

# *Interstate TRS Fund*

## **2018 Annual TRS Provider Data Request Filing Instructions**

Should you have any questions about these instructions or completion/content of the forms, please contact Bob Loube at 301-681-0338 or [bobloube@earthlink.net](mailto:bobloube@earthlink.net). Questions about the submission of this data request can be emailed to [TRSDataRequest@rolkaloube.com](mailto:TRSDataRequest@rolkaloube.com), or call 717-585-6605, extension 625.

### **Filing Requirements / Schedule / File Preparation**

Forms required of all providers:

- Annual Provider Information (“Basics”)

Forms to be completed as appropriate:

- Intrastate Rate and Minute Data for MARS Methodology
- Additional Provider-Paid Costs
- Additional Costs Paid to Provider
- Video Relay Service (“VRS”) Expense and Capital Investments Data
- Internet Protocol Relay (“IP Relay”) Service Expense and Capital Investments Data
- IP Captioned Telephone Service (“IP CTS”) Expense and Capital Investments Data Associated with CA Provisioned Service (“IP CTS CA”)
- IP CTS Expense and Capital Investments Data Associated with ASR Provisioned Service (“IP CTS ASR”)
- Annual VRS Demand Data
- Annual IP Relay Demand Data
- Annual IP CTS Demand Data

Filing deadline:

All forms must be uploaded to the Rolka Loube (“RL”) secure FTP portal **on or before February 20, 2019.**

Naming your file:

Each Excel workbook must be saved and submitted as a whole collection of completed data forms (*aka* worksheets) using this filing naming template: [xxxxxx\\_YYYY\\_Annual\\_v.xlsx](#).

- xxxxxx Represents the 6 digits of the provider's filer ID.
- YYYY Represents the four digit year designation for the most recent historical data being reported.
- v Represents a single digit for the version of the filing. The first filing submitted for the carrier should be 0. **If the file is being replaced for some reason, increment by 1 each time a replacement file is created for submission.**

## General Information

On November 19, 2007, the Federal Communications Commission ("FCC" or "Commission") released a Report and Order (FCC 07-186) adopting new cost recovery methodologies for the various forms of TRS. The Order also clarified the nature and extent to which certain categories of costs are compensable from the Fund.

The Order also provided that:

- Indirect overhead costs are not reasonable costs of providing TRS. Appropriate overhead costs are those costs directly related to, and which directly support, the provision of relay service. Indirect overhead costs may not be allocated to TRS by an entity that provides services other than TRS based on the percentage of the entity's revenues that are derived from the provision of TRS. (FCC 07-186, ¶74-75).
- Start-up expenses are compensable, but must be amortized in accordance with generally accepted accounting rules (FCC 07-186, ¶76-77).
- All costs submitted must directly support the provision of relay service (FCC 07-186, ¶75).
- Reasonable executive compensation for persons who directly support the provision of TRS is compensable from the Fund (FCC 07-186, ¶79). For example, if executives of a company that provides a variety of services in addition to TRS do not personally work on TRS issues, no part of their salaries can be included in the company's TRS cost submission (FCC 07-186, ¶75).
- Financial transaction costs or fees unrelated to the provision of relay service are not compensable as reasonable costs of providing service. Such costs include costs and fees relating to a change in ownership of the entity providing relay service, the sale of the entity, the spinoff of part of the entity, or any other transaction directed at the ownership, control, or structure of the relay provider (FCC 07-186, ¶80).

- Costs attributable to relay hardware and software used by the consumer, including, but not limited to, marketing, installation, maintenance costs, and testing are not compensable from the Fund. Compensable expenses do not include expenses for customer premises equipment – whether for the equipment itself, equipment distribution, marketing, or installation of the equipment or necessary software (FCC 07-186, ¶182). Any information requested is for informational purposes only.

- Do not include profit or tax allowances in expenses. (FCC 04-137, ¶179-182)

- Only expenses to meet the non-waived mandatory minimum standards should be included. (FCC 04-137, ¶188-190)

- Capital investment data, if applicable, must be submitted by service. (FCC 04-137, ¶177-182)

- If depreciation expenses are reported, the year-end net book value of the capital investment from which depreciation was computed must be reported in Section F. Depreciation attributable to relay hardware and software used by the consumer is not compensable from the Fund.

- STS providers must include a report detailing specific outreach efforts directly attributable to the additional support for STS outreach.

