



North Carolina  
Department of Health and Human Services  
**Division of Services for the Deaf and Hard of Hearing**  
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Michael F. Easley, Governor • Carmen Hooker Odom, Secretary • Linda Harrington, Director

September 25, 2002

Commission's Secretary, Office Of The Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capital Heights, Maryland 20743

RE: Application for state certification renewal of current certification of  
Telecommunications Relay Service (TRS) Docket No. 90-571

Dear Sir:

Persuant to Title IV of the Americans with Disabilities Act of 1990, 47 U.S.C. & 225 (f) (2), and section 64.605 (b) of the Commission's rules, 47 C.F.R. & 64.605 (b), on behalf of the State of North Carolina, the North Carolina Division of Services for the Deaf and the Hard of Hearing hereby submits this application for renewal of the certification of Relay North Carolina (RNC). We believe that the standards and regulations for relay Services prescribed by the Federal Communications Commission and contained in 47 C.F.R. & 64.604 have been met as described.

Attached you will find the documents that show that Relay North Carolina has complied The FCC's regulations and standards. Relay North Carolina has been in operation since June 1, 1991 and has met all operational, technical, and functional minimum standards.

Please direct the FCC certification approval order to me or any questions to me at 919-773-2974 TTY or email to me at [linda.nelson@ncmail.net](mailto:linda.nelson@ncmail.net).

Thank you in advance for your time to review our application.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda K. Nelson".

Linda K. Nelson  
TANC/TRS Administrator  
Relay North Carolina

CC: Kendrick Fentress  
Linda Harrington

North Carolina Host of the 1999 Special Olympics World Summer Games



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## **Appendices required by the FCC**

- A. Copy of North Carolina State Legislation/PUC Orders
- B. Diversified Culture Training
- C. TRS, STS, VRS Training Outlines
- D. Actual results of 60 WPM typing
- E. Copy of Oral-to-Type Test script
- F. Pledge of Confidentiality
- G. E911 Call Procedure
- H. Policy on 10 and 15 Minute Rule
- I. Quality Assurance Program on Speed of Answer
- J. Sprint Carrier of Choice Letter of Invitation
- K. Sprint Disaster Recovery Plan
- L. Sprint TRS Standard Features Matrix
- M. Copy of State's 2001 and 2002 Annual Consumer Complaint Log Record
- N. Copies of Outreach/Marketing, NCDHH membership list, telephone bill, billing insert
- O. Copy of RFP on NCTRS

## **Operational Standards**

### **A.1 Communication Assistant CA**

#### **CA Employment Standards**

Sprint has established a successful procedure to attract qualified applicants for CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

#### **Communication Assistants Training Program**

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, Oral Deaf, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hearing-impaired, possesses extensive knowledge in this area. During the CA's initial training, he/she is trained and evaluated on how to accurately reflect the TTY user's intent and on the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Please review the Sprint's Diversified Culture training package in Appendix B.

Additionally, applicants are given four written and hands-on evaluations to demonstrate their ability to spell, type accurately and process a call using live training terminals and role-plays written in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment.

Please review the Sprint TRS, Speech to Speech (STS) and Video Relay Service (VRS) Training outlines in Appendix C.

A team of ASL fluent Sprint employees developed ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

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## **Transmission of 60-WPM**

All Sprint CAs type a minimum of 60-WPM. Sprint utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60-word-per-minute performance requirement is maintained. During this test we do not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words-per-minute typed.

Appendix D shows actual results of 60 wpm typing scores.

Appendix E shows the typing test script.

Sprint utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

## **CA Quality Assurance Programs**

### Individual Monthly Survey

Monthly surveys and formal reviews are used to monitor and evaluate the continuing training for our CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

### Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Supervisors from every center pair up to perform 10 scripted test calls each on an alternate centers for a total of 700 test calls. After each call, the supervisors fax the survey form to the appropriate center for the CA to receive immediate feedback. This feedback and appropriate guiding performance measures for specific components are addressed with each CA.

