

Justification of Non-substantial changes to Collection 3060-0463

The Commission is submitting this non-substantial change request to the Office of Management and Budget (OMB) to revise the instructions for the telecommunications relay services (TRS) provider cost and demand data collection forms issued by the TRS Fund administrator. All dates have been updated from the 2021 version to the 2022 version, an email address has been corrected, and there are several instances where we have fixed spelling. The following is a listing of the other changes, including explanations where the change is not self-explanatory.

In the attached State Filing Instructions and State Excel spreadsheet, the only changes are dates and an email address.

In the attached Provider Filing Instructions:

- 1) Page 6 – In the paragraph under “Demand,” the word “compensable” has been inserted in the third line. This is a clarifying edit. With one exception, all TRS providers understood that the Commission’s TRS administrator was asking for compensable demand data and that non-compensable demand data was not to be included. The clarification is for the benefit of the one TRS provider that misunderstood the instructions.
- 2) Page 7 – Under B.1, Salaries & Benefits – Relay Center: CA/Interpreting Staff, the wording was clarified to change “individual contract interpreters and/or CAs who are not employees” at the end of the first sentence to “individually contracted or sole proprietor interpreters and CAs” and to change “CAs” in the second sentence to “CAs and interpreters.” These changes are for clarification only. The meaning has not changed.
- 3) Page 10 – Under E.3, Subcontractor, in the first sentence “a contract to provide IP-based TRS service, excluding costs associated with profit or tax allowances of the subcontractor” is changed to “with two or more individuals providing IP-based TRS services for the provider under a single contract.” This is a conforming edit to avoid double-reporting of the same costs. Under B.1, noted in 2) above, the Commission’s TRS administrator is already asking for the cost data for individual contract interpreters and/or CAs who are not employees. To make it clear that the data for individuals who are contractors to report the data under B.1 and not E.3, the wording of E.3 is being modified to specify that E.3 includes third-party costs associated with two or more individuals providing service under one contract.
- 4) Page 15 – In the paragraph under “Demand,” the words “compensated conversation minutes” and “compensable” are inserted for clarification. See 1) above.
- 5) Page 17 – Under B.1, Recurring Variable Expenses (Direct TRS Operation Expenses), change the first bullet point “CA and/or interpreter staff” to two bullet points: “CA and/or interpreter employees” and “Sole proprietor and individually operated LLCs offering CA and interpreter services.” This is a conforming clarifying edit to make it clear that “staff” includes employees and sole proprietor and individually operated LLCs offering CA and interpreter services. See 2) above. It also makes it clear that such information is to be reported under B.1. and not under E.1.
- 6) Page 17 – Under C.2, Administrative Expenses, add “Engineering” as a bullet point. This is a conforming edit to make the instructions for the Appendix C.2 consistent with C.1, which already includes “Engineering” as a bullet point, and consistent with the general instructions on page 8 under C.3, which specifically includes “Engineering” as a line item under “Annual Administrative Expenses.”

In the attached proposed new 2022 version of the Provider Excel spreadsheet:

- 7) Under the Instructions Tab, in box B.1., same edit as 2) above.
- 8) Under the Instructions Tab, in box E.3, same edit as 3) above.
- 9) Under the Appendix Instructions Tab, in box B.1, same edit as 5) above.
- 10) Under the Appendix Instructions Tab, in box C.2, same edit as 6) above.
- 11) Under the Demand Tab, in the sentence above the tables, the words “compensated” and “compensable” are inserted for clarification. See 1) above.