

**FEDERAL COMMUNICATIONS  
COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	
	)	
Structure and Practices of the Video Relay	)	CG Docket No. 10-51
Service Program	)	

**Interstate Telecommunications Relay Services Fund  
Payment Formula and Fund Size Estimate**

Rolka Loube Associates LLC  
4050 Crums Mill Road  
Suite 303  
Harrisburg, PA 17112

April 29, 2022

## Contents

Summary.....	3
Interstate TRS Fund Overview.....	4
TRS Rate Development.....	5
Analog Relay Services.....	5
Interstate TTY & STS Formula Development .....	7
CTS Formula Development .....	8
IP Based Services .....	8
IP Relay.....	10
IP CTS.....	13
VRS .....	15
Demand Projection Methodology .....	16
Funding Requirements.....	17
Contribution Base & Factor Calculation .....	18
Program Administration .....	20
Interstate TRS Fund Advisory Council Reports.....	20
Fund Status Report .....	21
Exhibits.....	22
Appendix .....	22

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	
	)	
Structure and Practices of the Video Relay	)	CG Docket No. 10-51
Service Program	)	

**Payment Formula and Fund Size Estimate  
Interstate Telecommunications Relay Services Fund  
For July 2022 through June 2023**

**Summary**

Rolka Loube Saltzer Associates LLC dba Rolka Loube (RL), as Interstate Telecommunications Relay Services (TRS) Fund Administrator (the Administrator), herein submits proposed compensation rates, demand projections, projected fund size, and proposed carrier contribution factors for the period July 1, 2022, through June 30, 2023, in accordance with 47 CFR § 64.604 and the Federal Communications Commission’s (FCC or Commission) rules.<sup>1</sup>

In accordance with the Commission’s rules, RL proposes the following compensation rates for the three analog TRS services and Internet Protocol (IP) Relay:

Traditional TRS (TTY) .....	\$4.5098
Speech-to-Speech (STS) .....	\$5.6408
Captioned Telephone Service (CTS) .....	\$2.3419
Internet Protocol (IP) Relay.....	\$1.8551

---

<sup>1</sup> 47 CFR §64.604(c)(5)(iii)(H).

For purposes of determining Fund revenue requirements, RL assumes continuation of the following compensation rates for IP CTS and VRS:

IP CTS.....	\$1.3000
Video Relay Service (VRS) Emergent.....	\$5.2900
VRS Tier I.....	\$4.8200
VRS Tier II.....	\$3.9700
VRS Tier III.....	\$2.6300

The Administrator projects a net fund cash requirement for fund year 2022-2023 of \$978,613,076. The net fund cash requirement is the sum of service requirements (product of the above rates and projected service demand), administrative overhead, and a budgetary reserve minus the projected fund balance as of June 30, 2022.

Based upon best available estimates from the Data Collection Agent (DCA), the interstate contribution base is \$37,844,989,481 and the combined interstate and intrastate contribution base is approximately \$84,611,976,314. Using the proposed rates and projected demand and subtracting the estimated year-end balance, the non-IP CTS net fund requirement is \$425,861,200 and the IP CTS net fund requirement is \$552,751,875. Dividing the net fund requirements by the respective contribution bases, the calculated non-IP CTS contribution factor is 0.01125 and the IP CTS contribution factor is 0.00653.<sup>2</sup>

## Interstate TRS Fund Overview

The Interstate TRS Fund (TRS Fund/Fund) is designed to compensate eligible relay service providers<sup>3</sup> for the reasonable costs of furnishing “[t]elephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deafblind, or who has a speech disability to engage in communication by wire or radio with one or more individuals in a manner that is functionally equivalent to the ability of a hearing individual who does not have a hearing or speech disability

---

<sup>2</sup> The component parts of the projected funding requirement are detailed in Exhibit 2.

<sup>3</sup> Eligible providers are TRS providers operating under contract with state TRS programs and IP-based TRS providers certified by the Commission pursuant to 47 CFR §64.604.

to communicate using voice communications services by wire or radio.”<sup>4</sup> Services that are currently compensated from the TRS Fund include interstate Text Telephone (TTY), interstate Speech-to-Speech (STS), interstate Captioned Telephone Service (CTS), Internet Protocol Relay Service (IP Relay), Internet Protocol Captioned Telephone Service (IP CTS), and Video Relay Service (VRS). The Fund is supported by contributors based on their relative share of intrastate, interstate, and international end-user revenues.<sup>5</sup> The TRS Funding period begins July 1<sup>st</sup> and ends June 30<sup>th</sup> of the following calendar year. The Commission’s shared funding mechanism for the TRS Fund ensures that the costs of meeting relay service obligations are borne equitably. The Administrator compensates providers on a per-minute basis for eligible conversation minutes at rates approved by the Commission and in accordance with Commission rules. Per minute compensation rates will be effective for minutes of service beginning July 1<sup>st</sup>.

This Annual Report reflects the 2022-2023 program year’s proposed funding requirements and service compensation rate calculations based on state and provider responses to the 2021 Relay Services Data Request (RSDR).

## TRS Rate Development

### Analog Relay Services

The Commission’s 2007 *Cost Recovery Order*<sup>6</sup> adopted the Multi-state Average Rate Structure (MARS) plan as the basis for calculating the compensation rate for TTY, STS, and CTS services. Based on the weighted average of intrastate service rates, RL proposes the following compensation rates:

Traditional TRS (TTY) .....	\$4.5098
Speech-to-Speech (STS) .....	\$5.6408
Captioned Telephone Service (CTS) .....	\$2.3419

---

<sup>4</sup> 47 U.S.C. § 225(a)(3).

<sup>5</sup> See 47 CFR §64.604(c)(5)(iii)(A)-(C).

<sup>6</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order and Declaratory Ruling, 22 FCC Rcd. 20140 (2007) (*Cost Recovery Order*) at ¶ 16.

As directed by the Commission,<sup>7</sup> the Administrator must first collect data on compensation rates for intrastate services.<sup>8</sup> Accordingly, in early February 2022, the Administrator requested that all intrastate TRS administrators and all interstate TRS service providers submit the following information, applicable to calendar year 2021, to be provided no later than the end of February 2022:

- a. For per minute contracts, the per minute compensation rate for intrastate TTY, STS, and CTS and whether the rate applies to session or conversation minutes,
- b. For flat-rate contracts,<sup>9</sup> the total amount paid for intrastate TTY, STS, and CTS and whether the flat amount was paid monthly or annually,
- c. For per minute contracts, the total number of intrastate conversation minutes for TTY, STS, and CTS,
- d. For per minute contracts, the total intrastate session minutes for TTY, STS, and CTS, and
- e. Any amounts paid by the state to the provider for services beyond those related to TTY, STS, and CTS translation.<sup>10</sup>

For per minute contracts, the Administrator multiplies the reported service rate by the corresponding intrastate session or conversation minutes (whichever the jurisdiction's rate was based upon) to calculate the state's service-specific payment amount. For states that have flat-rate contracts or pay providers for services provided beyond those related to translation, an allocation must be made to assign these lump-sum amounts to the individual services covered by these costs. To do this, each individual service's percentage of the total conversation minutes must be calculated. Lump-sum amounts for each contract or amounts paid to a provider are multiplied by the conversation minute percentage factor for each service to get the amount allocated to each service from the lump-sum amounts. This calculated flat-rate revenue amount

---

<sup>7</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, FCC 11-104, Rel. June 30, 2011 at ¶¶ 9-18.

<sup>8</sup> See Appendix A for Intrastate Filing Instructions.

<sup>9</sup> Flat-rate contracts are independent of total conversation minutes serviced.

<sup>10</sup> For example: Outreach, Marketing, and Administration.

is added to the per-minute revenues for each service, and the total is divided by the service's total conversation minutes to find the amount utilized in that service's interstate compensation rate.

#### Interstate TTY & STS Formula Development

For interstate TTY and interstate STS compensation rates, the Administrator combines intrastate TTY and STS data. Using combined service data from the intrastate jurisdictions, sixteen of which reported contracting services on a flat rate,<sup>11</sup> the Administrator calculated that the total payment for intrastate TTY and STS during calendar year 2021 amounted to \$16,431,684. The total intrastate TTY and STS conversation minutes for calendar year 2021 were 3,643,555. The results of the TTY and STS rate analysis can be found in Exhibit 1-1, which displays an array of rates reported by the individual states as well as implicit rates for flat amount contracts. To retain provider requested confidentiality, the Exhibit does not correlate states to specific rate data.

RL hereby renews its recommendation that the Commission authorize future reports to identify the rates and demand by state, unless the reporting state asserts a claim of confidentiality regarding its compensation rates. Only two providers currently provide state services reflected in the MARS calculations.

By dividing the total payment amount by the total conversation minutes, the Administrator proposes a rate of \$4.5098 per conversation minute for program year 2022-2023 interstate TTY service. This proposed rate is approximately 7.52% above the 2021-2022 TTY compensation rate of \$4.1944.

In the *Cost Recovery Order*, the Commission added an additional amount of \$1.131 to the 2007-2008 interstate STS compensation rate to be used by the providers for outreach efforts.<sup>12</sup> In the ensuing fund years, the Commission has found it appropriate to continue the outreach additive at the same level. The Administrator continues to recommend adding the \$1.131 to the MARS based STS rate resulting in

---

<sup>11</sup> Arizona, Colorado, Connecticut, Delaware, District of Columbia, Hawaii, Illinois, Maine, New Hampshire, North Carolina, North Dakota, Puerto Rico, Rhode Island, South Carolina, Texas, and the Virgin Islands.

<sup>12</sup> *Cost Recovery Order* ¶¶ 57,61.

a proposed interstate STS per conversation minute rate of \$5.6408.<sup>13</sup> for the 2022-2023 program year. This proposed rate is an increase of 5.92% from the \$5.3254 compensation rate utilized for service generated in the 2021-2022 program year.

While the rate has increased, the Administrator notes that the demand for STS continues to be far less than the other TRS services. Additionally, the Administrator notes that the outreach additive, projected to be less than \$200,000 across the two service providers when applied to the projected demand, may not achieve the desired result. The Administrator lacks adequate information to determine if this community is being adequately served or to determine the underlying cause of the continued low volume of this service.

#### CTS Formula Development

The proposed CTS rate was calculated by applying the same steps used for the TTY/STS calculation against the CTS intrastate data. The results of the CTS rate analysis can be found in Exhibit 1-2, which displays an array of rates reported by the individual states as well as implicit rates for flat-rate contracts. To retain provider requested confidentiality, the Exhibit does not correlate states to specific rate data.

The total intrastate CTS payment, including the amounts paid to providers for services beyond CTS translation, declined 25% from \$20,369,910 for calendar year 2020 to \$15,331,283 for calendar year 2021. The total CTS intrastate conversation minutes declined 24% from 8,608,773 for calendar year 2020 to 6,546,478 for calendar year 2021.

By dividing the total payment by the total conversation minutes, the Administrator proposes a compensation rate of \$2.3419 per conversation minute for program year 2022-2023 interstate CTS service, a 1% decrease from the \$2.3662 rate utilized for the 2021-2022 program year.

#### IP Based Services

On November 19, 2007, the FCC released a Report and Order<sup>14</sup> adopting new cost recovery methodologies for the various forms of TRS. The Order also clarified

---

<sup>13</sup> At its April 2022 meeting, the Interstate TRS Advisory Council was informed of the Administrator's intent to recommend that \$1.131 per minute of extra funding for STS outreach purposes be maintained.

<sup>14</sup> FCC 07-186.



the nature and extent to which certain categories of costs are recoverable from the TRS Fund.<sup>15</sup> In accordance with Commission rules,<sup>16</sup> TRS providers requesting compensation from the TRS Fund must submit historical and projected cost and demand data to the Administrator to determine TRS Fund revenue requirements.<sup>17</sup> Based on provider responses to the 2021 RSDR, RL proposes the following compensation rates:

Internet Protocol (IP) Relay.....	\$1.8551
IP CTS.....	\$1.3000
Video Relay Service (VRS) Emergent.....	\$5.2900
VRS Tier I.....	\$4.8200
VRS Tier II.....	\$3.9700
VRS Tier III.....	\$2.6300

As directed by the Commission, the Administrator must first collect historical and projected cost and demand data from certified TRS service providers who request compensation from the TRS Fund. Accordingly, in early February 2022, the Administrator requested that all interstate TRS service providers submit the following information applicable to calendar years 2020 through 2023, to be provided no later than the end of February 2022:

- a. Two years of historical and two years of projected demand for each certified IP-based service,
- b. Two years of historical and two years of projected expenses for each certified IP-based service,
  - a. For IP CTS service providers, a breakout of Communications Assistant (CA) and Automatic Speech Recognition (ASR) associated demand and expenses, and
- c. Appendices supporting each expense category

For analysis purposes, the Administrator requires the provider to report

---

<sup>15</sup> The following Orders changed the mechanism for one or more of the services following the issuance of FCC 07-186: FCC 11-54, FCC 16-25, FCC 17-86, FCC 18-79, & FCC 20-132.

<sup>16</sup> See 47 CFR § 64.604(c)(5)(iii)(D).

<sup>17</sup> See Appendix B for Interstate Filing Instructions

historical and projected costs into the seven following distinct expense categories:

- Facilities ..... Associated with land and buildings, etc.
- CA Related ..... Costs of individuals performing interpretive services
- Non-CA Relay Center ..... Other costs associated with the relay center including supervisory management, telecommunications expenses, etc.
- Indirect ..... Finance, human resources, legal, executive compensation, etc.
- Depreciation..... Annual depreciation on facilities and equipment
- Marketing ..... Advertising the provider’s service
- Other..... Expenses not directly associated with one of the other expense categories

The Administrator then combines each service’s data together and calculates an industry cost per minute based on each service’s definition of recoverable costs and Commission-approved operating margins.<sup>18</sup> For any cost categories that have had a meaningful change from the prior year, the Administrator will review the supporting appendix data for each provider to determine the cause and report the substantive change to the Commission.

#### IP Relay

*Due to the single provider offering service, cost information has been redacted from this report*

The Commission adopted a cost recovery methodology for IP Relay based on a price-cap like methodology, effective for the 2019-2020 fund year, beginning a new three-year rate cycle. The resulting 2019-2020 rate of \$1.67 per minute included an allowance for costs of outreach efforts necessary to reach consumers who are deafblind.<sup>19</sup> The rate also included several adjustments to the calculation to align IP

---

<sup>18</sup> Operating margin is calculated as the approved percentage of costs within the FCC-determined “Zone of Reasonableness” (10% for IP CTS, 12.35% for IP Relay, and a range from 7.75% to 12.35% for VRS). For estimating the fund requirement, the Administrator applied a 10% operating margin for VRS, roughly the mid-point of this range.

