	Outgoing calls are automatically routed through the CapTel call center.	Both incoming and outgoing calls are automatically routed through the CapTel call center.
Calling a CapTel User	People calling the CapTel user must first dial the toll free number for CapTel; then dial the CapTel user's phone number when prompted.	People calling the CapTel user dial that person's number directly.
Calling Features	Call-waiting and automatic call back (*69) are not available.	Call-waiting and automatic call back (*69) can be used.
911 Calls Note that CapTel Captioning Centers are not 911 centers and do not assume responsibility for calls placed through 911.	Calls placed to 911 connect directly to Emergency 911 Services and are not routed through the CapTel call center. Calls are processed as VCO calls whereby the 911 call-taker can hear everything you say, and then types his/her response, which appears on the CapTel display screen. You speak directly into the handset, as you would with any other CapTel call. Note: VCO stands for "Voice Carry Over", a service that allows callers to speak for themselves and read typed responses.	Calls placed to 911 are captioned through the CapTel call center. Spoken conversation is received through one line, while captions are provided through the second line.

711 Via Captioned Telephone

Our service provider provides voice consumers the ability to call a CTS user by dialing 711 rather than the CapTel 800 number. Voice users can use this on a per-call basis or as an option on the Customer Profile.

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release is waived for CapTel.

TTY to TTY Call Release

Our service provider provides a true call release function which removes the workstation from the call, satisfying this FCC requirement. Once the CA reaches a compatible TTY user and ensures the two TTY parties are communicating, we release the call from the workstation so that the CA can take other incoming calls.

Speed Dialing

Relay users can enter 50 Speed Dial contacts in their Customer Profile, which is presented to the CA each time the relay user calls the relay. Contacts are listed by the name the user will ask for and can include a combination of family, friends, work and emergency numbers. To make a call, the relay user simply instructs the CA to call a person listed in their customer profile (i.e. “Call Bob”).

Three-Way Calling

If the customer has purchased this feature from their LEC, this feature can be provided by either tying the third party directly into the conversation or tying the third party in by making a second call to the relay center.

Speed Dialing via Captioned Telephone

Speed Dialing, which is built into the CapTel phone’s Dialing Directory, allows users to quickly dial frequently called phone numbers and is available to all Captioned Telephone users. To speed dial a number that the CapTel user has saved in the CapTel memory, the user simply presses the button next to the “Memory Dial/Redial” arrow. A list of saved numbers along with the last number dialed is displayed. The user then presses the button next to the number they wish to dial again and CapTel dials the number automatically.

Three-way Calling via Captioned Telephone

FCC compliant Three-way calling is available to Captioned Telephone users in the State. A standard telephone user can initiate a three-way call to a Captioned Telephone TS user in the following manner:

The party with three-way calling feature on his/her phone line would hook flash to put the other person on hold, and would then dial the national CapTel voice number and give the CA the CTS

user's telephone number or dial the CTS user direct if a 2-Line CTS user. All three parties would then be joined and the CTS user would receive captions on the call.

With 2-Line Captioned Telephone, the CTS user can initiate a Three-way call in the same manner that a standard phone user would. The first line works exactly as a regular phone line (able to add another caller) and the second line supports the captions.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Machine Recording Capabilities

The recording function allows the CA to record a voice announcement and then play back the message at a speed controlled by the CA, ensuring accurate message transmittal. The message is retained for the length of the call, which prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. By having advanced recording technology, we eliminate the problem of "fast recording" for the CA and ensures that communication is received and transmitted accurately.

Using Automated (Touchtone) Systems via Captioned Telephone

CTS users have access to audiotext, interactive voice response units and answering machines including message retrieval services and can easily receive and/or leave messages on answering machines or voice mail systems with automated menus. The CTS user can press the CapTel number buttons at any time during a call to make selections. The captioning service continuously transcribes what is heard regardless of what the CapTel user is saying or which buttons they press.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Voice Mail

CAs can retrieve and relay TTY messages to voice users, and voice messages to TTY users from voice processing systems. We use hot keys (automated macros) to alert relay users to the presence of a recorded message and/or interactive menu. CAs use the following procedures to obtain or leave messages for relay users:

1. The CA informs the user that they have reached a voice processing system and asks if they want to leave a message.

2. If the user requests message retrieval, the CA will obtain the appropriate access codes from the user. Access codes or any other information needed to access a voice mail system subsequent to the call is not retained. This information is considered “call” information and just like any other call information, is kept completely confidential.
3. After accessing the voice processing system, the CA relay the messages that have been recorded or leave a message as requested. An advanced recording function is utilized to capture this information.