- The following are examples of non-compensable fund costs:

- Costs associated with an Internet-based TRS consumer's acquisition of a ten-digit geographic telephone number.
- Costs associated with an Internet-based consumer's acquisition and usage of a toll free telephone number.
- E911 charges imposed on TRS providers under a state or local E911 funding mechanism. (FCC 08-275, ¶47-56)

The preceding General Information is representative of Commission determinations but is not intended to be a complete list of FCC Orders which have addressed costs. All reasonable expenses of providing eligible relay services, whether as part of a state-contracted service or a stand-alone service, are reportable.

## Completing the 'Basics' Worksheet

1. **ID & Provider Name:** In the first white box, select your company name from the drop down list.

2. **Contact Name:** Enter the name of the person who prepared the report. This person will be contacted by RL if there are any questions or problems with the submission.
3. **Contact Email Address:** Enter the email address of the person identified in step 2.
4. **Contact Telephone:** Enter the telephone number of the person identified in step 2, including area code and any appropriate extension number.
5. **Explanation of Changes:** In the next box, enter details about any changes since your last filing and/or plans for change for the upcoming tariff year 2019-2020 (July – June).

## Completing the ‘Rate and Minute Data’ Worksheet

Since the Commission Report and Order FCC 07-186, each provider of interstate TRS, STS and CTS is to annually provide the following data for the previous calendar year: per-minute compensation rates for intrastate traditional TRS, CTS and STS; whether the rate applies to session minutes or conversation minutes; the number of intrastate session minutes for traditional TRS, CTS and STS; and the number of intrastate conversation minutes for traditional TRS, CTS and STS.

### Column Instructions:

1. **Provider:** This information will automatically be populated with the provider’s 6-digit ID selected within the Basics sheet after the Service Type and the Jurisdiction columns are completed.
2. **Service Type:** Either select the service type using the drop down list or type either “TRS”, “STS” or “CTS”.
3. **Jurisdiction:** Enter the appropriate state or territory (such as “Puerto Rico”, “PR”, “VI”, “Guam”, etc.)
4. **Rate Start Date:** Enter a valid date including month, day and year when the contract being reported began (such as “3/1/2018”).
5. **Rate End Date:** Enter a valid date including month, day and year when the contract being reported terminates (such as “2/28/2019”).
6. **Conversation Rate:** Enter the per-minute compensation rate when the compensation rate is based upon actual intrastate conversation minutes (such as “4.52”). The currency format is already configured within the form and therefore, a dollar sign should not be typed. If the compensation is not

per minute, record the compensation information in the form “Additional Costs Paid to Provider”.

7. **Session Rate:** Enter the per-minute compensation rate when the compensation rate is based upon actual intrastate session minutes (such as “4.52”). The currency format is already configured within the form and therefore, a dollar sign should not be typed. If the compensation is not per minute, record the compensation information in the form “Additional Costs Paid to Provider”.
8. **Conversation Minutes:** Enter the total intrastate conversation minutes for the period in which the rate was effective during the calendar year 2018.
9. **Session Minutes:** Enter the total intrastate session minutes for the period in which the rate was effective during the calendar year 2018.

## Completing the ‘Additional Provider-Paid Costs’ Worksheet

Please identify any incentives or services the TRS provider paid for or provided, during calendar year 2018, for which the state was not required to pay. Reminder – certain types of incentive payments are prohibited by Commission rules and orders.

Column Instructions:

1. **Provider:** This information will automatically be populated with the provider’s 6-digit ID selected within the Basics sheet after the Service Type and the Jurisdiction columns are completed.
2. **Service Type:** Either select the service type using the drop down list or type either “TRS”, “STS” or “CTS”.
3. **Jurisdiction:** Enter the appropriate state or territory (such as “Puerto Rico”, “PR”, “VI”, “Guam”, etc.)
4. **Rate Start Date:** Enter a valid date including month, day and year when the contract being reported began (such as “3/1/2018”).
5. **Rate End Date:** Enter a valid date including month, day and year when the contract being reported terminates (such as “2/28/2019”).
6. **Amount:** Enter the amount of provider-paid costs. The currency format is already configured within the form and therefore, a dollar sign should not be typed.

7. **Description:** Describe the type of cost or incentive paid for by the provider. Reminder – certain types of incentive payments are prohibited by Commission rules and orders.

## Completing the ‘Additional Costs Paid to Provider’ Worksheet

If the contractual per-minute compensation rate does not include all the costs paid by the state to the provider for the relay service, enter amounts paid to the provider during 2018.