<sup>19</sup> To enable such outreach, the Bureau granted a limited waiver of the rule disallowing TRS Fund

Relay rate setting with recent Commission precedent and address gaps in the national outreach program. The Commission adjusted the rate to \$1.7146 for the 2020-2021 fund year.<sup>20</sup> The rate remained unchanged for the 2021-2022 fund year.

*Operating Margin.* To align the setting of an IP Relay compensation rate with recent Commission policy determinations on TRS compensation, the Commission replaced the allowed rate of return on capital investment with an allowed “operating margin.” In addition to recovering average industry expenses, this “operating margin” permits recovery of a designated percentage of average expenses. This percentage is ordered to be within the same zone of reasonableness established for VRS, a range between 7.6% and 12.35%. The Commission has designated an “operating margin” of 12.35% for use in making the IP Relay rate calculation.

*Research and Development.* The Commission also concluded in 2019 that the research and development costs described in T-Mobile’s 2019 waiver request are allowable expenses that may be recovered without the necessity of a waiver.

*Cost Averaging.* Also consistent with recent Commission policy determinations regarding other forms of TRS, in setting a new base compensation rate for IP Relay, the Commission relied on a cost calculation that averaged T-Mobile’s projected costs for 2020 with its historical costs reported for 2019.<sup>21</sup>

*Outreach to the Deafblind Community.* The Commission renewed for one year the partial waiver of the Commission’s prohibition on outreach cost recovery, which was initially granted in 2016, and renewed for years 2017 through 2020, to permit the recovery of costs for specific IP Relay outreach efforts to meet the TRS

---

compensation for IP Relay outreach costs. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, CG Docket Nos. 10-51 and 03-123, Order, 31 FCC Rcd 7246, 7250-52, paras. 13-20 (CGB 2016) (*2016 TRS Rate Order*).

<sup>20</sup> *2020 TRS Rate Order*, DA 20-692, Para 19.

<sup>21</sup> The Commission recently affirmed the use of this blended approach for setting VRS compensation rates, and it also followed this approach in setting interim compensation for IP CTS providers. *See 2017 VRS Rate Order*, 32 FCC Rcd at 5928-29, para. 69; *2018 IP CTS Modernization and Reform Order*, 33 FCC Rcd at 5813, para. 23. The Commission has found that using an average of projected costs for the calendar year in which a rate is established (in this case 2019) and historical costs for the preceding calendar year (in this case 2018) is a reasonably accurate predictor of actual costs incurred for the Fund Year. *2017 VRS Rate Order*, 32 FCC Rcd at 5928-29, para. 69.

needs of people who are deafblind.<sup>22</sup>

*Other Outreach Expenses.* The Commission also found that special circumstances warranted a limited waiver of the prohibition against compensation for IP Relay outreach costs. This waiver (1) will serve the public interest by enabling outreach to potential IP Relay users not currently being reached by the National Outreach Program; and (2) will not undermine the policy underlying the rule because T-Mobile, as the sole provider of IP Relay service, has little incentive to divert outreach funds to branded marketing.

*Indirect Overhead.* The Commission continued to deny T-Mobile's waiver request regarding indirect overhead costs. The Commission requires providers that have an extensive portfolio of non-TRS communication offerings to adopt a cost causative method of allocating indirect corporate overhead expenses among its offerings. Because T-Mobile has not demonstrated that it has adopted such an allocation method, the Commission denied T-Mobile's request to include indirect overhead costs in the cost of IP Relay.<sup>23</sup>

In compliance with the Commission's rules, T-Mobile is required to report historical and projected costs to the Administrator on an annual basis. As T-Mobile is the only remaining IP Relay service provider, reporting publicly on the T-Mobile cost data would reveal information considered to be confidential by T-Mobile.

In view of the relatively stable level of IP Relay demand, RL recommends that the IP Relay rate continue to include the allowance for deafblind outreach activities. Because the Commission has adopted the inclusion of an operating margin rather than a return on investment when determining rates for the other IP based services, RL also recommends continuing to supplement the IP Relay rate with an operating margin rather than a return on investment. In accordance with the Commission's rulings and with the addition of a 12.35% operating margin to the other allowable expenses, the Administrator calculated a compensation rate of \$1.8551 using the average of historical 2021 and projected 2022 expenses and

---

<sup>22</sup> See *2016 TRS Rate Order*, 31 FCC Rcd at 7251-52, para. 19; see also *2017 TRS Rate Order*, 32 FCC Rcd at 5145-46, paras. 11-13; *2018 TRS Rate Order*, 33 FCC Rcd at 6304, para. 11.

<sup>23</sup> *2020 TRS Rate Order*, DA 20-692, Para 15.

demand.

#### IP CTS

In accordance with the Commission's rules, IP CTS providers are required to supply two years of historical and two years of projected demand and expenses related to the provisioning of IP CTS. The Administrator received responses from six IP CTS providers. On July 7, 2018, the FCC authorized the use of and compensation for fully automated speech recognition (ASR) to produce captions for IP CTS calls.<sup>24</sup> Since this declaratory ruling, all six IP CTS providers have been certified to produce captions via ASR, two of which are ASR-only IP CTS providers.

Due to the differing costs associated with CA-based (CA) and ASR-only (ASR) captions, IP CTS providers are required to report costs for CA and ASR separately. When reviewing the CA and ASR expenses separately, the Administrator calculated an average cost of \$1.0898 and \$0.7132, respectively, for the 2021-2022 average. Analysis shows that approximately 75% of the CA cost is attributed to CA, indirect, and "other" cost expenses, while approximately 75% of the ASR cost is attributed to indirect and marketing. While these large percentages of the total cost include indirect for both captioning methods, indirect accounts for 50% of ASR costs and only 18% of CA costs. Results of the separate cost analysis are available in Exhibit 1-3.a and Exhibit 1-3.b.

While the RSDR responses require this separation of costs and demand, the Administrator calculates a rate for the IP CTS combined industry. Results of this analysis are available in Exhibit 1-3, detailing actual costs for calendar years 2017 through 2021, and projected costs for calendar years 2022 and 2023. This Exhibit demonstrates that the average cost of IP CTS continues to decrease. IP CTS expenses plus a 10% operating margin declined from \$1.3548 in 2017 to \$0.9593 in 2021. However, the projected 2022 and 2023 results show a slight increase in costs, with calculated costs resulting at \$1.0468 and \$1.0233, mostly associated with an increase

---

<sup>24</sup> FCC 18-79.

in indirect<sup>25</sup> and other<sup>26</sup> expenses.

Based on the number of reported minutes of service, IP CTS continues to be the most popular TRS service. The *IP CTS Modernization and Reform Order* adopted interim rates for the provision of IP CTS, effective from July 1, 2018, through June 30, 2019. For the period July 1, 2019, through June 30, 2020, the interim rate established by the Commission was \$1.58. In the *2020 IP CTS Report and Order*, the Commission retained its determination that the IP CTS rate should be based on average industry cost including an operating margin. The Commission continued its rate glide path by immediately lowering the \$1.58 rate to \$1.42 and establishing a rate of \$1.30 for the 2021-2022 fund year.

In the past, the Commission has raised concerns about the extent to which projected costs provide a reliable basis for setting TRS compensation rates. In the VRS context, the Commission has often resolved this issue by using a weighted average of providers' historical and projected per-minute costs to set compensation rates. The Commission recently found this blended approach to be a reasonably accurate predictor of actual VRS costs and followed this approach in setting interim IP CTS rates.<sup>27</sup>

Based on provider actual costs for 2021 and projected costs for the years 2022, plus a 10% operating margin and in accordance with the FCC's rules dictating recoverable costs for IP CTS, the average cost for IP CTS is approximately \$1.0030.

The reported actual costs continue to decline. The reported costs of the highest cost providers also continue to decline. The projected costs and demand, however, indicate an increase of the average cost, a result of an increase in indirect (18%), marketing (40%), and "other" (50%) expense categories. The increase in projected costs increases the value of the operating margin.

The Commission has directed the service providers to submit detailed

---

<sup>25</sup> Indirect expenses category includes: Finance, Accounting, Legal, Regulatory, Engineering, Research and Development, Operations Support, Human Resources, Billing, Contract Management, Risk Management and Other Corporate Overhead expenses.

<sup>26</sup> Other expenses category includes: Subcontractor, Software, and any additional costs not already reported within one of the other RSDR categories.

<sup>27</sup> FCC 18-79, Para. 23.

allocations of subcontractors' costs. Each provider used a different method for allocating subcontractor costs. Comparisons of these methods have been provided to the Commission. This information is proprietary and has not been included in this report.

The rate of \$1.30 adopted by the Commission for the 2021-2022 fund year is not only above the average provider cost of \$1.0030 but also is above the average provider CA only cost plus the operating margin of \$1.0898 for the 2021-2022 fund year. To estimate the funding requirement and contribution factors, the Administrator used a compensation rate of \$1.30 per minute.

VRS

On July 6, 2017, the Commission released a Report and Order, establishing the current VRS compensation rates and Tier structure and addressing allowable cost categories, capital cost recovery, and related compensation matters.<sup>28</sup> The current rates and tier structure are defined as:

Emergent.....	For 0.1 to 500,000 minutes .....	\$5.2900
Tier I.....	For 0.1 to 1,000,000 minutes.....	\$4.8200
Tier II.....	For 1,000,000.1 to 2,500,000 minutes .....	\$3.9700
Tier III .....	For over 2,500,000 minutes.....	\$2.6300

Although the Commission has adopted a four-year Tier and Rate plan, VRS providers are required to report historical and projected costs and demand to the Administrator on an annual basis. The Administrator analyzes the provider responses to calculate average costs per minute for the industry. Results of this analysis are available in Exhibit 1-4, detailing actual costs for calendar years 2017 through 2021, and projected costs for calendar years 2022 and 2023.

In accordance with the Commission's rules regarding recoverable VRS costs and including a 10% operating margin, the Administrator calculated an average cost of \$2.9755, an increase of 8.23% from the two-year historic average of \$2.7493. CA related costs are projected to increase by 14.68% between 2021 and 2022. This is attributed to increases in CA salaries and inconsistencies on projected occupancy

---

<sup>28</sup> FCC 17-86.

calculations. Additionally, indirect costs rose by 24.77% between 2021 and 2022, caused by increases in industry engineering and operations support.

If the Commission retains the current allowable cost categories and VRS rates and tiers for the 2022-2023 fund year, then the operating margin for the industry will be 13.73%, based on the projected demand and costs. While VRS costs are increasing, the Administrator notes that the current Tier III rate of \$2.63 is above the industry 2021-2022 average marginal costs.<sup>29</sup>

## Demand Projection Methodology

To estimate the annual funding requirement and propose a contribution factor, an estimate of the interstate funding requirement for each of the services is required. The fund requirement equals the service rates multiplied by the service demand reimbursed during the program year, which runs July through June. The Administrator has adjusted the demand levels of the rate year to reflect the two-month difference between the provision of service and the reimbursement for that service. Providers of analog services (TTY, STS, and CTS) are not required to submit demand projections.

In this report, historical demand was used to estimate the future demand for interstate analog services. Using the regression analysis functionality of Microsoft Office Excel, the Administrator projected demand for the 2022-2023 fund year using actual demand available to the Administrator at the time of forecasting.<sup>30</sup> For each of these services, the Administrator projected demand and an estimated funding requirement based on the proposed compensation rates for the funding year. This approach has historically provided reasonably accurate results for these services.

The Administrator has historically used the forecasts submitted by the providers for the IP based services. This approach has historically provided reasonably accurate results for these services. While the reported demand for services spiked dramatically above the projected demand for March 2020 and demand was higher than normal for the duration of the COVID pandemic, the Administrator notes

---

<sup>29</sup> Marginal Costs include costs attributed to CA, Non-CA Relay Center, and Other.

<sup>30</sup> January 2016 through January 2022 actual service minutes.



that demand has been trending to return to pre-COVID demand trends. As a result of the return to pre-COVID demand trends, for purposes of estimating the fund requirement and the contribution factor, the Administrator accepts the provider projected IP CTS and VRS demand as submitted.

The demand projections for IP Relay appeared higher than past trends. The Administrator implemented a minor decrease to the demand projection for estimating the funding requirement to reflect past demand trends.

## Funding Requirements

Collectively, anticipated expenditures for the six relay services total \$1,268,616,275. Historically, the Administrator has recommended that the TRS Fund include an additional component to protect the Interstate TRS program from running short of available funds before the end of the TRS Fund year. In its 2009 and 2010 Rate orders, the Commission accepted the Administrator's recommendation to include a surplus of one month's projected distributions to providers.<sup>31</sup> For the 2014-2015 funding year, the Administrator recommended that the budgetary reserve be increased to two months, and the Commission accepted the change. A two-month budgetary reserve totaling \$212,106,822 for anticipated provider distributions due to projected May and June 2023 service minutes amounts to \$121,244,282 for IP CTS and \$90,862,541 for all other services. The Administrator anticipates a total service requirement of \$1,480,723,097.

In addition to TRS services, the TRS fund supports the National Deaf Blind Equipment Distribution Program (NDBEDP). In its August 4, 2016, Order,<sup>32</sup> the Commission permanently established the NDBEDP to certify and provide reimbursement to entities in each state so that they can distribute specialized CPE to low-income individuals who are deafblind.<sup>33</sup> Funding for this program has been established at \$10,000,000 per year. As such, \$10,000,000 has been included in the

---

<sup>31</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CG Docket No. 03-123, 23 FCC Rcd 9976 (2008 Rate Order) at n.56.

<sup>32</sup> See FCC 16-101, adopted August 4, 2016, Rel. August 5, 2016.

<sup>33</sup> *Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, Section 105, Relay Services for Deaf-Blind Individuals*, Report and Order, CG Docket No. 10-210, Adopted April 4, 2011.

Interstate TRS fund requirement for the 2022-2023 fund year.

Allowances for ongoing TRS reforms, database administration, fund administration, data collection agent costs, TRS Fund Advisory Council expense, audits of service providers, an independent financial audit of the fund, bankruptcy representation, the development and implementation of a Payment Integrity Information Act (PIIA) audit plan approved by the Office of Management and Budget (OMB), and identity validation costs totaling \$22,889,979 are included as other TRS Fund administration costs.

The Administrator anticipates that the total fund requirement is approximately \$1,513,613,076. It is anticipated that there will be a surplus of approximately \$535 million on June 30, 2022, which is deducted from the funding requirement when determining the contribution factor. The Administrator estimates that the net fund requirement will be \$978,613,076.