The notepad feature, an enhanced function of the workstation, allows CAs to electronically track special instructions given at the beginning of the call. Electronically capturing information such as account numbers, menu options, access codes, extensions, etc. gives the CA constant visual access to the caller’s instructions. To guarantee confidentiality, all notes are automatically erased from the workstation at the end of the call.

Answering Machine Retrieval (Single-Line)

With this service, CAs can retrieve messages from a voice or TTY answering machine or a single line telephone.

1. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the CA by putting the handset near the speaker of the answering machine.
2. The technology records the messages, enabling the CA to capture the information and type it back to the relay customer.
3. Once the call is completed, the recording is automatically erased.

Leaving Messages on Answering Machines via Captioned Telephone

The CapTel user may begin leaving their message as soon as they see “BEEP” on the display screen or hear the recorded greeting end the same way they would with a regular phone.

Retrieving Voice Mail Messages via Captioned Telephone

To retrieve their voice mail, the Captioned Telephone user simply calls into their voice mail/answering machine system as a remote caller, and follows the voice mail/answering machine prompts to retrieve the messages.

Captioning External Answering Machine Messages via Captioned Telephone

Captioned Telephone users can receive captions of voice messages left on an answering machine that is near the CapTel phone. Users press the menu button on the CapTel phone until the “Caption External Answering Machine Messages” is displayed. Users place the CapTel phone handset mouthpiece next to the answering machine speaker, and then play the answering machine message aloud, following the instructions on their CapTel screen. When finished, hanging up the CapTel handset causes the “Caption External answering Machine Messages” feature to go off automatically.

(4) [Reserved]

(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Waived for CapTel.

Our service provider provides STS users the same profile and features contained within that profile which are currently available to other relay users. Included in the profile is a feature that allows relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA and, the CA will repeat the name and state the number of the person to call. Our service provider will transfer this information to a new STS provider prior to the end of the contract.

Section 5 Technical Standards

47 C.F.R. § 64.604 Mandatory minimum standards.

(b) Technical standards –

(1) ASCII and Baudot. TTY-based relay service shall be capable of communicating with ASCII and Baudot format, at any speed generally in use. Other forms of TRS are not subject to this requirement.

Waived for CapTel.

Our service provider is able to receive and transmit in a variety of voice and text based formats at speeds generally in use for TRS communication. Note that ASCII is an antiquated technology that is very rarely used in traditional relay.

(2) Speed of answer.

(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

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

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Our service provider answers eighty-five percent (85%) of calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.

Our service provider begins measuring Average Answer Time from the moment a relay call arrives at our relay switch (i.e. in the TRS center's network). As soon as the relay equipment accepts the call from the LEC and the public switched network delivers the call to the TRS center, we start our call detail record process to capture answer time data. Our service provider will answer eighty-five percent (85%) of all TRS calls within 10 seconds of the call entering the relay switch during all times of the day and by any method that results in the call being immediately placed, not put in a queue or on hold. Abandoned calls are included in this daily answer performance calculation.

Call Blockage

Call blockages for relay users is no different from that experienced by non TRS callers. The relay system is designed to a P.01 standard, meaning that no more than one call in 100 will receive a busy signal when calling the Relay at the busiest hour.

Although very unlikely, in the event a switch is down, calls are automatically rerouted to a redundant switch (the switch puts calls in a "queue" in order to handle them in the order received and to assign them on a rotating basis to the various workstations) or intercept messages are used rather than busy signals.

TRS blockage rate is measured every thirty minutes, twenty-four hours a day to ensure its service remains at P.01 or better.

Captioned Telephone Answer Performance

Our service provider provides adequate staffing, trunking capacity, CA workstations, and equipment capacity to meet the current FCC Standard of 85% of all calls answered within 10 seconds on a daily basis.

Captioned Telephone Blockage

Our service provider ensures CTS compliance with the P.01 customary TRS industry standard for blockage, which means that no more than one call in 100 will receive a busy signal when calling the Captioning Center at the busiest hour.

(3) [Reserved]

(4) TRS facilities.

(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Our service provider ensures that relay will continue to be available 24 hours a day, 7 days a week, 365 days a year

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The facilities used by our service provider have the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day.

