

**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**

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May 1, 2023

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**Payment Formula and Fund Size Estimate  
Interstate Telecommunications Relay Services Fund  
For July 2023 through June 2024**

## 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, 2023, through June 30, 2024, 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) .....	\$5.7204
Speech-to-Speech (STS) .....	\$6.8514
Captioned Telephone Service (CTS) .....	\$2.6619
Internet Protocol (IP) Relay .....	\$2.0927

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<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 2023-2024 of \$1,230,641,592. The net fund cash requirement is the sum of service requirements, administrative overhead, and a budgetary reserve minus the projected fund balance as of June 30, 2023.

Based upon best available estimates from the Data Collection Agent (DCA), the interstate contribution base is \$34,736,378,482 and the combined interstate and intrastate contribution base is approximately \$79,030,990,686. Using the proposed rates and projected demand and subtracting the estimated year-end balance, the Analog services net fund requirement is \$8,327,647 and the IP based services net fund requirement is \$1,222,313,945. Dividing the net fund requirements by the respective contribution bases, the Analog services contribution factor is 0.00024 and the IP based services contribution factor is 0.01547.<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

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<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 Teletype, Speech-to-Speech (STS), 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 2023-2024 program year’s proposed funding requirements and service compensation rate calculations based on state and provider responses to the 2022 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 interstate TTY, STS, and CTS services. Based on the weighted average of intrastate service rates, RL proposes the following compensation rates:

Traditional TRS (TTY) .....	\$5.7204
Speech-to-Speech (STS) .....	\$6.8514
Captioned Telephone Service (CTS) .....	\$2.6619

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<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 late January 2023 the Administrator provided the state TRS administrators with filing instructions and a filing template to submit expenses and service demand totals applicable to calendar year 2022. Responses to the data request were required to be provided no later than February 24, 2023. The filing instructions and template can be found in Appendix A.

In the last few years, the intrastate data has shown a shift in contract structure, with data being submitted for per minute, flat rate, and hybrid structured contracts. As of the 2022 filing, eighteen states reported contracting services for TTY or STS services at a flat rate. Additionally, twelve states reported flat rate contracts for CTS.

For per minute contracts, a service's total expense is calculated as the product of the reported service rate and the session or conversation minutes depending on the contract details. For states that pay for intrastate service at a flat or reoccurring amount, for each individual service type, the service's total expenses are calculated as an allocation of the conversation minutes supported during the contract period. This process is repeated to allocate non-translation service (outreach, administration, billing, etc.) expenses to the individual analog services.

#### 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, the Administrator calculated that the total payment for intrastate TTY and STS during calendar year 2022 amounted to \$17,498,126. The total intrastate TTY and STS conversation minutes for calendar year 2022 were 3,058,919. 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.

By dividing the total payment amount by the total intrastate conversation minutes, the Administrator proposes a rate of \$5.7204 per conversation minute for

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<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.

program year 2023-2024 interstate TTY service. This proposed rate is approximately 26.8% above the 2022-2023 TTY compensation rate of \$4.5098.

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>9</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 a proposed interstate STS per conversation minute rate of \$6.8514 for the 2023-2024 program year. This proposed rate is an increase of 21.5% from the \$5.6408 compensation rate utilized for service generated in the 2022-2023 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 \$152,000 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.

The total intrastate CTS payment, including the amounts paid to providers for services beyond CTS translation, declined 12.6% from \$15,331,283 for calendar year 2021 to \$13,406,948 for calendar year 2022. The total CTS intrastate conversation minutes declined 23% from 6,546,478 for calendar year 2021 to 5,036,679 for calendar year 2022.

By dividing the total payment by the total conversation minutes, the Administrator proposes a compensation rate of \$2.6619 per conversation minute for

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<sup>9</sup> *Cost Recovery Order* ¶¶ 57,61.

program year 2023-2024 interstate CTS service, a 13.66% increase from the \$2.3419 rate utilized for the 2022-2023 program year.