## Contribution Base & Factor Calculation

For the July 2022 to June 2023 fund year, the Administrator used the carriers' estimated 2021 end-user revenues as the basis for calculating carriers' contribution calculations. The interstate contribution base has become smaller each year.<sup>34</sup> RL anticipates an 8.55% reduction in the interstate contribution base for the program year beginning July 1, 2022, for a contribution base of \$37,844,989,481. RL anticipates a decline in the combined intrastate and interstate contribution base of 9.26% from \$93,247,287,880 to \$84,611,973,314 for the program year 2022-2023.

The DCA also provides updates to the data reported by carriers throughout the program year to reflect a variety of changed contributor circumstances, such as gone out of business, no telecommunications revenues, bankruptcies, and mergers and acquisitions.

The contribution base changes from year to year as well as over the course of the program year. Changes to the contribution base reported to the Administrator by the DCA during the program year have reduced the available funding level by approximately \$2 million. This erosion of funding is one of the factors considered in

---

<sup>34</sup> See Exhibit 3 for Contribution Base History.

recommending a two-month budgetary reserve allowance; however, the erosion of funding has not been a specific item included in the net funding requirements.

The DCA provides the Administrator with the FCC Form 499-A carrier revenue information used to calculate the contribution factor and maintains the carrier database for all funds. Revisions to FCC Form 499-A revenue data are provided by the DCA to the Administrator and other program managers so that corrections may be made to carrier billing. Revisions may be telecommunications service provider initiated or may be the result of an audit. The first edition of the reported 2022 499-A submissions is provided to the Administrator on or about April 20<sup>th</sup>. Each subsequent month, the DCA will provide updated information including information received from contributors that did not file by April 1<sup>st</sup>. During the first several months of the program year, there are substantial adjustments to the contribution base derived from the first edition of the reported 2022 499-A submissions. The Administrator anticipates submitting an updated contribution factor recommendation to the Commission for consideration in response to the Public Notice regarding this submission.

Upon approval of the contribution factors by the Commission, the Administrator will promptly bill carriers for the 2022-2023 funding period which begins July 1, 2022. Annual contributions will be due within 30 days after their July invoice date. Carriers whose contributions are \$1,200 or more have the option to be invoiced in twelve equal monthly installments. Payment will be due four weeks after the issue date of the monthly invoice. RL has assigned each monthly contributor to one of three monthly invoice cycles and issues approximately one third of the monthly invoices on the first three Fridays of each month.

RL expects to begin issuing invoices for the 2022-2023 program year on or about Friday, July 15, 2022. Receipts associated with those invoices will begin to arrive in mid-August. This lag in the receipt of revenues is not currently recognized as significant because there has not been a material change in the yield of the contribution factor great enough to impact cash flow associated with the final billing cycles.

The total projected net funding requirement for the 2022-2023 funding year is estimated to be \$978,613,076. Based on the 2022-2023 demand projections and proposed rates contained herein, coupled with the anticipated calendar year 2021 revenue bases, the Administrator estimates that the contribution factors are 0.01125 for non-IP CTS TRS services and 0.00653 for IP CTS services.

## Program Administration

### Interstate TRS Fund Advisory Council Reports

Pursuant to section 64.604 of the Commission's rules, the Advisory Council (Council) offers recommendations to the Administrator regarding interstate TRS cost-recovery matters.<sup>35</sup> The Advisory Council includes non-paid volunteers from the hearing and speech disability community, TRS users (voice and text telephone), state regulators and relay administrators, interstate service providers, and TRS providers. Appendix C contains a listing of current Advisory Council members.

On October 1, 2021, the Advisory Council met via Zoom conference. The meeting included an extensive overview of developments at the FCC presented by Eliot Greenwald, Deputy Chief, Disability Rights Office (DRO) of the FCC and a discussion of the Health of the Fund by the Administrator, Rolka Loube. The Council members expressed interest in matters relating to the establishment of a deafblind subcommittee. Also of interest was the establishment of a subcommittee to consider and update the bylaws of the council. During the new business portion of the meeting, the Council established both new subcommittees. The Council also continued interest in the work of a subcommittee that, subject to non-disclosure agreements with the service providers, will have access to the service provider annual cost and demand submissions to the Administrator.

The method and sequence of conducting the spring 2022 meeting of the TRS Fund Advisory Council has been modified from the traditional practices in deference to the social distancing practices in place during the current health pandemic. On April 13, 2022, the Council conducted a virtual meeting via Zoom. The virtual meeting included an overview of developments at the FCC, presented by Eliot

---

<sup>35</sup> 47 CFR § 64.604 (c)(5)(iii)(H).

Greenwald, Deputy Chief, DRO and Michael Scott, an attorney in the DRO. An overview of the administrator's draft findings to be submitted to the FCC was presented by Robert Loube, Garrett McGrath, and Amanda Coby of Rolka Loube. The topics addressed included compensation rates, demand projections, and contribution factors based on the annual data collection from state programs and eligible service providers applicable to the fund year beginning July 1, 2022. The minutes of the October 2021 and the April 2022 meetings were not available in time for this submission but are anticipated to be available for submission to the Commission during the comment period on this Annual Report.

#### Fund Status Report

Included in Appendix E is a copy of the TRS Fund Status comparing the projected budgetary levels for the current program year with the actual results of operations for the period July 2021 through March 2022. This report is presented to the Advisory Council in monthly Health of the Fund calls to keep them informed as to the surplus or deficit that may be occurring that could impact the rates.

## Exhibits

1-1	TTY and STS data collected from states for the analog Interstate rate calculation
1-2	CTS data collected from states for the analog Interstate rate calculation
1-3	IP CTS cost trend data
1-3.a	IP CTS CA cost trend data
1-3.b	IP CTS ASR cost trend data
1-3.c	IP CTS actual and projected demand trends
1-4	VRS cost trend data
1-4.a	VRS actual and projected demand trends
1-5	IP Relay actual and projected demand trends
2	Proposed Interstate TRS Fund size and contribution factor for the 2022-2023 fund year
3	Interstate and Interstate plus Intrastate Contribution base

## Appendix

A	2021 State Annual Cost and Demand Filing Instructions
B	2021 Provider Annual Cost and Demand Filing Instructions
C	2021 Advisory Council and RL Staff
D	2021 Fall and Spring Advisory Council Meeting Minutes – will be submitted in May
E	2021 Fund Status Report
F	2021-2022 Rolka Loube Report – will be submitted in May





 GSA Contract Holder  
47QRAA18D00FA

Interstate TRS Fund  
Annual State Data Request

***Filing Instructions***



---

## 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 1.0 hour 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-PERMS, Washington, DC 20554, Paperwork Reduction Act Project (3060-0463). We will also accept your PRA comments if you send an e-mail to [PRA@fcc.gov](mailto: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 3060-0463.

**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.**

## Contents

Definitions .....	4
Introduction .....	4
Overview .....	4
Annual Filing Rules.....	4
Traditional Services.....	4
Annual Filing Forms .....	5
Preparation of Forms .....	5
Filing Schedule and Submission.....	6

## Definitions

Please see the table below for a list of acronyms and definition.

Acronym	Definition
FCC	Federal Communications Commission
TRS	Interstate Telecommunications Relay Service
MARS	Multistate Average Rate Structure
TTY/TT	Teletype/Text Telephone
STS	Speech-to-Speech
CTS	Captioned Telephone Service
RSDR	Relay Service Data Request

## Introduction

On November 19, 2007, the FCC released a Report and Order (FCC 07-186) adopting new cost recovery methodologies for the various forms of TRS. For TTY, STS, and CTS services, the Commission adopted the MARS Plan. One MARS rate is calculated for interstate TTY and STS services, and one MARS rate is calculated for interstate CTS service.

As administrator of the TRS Fund, Rolka Loube oversees the collection and analysis of cost and demand data. Rolka Loube has created a form and associated instructions for the submission of the annual filing data. If you have questions regarding these instructions, please email [TRSDataRequests@rolkaloube.com](mailto:TRSDataRequests@rolkaloube.com).

## Overview

The purpose of this document is to provide a complete detailed set of instructions to state TRS administrators to submit rate and minute data. Following these instructions, each state will submit accurate annual rate and minute data to Rolka Loube.

## Annual Filing Rules

In accordance with FCC 07-186, each state TRS Administrator is to provide rate and minute data for TTY, STS, and CTS service for the reporting period.

## Traditional Services

State TRS Administrators that held a contract to receive TTY, STS, and/or CTS services during the reporting period must complete the following worksheets: **Flat Rate Revenue**, **Per Minute Revenue**, **Add. Revenue Paid to Provider**.

---

## Flat Rate Costs

If a state TRS Administrator established a service contract to receive TTY, STS, and/or CTS at a flat rate (independent of the number of minutes serviced) during the reporting period, use the **Flat Rate Costs** worksheet to report the costs. Amounts provided should include only those revenues associated with provisioning TTY, STS, and/or CTS services. Additional costs associated with programs such as outreach, administration, or billing should be reported on the **Add. Costs Paid to Provider** worksheet and not in the reported flat rate amount. See [Flat Rate Costs](#) for instructions on completing this worksheet.

## Per Minute Costs

If a state TRS Administrator established a service contract to receive TTY, STS, and/or CTS at a per minute rate (dependent on the number of minutes serviced) during the reporting period, use the **Per Minute Costs** worksheet to report the costs. Amounts provided should include only those revenues associated with provisioning the TTY, STS, and/or CTS services. Additional costs associated with programs such as outreach, administration, or billing should be reported on the **Add. Costs Paid to Provider** worksheet and not in the reported per minute rate. See [Per Minute Costs](#) for instructions on completing this worksheet.

## Additional Costs Paid to Provider

If a state TRS Administrator paid funds during the reporting period for programs that support TTY, STS, and/or CTS in addition to those associated with provisioning the services, use the **Add. Revenue Paid to Provider** worksheet to report the revenue. See [Additional Costs Paid to Provider](#) for instructions on completing this worksheet.

## Annual Filing Forms

### Preparation of Forms

#### *Filing Information*

To complete the **Filing Information** worksheet, follow the steps below:

1. Select state or territory name for the jurisdiction.
2. Enter the preparer's name, contact email address, and contact telephone number.
3. Select the year for the filing period.
4. Enter the name and title of the senior officer attesting to the completion and accuracy of the filing.
5. Enter the signature and signature date of the senior officer.

#### *Flat Rate Costs*

To complete the **Flat Rate Costs** worksheet, follow the steps below:

1. Select the provider associated with the flat rate. *If the appropriate value is not available, email [TRSDataRequest@rolkaloube.com](mailto:TRSDataRequest@rolkaloube.com).*

2. For each of the services, indicate if the flat rate contract covers the provision of TTY, STS, and/or CTS service minutes.
3. Enter the start and end date associated with the flat rate contract.
4. Select Annual if the amount is for the entire contract period or Monthly if the amount reported is per each month of the contract period.
5. Enter the flat rate amount, rounding to the nearest dollar.
6. Enter the TTY, STS, and/or CTS conversation minutes for services received during the contract period.

### **Per Minute Costs**

To complete the **Per Minute Costs** worksheet, follow the steps below:

1. Select the provider associated with the per minute contract.
2. Select the service (TTY, STS, or CTS) covered by the per minute contract.
3. Enter the start and end date associated with the per minute contract.
4. Indicate whether the per minute rate applies to reported session minutes or conversation minutes.
5. Enter the per minute rate.
6. Enter the conversation and session minutes received during the contract period.

### **Additional Costs Paid to Provider**

To complete the **Add. Costs Paid to Provider** worksheet, follow the steps below:

1. Select the provider associated with the additional cost.
2. For each of the services, indicate if the additional costs cover the programs for TTY, STS, and/or CTS service.
3. Enter the start and end date associated with the additional costs contract.
4. Select Annual if the amount is for the entire contract period or Monthly if the amount reported is per each month of the contract period.
5. Enter the additional cost amount, rounding to the nearest dollar.
6. Select a program that best describes the revenue reported.  
If Other is selected, then enter a description of the program covered by the revenue.

## **Filing Schedule and Submission**

### **Submission Process**

Rolka Loube is using BOX for the secure transmission of files containing confidential cost and demand data. To submit a completed filing, visit [BOX.com](https://box.com) and log in with your BOX credentials. If you do not have credentials to BOX, please email [TRSDataRequests@rolkaloube.com](mailto:TRSDataRequests@rolkaloube.com). After logging into BOX, you will see a folder for Annual Filings and the option to upload files to this folder.

### ***Filing Schedule***

All forms must be submitted to Rolka Loube on or before February 21, 2022.

### ***Filing Name Convention***

All filing submissions must be named XX\_2021\_Annual\_V.xlsx where:

- XX is the two-character state/territory abbreviation
- V is the single digit version number starting at zero (0) and incrementing by one (1) for each replacement submission.



 GSA Contract Holder  
47QRAA18D00FA

Interstate TRS Fund  
Annual Provider Data Request

***Filing Instructions***

---

## **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 10.0 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 (3060-0463). 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 3060-0463.

**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.**



---

## Contents

Acronyms .....	4
Introduction .....	4
Overview .....	5
Annual Filing Rules .....	5
Traditional Services .....	5
IP-Based Services .....	6
Annual Filing Forms .....	13
Preparation of Forms .....	13
Filing Schedule and Submission .....	22

## Acronyms

Please see the table below for a list of acronyms and explanations.

Acronym	Definition
FCC	Federal Communications Commission
TRS	Interstate Telecommunications Relay Service
TTY	Teletype/Text Telephone
STS	Speech-to-Speech
CTS	Captioned Telephone Service
RSDR	Relay Service Data Request
VRS	Video Relay Service
IP CTS	IP Captioned Telephone Service
CA	Communications Assistant
ASR	Automatic Speech Recognition
URD	User Registration Database
CPE	Customer Premise Equipment
IRM	Information Rights Management

## Introduction

On November 19, 2007, the FCC 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 TRS Fund<sup>1</sup>.

As administrator of the TRS Fund, Rolka Loube oversees the collection and analysis of cost and demand data. Rolka Loube has created a form and associated instructions for the submission of the annual filing data. If you have questions regarding these instructions, please submit a ticket to the [Rolka Loube Provider Help Desk](#).

---

<sup>1</sup> The following Orders changed the mechanism for one or more of the services following the issuance of FCC 07-186: FCC 11-54, FCC 16-25, FCC 17-86, FCC 18-79, & FCC 20-132.

---

## Overview

The purpose of this document is to provide a complete detailed set of instructions to TRS providers. Following these instructions, each TRS provider will submit accurate annual cost and demand data to Rolka Loube that is consistent with the compensable cost categories.

## Annual Filing Rules

In accordance with 47 CFR § 64.604(c)(5)(iii)(D), TRS providers requesting reimbursement from the TRS Fund must submit historical, projected, and state-related information requested by the administrator to determine TRS Fund revenue requirements and payments.