Column Instructions:

1. **Provider:** This information will automatically be populated with the provider’s 6-digit ID selected within the Basics sheet after the Service Type and the Jurisdiction columns are completed.
2. **Service Type:** Either select the service type using the drop down list or type either “TRS”, “STS”, “CTS” “IPCTS”, “IP” or “VRS”.
3. **Jurisdiction:** Enter the appropriate state or territory (such as “Puerto Rico”, “PR”, “VI”, “Guam”, etc.)
4. **Rate Start Date:** Enter a valid date including month, day and year when the contract being reported began (such as “3/1/2018”).
5. **Rate End Date:** Enter a valid date including month, day and year when the contract being reported terminates (such as “2/28/2019”).
6. **Amount:** Enter the amount of payments for 2018. The currency format is already configured within the form and therefore, a dollar sign should not be typed.
7. **Description:** Describe the type of payment to the provider for 2018.
8. **Source:** Identify the entity that provided the payment to the provider.

## Completing the ‘Video Relay Service Expense and Capital Investments Data’ Worksheet

Include claimed expenses attributable to providing Video Relay Service as required under Part 64 of the FCC rules, such as gathering traffic, the center itself, and handing off calls to the interexchange carrier. When reporting expenses, report all amounts in whole dollars. For the four columns: 2017, 2018, 2019 and 2020 enter Actual or

Projected amounts as requested. All amounts should be traceable to the company's trial balance. For each category of cost the total submitted should tie to the category expenses in the Appendix H, Sections 1 and 2, income statements. E.g. A1 rent for the Video Relay Service ("VRS") Relay Service Data Request ("RSDR") submission should tie to the A1 rent expense VRS column in the income statements.

**Provide all spreadsheets used to allocate cost among the TRS services. \*\*\*  
See Appendix 1, Section A for further instructions \*\*\***

**A. Annual Recurring Fixed/Semi-Variable Expenses see Appendix 1.** Submit all expenses associated with building rent, utilities, maintenance, property tax, leased furniture and office equipment.

1. **Rent:** Annual payments solely for land and/or buildings rented for the provision of Video Relay Services.
2. **Utilities:** Expenses associated with land and buildings used for the provision of VRS, such as water, sewerage, fuel, T1, trunk lines, internet connectivity, internet service, VoIP service, and power. Telephone service expenses, such as center toll free numbers, and local and foreign exchange should also be included here. **Also see ITEM B. 4.**
3. **Building Maintenance:** Expenses for maintenance and repair used for the provision of VRS.
4. **Property Tax (if owned):** Taxes paid on property owned and used for the provision of VRS.
5. **Furniture (if leased):** Lease or rental expenses associated with center furnishings used for the provision of VRS.
6. **Office Equipment (if leased):** Lease or rental expenses associated with office equipment used for the provision of VRS.

**B. Annual Recurring Variable Expenses (Direct VRS Operating Expenses)**

1. **Salaries and Benefits:** *Non-management employees (persons performing Communications Assistant ("CA") and interpreter activities)*, compensation such as wages, salaries, commissions, bonuses, incentive awards and termination payments; payroll-related benefits paid on behalf of employees, such as pensions, savings plans, workers' compensation required by law, insurance plans (life, hospital, medical, dental, vision); and social security and other payroll taxes. **Included in this expense is the cost of "contract interpreters and/or communication assistants" who are not employees.** **ADDITIONAL DATA IS REQUIRED – see Appendix 1**

2. **Salaries and Benefits: Management employees (relay center managers & supervisors)**, compensation such as wages, salaries, commissions, bonuses, incentive awards and termination payments; payroll-related benefits paid on behalf of employees, such as pensions, savings plans, workers' compensation required by law, insurance plans (life, hospital, medical, dental, vision); and social security and other payroll taxes. **ADDITIONAL DATA IS REQUIRED – see Appendix 1** See discussion of executive compensation at paragraphs 78-79 of the Commission's Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186).
3. **Salaries and Benefits: Relay center staff compensation**, such as wages, salaries, commissions, bonuses, incentive awards and termination payments; payroll-related benefits paid on behalf of employees, such as pensions, savings plans, workers' compensation required by law, insurance plans (life, hospital, medical, dental, vision); and social security and other payroll taxes. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
4. **Telecommunications Expenses:** Expenses associated with inspecting, testing, analyzing and correcting trouble; repairing or reporting on telecommunications plant (switching, transmission, operator, cable and wire) to determine need for repairs, replacements, rearrangements, and changes; expenses for activities, such as controlling traffic flow, administering traffic measuring and monitoring devices, assigning equipment and load balancing, collecting and summarizing traffic data, administering trunking equipment and facilities, automatic call distributor and assigning interoffice facilities and circuit layout work. **Note: expenses reported here are in addition to the telephone service expenses reported in Section A 2.**
5. **Billing Expenses:** Rating of toll messages and billing functions not recovered from other sources.
6. **Relay Center Expenses:** Expenses not included in other accounts, such as providing food services, libraries, archives, mail service, procuring office equipment, office supplies, materials and repairs.