Location of TRS Switches and Relay Platforms

- Switches and relay platforms are located in two geographically diverse locations.
- Incoming calls are primarily controlled by an Automatic Call Distributor (ACD) and switch equipment via redundant network connections.
- For redundancy purposes, all call centers can operate off the ACD and switch equipment in either switching facility via redundant network connections.
- Incoming relay calls enter the relay network and are then connected to the workstation. This all happens instantaneously. Calls made to the terminating party exit through the call network as well.

TRS Uninterruptible Power

Our service provider's relay centers all make use of an uninterruptible power supply (UPS) which supports relay technology and operations during a loss of power through the combination of battery and generator back-up. This allows them to continue uninterrupted relay service during short or long-term power outages. In the event of a power outage, batteries supply power until generators come on-line, which is just a matter of minutes. Generators, which are tested monthly, are supplied with enough fuel to run for a minimum of 24 hours. They also have arrangements with suppliers who has them on a priority list to provide fuel during times of crisis so that if needed, generators can provide power for any long-term power outage.

The power system supports the switch system and its peripherals:

- Switch room environmentals
 - Air conditioning/heating
 - Dry fire suppression system
 - Emergency lights
 - System alarms
- CA consoles/terminals
- CA work-site and lighting and
- Call Detail Record (CDR) recording at each center

TRS Switching System

Our service provider's switch is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The switch supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, and Digital Signal Processing service cards. Our switch adapts to standard network and line interfaces, including T1, E1, J1, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records. The ISOS is a fully operational basic switch and has great flexibility.

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of CA control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database maintains a preference of each caller to speed up call connections and to provide information for tailored call processing.

The host controller is housed in a redundant server environment and will automatically failover to prevent dropped calls in the event of technical failure. In addition, redundant and geographically dispersed host controllers and switches facilitate failover in a disaster recovery situation. An inventory of spare critical components is maintained for the switching system onsite to ensure that the required levels of service are met.

If one switching systems cannot be returned to service by transferring control to redundant equipment, the calls are rerouted to another switching system. The switching systems are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online. Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to ensure the required levels of service are continually met.

Our service provider's flexible system architecture connects every workstation to both switching locations so that the workstation can utilize either system in the event that one becomes unreachable. This also allows us to provide uninterrupted service during maintenance windows. Network redundancy is delivered with two separate high-speed routes provided by two different carrier groups connecting all centers.

Captioned Telephone Redundancy/Switching System

Each Captioned Telephone Service Relay Center is equipped with redundant systems for power; utilizing a combination of battery backup, commercial UPS supply, and/or auxiliary generator to supply uninterruptible power to the Captioned Telephone Center for a minimum of 8 hours. Redundant systems for power include ACD/telecom switching equipment, call processing

servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Captioned Telephone Switching System

The Captioned Telephone switching system includes a redundant Central Processing Unit (CPU) on “hot stand-by” to ensure that no calls are dropped due to processor failure. The switching system also includes:

- A full Maintenance and Administrative Terminal with keyboard, screen and printer capabilities
- On-line monitoring
- Real time programming capabilities which will not take the system off-line
- The ability to perform preventative maintenance without taking the system off-line

An inventory of spare critical components is maintained on site to ensure the required levels of service are met.

(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Our service provider uses flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology the platform used is ideal for today’s rapidly changing technologically advanced environment.

(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

True Caller ID

The relay platforms deliver true Caller ID in which the actual information of the calling party (not the relay center number) appears on the called party’s Caller ID box.

- Included in the calling line identification information that passes through the relay service is call blocking information.
 - This information passes through automatically to the called party with no relay intervention.
 - The relay user has complete control over blocking information with their local phone company, whereby if the Caller ID block indicator is enabled on the call when we receive it, the relay caller’s number is not passed on to the called party.

This provisioning of Caller ID technology complies with all FCC rules.

True Caller ID via Captioned Telephone

Captioned Telephone users are provided with True Caller ID which passes along the 10-digit number of the person calling, consistent with FCC requirements. The actual identity of the Calling Party is presented to the Called Party's Caller ID box (True Caller ID). However, if the Calling Party blocks their Caller ID, the Called Party does not receive Caller ID information, functionally equivalent to a normal telephone call. Caller ID information of the Called Party is shown on the CapTel display screen.

(7) STS 711 Calls. An STS provider shall, at a minimum, employ the same means of enabling an STS user to connect to a CA when dialing 711 that the provider uses for all other forms of TRS. When a CA directly answers an incoming 711 call, the CA shall transfer the STS user to an STS CA without requiring the STS user to take any additional steps. When an interactive voice response (IVR) system answers an incoming 711 call, the IVR system shall allow for an STS user to connect directly to an STS CA using the same level of prompts as the IVR system uses for all other forms of TRS.
Waived for CapTel.