### **Traditional Services**

Providers that held a contract to provide TTY, STS, and/or CTS services during the reporting period must complete the following worksheets: **Flat Rate Revenue**, **Per Minute Revenue**, **Add. Revenue Paid to Provider**.

#### **Flat Rate Revenue**

If a provider has established a service contract to provide TTY, STS, and/or CTS at a flat rate (independent of the number of minutes serviced) during the reporting period, use the **Flat Rate Revenue** worksheet to report the revenue. Amounts provided should include only those revenues associated with provisioning TTY, STS, and/or CTS services. Additional revenue associated with programs such as outreach, administration, or billing should be reported on the **Add. Revenue Paid to Provider** worksheet and not in the reported flat rate amount. See [Flat Rate Revenue](#) for instructions on completing this worksheet.

#### **Per Minute Revenue**

If a provider has established a service contract to provide TTY, STS, and/or CTS at a per minute rate (dependent on the number of minutes serviced) during the reporting period, use the **Per Minute Revenue** worksheet to report the revenue. Amounts provided should include only those revenues associated with provisioning the TTY, STS, and/or CTS services. Additional revenues associated with programs such as outreach, administration, or billing should be reported on the **Add. Revenue Paid to Provider** worksheet and not in the reported per minute rate. See [Per Minute Revenue](#) for instructions on completing this worksheet.

#### **Additional Revenue Paid to Provider**

If a provider received funds during the reporting period for programs that support TTY, STS, and/or CTS in addition to those associated with provisioning the services, use the **Add. Revenue Paid to Provider** worksheet to report the revenue. See [Additional Revenue Paid to Provider](#) for instructions on completing this worksheet.

#### **Costs Paid by Provider**

If a provider has contributed funds during the reporting period for incentives or services for which the state was not required to pay, use the **Costs Paid by Provider** worksheet to report the funds. See [Costs Paid By Provider](#) for instructions on completing this worksheet.

## IP-Based Services

For IP-based TRS providers, response to the Relay Service Data Request (RSDR) is required under 47 CFR § 64.604(c)(5)(D)(1).

### Demand

For all IP-based TRS services (for which the provider is certified), using the **Demand** worksheet, the provider must report two years of actual compensated demand and two years of projected demand. For IP CTS service providers, demand associated with CA-generated captions and ASR-generated captions must be reported separately. See [Demand](#) for instructions on completing this worksheet.

### Service Expenses

TRS providers must complete a worksheet for each service provisioned: **VRS Expenses, IP Relay Expenses, IP CTS CA Expenses, and/or IP CTS ASR Expenses.**

- Providers must report two years of actual and two years of projected expenses associated with provisioning the TRS service.
- For IP CTS service providers, costs/expenses associated with CA-generated captions and ASR-generated captions must be reported separately.

Descriptions of required expense categories/subcategories are provided in the following tables:

- A. Annual Recurring Fixed/Semi-Variable Expenses
- B. Annual Recurring Variable Expenses (Direct VRS Operation Expenses)
- C. Annual Administrative Expenses
- D. Annual Depreciation/Amortization Associated with Capital Investment
- E. Other Expenses
- F. Capital Investments

See [Expenses](#) for instructions on completing these worksheets.

Additional information is required in the Appendix section to support the expenses provided on these worksheets. See [Filing Appendix Instructions](#) for instructions to complete the Appendix data requirement.

#### A. Annual Recurring Fixed/Semi-Variable Expenses

Cost Subcategory		Description
1	Rent	Annual payments solely for land and/or buildings rented for the provision of the TRS service, including the rent for office space used by administrative employees.

Cost Subcategory		Description
2	Utilities	Allowable expenses associated with land and buildings used for the provision of the TRS service, 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 be included here along with allowable related E911 and numbering expenses. Please see appendix instructions for reporting total, allowable, and non-allowable E911 and numbering expenses.
3	Building Maintenance	Expenses for maintenance and repair used for the provision of the TRS service, including maintenance of office buildings.
4	Property Tax	Taxes paid on property owned and used for the provision of the TRS service.
5	Furniture	Lease or rental expenses associated with furnishings used for the provision of the TRS service.
6	Office Equipment	Lease or rental expenses associated with office equipment used for the provision of the TRS service.

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

Cost Subcategory		Description
1	Salaries & Benefits – Relay Center: CA/Interpreting staff	CA and interpreter 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. Include expenses associated with individual contract interpreters and/or CAs who are not employees. The FCC prohibits incentives paid to CAs for the number of calls or the number of minutes billed.
2	Salaries & Benefits – Relay Center: Management staff	Relay center managers & supervisor 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.
3	Salaries & Benefits – Relay Center: Relay Center staff	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

Cost Subcategory		Description
		by law, insurance plans (life, hospital, medical, dental, vision); and social security and other payroll taxes.
4	Telecommunication 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 repair, 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.
5	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 repair.

**C. Annual Administrative Expenses**

Cost Subcategory		Description
1	Finance/Accounting	Expenses incurred in providing accounting and financial services. <ul style="list-style-type: none"> <li>• Accounting services include payroll and disbursements, property accounting, capital recovery, regulatory accounting, tax accounting, auditing, capital and operating budget and control, and general accounting.</li> <li>• Financial services include banking operations, cash management, and benefit investment fund management, etc.</li> </ul>
2	Legal/Regulatory	Expenses incurred for legal and regulatory services. <ul style="list-style-type: none"> <li>• Legal services include conducting and coordinating litigation, providing guidance on regulatory and labor matters, court expenses, filing fees, cost of counsel, etc.</li> <li>• Regulatory services include preparing and presenting information for regulatory purposes, such as responding to this data request and the cost of registering customers in the URD.</li> </ul>
3	Engineering	Expenses incurred in the general day-to-day engineering operation of the TRS telecommunications plant and/or IP network.

Cost Subcategory		Description
4	Research and Development	Expenses incurred for research and development required to meet applicable non-waived mandatory minimum standards Please see appendix instructions for reporting total R&D expenses and R&D expenses above and beyond meeting mandatory minimum standards.
5	Operations Support	Expenses that ensure the sustainability of service including troubleshooting, customer service, and technical support.
6	Human Resources	Expenses incurred in performing personnel administration activities, including recruiting, hiring, forecasting, planning, training, scheduling, counseling employees, and reporting.
7	Billing	Administrative expenses of rating and providing billing information to interexchange and exchange carriers, if not recovered by other means.
8	Contract Management	Expenses of managing activities required by the provider contracts.
9	Risk Management	Management expenses associated with workers' 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. All costs over \$10,000 should be itemized. Indirect overhead costs are not reasonable costs of providing TRS Fund supported services. Appropriate overhead costs are those costs that are directly related to and directly support the provision of TRS Fund supported relay service. Indirect overhead costs may not be allocated to TRS Fund supported services by an entity that provides other services not supported by the TRS Fund based on the percentage of the entity's revenues that are derived from the provision of TRS.

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

Cost Subcategory		Description
1	Furniture & Fixtures	Depreciation expense on furniture and/or fixtures.

Cost Subcategory		Description
2	Telecommunication Expenses	Depreciation expense associated with capitalized expenses of telecommunication equipment including switching equipment, operator services equipment, cable and wire facilities, transmission equipment, and power equipment.
3	Leasehold	Amortization of leasehold improvements – improvements which become a permanent part of a building, like walls or carpeting.
4	Software	Amortization expenses associated with capitalized software.
5	Other Capitalized	Depreciation expense not accounted for in other categories.

**E. Other Expenses**

Cost Subcategory		Description
1	Marketing/Advertising	Expenses associated with promoting provided services and/or identifying the needs of users, excluding costs associated with providing user incentives.
2	Outreach	Expenses associated with educating the public on the TRS service.
3	Subcontractor	Third-party costs associated with a contract to provide IP-based TRS service, excluding costs associated with profit or tax allowances of the subcontractor. Please see appendix instructions for reporting and allocating subcontractor costs to the appropriate categories and subcategories. Subcontractor costs not properly allocated shall be treated as non-allowable costs.
4	License fees paid to a third party	Expenses associated with payments to a third-party for use of technology, software, and/or equipment.
5	License fees paid to an affiliate	Expenses associated with payments to an affiliate for use of technology, software, and/or equipment.
6	Software Expenses	Expenses related to in-house development/maintenance of software and/or license fees associated with commercial software as required to meet mandatory minimum standards. Please see appendix instructions for reporting total software expenses including software on off-the-shelf CPE and software expenses above and beyond meeting mandatory minimum standards.



Cost Subcategory		Description
7	Customer Premises Equipment Expenses	Expenses associated with hardware and software, including installation, maintenance, and testing <sup>2</sup> as well as expenses associated with software installed on proprietary CPE.
8	Other Expenses	Any expenses associated with the provisioning of the TRS service that has not been reported previously. Explanation of costs must be included within the appendix.

### F. Capital Investments

Cost Subcategory		Description
1	Furniture & Fixtures	Year-end net book value of capital investment on furniture and/or fixtures.
2	Telecommunication Expenses	Year-end net book value of capital investment associated with telecommunication equipment including switching equipment, operator services equipment, cable and wire facilities, transmission equipment, and power equipment.
3	Leasehold	Year-end net book value of capital investments for leasehold improvements – improvements which become a permanent part of a building, like walls or carpeting.
4	Software	Year-end net book value of capital investments associated with capitalized software.
5	Other Capitalized	Year-end net book value of capital investments not accounted for in other categories.

### Communications Assistant Stats

For all IP-based TRS services that require the use of a CA, the provider must report two years of actual and two years of projected values for the following categories:

- Average Monthly Full-Time CAs
- Average Monthly Part-Time CAs – Reported on full-time equivalent basis.
- Total CA Managers
- Total Non-CA Relay Staff

<sup>2</sup> Pursuant to FCC 17-86 para. 12

- Total Yearly Number of Available Interpreting Minutes
- Total Yearly Number of Session Minutes
- Total Yearly Number of Conversation Minutes
- Occupancy Percentage calculated as yearly total of session minutes divided by yearly total of available interpreting minutes.
- Utilization Percentage calculated as yearly total of conversation minutes divided by yearly total of session minutes.

See [CA Stats](#) for instructions to complete the data requirement.

---

## Annual Filing Forms

### Preparation of Forms

#### *Filing Security*

To ensure the security of the confidential cost and demand data, Rolka Loube has implemented IRM on the Annual Filing forms. IRM restricts the access of the form to individual email addresses and can be granted at read and write levels. If additional access is required to complete the filing, please submit an access request ticket to the [Rolka Loube Provider Help Desk](#).

#### *Filing Information*

To complete the **Filing Information** worksheet, follow the steps below:

1. Select provider name. *If the appropriate value is not available, submit a ticket to the [Rolka Loube Provider Help Desk](#).*
2. Enter the preparer's name, contact email address, and contact telephone number.
3. Select the year for the filing period.
4. Enter the name and title of the senior officer attesting to the completion and accuracy of the filing.
5. Enter the signature and signature date of the senior officer.

#### *Filing Notes*

To complete the **Filing Notes** worksheet, include the following information:

- A summary of any changes, activities, and/or improvements since the prior year filing, or that are planned for the upcoming program year, which caused or may cause substantial changes in cost and/or demand data.  
Examples include, but are not limited to, implementation of ASR; changes in the use of subcontractors; etc.
- The methodology used to determine the forecasted minutes for the projected years.
- Any characteristics unique to a particular service or changes in the relay services marketplace

Examples include, but are not limited to, addition or loss of a state contract; increases in volumes due to specific outreach program; decreases in call volume due to use of internet or other TRS technology or new, time saving technology; changes in volumes due to abnormal weather conditions; etc.

Failure to provide a sufficient explanation for a projected substantial change may result in the TRS Fund administrator or the Commission, or both, not giving credit, or only giving partial credit, for such change.

### ***Flat Rate Revenue***

To complete the **Flat Rate Revenue** worksheet, follow the steps below:

1. Select the jurisdiction associated with the flat rate.
2. For each of the services, indicate if the flat rate contract covers the provision of TTY, STS, and/or CTS service minutes.
3. Enter the start and end date associated with the flat rate contract.
4. Select Annual if the amount is for the entire contract period or Monthly if the amount reported is per each month of the contract period.
5. Enter the flat rate amount, rounding to the nearest dollar.
6. Enter the TTY, STS, and/or CTS conversation minutes for services provisioned during the contract period.

### ***Per Minute Revenue***

To complete the **Per Minute Revenue** worksheet, follow the steps below:

1. Select the jurisdiction associated with the per minute contract.
2. Select the service (TTY, STS, or CTS) covered by the per minute contract.
3. Enter the start and end date associated with the per minute contract.
4. Indicate whether the per minute rate applies to reported session minutes or conversation minutes.
5. Enter the per minute rate.
6. Enter the conversation and session minutes serviced during the contract period.

### ***Additional Revenue Paid to Provider***

To complete the **Add. Revenue Paid to Provider** worksheet, follow the steps below:

1. Select the jurisdiction associated with the additional revenue.
2. For each of the services, indicate if the additional revenue covers the programs for TTY, STS, and/or CTS service.
3. Enter the start and end date associated with the additional revenue's contract.
4. Select Annual if the amount is for the entire contract period or Monthly if the amount reported is per each month of the contract period.
5. Enter the additional revenue amount, rounding to the nearest dollar.
6. Select a program that best describes the revenue reported.
  - a. If Other is selected, enter a description of the program covered by the revenue.

### ***Costs Paid By Provider***

To complete the **Costs Paid by Provider** worksheet, follow the steps below:

---

1. Select the jurisdiction associated with the cost.
2. For each of the services, indicate if the cost covers the programs for TTY, STS, and/or CTS service.
3. Enter the start and end date associated with the cost
4. Select Annual if the amount is for the entire contract period or Monthly if the amount reported is per each month of the contract period.
5. Enter the cost amount, rounding to the nearest dollar.
6. Enter a description of the cost.

### ***Demand***

To complete the **Demand** worksheet, enter the actual and projected monthly demand minutes for each service provided during the years indicated.

### ***Expenses***

To complete the service **Expenses** worksheets, for each service provided, supply actual and projected expenses during the years indicated. For descriptions of expense categories/subcategories, see the [Service Expenses](#) section.

### ***CA Stats***

To complete the **CA Stats** worksheet, for each service provided, enter two years of actual and two years projected data for each of the following categories:

- Average Monthly Full-Time CAs
- Average Monthly Part-Time CAs – Reported on full-time equivalent basis.
- Total CA Managers
- Total Non-CA Relay Staff
- Total Yearly Number of Available Interpreting Minutes
- Total Yearly Number of Session Minutes
- Total Yearly Number of Conversation Minutes
- Provider calculated Occupancy Percentage
- Provider calculated Utilization Percentage

### Filing Appendix Instructions

Data may be entered on the worksheet, or a document may be embedded in the worksheet. Additional worksheets may be added as needed. For each expense category, include a worksheet that documents all allocations. All relationships and equations/formulas in the worksheets should be active. Equations/formulas must not reference links to external documents.