### C. Annual Administrative Expenses

Indirect overhead costs are not reasonable costs of providing TRS. Appropriate overhead costs are those costs that are directly related to, and directly support, the provision of relay service. Indirect overhead costs may not be allocated to TRS by an entity that provides services other than TRS based on the percentage of the entity's revenues that are derived from the provision of TRS. (FCC 07-186, ¶74-75).

1. **Finance/Accounting:** Expenses incurred in providing accounting and financial services. Accounting services include payroll and disbursements,



- property accounting, capital recovery, regulatory accounting, tax accounting, auditing, capital and operating budget and control, and general accounting. Financial services include banking operations, cash management, and benefit investment fund management, etc. **ADDITIONAL DATA IS REQUIRED - see Appendix 1**
2. **Legal/Regulatory:** Expenses incurred for legal and regulatory services. Legal services include conducting and coordinating litigation, providing guidance on regulatory and labor matters, court expenses, filing fees, cost of counsel, etc. Regulatory services include preparing and presenting information for regulatory purposes, such as responding to this data request. **ADDITIONAL DATA IS REQUIRED - see Appendix 1**
  3. **Engineering:** Expenses incurred in the general day-to-day engineering operation of the TRS telecommunications plant and /or IP network to meet applicable non-waived mandatory minimum standards. **ADDITIONAL DATA IS REQUIRED see Appendix 1**
  4. **Research and Development:** Expenses incurred for R&D required to meet applicable non-waived mandatory minimum standards. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
  5. **Operations Support:** Expenses that ensure the sustainability of service including troubleshooting, customer service and technical support. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
  6. **Human Resources:** Expenses incurred in performing personnel administration activities, including recruiting, hiring, forecasting, planning, training, scheduling, counseling employees and reporting. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
  7. **Billing:** Administrative expenses of rating and providing billing information to interexchange and exchange carriers, if not recovered by other means. **ADDITIONAL DATA IS REQUIRED - see Appendix 1**
  8. **Contract Management:** Expenses of managing activities required by the provider contracts. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
  9. **Risk Management:** Management expenses associated with workmen's compensation, payments in settlement of accident and damage claims, insurance premiums against losses and damages, sickness and disability payment, etc.
  10. **Other Corporate Overhead:** Other administrative expenses of providing TRS not included in previous categories. All costs over \$10,000 should be itemized. **ADDITIONAL DATA IS REQUIRED – see Appendix 1** See

discussion of overhead costs at paragraphs 74-75 of the Commission's Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186).

#### **D. Annual Depreciation / Amortization Associated with Capital Investment**

Depreciation listed in this section MUST tie to the capital investment reported in Section F.

1. **Furniture & Fixtures:** Depreciation expense on furniture and/or fixtures. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
2. **Telecommunications Equipment:** Depreciation expense associated with capitalized expenses of telecommunications equipment including switching equipment, operator services equipment, cable and wire facilities, transmission equipment, and power equipment. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
3. **Leasehold:** Amortization of leasehold improvements – improvements which become a permanent part of a building, like walls or carpeting. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
4. **Software:** Amortization expenses associated with capitalized software.
5. **Other Capitalized:** depreciation expense not accounted for in other categories. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**

#### **E. Other Expenses**

1. **a) Advertising:** Advertising is a form of communication intended to persuade an audience (viewers, readers or listeners) to purchase or take some action upon products, ideas, or services. It includes the name of a product or service and how that product or service could benefit the consumer, to persuade a target market to purchase or to consume that particular brand. These messages are usually paid for by sponsors and viewed via various media.
- b) Marketing:** Marketing is the wide range of activities involved in making sure that you're continuing to meet the needs of your customers and getting value in return. Marketing activities include "inbound marketing," such as market research to find out, for example, what groups of potential customers exist, what are their needs, which of those needs can be met, how they should be met, etc. Inbound marketing also includes analyzing the competition, positioning your new product or service (finding your market niche), and pricing your products and services. "Outbound marketing" includes promoting a product through continued advertising, promotions, public relations and sales. Marketing represents expenditures by the provider to persuade users