Our service provider is in compliance with this rule as the technology automatically routes a STS user to an STS CA when dialing 711. This is available via the customer profile. When STS users reach TRS CAs after dialing 711, TRS CAs connect the caller directly to a STS CA without requiring the user to do anything further.

Section 6 Functional Standards

47 C.F.R. § 64.604 Mandatory minimum standards.

c) Functional standards —

(1) Consumer complaint logs.

(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

Our service provider tracks all TRS complaints and all other customer service activity. Consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service are maintained in a log which is retained for the State until the FCC grants the next application for certification.

Customer Care Database

Every contact made with the Customer Care Department is documented in a Customer Relations Management (CRM) tool. This includes contacts via our toll-free Customer Care number, the customer inquiry form or on-line feedback form, in writing, via Live Chat, or in person. Each database record includes:

- The name and/or address of the customer (if given)
- The date and time received
- The CA identification number
- If a complaint, the nature of the complaint
- The specific relief or satisfaction sought
- The result of the investigation
- The resolution of the complaint
- The date of the resolution
- The Customer Care representative responsible for handling the complaint

Complaint log summary contains complaints in violation of FCC Mandatory Minimum Standards. It also includes external complaints.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

We have submitted copies of complaint logs to the FCC each year as required.

(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

The State has submitted the following individual to the FCC as a contact person for TRS consumer information and complaints about Intrastate TRS.

Pennsylvania Public Utility Commission
Bureau of Consumer Services
PO Box 3265
Harrisburg, PA 17105-3265
General Complaints Telephone number: 800-692-7380
Toll free: 800-692-7380
Fax: 717-783-5659
Website <http://www.puc.state.pa.us/>

The State's service provider has submitted the following individual to the FCC as a contact person for TRS consumer information and complaints about Hamilton's service.

Dixie Ziegler, Vice President
Hamilton Relay, Inc.
1006 12th Street
Aurora, NE 68818
Voice/TTY 402-694-5101
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of

the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Community Outreach, Public Relations and Educational Programs

Outreach programs specifically target hearing audiences i.e. voice users, businesses and professionals, trade shows, civic organizations, government entities, public schools and university students. The outreach programs also target individuals who are deaf, hard of hearing, late deafened, deaf-blind, or who have difficulty speaking as well as their family and friends. Outreach utilizes venues such as presentations, exhibits, digital marketing, social media, webinars, demonstrations, etc. with special emphasis aimed at the business community and the hearing sector at large.

Outreach programs include demonstration of equipment and distribution of informational materials describing how to use TRS and CapTel services. The Outreach Coordinator presents relay information to organizations and groups, meets with businesses, educational institutions, veterans, equipment distribution programs, 911 and law enforcement centers, and other public and private entities to describe relay and how it works, and meets with individuals or groups to demonstrate equipment and answer questions. The Outreach Coordinator works with the elderly and people who have difficulty speaking to promote use of relay and also uses public relations campaigns to expose relay to a broader audience of people throughout the State.

Outreach and Marketing Materials

In addition to presentations, meetings and exhibits, our service utilizes informational materials such as flyers, brochures, promotional materials, newsletters, display materials, bill inserts and directory pages, and websites.

Complaint Resolution procedures and FCC complaint processes are described on State websites and brochures.

(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

On August 5, 2020, the FCC released a Report and Order (FCC 20-105) in which it repealed the equal access and billing option requirements for state program telecommunications relay services (TRS) providers.

Our service provider does not charge Relay users for the service when they make local or long-distance calls. There are only four call types that may require a billing method from TRS users:

1. calls placed from payphones

2. calls placed to and from international locations
3. calls placed to Directory Assistance
4. calls placed to pay-per-call services e.g., 900 numbers

Our service provider may use several methods to ensure proper billing of these types of calls, which may include collect calling and calling card payment methods.

CapTel users are not charged for long distance calls. Because relay is not involved in long distance for 2-line CapTel calls, users may be billed by their long-distance providers for the voice portion of the call.

(5) Jurisdictional separation of costs —

(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

Our service provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay, in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated from Pennsylvania's TRS fund.

(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

Please refer to §64.606 Section (d) at the end of this document for a description of Pennsylvania's TRS funding mechanism.