To assist with reviewing the required appendix data, please provide the worksheet name/file name next to the description of each required appendix component on the **Appendix Instruction** worksheet. The required data is described in the following tables.

A. Recurring Fixed/Semi-Variable Expenses	
1	<p>For expenses that are provisioned jointly with the expenses for other telecommunications relay services, provide the following:</p> <ul style="list-style-type: none"> <li>• Total company expenses</li> <li>• Description of how the total expenses are allocated among the TRS services and between TRS and non-TRS services.</li> <li>• Percent allocation for each service</li> </ul>
2	<p>Separately identify allowable and non-allowable<sup>3</sup> costs associated with E911 and numbering for IP-based TRS for each of the following categories:</p> <ul style="list-style-type: none"> <li>• Ensuring that database information is properly and timely updated and maintained</li> <li>• Processing and transmitting calls made to ten-digit numbers<sup>4</sup></li> <li>• Routing emergency calls to an appropriate Public Safety Answering Point</li> <li>• Other implementation-related tasks directly related to facilitating ten-digit numbering and emergency call handling</li> <li>• Consumer outreach and education related to the requirements and services<sup>5</sup></li> <li>• Any costs associated with obtaining numbers</li> </ul>

B. Recurring Variable Expenses (Direct TRS Operation Expenses)	
1	<p>Provide, by call center, job descriptions/titles and compensation including salaries and benefits and average number of staff within the categories below. The schedule should tie to the actual and projected amounts reported.</p>

<sup>3</sup> See FCC 08-275 paras. 48-56 and 08-151 para. 100 for allowable and non-allowable E911 and numbering costs

<sup>4</sup> Assigned pursuant to Order FCC 08-151 para. 100

<sup>5</sup> Pursuant to Order FCC 08-151 para. 100

B. Recurring Variable Expenses (Direct TRS Operation Expenses)	
	<ul style="list-style-type: none"> <li>• CA and/or interpreter staff</li> <li>• Relay center management and/or supervisors</li> <li>• Relay center staff</li> </ul>
2	<p>Provide expenses exceeding \$10,000 including vendor, description of goods/services, and expense amounts for the following categories:</p> <ul style="list-style-type: none"> <li>• Telecommunication expenses</li> <li>• Relay center expenses</li> </ul>

C. Administrative Expenses	
1	<p>Provide job descriptions/titles and compensation including salaries and benefits and average number of staff within the following categories:</p> <ul style="list-style-type: none"> <li>• Finance/Accounting</li> <li>• Legal/Regulatory</li> <li>• Engineering</li> <li>• Research and development – broken down by platform, software, and CPE; research and development expenses required to meet applicable non-waived mandatory minimum standards and expenses above and beyond meeting mandatory minimum standards shall be broken down into separate amounts.</li> <li>• Operations Support</li> <li>• Human Resources</li> <li>• Billing</li> <li>• Contract management</li> <li>• Other corporate overhead</li> </ul>
2	<p>Provide a schedule of expenses exceeding \$10,000 including vendor, description of goods/services, and expense amounts for the following categories:</p> <ul style="list-style-type: none"> <li>• Finance/Accounting</li> <li>• Legal/Regulatory</li> <li>• Research and Development – broken down by platform, software, and CPE; research and development expenses required to meet applicable non-waived mandatory minimum standards and expenses above and beyond meeting mandatory minimum standards shall be broken down into separate amounts.</li> </ul>

C. Administrative Expenses	
	<ul style="list-style-type: none"> <li>• Operations Support</li> <li>• Human Resources</li> <li>• Contract Management</li> <li>• Other Corporate Overhead</li> </ul>
3	Describe engineering activities.
4	Describe all TRS related research and development projects, and to the extent applicable, explain how they relate to meeting the mandatory minimum standards.
5	Provide other expenses incurred in rating and providing billing information to exchange and interexchange carriers if not recovered by other means.
6	Provide a list of officers, senior management, and directors. For individuals listed:
a	Provide a schedule that shows how their compensation has been assigned between TRS and non-TRS services. For TRS services, provide schedule that shows how their compensation has been assigned between Interstate and Intrastate TRS. For interstate Fund supported services, identify separately expenses assigned to each service.
b	Indicate if their compensation has been included in any other cost category/subcategory.

D. Depreciation Associated with Capital Investment	
1	Provide the depreciation method and period applied.
2	Explain departures from traditional depreciation methods.
3	Provide a schedule that reports depreciable life, depreciation method, and depreciation expenses by cost subcategory.

E. Other TRS Expenses	
1	Provide job descriptions/titles and compensation including salaries and benefits and average number of staff within the following categories:
	<ul style="list-style-type: none"> <li>• Marketing/Advertising</li> <li>• Outreach</li> <li>• Customer Premises Equipment – sales, installation, and maintenance employees</li> </ul>



E. Other TRS Expenses	
2	<p>For expenses exceeding \$10,000, provide a vendor, description of goods/services, and expense amounts for the following categories:</p> <ul style="list-style-type: none"> <li>• Marketing/Advertisement</li> <li>• Outreach</li> <li>• Subcontractor</li> </ul>
3	<p>Provide a copy of each subcontractor contract and include contract termination dates, billing rates and billing units, and an allocation of subcontractor expenses by RSDR expense categories and subcategories. Include all data that supports the allocation of subcontractor expenses.</p>
4	<p>Provide a list of items purchased and outline billing rates and billing units for the following categories:</p> <ul style="list-style-type: none"> <li>• License fees paid to a third-party</li> <li>• License fees paid to an affiliate</li> </ul>
5	<p>Provide the number of CPE sold, produced, and installed.</p>
6	<p>Provide the costs of CPE provided to consumers. Provide a schedule that breaks out the expenses among its component parts.</p>
7	<p>Provide a schedule of software expenses associated with CPE. Identify separately software expenses related to proprietary CPE and off-the-shelf CPE. Software expenses required to meet mandatory minimum standards and software expenses above and beyond meeting mandatory minimum standards shall be broken down into separate amounts.</p>
8	<p>Provide a schedule identifying and describing any expenses not previously reported in another category.</p>

F. Capital Investments	
1	<p>Provide an account of all capital equipment purchased in order to provide each form of TRS.</p> <p>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.</p>
a	<p>Itemize investments by:</p> <ul style="list-style-type: none"> <li>• Form of TRS</li> </ul>

F. Capital Investments	
	<ul style="list-style-type: none"> <li>• Equipment class</li> <li>• Gross book values</li> <li>• Accumulated depreciation</li> <li>• Net book values</li> </ul> <p>For VRS equipment, identify:</p> <ul style="list-style-type: none"> <li>• Investments used by communications assistants and interpreters to interact with end-users</li> <li>• Equipment used to monitor and supervise call centers</li> </ul>
	<p>b 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.</p>
2	<p>Provide an account of all capitalized expenses associated with software installed on off-the-shelf CPE and capitalized expenses associated with software installed on proprietary CPE shall be broken down into separate amounts. Capitalized expenses associated with software installed on CPE required to meet mandatory minimum standards and capitalized expenses associated with software installed on CPE above and beyond meeting mandatory minimum standards shall be broken down into separate amounts.</p>

G. Financial Data	
<p>This information should be supplied at the provider level rather than for each individual service.</p>	
1	<p>Provide the corporate comparative income statement and balance sheet for the provider for the prior two years of actual expenses</p>
2	<p>Provide a supporting schedule that ties to the income statement/balance sheet that contains a column for each TRS service including 'Other' (for non-TRS service amounts) and a row for each expense categories/subcategories included in the RSDR. For expense included in the 'Other' column, provide an explanation of the services provided.</p>
3	<p>Provide the applicable state corporate income tax rates for each state where the provider provides TRS service. If any states do not have a corporate income tax, indicate that the rate does not exist</p>
4	<p>Provide a list of all debt instruments, including notes, bonds, loans, commercial paper and similar financial obligations</p>
5	<p>For each listed debt instrument, provide the following information:</p>

	<ul style="list-style-type: none"> <li>• Balance as of the end of the filing year</li> <li>• Projected balance as of the end of the next year</li> <li>• Interest rate</li> <li>• Prior two years of actual interest paid</li> <li>• Two years of projected interest payments</li> <li>• Prior two years of actual principal payments</li> <li>• Two years of projected principal payments</li> <li>• Maturity date</li> <li>• Explanations of any covenants associated with the debt instrument.</li> <li>• Metrics associated with the covenant, for example, an interest coverage ratio of 3</li> <li>• Performance regarding the metrics for the filing year, for example, in the filing year, the actual interest coverage ratio was 4.3</li> </ul>
6	Provide any lead-lag study or any other study that would support a working capital requirement performed by or for the provider.

## **Filing Schedule and Submission**

### ***Submission Process***

Rolka Loube is using BOX for the secure transmission of files containing confidential cost and demand data. To submit a completed filing, visit [BOX.com](https://box.com) and log in with your BOX credentials. If you do not have credentials to BOX, please submit a ticket to the [Rolka Loube Provider Help Desk](#). After logging into BOX, you will see a folder for Annual Filings and the option to upload files to this folder.

### ***Filing Schedule***

All forms must be submitted to Rolka Loube on or before February 21, 2022. Non-compliance with the deadline may be considered a violation of 47 CFR § 64.604(c)(5)(D)(1).

### ***Filing Name Convention***

All filing submissions must be named 800XXX\_2021\_Annual\_V.xlsx where:

- 800XXX is the six-digit provider identifier.
- V is the single digit version number starting at zero (0) and incrementing by one (1) for each replacement submission.

# Appendix C

TRF Fund Advisory Council (As of April 2022 Meeting)									
Office			Officer						
#	Representing	Seat #	Name	Term	Title	Employer/Organization	Address	Phone	Email Address
1	Deaf and Hard of Hearing Community	1	Al Sonnenstrahl	Mar-13	Retired	Deaf Seniors of America	10910 Brewer House Road Rockville, MD 20852	(555) 555-5555	alsonny@icloud.com
2		2	Shannon Smith Vice Chair	May-15	Director of Accessibility & Human Resources	Teltex	1081 West Innovation Drive Kearney, MO 64060	(816) 479-0424 (VP) (816) 628-1949 (TTY) (816) 501-8478 (M)	shannon@teltex.com
3	Hearing/Speech Disability Community	1	Andrew Fitzenrider	Sep-19		City of Seattle	13520 Linden Ave North #221 Seattle, WA 98133	(260) 243-9678	ajfitzenri@comcast.net
4	Deaf Blind Community	2	Bryen Yunashko	Oct-18	CEO	Access 256 Productions, LLC			hello@bryen.com
5	TRS Users	1	Ron Bibler	Oct-07	CEO	Bibler Financial Group	518 Deer Drive Great Falls, MT 59404	(406) 727-7851	ron@biblefinancial.com
6		2	Zainab Alkebsi, Esq Chair	May-16	Policy Counsel	Law and Advocacy Center National Association of the Deaf	8630 Fenton Street, Suite 820, Silver Spring, MD 20910	(301) 563-9111	zainab.alkebsi@nad.org
7	State Representatives	1	Andrew Giles Fay	Apr-21	Commissioner	Florida Public Service Commission	2540 Shumard Oak Blvd. Tallahassee, FL 32399	(850) 413-6046	afay@psc.state.fl.us
8		2	Tim Schram	Aug-11	Commissioner	Nebraska Public Service Commission	300 The Atrium 1200 N Street Lincoln, NE 68508	(402) 471-0218	tim.schram@nebraska.gov
9	State Regulatory Relay Administrators	1	Steve Peck	Jul-15	TRS Program Manager	Department of Social Human Services/Office of the Deaf and Hard of Hearing	44540 10th Ave. SE Lacey, WA 98503	(360) 339-7762	steven.peck@dshs.wa.gov
10		2	Holly Bise	May-19	State Relay Administrator	Colorado	1560 Broadway, Suite 250 Denver, CO 80202	(303) 894-2024	holly.bise@state.co.us
11	Contributors	1	Phillip Hupf	Sep-12	Senior Analyst	Hamilton Telephone	1001 Twelfth Street Aurora, NE 68818	(402) 694-5101	phillip.hupf@hamiltonrelay.com
12		2	Linda Vandeloop Secretary	Apr-16	Ass't VP, Fed Regulatory	AT&T	1120 20th Street N.W. 10th Floor Washington DC 20036	(202) 457-3033	lv8571@att.com linda.vandeloop@att.com
13	Interstate TRS Providers	1	Jeff Rosen, Esq	Apr-14	General Counsel	Convo Communications, LLC	Capital of TX Hwy Suite 350 Austin, TX 78704	(240) 406-7238	jeff@convo.com
14		2	Mark Tauscher	Jan-10	Mgr Business Development	T-Mobile	Phoenix, AZ	(623) 207-6356 FAX (913) 523-1136	mark.a.tauscher@t-mobile.com

Rolka Loube			
4050 Crums Mill Road, Suite 303, Harrisburg PA 17112			
Name	Title	Phone Number	Email Address
David Rolka	President/CEO	(717) 303-3602	drolka@rolkaloube.com
Robert Loube	Vice President	(240) 393-0259	rloube@rolkaloube.com
Mary Beth Osborne	Chief Legal Counsel		mbosborne@rolkaloube.com
Sean Bull	Chief Operations Officer		sbull@rolkaloube.com
Danielle Hulock	Chief Financial Officer	(717) 303-3581	dhulock@rolkaloube.com
Kyle Dagan	Chief Information Security Officer	(717) 226-5167	kdagan@rolkaloube.com
John McGrath	Chief Strategy Officer	(717) 303-3618	jmcgrath@rolkaloube.com
Garrett McGrath	TRS Distribution Supervisor		gmcgrath@rolkaloube.com
Amanda Coby	Senior Data/Business Analyst		acoby@rolkaloube.com
Joy McGrath	Meeting Logistics Coordinator	(717) 303-3593	jmmcgrath@rolkaloube.com