- to choose their particular relay service over that of other relay service providers. **All costs over \$10,000 should be itemized.** The costs of equipment given to, sold to, and/or used by relay callers, and incentives are NOT to be reported as expenses. Reminder – certain types of incentive payments are prohibited by Commission rules and orders. **ADDITIONAL DATA IS REQUIRED – see Appendix 1.** See discussion at paragraph 82, Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186).
2. **Outreach:** Outreach is an effort by individuals in an organization or group to connect their ideas or practices to the efforts of other organizations, groups, specific audiences or the general public. Unlike marketing, outreach does not inherently revolve around a product or strategies to increase market share. Typically non-profits, civic groups, and churches engage in outreach. **ADDITIONAL DATA IS REQUIRED – see Appendix 1.** See discussion at paragraph 82, Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186).
  3. **Sub-Contractor:** 3rd party costs associated with a contract to provide IP Relay, IP CTS, and VRS. Do not include profit or tax allowances of sub-contractor. Provide these costs excluding any costs associated with license fees. If it is not possible to separate license fees from sub-contractor costs, provide total sub-contractor costs and state that the costs may include license fees. **ADDITIONAL DATA IS REQUIRED – see Appendix 1.**
  4. **License fees paid to a third party.** Third party costs associated with the payment of a license fee associated with the use of a sub-contractor's technology, software or equipment. **Additional DATA IS REQUIRED – see Appendix 1.**
  5. **License fees paid to an affiliate.** Costs associated with the payment of a license fee associated with the use of an affiliate's technology, software or equipment. **Additional DATA IS REQUIRED – see Appendix 1.**
  6. Software Expense
  7. Customer Premise Equipment Expense. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**
  8. Other: Expenses not previously reported. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**

## **F. Capital Investments**

Please provide the year end net book value of capital investments by categories listed in Section F from which the depreciation expenses in Section D were calculated. **ADDITIONAL DATA IS REQUIRED – see Appendix 1**

## **G. Costs Associated with E911 and Numbering for Internet-Based Telecommunications Relay Services**

Costs may be submitted for:

“those additional costs incurred by a provider that directly relate to (1) ensuring that database information is properly and timely updated and maintained; (2) processing and transmitting calls made to ten-digit numbers assigned pursuant to this Order; (3) routing emergency calls to an appropriate Public Safety Answering Point (“PSAP”); (4) other implementation-related tasks directly related to facilitating ten-digit numbering and emergency call handling; and (5) consumer outreach and education related to the requirements and services adopted in this Order” (FCC 08-151¶100).

The following costs are not compensable from the fund: (A) Costs associated with an Internet-based TRS consumer’s acquisition of a ten-digit geographic telephone number, (B) costs associated with an Internet-based consumer’s acquisition and usage of a toll free telephone number, and (C) E911 charges imposed on TRS providers under a state or local E911 funding mechanism. (FCC 08-275, ¶47-56). Do not include these costs. Do not include costs already included in the per minute IP Relay, IP CTS, and Video Relay Service compensation rate calculated pursuant to the Commission's rules.

## **Completing the ‘IP-Relay Expense and Capital Investments Data’ Worksheet (IP Relay Tab)**

Include reasonable expenses attributable to providing IP Relay as required under Part 64 of the FCC rules, such as gathering traffic, the center itself, and handing off calls to the carrier. When reporting expenses, please report all amounts in whole dollars. **Follow the same instructions for Sections A through G, as listed above in Video Relay Services Expense and Capital Investments Data, except substitute IP-Relay expenses and capital investments for VRS.**

## **Completing the ‘IP-CTS CA Services Expense and Capital Investments Data’ Worksheet**

Include reasonable expenses attributable to providing IP CTS using Communications Assistants (“CAs”) as required under Part 64 of the FCC rules, such as gathering traffic, the center itself, and handing off calls to the carrier. When reporting expenses, please report all amounts in whole dollars. **Follow the same instructions for Sections A through G, as listed above in Video Relay Services Expense and Capital Investments Data, except substitute IP CTS CA expenses and capital investments for VRS.**

## **Completing the ‘Annual IP-CTS Automated Speech Recognition Services Expense and Capital Investments Data’ Worksheet**