### Account Management and Trainer Test Calls

Additionally, the Operations department and members of the Account Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

## **A.2 Confidentiality and Conversation Context**

### **Confidentiality Policies and Procedures**

Sprint understands that measures to ensure confidentiality are crucial to the success of any TRS operation and has implemented procedural and environmental measures to safeguard

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customer and call information. In accordance with the FCC regulations, all information provided for call set up, including customer database and branding information, remains confidential and cannot be used for any other purposes. Sprint also prohibits the use of any information obtained during the processing of a call. After the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept after the call is released from the CA position. After the call has been terminated, the billing information is transferred to the billing files and is no longer accessible except for billing purposes.

No one is permitted to watch or listen to actual calls except CAs and supervisory staff for the purpose of relaying, assisting or monitoring the call or for training purposes.

CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets. The cubicles are arranged to minimize the number of cubicles that are side by side. The CA work areas have a security card key access and visitors are not allowed in CA work areas. These special equipment and environmental arrangements reduce noise interference and supports confidentiality.

All relay center personnel are required to sign and abide by a pledge of confidentiality that is a promise not to disclose the identity of any caller or any information learned during the course of relaying calls. Employees are expected to abide by the pledge of confidentiality during and after their period of employment. Sprint's confidentiality policies are strictly enforced.

Please refer to Appendix F for TRS Pledge of Confidentiality.

Sprint strictly enforces confidentiality policies including the following:

#### *Communication Assistant (CA)*

- Prospective CAs are screened in the interview process on issues regarding ethics and confidentiality. During initial training, CAs are presented with examples of situations that could be considered breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment. When CAs require counseling due to a stressful call, they do not discuss any specifics about the call. Sprint contracts with professional agencies to provide our employees with the confidential assistance of professionally certified counselors.
- Breach of confidentiality will result in termination of an employee. All claims of breach of confidentiality are fully investigated. If the investigation confirms that any employee committed a breach of confidentiality, the employee will be terminated.
- When CAs require counseling due to a stressful call, they will not discuss specifics about the call. Sprint has consulted with a medical agency to provide a confidential employee assistance program

#### *Building*

- CA center has security key access.
  - Visitors are not allowed in the CA work area.
  - CA terminals screens are not visible from any window area.
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Sprint CAs relay everything that is said and everything that is heard. CAs do not omit or censor any aspect of the relay call. CAs convey all conversation, including profanity. All conversation during initial call set-up and acceptance of charges from the called party is relayed. All comments directed to either party by the CA are relayed and typed in parentheses.

### **Verbatim Relay and the Translation of ASL**

CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered and at all times during the conversation, unless either user specifically requests summarization or ASL interpretation.

At the request of the relay user, Sprint CAs will translate written ASL into conversational English. All Sprint CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

### **STS Limited Exception of Retention of Information**

At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

### **STS Facilitation of Communication**

Sprint STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated on monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint relay users have full control of all of their relay calls.

Please refer to Appendix F for the TRS Pledge of Confidentiality

### **A.3 Types of Calls**

Sprint provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Sprint also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Sprint retain full control of the length and number of calls placed anytime through relay.

Sprint works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Sprint will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

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When a TRS call is placed through Sprint, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, in between calls and wrap up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

A complete list of all call types proved by Sprint may be found in Appendix I. Sprint Standard Features Matrix.

#### **A.4 Handling of Emergency Calls**

Sprint's procedure for handling E911 calls may be found in Appendix G.

#### **A.5 In-call Replacement of CAs**

Sprint's policy and procedure for 10 and 15 minute rule on in-call replacement of CAs may be found in Appendix H.

#### **A.6 CA Gender Preferences**

When a Sprint relay user requests a CA of the opposite gender to the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request.

#### **A.7 STS Called Numbers**

Sprint's relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term.