# Appendix E TRS Fund Status Report

## TRS Fund Status Report

Through March 2022

TRS Fund Status Report													
Through March 2022													
	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Program Year End
<b>July 21 - June 22 Month End Projections</b>													
Prior Balance	\$ 468,086,021.92	\$ 433,836,022.00	\$ 399,586,022.09	\$ 365,336,022.17	\$ 331,086,022.25	\$ 296,836,022.34	\$ 262,586,022.42	\$ 228,336,022.50	\$ 194,086,022.59	\$ 159,836,022.67	\$ 125,586,022.75	\$ 91,336,022.84	
Contributions	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 110,389,504.08	\$ 1,792,760,070.92
Payments	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (144,639,504.00)	\$ (1,735,674,048.00)
Balance	\$ 433,836,022.00	\$ 399,586,022.09	\$ 365,336,022.17	\$ 331,086,022.25	\$ 296,836,022.34	\$ 262,586,022.42	\$ 228,336,022.50	\$ 194,086,022.59	\$ 159,836,022.67	\$ 125,586,022.75	\$ 91,336,022.84	\$ 57,086,022.92	\$ 57,086,022.92
<b>July 21 - June 22 Month End Actuals</b>													
Prior Balance	\$ 468,086,021.92	\$ 478,877,566.09	\$ 485,687,053.13	\$ 495,348,502.91	\$ 510,660,862.45	\$ 498,772,057.33	\$ 537,145,887.71	\$ 545,055,087.35	\$ 548,740,557.96	\$ 550,032,329.06	\$ 545,072,329.06	\$ 544,072,329.06	
Contributions	\$ 120,207,813.93	\$ 118,322,345.15	\$ 114,420,573.92	\$ 122,103,995.86	\$ 93,329,881.27	\$ 125,118,737.78	\$ 103,476,928.54	\$ 109,620,582.51	\$ 115,442,945.38	\$ 94,225,000.00	\$ 106,000,000.00	\$ 103,000,000.00	\$ 1,793,354,826.26
Payments	\$ (109,416,269.76)	\$ (111,512,858.11)	\$ (104,727,954.82)	\$ (106,791,636.32)	\$ (105,218,686.39)	\$ (86,744,907.40)	\$ (95,547,514.59)	\$ (105,934,396.39)	\$ (114,098,986.81)	\$ (99,185,000.00)	\$ (107,000,000.00)	\$ (112,000,000.00)	\$ (1,258,178,210.59)
Refunds			\$ (31,169.32)				\$ (20,214.31)	\$ (715.51)	\$ (52,187.47)				\$ (104,286.61)
Balance	\$ 478,877,566.09	\$ 485,687,053.13	\$ 495,348,502.91	\$ 510,660,862.45	\$ 498,772,057.33	\$ 537,145,887.71	\$ 545,055,087.35	\$ 548,740,557.96	\$ 550,032,329.06	\$ 545,072,329.06	\$ 544,072,329.06	\$ 535,072,329.06	\$ 535,072,329.06
<b>Month End Accruals</b>													
<b>TRS Services</b>													
IP Relay	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
IP CTS	\$ (353.57)	\$ (1,136.44)	\$ (23.71)	\$ 1,479.74	\$ (39.08)	\$ (3,105.70)	\$ 63.05	\$ 3,096.86	\$ (7,688.72)	\$ (185.90)			
VRS	\$ (2,714,690.98)	\$ 442,366.75	\$ (6,709.78)	\$ (11,440.91)	\$ (3,960.63)	\$ (3,796.02)	\$ (3,207.77)	\$ (4,304.42)	\$ (5,582.16)	\$ 1,934.78			
<b>NDBEDP</b>													
PY 19-20	\$ (9,000,176.85)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
PY 20-21	\$ (3,990,489.36)	\$ 298,619.05	\$ 427,346.47	\$ 1,845,119.45	\$ 352,885.49	\$ 3,348.23	\$ 318,238.75	\$ -	\$ -	\$ 15,144.23			
PY 21-22	\$ (10,000,000.00)	\$ -	\$ 46,667.00	\$ 103,305.55	\$ 101,386.30	\$ 1,146,265.99	\$ 920,818.46	\$ 59,248.74	\$ 506,293.15	\$ 1,158,201.93			
<b>Month End Variances</b>													
Revenue	\$ 9,818,309.85	\$ 7,932,841.07	\$ 4,031,069.84	\$ 11,714,491.78	\$ (17,059,622.81)	\$ 14,729,233.70	\$ (6,912,575.54)	\$ (768,921.57)	\$ 5,053,441.30	\$ (16,164,504.08)	\$ (4,389,504.08)	\$ (7,389,504.08)	
Expense	\$ (35,223,234.24)	\$ (33,126,645.89)	\$ (39,911,549.18)	\$ (37,847,867.68)	\$ (39,420,817.61)	\$ (57,894,596.60)	\$ (49,091,989.41)	\$ (38,705,107.61)	\$ (30,540,517.19)	\$ (45,454,504.00)	\$ (37,639,504.00)	\$ (32,639,504.00)	
Balance	\$ 45,041,544.09	\$ 41,059,486.96	\$ 43,942,619.02	\$ 49,562,359.46	\$ 22,361,194.80	\$ 72,623,830.30	\$ 42,179,413.87	\$ 37,936,186.04	\$ 35,593,958.49	\$ 29,289,999.92	\$ 33,249,999.92	\$ 25,249,999.92	

Actual
Estimates

**Exhibit 1-1**

TTY Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 1.2095	144,078.0			\$ 174,256.18
\$ 1.3500	329,425.0	951,407.0	S	\$ 1,284,399.45
\$ 1.3500	77,269.0	153,930.0	S	\$ 207,805.50
\$ 1.3900	30,002.0	66,294.0	S	\$ 92,148.66
\$ 1.4200	20,243.1	49,601.8	C	\$ 28,745.16
\$ 1.5300	59,970.0	134,888.0	S	\$ 206,378.64
\$ 1.5500	4,789.0	11,508.0	C	\$ 7,422.95
\$ 1.6000	3,401.0	8,286.0	S	\$ 13,257.60
\$ 1.6364	16,385.5			\$ 26,812.42
\$ 1.6500	11,846.0	33,856.0	S	\$ 55,862.40
\$ 1.7500	6,850.0	27,402.0	S	\$ 47,953.50
\$ 1.8500	36,253.2	66,232.6	S	\$ 122,530.29
\$ 1.8800	6,266.0	18,381.0	S	\$ 34,556.28
\$ 1.8800	22,934.0	82,174.0	C	\$ 43,115.92
\$ 1.9000	50,184.3	99,918.7	S	\$ 189,845.47
\$ 1.9300	3,797.0	10,125.0	C	\$ 7,328.21
\$ 1.9700	33,880.0	72,825.1	S	\$ 143,465.49
\$ 2.0000	4,634.6	13,662.0	S	\$ 27,323.96
\$ 2.0800	1,048.1	4,931.3	S	\$ 10,257.06
\$ 2.0800	22,198.0	53,611.0	C	\$ 46,171.84
\$ 2.1300	31,493.2	77,006.6	S	\$ 164,024.14
\$ 2.1500	387,725.0	918,687.0	C	\$ 833,608.75
\$ 2.1600	37,121.9	47,013.9	C	\$ 80,183.39
\$ 2.1900	25,176.0	44,414.0	S	\$ 97,266.66
\$ 2.2000	10,091.2	20,425.5	S	\$ 44,935.99
\$ 2.2000	4,744.3	12,034.4	S	\$ 26,475.75
\$ 2.2278	45,662.0			\$ 101,724.24
\$ 2.2400	2,772.3	4,593.8	S	\$ 10,290.04
\$ 2.2500	47,854.0	91,117.0	S	\$ 205,013.25
\$ 2.3000	12,436.2	24,775.6	S	\$ 56,983.90
\$ 2.3000	8,251.0	20,544.7	S	\$ 47,252.74
\$ 2.3200	38,339.0	87,952.0	S	\$ 204,048.64
\$ 2.3280	94,807.2	203,244.0	S	\$ 473,152.10
\$ 2.3700	51,107.0	76,535.0	S	\$ 181,387.95
\$ 2.5500	68,931.5	185,490.0	S	\$ 472,999.50
\$ 2.5800	6,774.0	31,740.0	C	\$ 17,476.92
\$ 2.6000	35,251.0	44,398.4	C	\$ 91,652.70
\$ 2.6500	20,199.0	50,429.0	C	\$ 53,527.35
\$ 2.6800	12,364.0	43,017.0	C	\$ 33,135.52
\$ 2.7300	31,115.0	74,862.0	S	\$ 204,373.26

STS Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 1.2095	4,253.0			\$ 5,143.82
\$ 1.3500	15,009.0	24,136.0	S	\$ 32,583.60
\$ 1.3500	2,682.0	4,672.0	S	\$ 6,307.20
\$ 1.3900	3,588.0	5,131.0	S	\$ 7,132.09
\$ 1.4200	2,439.0	5,899.0	C	\$ 3,463.38
\$ 1.5300	1,333.0	2,535.0	S	\$ 3,878.55
\$ 1.6000	156.0	554.0	S	\$ 886.40
\$ 1.6364	41.3			\$ 67.58
\$ 1.6500	31.0	117.0	S	\$ 193.05
\$ 1.7500	-	10.0	S	\$ 17.50
\$ 1.8500	10.6	79.1	S	\$ 146.37
\$ 1.8800	336.0	450.0	S	\$ 846.00
\$ 1.8800	109.0	213.0	C	\$ 204.92
\$ 1.9000	1,552.4	3,184.6	S	\$ 6,050.65
\$ 1.9300	10.0	27.0	C	\$ 19.30
\$ 1.9700	2,831.5	3,754.5	S	\$ 7,396.37
\$ 2.0000	17.2	752.2	S	\$ 1,504.48
\$ 2.0800	174.3	296.6	S	\$ 616.87
\$ 2.0800	1,826.0	3,307.0	C	\$ 3,798.08
\$ 2.1300	3,810.3	5,045.2	S	\$ 10,746.32
\$ 2.1500	13,680.0	36,346.0	C	\$ 29,412.00
\$ 2.1600	1,154.7	2,443.0	C	\$ 2,494.04
\$ 2.1900	7,087.0	9,852.0	S	\$ 21,575.88
\$ 2.2000	37.3	73.6	S	\$ 161.94
\$ 2.2000	2,281.7	3,517.2	S	\$ 7,737.73
\$ 2.2278	438.0			\$ 975.76
\$ 2.2400	-	2.4	S	\$ 5.35
\$ 2.2500	126.0	250.0	S	\$ 562.50
\$ 2.3000	3.1	28.7	S	\$ 65.99
\$ 2.3000	280.5	502.1	S	\$ 1,154.72
\$ 2.3200	77.0	395.0	S	\$ 916.40
\$ 2.3280	136.2	329.8	S	\$ 767.77
\$ 2.3700	23,653.0	28,322.0	S	\$ 67,123.14
\$ 2.5500	40,144.1	57,500.6	S	\$ 146,626.48
\$ 2.5800	30.0	87.0	C	\$ 77.40
\$ 2.6000	604.9	1,348.4	C	\$ 1,572.66
\$ 2.6500	4.0	66.0	C	\$ 10.60
\$ 2.6800	30.0	64.0	C	\$ 80.40
\$ 2.7300	1,644.0	2,831.0	S	\$ 7,728.63
\$ 2.7500	1,690.0	2,274.0	S	\$ 6,253.50

TTY + STS Combined	
Conversation Minutes	Revenue
3,807.0	\$ 7,347.51
4,789.0	\$ 7,422.95
3,555.0	\$ 9,918.45
2,772.3	\$ 10,295.40
1,222.4	\$ 10,873.93
3,557.0	\$ 14,144.00
6,804.0	\$ 17,554.32
1,325.0	\$ 20,100.00
16,426.8	\$ 26,880.00
22.0	\$ 27,600.00
8,889.0	\$ 27,644.79
4,651.8	\$ 28,828.44
8,261.9	\$ 30,982.05
8,135.0	\$ 31,563.80
22,682.1	\$ 32,208.54
12,394.0	\$ 33,215.92
7,026.0	\$ 34,213.48
6,602.0	\$ 35,402.28
10,523.7	\$ 35,675.34
4,867.0	\$ 42,300.00
15,101.0	\$ 42,886.73
23,043.0	\$ 43,320.84
10,128.5	\$ 45,097.93
2,753.9	\$ 47,000.00
6,850.0	\$ 47,971.00
8,531.5	\$ 48,407.46
24,024.0	\$ 49,969.92
20,203.0	\$ 53,537.95
3,506.0	\$ 54,000.00
11,877.0	\$ 56,055.45
1,844.0	\$ 57,000.00
12,439.3	\$ 57,049.89
15,841.0	\$ 72,600.00
26,244.0	\$ 75,582.72
8,210.0	\$ 82,500.00
38,276.6	\$ 82,677.43
28,587.0	\$ 83,474.04
23,338.2	\$ 84,951.01
35,855.9	\$ 93,225.37
33,590.0	\$ 99,280.75

TRS contracts were paid independent of minutes. Rates presented are implicit.





## Exhibit 1-2

CTS Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 1.6300	68,118.5	76,714.5	S	\$ 125,044.55
\$ 1.6700	37,380.0	43,869.0	S	\$ 73,261.23
\$ 1.6800	46,855.5	50,296.5	S	\$ 84,498.07
\$ 1.6900	260,178.0	294,318.0	S	\$ 497,397.42
\$ 1.6900	94,819.6	113,491.2	S	\$ 191,800.06
\$ 1.7400	29,349.0	34,495.0	S	\$ 60,021.30
\$ 1.7400	3,678.0	4,788.0	S	\$ 8,331.12
\$ 1.7600	2,792.6	3,497.2	S	\$ 6,155.04
\$ 1.7600	192,962.0	222,915.0	S	\$ 392,330.40
\$ 1.7700	61,728.0	75,701.0	S	\$ 133,990.77
\$ 1.7700	34,621.0	41,497.0	S	\$ 73,449.69
\$ 1.7800	13,058.0	16,706.0	S	\$ 29,736.68
\$ 1.7800	15,427.0	17,947.0	S	\$ 31,945.66
\$ 1.8000	37,555.0	42,228.0	S	\$ 76,010.40
\$ 1.8000	14,348.2	15,459.0	S	\$ 27,826.22
\$ 1.8100	6,143.6	7,894.2	S	\$ 14,288.43
\$ 1.8100	97,000.0	116,410.0	S	\$ 210,702.10
\$ 1.8200	122,590.0	139,608.0	S	\$ 254,086.56
\$ 1.8400	874.9	1,138.0	S	\$ 2,093.85
\$ 1.8500	4,732.0	6,227.0	S	\$ 11,519.95
\$ 1.8500	343,133.9	391,433.7	C	\$ 634,797.64
\$ 1.8500	93,997.0	105,069.0	S	\$ 194,377.65
\$ 1.8500	176,557.3	209,099.9	S	\$ 386,834.85
\$ 1.8700	87,970.0	100,236.0	S	\$ 187,441.32
\$ 1.8700	23,605.7	28,229.6	S	\$ 52,789.43
\$ 1.8700	18,343.7	20,868.1	S	\$ 39,023.38
\$ 1.9000	141,744.7	156,796.0	S	\$ 297,912.42
\$ 1.9100	59,624.0	70,662.0	S	\$ 134,964.42
\$ 1.9600	25,806.9	31,933.3	C	\$ 50,581.45
\$ 1.9600	2,758.0	3,097.0	C	\$ 5,405.68
\$ 1.9800	779,200.0	8,429,800.0	C	\$ 1,542,816.00
\$ 1.9800	146,332.0	163,775.0	S	\$ 324,274.50
\$ 2.0000	5,693.1	6,671.1	S	\$ 13,342.22
\$ 2.0100	37,660.0	44,382.0	C	\$ 75,696.60
\$ 2.0100	13,641.0	16,391.0	C	\$ 27,418.41
\$ 2.0100	18,654.0	20,736.0	C	\$ 37,494.54
\$ 2.0100	60,524.0	68,786.0	S	\$ 138,259.86
\$ 2.0500	340,347.0	388,060.0	C	\$ 697,711.35
\$ 2.0573	2,187.3			\$ 4,500.00
\$ 2.0600	154,898.4	174,626.6	C	\$ 319,090.72

TRS contracts were paid independent of minutes. Rates presented are implicit.