Include reasonable expenses attributable to providing IP CTS using Automated Speech Recognition (“ASR”) as required under Part 64 of the FCC rules, such as gathering traffic, the center itself, and handing off calls to the carrier. When reporting expenses, please report all amounts in whole dollars. **Follow the same instructions for Sections A through G, as listed above in Video Relay Services Expense and Capital Investments Data, except substitute IP CTS ASR expenses and capital investments for VRS.**

## **Completing the ‘Annual IP-Relay, IP CTS CA, IP CTS ASR, and VRS Demand Data’ Worksheets**

All minute data should be reported in conversation minutes. Conversation minutes are measured in terms of conversation time, i.e., from calling party connection to called party until the disconnection of both parties. Do not include time for call set-up, call ringing, waiting for an answer, calls that reach busy numbers or receive no answers, or the call wrap-up. 2017 and 2018 minutes should be actual conversation minutes. Minutes for 2019 and 2020 should be projected conversation minutes by month. The projected minutes should reflect reasonable growth rates and include other considerations that might increase or decrease the minutes handled by a center, such as adding a new state to a center. Include a description of the methodology used to determine the projected minutes for 2019 and 2020.

## APPENDIX 1 For IP Relay, IP CTS CA, IP CTS ASR, and VRS

This Appendix applies to each service separately.

### SECTION A: Annual Recurring Fixed/Semi-Variable Expenses

For Section A expenses that are provisioned jointly with the expenses for other telecommunications relay services, provide the total company expenses, a description of how the total expenses are allocated among the TRS services and between TRS and non-TRS services, and the percent allocation for each service. For example, a building lease could be allocated based on the relative square feet of the building used to provide the services. Include a spreadsheet that documents the allocation. All relationships and equations in the spreadsheet should be active. Do not copy and paste special any data.

### SECTION B: Annual Recurring Variable Expenses

#### 1. Salaries and Benefits

- a) Provide a detailed schedule of the number of full-time employees and part-time equivalent employees – **Non-management (persons performing communications assistant and interpreter activities)**, their job title and job description, and the components of their compensation, including salaries and benefits. This includes the cost of contract interpreters and/or communication assistants. The schedule should tie to the actual and projected amounts for 2017-2020. Please provide data for each center and job title and job description for each employee classification. Number of employees should be the average for the year.

Please provide data for each center. This should be the average for the year, not year-end numbers.

- b) Provide a detailed schedule of the occupancy and utilization percentages used to develop the number of employees required to meet call volumes. The schedule should tie to the schedule requested in A above.

Occupancy Percentage = # of minutes a CA/Interpreter is occupied processing a call (including set-up, wrap-up) / # of available minutes (payroll time). Provide the numerator and the denominator data separately.

Utilization Percentage = # of conversation minutes (does not include set-up, wrap-up) / # of minutes a CA/Interpreter is occupied processing a call (including set-up, wrap-up). Provide the numerator and the denominator data separately.

Please also include information on the normal workday length and the amount of time CAs/interpreters are at their desks waiting to take calls (available/payroll time minus lunch, breaks, vacation).

- c) Provide the speed of answer you are staffing to meet for each center. This should be the average for the year, not year-end data.
  1. Number of communication assistant and interpreter seats at each call center
  2. Number of call centers
  3. Average hourly salary for communication assistants and interpreters
  4. Provide fully loaded CA costs including labor, facilities and CA direct G&A
2. Salaries and Benefits - Provide a detailed schedule of the number of management employees (relay center managers & supervisors), their job titles and job description, and the components of their compensation, including salaries and benefits. The schedule should tie to the actual and projected demand for 2017-2020. Please provide data for each center and job title and job description for each employee classification. See discussion of executive compensation at paragraphs 75, 78-79 of the Commission's Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186). Number of employees should be the average for the year.
3. Salaries and Benefits - Provide a detailed schedule of the number of relay center staff (clerical staff and others who perform non-communications assistant and interpreter activities) employees, their job title and job description, and the components of their compensation, including salaries and benefits. The schedule should tie to the actual and projected demand for 2017-2020. Please provide data for each center, and job title and job description for each employee classification. Number of employees should be the average for the year.
4. Provide a schedule of telecommunications expenses for each call center. Include the vendor, a description of the good(s) or service(s), and the amount.
5. Provide a schedule of the billing expenses for each call center. If billing is performed in-house, provide the work hours required. If billing is provided by a vendor, include the vendor, a description of the good(s) or service(s), and the amount.
6. Provide a schedule of relay center expenses for each call service. Include the vendor, a description of the good(s) or service(s), and the amount.