(6) Complaints —

(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.606 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the

state relay administrator, a state PUC, the relay provider, or with any other state entity.

The PA PUC will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state administrator, the relay provider or with any other state entity.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

*(2) A shorter period as prescribed by the regulations of such state;
or*

(B) The Commission determines that such state program is no longer qualified for certification under §64.606.

The PA PUC understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

The PA PUC understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal complaints —

(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet email, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints.

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

The PA PUC will assist as necessary in this process.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

- (1) The name and address of the complainant,*
- (2) The name and address of the defendant against whom the complaint is made,*
- (3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and*
- (4) The relief sought.*

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service.

(1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the

Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

The PA PUC will assist as necessary in this process.

Supplemental Information

Customer Care activities, including inquiries, comments, compliments and complaints, are handled by personnel trained on Deaf Culture and the needs of individuals who have difficulty speaking or hearing.

Customers may contact Customer Care via a toll-free telephone number, e-mail, through the Relay Service web-site, in person, in writing or via Live Chat. Additionally, any caller to the relay center having a complaint (or compliment) is able to reach a supervisor or customer care representative while still online during a relay call. Contact information for customer inquiries is described in appropriate printed outreach material that is distributed to the general public.

Customer Care staff, in communication with Hamilton's Director of Account Management and Compliance (who reviews all complaint information), has ultimate responsibility for all contacts. Our service provider responds to all customer inquiries within 24 hours and strive to resolve complaints within 72 hours; however, all complaints are resolved within 10 calendar days depending on the complexity of the problem.

In the event of a Customer Care contact regarding relay service, trained staff members follow an established procedure that varies depending on the gravity of the situation.

- Inquiries for materials are directed to the State Outreach Coordinator. Customer Care staff, along with the Outreach Coordinator, are responsible for building one-on-one

relationships with customers, sending the appropriate materials and ensuring the customers' requests have been met.

- Feedback involving CAs are directed to the CA's Supervisor and the Relay Center Manager, who share the feedback with the CA along with the appropriate coaching, re-training and counseling steps to resolve the situation. Detailed call records show each key command (not actual text) the CA makes.
- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to technical support staff and are addressed promptly.

If the customer is not satisfied with the resolution of the complaint or with any action taken, monthly report to the PA PUC will so state. The customer always has the opportunity to file a complaint or appeal with the PA PUC in order to have the complaint and action of reviewed for such action as the PA PUC may deem appropriate.

The PA PUC will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for Pennsylvania. The PA PUC will cooperate in the investigation or resolution of any and all complaints concerning Relay with the Federal Communication's Commission.

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Upon termination of the contract, our service provider will transfer the customer profile database to a new relay provider. They will transfer this data in a usable format at least 60 days in advance of our last day of service.

The data gathered from providing relay service is not used for any purpose other than connecting the relay user to their called party. Our service provider has not, and never will make any relay information available for sale or distribution. They will not sell, distribute, share or reveal in any way the information referenced above, unless compelled to do so by lawful order.

Section 7 Exceeding FCC Minimum Standards

47 C.F.R. § 64.606 Internet-based TRS provider and TRS program certification.

(a) Documentation —

(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “TRS State Certification Application.” All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

Pennsylvania is currently certified to provide intrastate TRS through July 25, 2023. This application is submitted to re-certify Pennsylvania for an additional five years.

(b)

(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

The PA PUC regulates the provision of TRS in the State and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies. The contract entered into between the PA PUC and Hamilton Relay, Inc. provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which the PA PUC could terminate the agreement with Hamilton. Consumers have the opportunity to file complaints or petitions concerning relay service in Pennsylvania. Complaint Resolution procedures and FCC complaint processes are described on state relay websites and brochures.

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes [that its program in no way conflicts with federal law].

The Pennsylvania Relay Program in no way conflicts with federal law.

(c)

(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

The State is currently certified to provide intrastate TRS. The State is requesting certification beginning July 26, 2023, continuing for a five-year period.

(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

The PA PUC understands.

(e)

(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

The Pennsylvania relay program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

(f) Notification of substantive change.

(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet Federal minimum standards after implementing the substantive change.

The PA PUC understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

CG Docket No. 03-123
TRS State Certification Application for Pennsylvania
December 1, 2022

By this application the PA PUC intends that the operation of the Pennsylvania Relay Program will continue to be in compliance with the FCC rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the FCC that would cause or could cause the state relay to be out of compliance, the PA PUC agrees to take such action as may be reasonably required to bring it into compliance.