### **Technical Standards**

#### **B.1 ASCII & Baudot**

Each Sprint CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the

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baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

## **B.2 Speed of Answer**

Sprint's Quality Assurance Program on Speed of Answer and reports showing 90<sup>o</sup>/10 seconds may be found in Appendix I.

## **B.3 Equal Access to Interexchange Carriers**

Sprint provides North Carolina callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the North Carolina Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program for North Carolina are:

- AT&T (0288)
  - Broadwing Communications (0948)
  - Broadwing Telecommunications (0071)
  - Excel (0752)
  - Grafton Communications (0555)
  - Lightyear Communications (0555)
  - Madison River Long Distance (0444)
  - Metromedia (0222)
  - MCIWorldCom
  - Moultrie Inforcomm, Inc (0077)
  - OTZ Telecommunications (0077)
  - RCI (0211) Sprint (0333) Telegroup (0222)
  - Touch America (formerly Qwest)
  - Verizon Long Distance
  - Wabash Independent Networks (0288)
  - Winstar (0643)
  - WorldCom
  - Yucca Telecommunications (0288)
  - 10-10-220 (Telecom USA/ MCI)
  - 10-10-222 (MCI WorldCom)
  - 10-10-275 (WorldxChange)
  - 10-10-288 (AT&T)
  - 10-10-297 (Excel)
  - 10-10-321 (Telecom USA/ MCI)
  - 10-10-345 (AT & T Lucky Dog)
  - 10-10-333 (Sprint)
  - 10-10-502 (WorldxChange)
  - 10-10-629 (WorldxChange)
  - 10-10-636 (Clear Choice Five Talk)
  - 10-10-781 (WorldxChange)
  - 10-10-811 (VarTec FiveLine)
  - 10-10-834 (WorldxChange)
  - Everrest Connections Corporation
  - One Point Communications
  - Unitel Communications
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If a North Carolina caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix J for a sample of the Carrier of Choice letter.

#### **B.4 TRS Facilities**

North Carolina does not have an in-state facility. All North Carolina calls are routed to out of state TRS centers in Austin, Tucson, Independence, Lubbock, Ohio, Sioux Falls, Moorehead, Minn, and Syracuse.

Sprint TRS and Sprint relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
  - Switch room environmental
  - CA positions (consoles/terminals and emergency lights)
  - Emergency lights (self-contained batteries)
  - System alarms
  - CDR recording.
- As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

Please refer to the Disaster Recovery Plan provided in Appendix K for a complete explanation of Sprint's back-up plan.

## **B.5 Technology**

### **Voice Carry Over**

Sprint has provided voice and hearing carryover as standard TRS features longer than any other provider. Voice carryover (VCO) allows a user to speak directly to the person he/she is calling and receive responses by text through the CA (and vice-versa). In addition, Sprint supports VCO-VCO, VCO-HCO, VCO-TTY, and Two Line VCO calls.

### **Hearing Carry Over**

Hearing carryover (HCO) allows a person to listen directly to the person they are calling and provide their responses by text through the CA (and vice-versa). Sprint was the very first relay provider to offer HCO users what is known as voice progression technology. This advancement eliminates the HCO users' need for reading macros and allows him/her to hear the call set-up, ringing and the called party answering the telephone. In addition, Sprint supports HCO-HCO, HCO-VCO, HCO-TTY, and Two Line HCO calls.

### **Internet Relay**

Sprint provides a web-enabled, multi-language product – Sprint Internet Relay. Sprint Internet Relay calls can take place anywhere there is an Internet connection. This feature provides a secure and interactive relay experience using intuitive features designed for TRS users.