## **SECTION C: Annual Administrative Expenses**

1. Finance/Accounting
  - a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
  - b) Provide a schedule of other expenses incurred in providing accounting and financial services. Include the vendor, a description of the good(s) or service(s), and the amount.
2. Legal/ Regulatory
  - a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salaries and benefits. Number of employees should be the average of the year.
  - b) Provide a schedule of other expenses incurred in providing legal services and a description of those expenses. Include the vendor, a description of the good(s) or service(s), and the amount.
3. Engineering (day-to-day operations)
  - a) Provide a detailed schedule of the number of employees, their job title, job description and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
  - b) Describe Engineering activities and explain how it relates to meeting the non-waived mandatory minimum standards. (See FCC 04-137, ¶ 188-190)
4. Research and Development
  - a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year. Provide a break down based on platform, software and customer premise equipment.
  - b) Provide a schedule of other expenses incurred in providing research and development services and a description of those expenses. Include the vendor, a description of the good(s) or service(s), and the amount.
  - c) Describe each TRS-related Research and Development project and explain how it relates to meeting the non-waived mandatory minimum standards. (See FCC 04-137, ¶ 188-190)
5. Operations Support



- a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salary and benefits. Number of employees should be the average for the year.
- b) Provide a schedule of other expenses incurred in providing operations support and a description of those expenses. Include the vendor, a description of the good(s) or service(s), and the amount.

6. Human Resources

- a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
- b) Provide a schedule of other expenses incurred in providing human resources services and a description of those expenses. Include the vendor, a description of the good(s) or service(s), and the amount. This includes forecasting, planning, recruiting and reporting.

7. Billing

- a) Provide a detailed schedule of the number of employees, job title, job description and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
- b) Provide other administrative expenses incurred in rating and providing billing information to exchange and interexchange carriers if not recovered by other means.

8. Contract Management

- a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
- b) Provide a schedule of managing activities required by provider contract and a description of those activities. Include vendor, a description of service(s) or good(s), and the amount

9. Risk Management (No additional information is needed)

## 10. Other Corporate Overheads

- a) Provide a detailed schedule of the number of employees, job title, job description and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
- b) Itemize any costs over \$10,000. See discussion of overhead costs at paragraphs 74-75 of the Commission's Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186).

### **SECTION D: Annual Depreciation/Amortization Associated with Capital Investment**

Depreciation method and period applied should be included. Departures from traditional depreciation methods should be explained in detail. We emphasize that the depreciable life, depreciation method, and depreciation expense must be categorized by items listed in Section D.

### **SECTION E: Other Expenses**

#### 1. Marketing/Advertising Expenses

- a) Provide a detailed schedule of the number of employees, job title, job description and the components of their compensation, including salaries and benefits. This includes product management expenses associated with managing product lifecycle. Number of employees should be the average of the year.
- b) Provide a schedule of expenses for marketing/advertising. Include the vendor, a description of the good(s) or service(s), and the amount.
- c) Do not report the cost and any associated costs of equipment given to, sold to, and/or used by relay callers in any expenses.
- d) Do not report expenses associated with marketing, installation, and training, including, but not limited to, test calls, on the equipment.

#### 2. Outreach Expenses

- a) Provide a detailed schedule of the number of employees, job title, job description, and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
- b) Provide a schedule of expenses for outreach. Include the vendor, a description of the good(s) or service(s), and the amount.

- c) Do not report the cost and any associated costs of equipment given to, sold to, and/or used by relay callers in any expenses.
- d) Do not report expenses associated with outreach, installation, and training, including, but not limited to, test calls, on customer premises' equipment. See discussion at paragraph 82 and Declaratory Ruling at paragraphs 89-94 of the Commission's Report and Order and Declaratory Ruling, released on November 19, 2007 (FCC 07-186).

3. Sub-Contractor Expenses

- a) Provide a schedule of sub-contractor expenses. Include the vendor, RSDR category of expense, a description of the good(s) or service(s), and the amount.
- b) Provide a copy of each sub-contractor contract.
- c) For each contract with a sub-contractor, provide the termination date of the contract.
- d) For each contract with a sub-contractor, provide the billing rate(s) and the billing units for the years 2017-2020.
- e) For each contract with a sub-contractor, provide the underlying costs of the sub-contractor by the costs listed in the RSDR. If those costs are not available, please state that those costs are not available.