## Exhibit 1-2 Cont.

CTS Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 2.0800	133,500.0	147,644.0	S	\$ 307,099.52
\$ 2.0800	91,961.8	106,579.4	C	\$ 191,280.63
\$ 2.0800	170,694.5	198,253.8	S	\$ 412,367.99
\$ 2.0800	16,855.0	18,893.0	C	\$ 35,058.40
\$ 2.0800	396,268.0	437,299.0	C	\$ 824,237.44
\$ 2.0800	7,826.0	10,447.0	C	\$ 16,278.08
\$ 2.1100	10,185.0	11,021.0	C	\$ 21,490.35
\$ 2.1400	263,728.0	301,767.0	C	\$ 564,377.92
\$ 2.1500	10,569.8	12,021.5	C	\$ 22,725.09
\$ 2.1500	5,887.1	6,285.0	C	\$ 12,657.24
\$ 2.1600	119,748.4	130,779.2	C	\$ 258,656.63
\$ 2.1600	30,306.4	37,385.4	C	\$ 65,461.82
\$ 2.1600	60,703.0	66,312.1	C	\$ 131,118.50
\$ 2.1700	33,762.5	40,674.4	C	\$ 73,264.69
\$ 2.2189	18,928.0			\$ 42,000.00
\$ 2.2500	53,973.0	65,738.0	C	\$ 121,439.25
\$ 2.2500	216,282.0	252,745.0	C	\$ 486,634.50
\$ 2.3100	65,955.0	72,019.0	C	\$ 152,356.05
\$ 2.3300	136,163.0	157,383.0	C	\$ 317,259.79
\$ 2.4000	121,781.3	136,034.4	C	\$ 292,275.05
\$ 2.4000	55,792.0	65,786.5	C	\$ 133,900.85
\$ 2.4046	257,259.0			\$ 618,600.00
\$ 2.9900	182,691.3	216,607.4	C	\$ 546,246.90
\$ 3.0200	92,823.7	109,670.4	C	\$ 280,327.45
\$ 3.2100	16,610.4	19,229.2	S	\$ 61,725.73
\$ 3.2800	24,838.0	27,210.0	C	\$ 81,468.64
\$ 3.4489	69,500.0			\$ 239,700.00
\$ 3.5100	62,183.1	71,805.1	S	\$ 252,035.97
\$ 3.5853	6,192.0			\$ 22,200.00
\$ 3.7054	31,225.0			\$ 115,700.00
\$ 3.9303	26,868.0			\$ 105,600.00
\$ 5.1317	8,769.0			\$ 45,000.00
\$ 5.4186	69,760.0			\$ 378,000.00
	<b>6,546,478.2</b>	<b>14,475,441.8</b>		<b>\$ 14,697,766.42</b>

<b>Additional Costs Paid To Providers</b>	<b>\$ 633,517.01</b>
<b>Total Costs</b>	<b>\$ 15,331,283.43</b>
<b>Rate</b>	<b>\$ 2.3419</b>

TRS contracts were paid independent of minutes. Rates presented are implicit.

## Exhibit 1-3

Expense Category	IP CTS Cost Trend Data						
	Historical					Projected	
	2017	2018	2019	2020	2021	2022	2023
Facilities	\$ 0.0253	\$ 0.0230	\$ 0.0222	\$ 0.0224	\$ 0.0229	\$ 0.0187	\$ 0.0179
CA Related	\$ 0.2773	\$ 0.2725	\$ 0.2560	\$ 0.3128	\$ 0.2679	\$ 0.2111	\$ 0.2019
Non-CA Relay Center	\$ 0.0500	\$ 0.0520	\$ 0.0486	\$ 0.0869	\$ 0.0726	\$ 0.0554	\$ 0.0621
Indirect	\$ 0.1478	\$ 0.1836	\$ 0.1627	\$ 0.1885	\$ 0.2097	\$ 0.2476	\$ 0.2550
Depreciation	\$ 0.0254	\$ 0.0253	\$ 0.0282	\$ 0.0311	\$ 0.0286	\$ 0.0202	\$ 0.0171
Marketing	\$ 0.0863	\$ 0.0811	\$ 0.0645	\$ 0.0598	\$ 0.0665	\$ 0.0933	\$ 0.1231
Outreach	\$ 0.0465	\$ 0.0339	\$ 0.0372	\$ -	\$ 0.0010	\$ 0.0008	\$ 0.0010
Other <sup>1</sup>	\$ 0.5730	\$ 0.5437	\$ 0.4990	\$ 0.2394	\$ 0.2028	\$ 0.3044	\$ 0.2523
Operating Margin	\$ 0.1232	\$ 0.1215	\$ 0.1118	\$ 0.0941	\$ 0.0872	\$ 0.0952	\$ 0.0930
<b>Total Cost</b>	<b>\$ 1.3548</b>	<b>\$ 1.3366</b>	<b>\$ 1.2302</b>	<b>\$ 1.0352</b>	<b>\$ 0.9593</b>	<b>\$ 1.0468</b>	<b>\$ 1.0233</b>

CA & Other Related	\$ 0.8503	\$ 0.8162	\$ 0.7550	\$ 0.5523	\$ 0.4707	\$ 0.5155	\$ 0.4541
All Others	\$ 0.5045	\$ 0.5204	\$ 0.4752	\$ 0.4829	\$ 0.4886	\$ 0.5313	\$ 0.5691
<b>Total:</b>	<b>\$ 1.3548</b>	<b>\$ 1.3366</b>	<b>\$ 1.2302</b>	<b>\$ 1.0352</b>	<b>\$ 0.9593</b>	<b>\$ 1.0468</b>	<b>\$ 1.0233</b>

1 All Other Expense Category includes Subcontractor, Software, License Fees to a Third Party and Other expenses

### Exhibit 1-3.a

Expense Category	IP CTS CA Cost Trend Data			
	Historical		Projected	
	2020	2021	2022	2023
Facilities	\$ 0.0224	\$ 0.0260	\$ 0.0256	\$ 0.0276
CA Related	\$ 0.3137	\$ 0.3074	\$ 0.3007	\$ 0.3261
Non-CA Relay Center	\$ 0.0867	\$ 0.0781	\$ 0.0615	\$ 0.0689
Indirect	\$ 0.1877	\$ 0.1873	\$ 0.2000	\$ 0.2232
Depreciation	\$ 0.0312	\$ 0.0253	\$ 0.0142	\$ 0.0115
Marketing	\$ 0.0595	\$ 0.0505	\$ 0.0627	\$ 0.0925
Outreach	\$ -	\$ 0.0012	\$ 0.0009	\$ 0.0010
Other <sup>1</sup>	\$ 0.2401	\$ 0.2314	\$ 0.4089	\$ 0.3589
Operating Margin	\$ 0.0941	\$ 0.0907	\$ 0.1074	\$ 0.1110
<b>Total Cost</b>	<b>\$ 1.0356</b>	<b>\$ 0.9979</b>	<b>\$ 1.1818</b>	<b>\$ 1.2208</b>
CA & Other Related	\$ 0.5538	\$ 0.5387	\$ 0.7096	\$ 0.6851
All Others	\$ 0.4818	\$ 0.4592	\$ 0.4722	\$ 0.5357
<b>Total:</b>	<b>\$ 1.0356</b>	<b>\$ 0.9979</b>	<b>\$ 1.1818</b>	<b>\$ 1.2208</b>

1 All Other Expense Category includes Subcontractor, Software, License Fees to a Third Party and Other expenses

## Exhibit 1-3.b

Expense Category	IP CTS ASR Cost Trend Data			
	Historical		Projected	
	2020	2021	2022	2023
Facilities	\$ 0.0150	\$ 0.0023	\$ 0.0025	\$ 0.0020
CA Related	\$ -	\$ -	\$ -	\$ -
Non-CA Relay Center	\$ 0.1501	\$ 0.0354	\$ 0.0412	\$ 0.0512
Indirect	\$ 0.4795	\$ 0.3614	\$ 0.3597	\$ 0.3066
Depreciation	\$ 0.0022	\$ 0.0509	\$ 0.0345	\$ 0.0260
Marketing	\$ 0.1588	\$ 0.1751	\$ 0.1656	\$ 0.1727
Outreach	\$ -	\$ -	\$ 0.0007	\$ 0.0010
Other <sup>1</sup>	\$ 0.0002	\$ 0.0093	\$ 0.0582	\$ 0.0789
Operating Margin	\$ 0.0806	\$ 0.0634	\$ 0.0662	\$ 0.0638
<b>Total Cost</b>	<b>\$ 0.8863</b>	<b>\$ 0.6977</b>	<b>\$ 0.7286</b>	<b>\$ 0.7023</b>

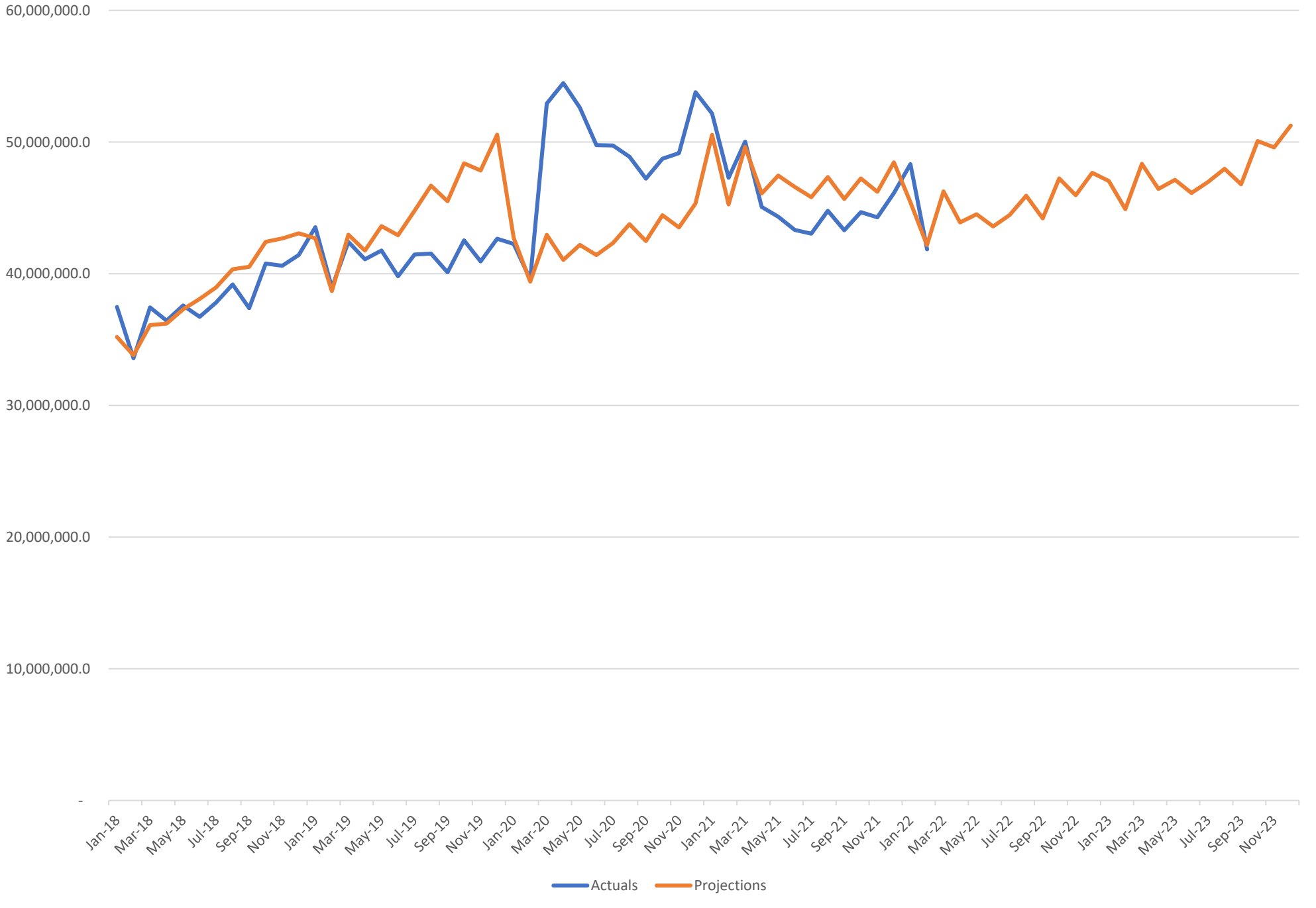
  

CA & Other Related	\$ 0.0002	\$ 0.0093	\$ 0.0582	\$ 0.0789
All Others	\$ 0.8860	\$ 0.6885	\$ 0.6704	\$ 0.6234
<b>Total:</b>	<b>\$ 0.8863</b>	<b>\$ 0.6977</b>	<b>\$ 0.7286</b>	<b>\$ 0.7023</b>