### **Video Relay Service**

North Carolina has been providing VRS since the implementation of VRS on August 19, 1997. It was the first state in the country and in the world to provide permanent VRS on five day a week (Mon-Fri) and 8 hour a day basis. There are 10 public sites which are six Regional Resource Centers for the Deaf and the Hard of Hearing under the Division of Services for the Deaf and the Hard of Hearing, one school for the deaf, two public libraries, and United Way funded program for the deaf. They provide VRS on ISDN services to the public. NCTRS is now providing both VRS on Internet and ISDN services.

Sprint is the only provider with a web-based platform to support VRS. Users of VRS utilize video conferencing equipment and high-speed telecommunication lines to access the service. 90% of VRS customers use VRS through the Internet.

### **Future Technology under Development**

Sprint is currently investigating future communication enhancements including, Caption Telephone, Real-Time Captioning service for conference calling, Speech to Text technology, Wireless Internet Relay through cell phone devices, wireless Video Relay accessibility, Palm Pilot and Two-Way Pager utilization through relay.

Please see Appendix L Sprint Standard Features Matrix.

North Carolina will be more aggressive in offering more new technological features to its customers. Some future technologies will be Captel, two way pager utilization through relay service, conference calling, new platforms such as SS7, advanced internet relay features, and wireless communications, such as cellular phones.

North Carolina is now experimenting the Captel and will implement it during the year of 2003 or early in 2004.

Captel is an enhanced VCO service that helps speeds up the process of handling VCO calls. It allows the callers to directly dial the party he/she is calling, listen to that party speak, and read captions of the conversations on the standard telephone line. A communication assistant using voice recognition technology generates the captions.

Video Relay Service on Internet and ISDN lines will continue. More webcams will be installed in customers' homes and offices. More outreach activities to promote VRS will be planned during the year of 2003.

Speech to Speech (STS) was implemented in 2000. The RAP agents will aggressively promote this service in North Carolina. The number of STS calls has been increasing since the RAP contract was granted to a group who works with speech impaired people.

#### **B.6 Voice Mail and Interactive Menu (Hot Key)**

When the Sprint relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message.

This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, Sprint relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

Callers to Sprint relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier will rate and bill the user as if the call was dialed directly from the originating user's telephone.

North Carolina 900 Services number is 900-230-6464

## **Functional Standards**

### **C.1 Consumer Complaint Logs**

Sprint provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to North Carolina. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 25th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31, as well as a summary of the complaint log.

Please refer to Appendix M for copies of 12 month complaint log reports for 2000 and 2001.

### **C.2 Contact Persons**

Linda Nelson the Telecommunications Access of North Carolina (TANC) Administrator. She oversees the TRS, video relay service, and telecommunications equipment distribution program. Her office is located at the Division of Services for the Deaf and the Hard of Hearing under Department of Health and Human Services. Her direct TTY is 919-773-2874 and her email address is [linda.nelson@ncmail.net](mailto:linda.nelson@ncmail.net). Her address is 319 Chapanoke Road, Suite 108, Raleigh, NC 27603.

Ms. Nelson is the point of contact person for North Carolina TRS.

### **C.3 Public Access to Info**

North Carolina has been very active in promoting TRS to the public. The key to successful TRS is dedicated marketing throughout the state done by the Sprint Account Manager and the TANC Administrator.

The NC contract requires a full time account manager with a budget of \$100,000 (paid by NC surcharge and built in cost per minute). The account manager's office is located in Raleigh, NC. The Sprint Account Manager and the TANC administrator have worked as a team to develop, plan, and organize outreach activities. Sprint has developed outreach materials and has gotten approvals from the state. Sprint has complied with NC's contract requirements for review, input, and approvals of the materials.

Sprint and NCTRS have two Relay Ambassador Programs (RAP) that focus on VCO and STS in the state. The objective of the RAPs is to educate hard of hearing and speech impaired people and senior citizens how to use TRS with their special services. As a result of hiring people as RAP agents, it has helped increase the numbers of VCO and STS calls.