4. License fees paid to a third party

- a. Provide a description of the items purchased according to the license fee agreement.
- b. Provide the billing rate(s) and billable units associated with the license fees for the years 2017-2020.

5. License fees paid to an affiliate

- a. Provide a description of the items purchased according to the license fee agreement.
- b. Provide the billing rate(s) and billable units associated with the license fees for the years 2017-2020.

6. Software (No additional information is needed)

7. Customer Premise Equipment

- a) Provide a detailed schedule of the number of sales, installation and maintenance employees, job title, job description and the components of their compensation, including salaries and benefits. Number of employees should be the average for the year.
- b) Provide the number of Customer Premise Equipment units sold, produced and installed.
- c) Provide the Cost of Goods Sold. Costs attributable to relay hardware and software used by the consumer, including, but not limited to, marketing, installation, maintenance costs, and testing are not compensable from the Fund. These costs are reported for informational purposes only.

8. Other - Do not include "Profit or Tax Allowances." List and explain expenses not stated in other categories.

**SECTION F: Capital Investments**

Support data for capital investment should include where appropriate, among other things: all capital equipment purchased in order to provide each form of TRS, itemized by equipment class, gross book values, accumulated depreciation, and net book values. Only report the year-end net book value in Section F.

Support data for VRS equipment should separately identify investments used by communications assistants and interpreters to interact with end-users, and equipment used to monitor and supervise call centers.

For each type of equipment provide gross book values, accumulated depreciation and net book values.

For equipment used to monitor and supervise call centers that provide multiple TRS services, provide the total company investments, describe how total investments are allocated among the services, and the percent allocation for each service.

Only include capital investment items that are long term in nature and subject to depreciation. Items such as office supplies should be listed in Section B. 6. Relay Center Expenses.

**SECTION G: Costs Associated with E911 and Numbering for Internet-Based Telecommunications Relay Services**

Provide the total number of E911 calls handled for the years 2017–2018.

**SECTION H: Financial Data (This information should be supplied at the provider level rather than for each individual service)**

1. Provide the corporate income statement and balance sheet for the entity for 2017 and 2018.
2. Provide a supporting schedule that ties to the income/balance sheet that contains the following information:
  - a. A column for each TRS service and a column for "Other" that contains the non-TRS service amount.
  - b. Rows for each of the categories of expense that were submitted with the data submission under sections A through G.
  - c. An explanation of the services provided related to the amounts in the "Other" column.
3. Please provide the applicable state corporate income tax rates for each state where you provide VRS, IP-Relay, IP CTS CA, or IP CTS ASR. If any state does not have a corporate income tax, please indicate that the rate does not exist.
4. Please provide a list of all debt instruments, where debt instruments include notes, bonds, loans, commercial paper and similar financial obligations.
5. For each listed debt instrument, please provide:
  - a. The balance as of December 31, 2018
  - b. The expected balance as of April 30, 2019
  - c. The interest rate
  - d. Interest paid in 2017
  - e. Interest paid in 2018
  - f. Estimated interest payments in 2019
  - g. Estimated interest payments in 2020
  - h. Principal payments in 2017
  - i. Principal payments in 2018
  - j. Estimated principal payments in 2019
  - k. Estimated principal payments in 2020
  - l. Maturity date
  - m. An explanation of any covenants associated with the debt instrument
  - n. The metric associated with the covenant, for example, an interest coverage ratio of 3

- o. 2018 performance regarding the metric, for example, in 2018 the actual interest coverage ratio was 4.3
6. Provide any lead-lag study or any other study that would support a working capital requirement performed by or for the provider.

**Persons willfully making false statements on this form can be punished by fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. §1001.**

#### **PRIVACY ACT AND PAPERWORK REDUCTION ACT STATEMENTS**

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your certification may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order. In certain cases, the information in your certification may be disclosed to the Department of Justice or a court or adjudicative body when a) the FCC; or b) any employee of the FCC; or c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding.

We have estimated that this collection of information will take 5.0 hours annually. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, Office of Managing Director, AMD-PERF, Washington, DC 20554, Paperwork Reduction Act Project (3060-1249). We will also accept your PRA comments if you send an e-mail to PRA@fcc.gov.

Please DO NOT SEND COMPLETED FORMS TO THIS ADDRESS. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number and/or we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1249.

**THIS NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93- 579, DECEMBER 31, 1974, 5 U.S.C. SECTION 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**