1 All Other Expense Category includes Subcontractor, Software, License Fees to a Third Party and Other expenses

# Exhibit 1-3.c

## IP CTS Demand Actuals vs Provider Projections



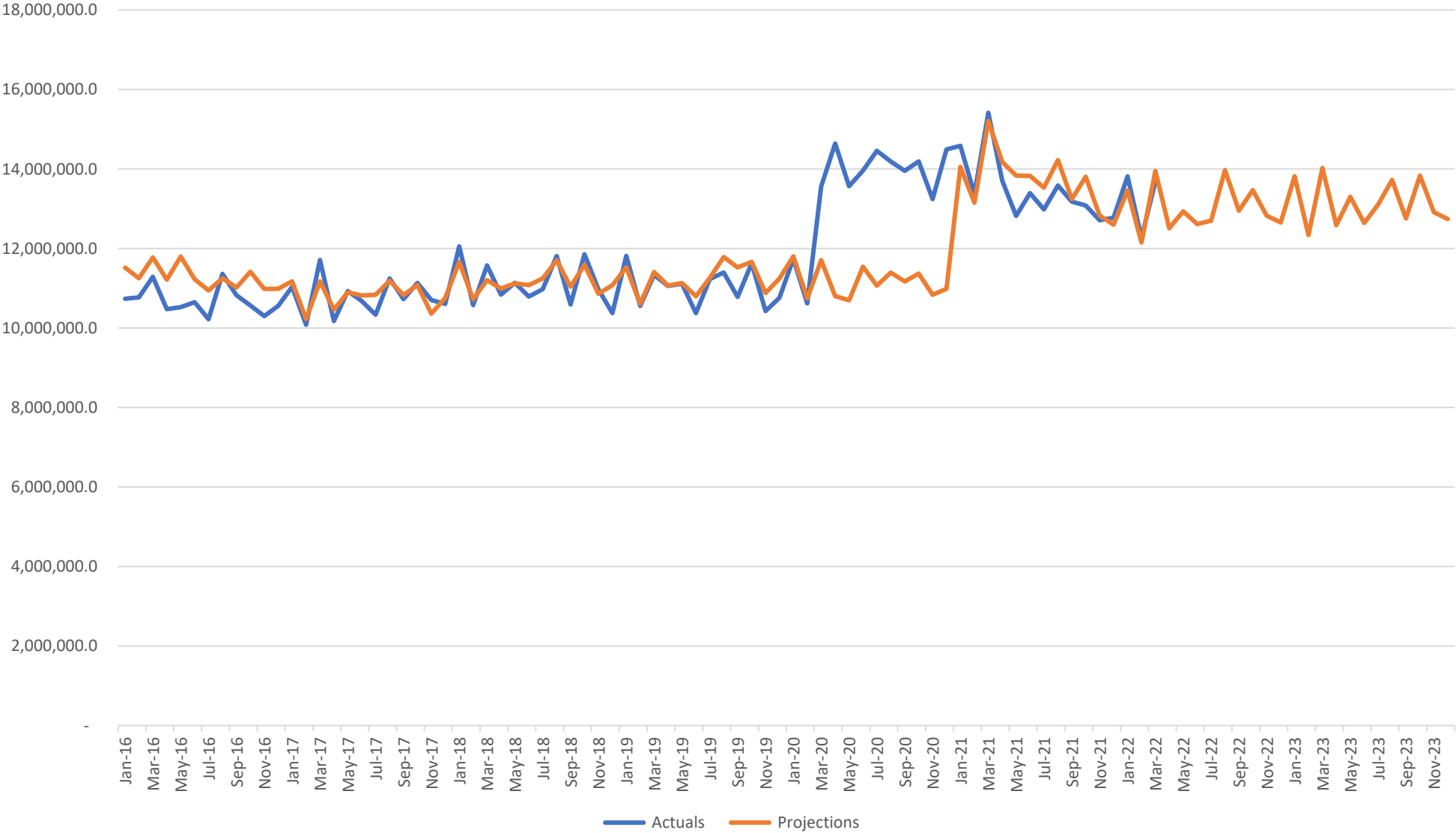
### Exhibit 1-4

VRS Cost Trend Data							
Expense Category	Historical					Projected	
	2017	2018	2019	2020	2021	2022	2023
Facilities	\$ 0.1913	\$ 0.1800	\$ 0.1827	\$ 0.1509	\$ 0.1595	\$ 0.1568	\$ 0.1531
CA Related	\$ 1.3833	\$ 1.3910	\$ 1.3884	\$ 1.3435	\$ 1.3404	\$ 1.5371	\$ 1.5933
Non-CA Relay Center	\$ 0.3434	\$ 0.3099	\$ 0.2849	\$ 0.2233	\$ 0.1899	\$ 0.2092	\$ 0.2127
Indirect	\$ 0.5529	\$ 0.5404	\$ 0.5636	\$ 0.6035	\$ 0.6450	\$ 0.8048	\$ 0.8529
Depreciation	\$ 0.0826	\$ 0.0910	\$ 0.0700	\$ 0.0802	\$ 0.0769	\$ 0.0817	\$ 0.0815
Marketing	\$ 0.1168	\$ 0.0940	\$ 0.1051	\$ 0.0907	\$ 0.0948	\$ 0.1138	\$ 0.1181
Other <sup>1</sup>	\$ -	\$ -	\$ -	\$ 0.0000	\$ 0.0000	\$ 0.0000	\$ 0.0000
Operating Margin	\$ 0.2670	\$ 0.2606	\$ 0.2595	\$ 0.2492	\$ 0.2507	\$ 0.2903	\$ 0.3012
<b>Total Cost</b>	<b>\$ 2.9373</b>	<b>\$ 2.8669</b>	<b>\$ 2.8542</b>	<b>\$ 2.7414</b>	<b>\$ 2.7572</b>	<b>\$ 3.1938</b>	<b>\$ 3.3127</b>
CA & Other Related	\$ 1.3833	\$ 1.3910	\$ 1.3884	\$ 1.3435	\$ 1.3404	\$ 1.5372	\$ 1.5933
All Others	\$ 1.5540	\$ 1.4759	\$ 1.4658	\$ 1.3979	\$ 1.4167	\$ 1.6566	\$ 1.7194
<b>Total:</b>	<b>\$ 2.9373</b>	<b>\$ 2.8669</b>	<b>\$ 2.8542</b>	<b>\$ 2.7414</b>	<b>\$ 2.7572</b>	<b>\$ 3.1938</b>	<b>\$ 3.3127</b>

1 All Other Expense Category includes Subcontractor, Software, License Fees to a Third Party and Other expenses

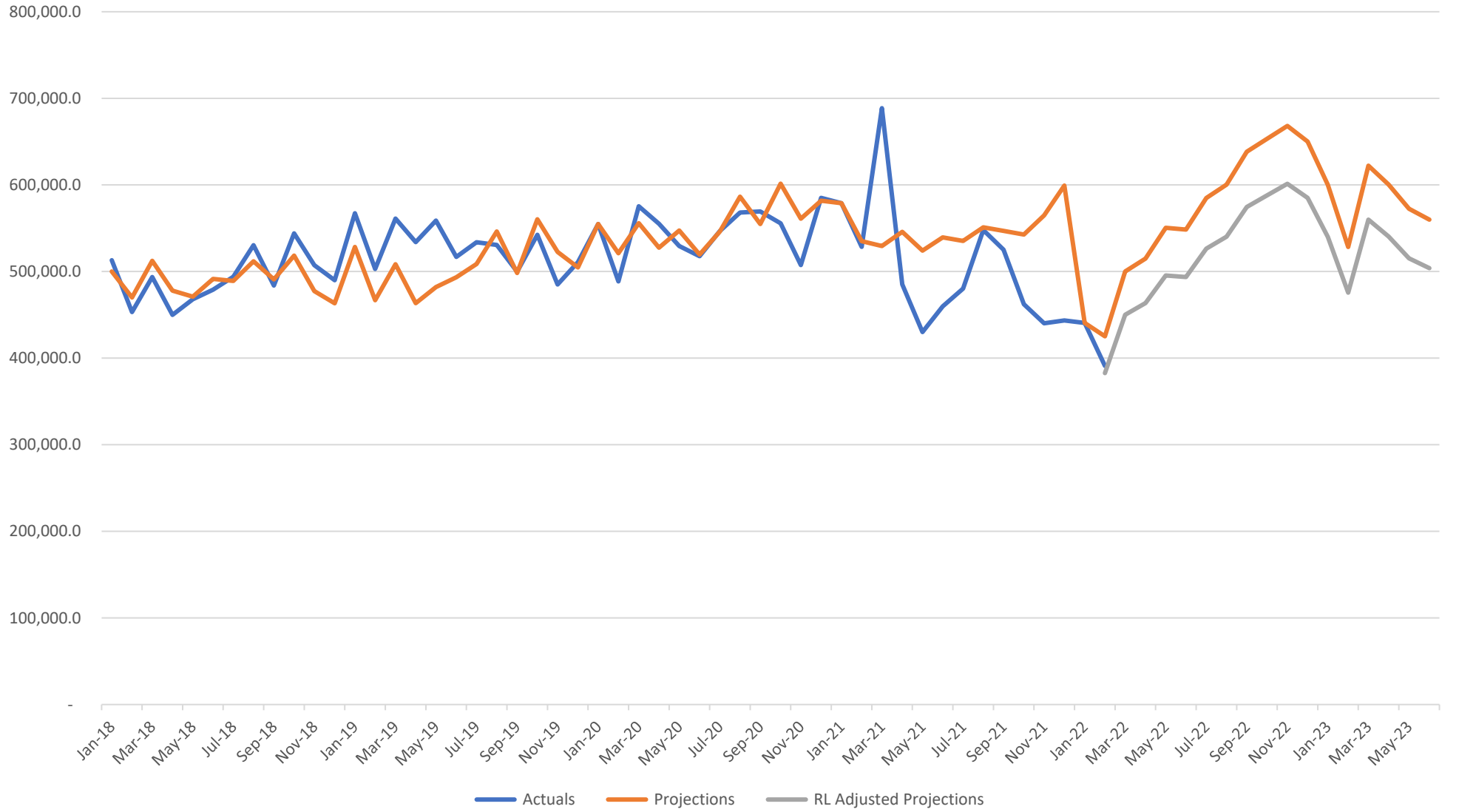
# Exhibit 1-4.a

## VRS Demand Actuals vs Provider Projections





# Exhibit 1-5 IP Relay Demand Actuals vs Provider Projections



**Exhibit 2**

<b>PROJECTED 2022-2023</b>		Methodology	Prior Year Demand Balance	Prior Year Rate	Projected Budget Year Demand	Projected Rate	Two Month Reserve Demand	Two Month Reserve Rate	Fund Requirement	Two Month Reserve
Traditional TRS	MARS	203,799	\$ 4.1944	985,976	\$ 4.5098	190,591	\$ 4.5098	\$ 5,301,369	\$ 859,527	
Speech to Speech	MARS	22,229	\$ 4.1944	111,146	\$ 4.5098	22,229	\$ 4.5098	\$ 594,484	\$ 100,248	
STS outreach		22,229	\$ 1.1310	111,146	\$ 1.1310	22,229	\$ 1.1310	\$ 150,847	\$ 25,141	
Caption Telephone	MARS	306,861	\$ 2.3662	1,488,966	\$ 2.3419	288,726	\$ 2.3419	\$ 4,213,104	\$ 676,167	
Subtotal MARS:								\$ 10,259,804	\$ 1,661,084	
IP Relay	DA 20-692	988,994	\$ 1.7146	5,531,141	\$ 1.8551	1,019,112	\$ 1.8551	\$ 11,956,549	\$ 1,890,555	
Subtotal IP Relay:								\$ 11,956,549	\$ 1,890,555	
Emergent Tier	FCC 17-86	844,810	\$ 5.2900	4,610,888	\$ 5.2900	862,543	\$ 5.2900	\$ 28,860,642	\$ 4,562,852	
Tier 1	FCC 17-86	4,000,000	\$ 4.8200	20,000,000	\$ 4.8200	4,000,000	\$ 4.8200	\$ 115,680,000	\$ 19,280,000	
Tier 2	FCC 17-86	6,000,000	\$ 3.9700	30,000,000	\$ 3.9700	6,000,000	\$ 3.9700	\$ 142,920,000	\$ 23,820,000	
Tier 3	FCC 17-86	14,702,882	\$ 2.6300	76,710,075	\$ 2.6300	15,075,304	\$ 2.6300	\$ 240,416,077	\$ 39,648,050	
Subtotal VRS:								\$ 527,876,719	\$ 87,310,902	
Non IP CTS Projected Provider Payments								\$ 550,093,072	\$ 90,862,541	
Subtotal:								\$ 640,955,613		
IP Caption Telephone - CA	FCC 18-79	63,274,767	\$ 1.3000	304,903,267	\$ 1.3000	59,196,095	\$ 1.3000	\$ 478,631,444	\$ 76,954,924	
IP Caption Telephone - ASR		24,172,071	\$ 1.3000	160,360,051	\$ 1.3000	34,068,737	\$ 1.3000	\$ 239,891,759	\$ 44,289,358	
IP CTS Projected Provider Payments								\$ 718,523,203	\$ 121,244,282	
Subtotal:								\$ 839,767,484		
								\$ 1,268,616,275	\$ 212,106,822	
Grand Total Service Requirements:								\$ 1,480,723,097		
Two Month Non IP CTS Percentage								42.84%		
Two Month IP CTS Percentage								57.16%		
Deaf Blind Equipment Distribution Program								\$ 10,000,000	\$ 4,283,810	\$ 5,716,190
TRS Fund Administration costs								\$ 22,889,979	\$ 9,805,633	\$ 13,084,346
Subtotal:								\$ 32,889,979	\$ 14,089,443	\$ 18,800,536
Grand Total Service Requirements:								\$ 1,513,613,076		
estimated fund balance at 6/30/2022								\$ 535,000,000	\$ 229,183,855	\$ 305,816,145
Non IP CTS Requirement								\$ 655,045,056		
Net Non IP CTS Requirement								\$ 425,861,200		
IP CTS Requirement								\$ 858,568,020		
Net IP CTS Requirement								\$ 552,751,875		
Net Requirement								\$ 978,613,076		
estimated non-IP CTS requirements								\$ 425,861,200		
* estimated non-IP CTS contribution base								\$ 37,844,989,481		
Contribution factor non-IP CTS	FCC 19-118							<b>0.01125</b>		
estimated IP CTS requirements								\$ 552,751,875		
** estimated IP CTS contribution base								\$ 84,611,976,314		
Contribution factor IP CTS	FCC 19-118							<b>0.00653</b>		

\* based on data reported by USAC updated through 5/2022  
 \*\* based on data reported by USAC updated through 5/2022

## Exhibit 3

Base Revenue Contribution Figures		
Program Year Beginning	Interstate Contribution Base	Interstate and Intrastate Contribution Base
2004	\$ 81,954,191,761	
2005	\$ 80,666,621,324	
2006	\$ 80,457,972,602	
2007	\$ 77,898,078,806	
2008	\$ 79,418,092,243	
2009	\$ 78,895,806,171	
2010	\$ 72,844,997,816	
2011	\$ 69,450,220,823	
2012	\$ 67,206,226,973	
2013	\$ 67,278,109,560	
2014	\$ 65,234,609,107	
2015	\$ 64,129,341,109	
2016	\$ 61,424,575,348	
2017	\$ 58,034,785,511	
2018	\$ 53,380,042,779	
2019	\$ 50,876,678,778	
2020	\$ 45,263,218,059	\$ 105,871,186,948
2021	\$ 41,382,719,812	\$ 93,247,287,880
2022	\$ 37,844,989,481	\$ 84,611,976,314