Sprint and NCTRS have developed the flyers on VCO direct, STS, generic TRS, and TRS brochures. TRS flyers are also available in Spanish language for Spanish speaking people in North Carolina. The Hispanic group is the largest minority group in North Carolina. Sprint developed generic TRS and STS videos for education purposes. The videos are given away to service providers and customers.

Posters, training videos on VCO, and Website are provided, too. Sprint also distributes its Sprint Relay magazine, **Relay Today**, to everyone in North Carolina. TANC has its website under [www.dsdhh.dhhs.state.nc.us](http://www.dsdhh.dhhs.state.nc.us). Sprint has its own website, too.

Activities that Sprint and NCTRS have done are booths at trade shows and conferences, town hall meetings, give away gimmicks at various events, public radio announcements, home visits, and presentations at schools and colleges.

NC Council for the Deaf and the Hard of Hearing meets quarterly. The Council reports to the Department of Health and Human Services. One of the subcommittees under the Council is Communications Access Committee that works with the TANC Administrator. The members share their input and ideas to help the TRS program improve quality of its services.

Appendix N includes a list of the Council members, the summaries of 2000 and 2001 outreach activities, TANC’s website, telephone bill, and billing insert.

**C.4 Rates**

North Carolina Relay users are charged no more for services than for those charges paid by standard “voice” telephone users. North Carolina Relay users who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users who select a preferred interstate carrier via the North Carolina Relay COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. Table exhibits the discounted rates off Sprint’s MTS rates.

	<b>Intrastate</b>	<b>Interstate</b>
<b>Day</b> (7 AM – 6:59 PM)	50%	50%
<b>Evening</b> (7 PM – 10:59 PM)	50%	50%
<b>Night/weekend</b> (11 PM – 6:59 AM; all day Saturday & Sunday)	50%	50%

**C.5 Jurisdictional Separation of Costs**

All North Carolina Relay intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State.

All intrastate and local calls are funded by TRS surcharge of \$.11 per access line on each customer's monthly telephone bill.

Please refer to Appendix A for North Carolina state legislation and PUC orders.

## **C.6 Complaints**

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to North Carolina. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the Account Manager for resolution and follow-up with the customer. North Carolina customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the North Carolina Account Manager to file complaints or commendations.

Sprint has the capability to transfer the caller on-line to Customer Service department. A Customer Service representative will always answer the calls live. The Account Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month.

Customers send their complaints to Sprint Account Manager for resolutions. If the TANC Administrator receives complaints, she forwards them to the Account Manager. Sprint needs to resolve them within 180 days of filing. Otherwise, customers are encouraged to file their complaints with the State Utilities Commission of North Carolina/Consumer Services Division.

The TANC Administrator designed the Customer Satisfaction Report for customers to fill out their complaints or compliments. The copies have been placed at different state offices in North Carolina. The Sprint account manager and the TANC Administrator go to different towns to talk to customers about TRS. At these meetings, they sometimes collect customers' complaints. The Sprint Account Manager brings them to his office to work on them. Customers also file their complaints with the Sprint Customer Services or the relay center supervisor by calling them. The customer services representative sends them to the Sprint Account Manager.

Appendix M shows the state's 2000 and 2001 annual consumer complaint log records.

Appendix M includes a copy of North Carolina Customer Satisfaction report.

### **C.7 Treatment of TRS Customer Info**

The Sprint Customer Preference Database includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) Sprint will transfer all North Carolina database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

### **State Certification**

North Carolina meets the minimum or exceeds all of operational, technical, and functional minimum standards of relay service. North Carolina TRS exceeds some of the FCC requirements such as 90% of calls answered within 10 seconds and the average speed time that does not exceed 3.3 seconds.

Please refer to Appendix O for NCTRS Request for Proposal that includes all FCC requirements.

North Carolina is not aware that any requirements or standards in the TRS contract would conflict with the FCC requirements.

The TRS funding is billed in every customer's monthly telephone bill. It shows \$.11 per access line. Customers are informed of the surcharge at all public events.