### IP Based Services

On November 19, 2007, the FCC released a Report and Order<sup>10</sup> 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 recoverable from the TRS Fund.<sup>11</sup> The Commission further addressed the mechanisms for determining IP Relay rates in the Report and Order at FCC 22-48, released June 30, 2022, and IP CTS rates in the Notice of Proposed Rulemaking and Order on Reconsideration at FCC 22-97, released December 22, 2022. In accordance with Commission rules,<sup>12</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>13</sup> Based on provider responses to the 2022 RSDR, RL proposes the use of the following compensation rates for determining the contribution factor:

Internet Protocol (IP) Relay .....	\$2.0927
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 late January 2023 the Administrator provided the state TRS administrators with filing instructions and a filing template to submit expenses and service demand totals applicable to calendar

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<sup>10</sup> FCC 07-186.

<sup>11</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>12</sup> See 47 CFR § 64.604(c)(5)(iii)(D).

<sup>13</sup> See Appendix B for Interstate Filing Instructions



year 2022. Responses to the data request were required to be provided no later than February 24, 2023. The filing instructions and template can be found in Appendix B. For analysis purposes, the Administrator requires the provider to report historical and projected costs into seven distinct expense categories, outlined in Appendix B.

While the responses to the data request were originally due February 24, 2023, the Administrator did not receive complete and adequate data until mid-April. For this reason, the Administrator was unable to perform a thorough analysis of the IP-based service providers' costs as they relate to the calculation of reimbursement rate recommendations.

#### IP Relay

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

The Commission adopted a four-year cost recovery methodology for IP Relay on June 25, 2022, for the period from July 1, 2022, through June 30, 2026, at FCC 22-48. The order established a base compensation level of \$1.9576 per minute applicable for service generated during the 2022-2023 program year. For each subsequent program year, an inflation factor will be applied to the prior year's compensation level linked to the Department of Labor's Employment Cost Index (ECI) for professional, scientific, and technical services. Additionally, the rate is adjusted by adding an appropriate amount, if necessary, to compensate service providers for exogenous costs. The rate also included several adjustments to the calculation to expand the allowable cost categories to include the reasonable costs of outreach and acquisition of 10-digit telephone numbers and because the record indicated that IP Relay costs have been relatively accurate, the calculation was based on two years of projected costs and demand. Additionally, in lieu of a return on capital investment, the Commission allowed an operating margin of 12%. The Commission delegated to the Chief of CGB (Consumer Government Bureau) to approve annual inflation adjustments for IP Relay, beginning with the Fund Year 2023-2024.

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 accordance with the Commission's rulings outlined within FCC 22-48, the Administrator recommends a compensation rate of \$2.0927 per minute, calculated as 106.9% of the prior year's reimbursement rate. The inflation adjustment of 6.9% was calculated as 1/100<sup>th</sup> of the difference between the 2021 quarter four ECI of 149.2 and the 2022 quarter four ECI of 156.1.

#### 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. While the Administrator received responses from six IP CTS providers, only five providers remained providing service by the end of 2022. 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>14</sup> Since this declaratory ruling, all IP CTS providers have been certified to produce captions via ASR, with one provider providing ASR-only IP CTS.

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 a cost per minute of \$1.1902 and \$0.7377, respectively, for the 2022-2023 tariff year. Analysis shows that a substantial portion of the costs for both captioning methods were attributed to subcontractor expenses, accounting for 30% of CA costs and 25% of ASR 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 2018 through 2022, and projected costs for calendar years 2023 and 2024. This Exhibit demonstrates that the average cost of IP CTS continues to decrease. IP CTS expenses

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<sup>14</sup> FCC 18-79.

plus a 10% operating margin declined from \$1.3366 in 2018 to \$0.9074 in 2022. This decline in costs is associated with the relative gain in IP CTS ASR minutes relative to IP CTS CA minutes. However, the projected 2023 and 2024 results show a slight increase in costs, with calculated costs resulting at \$0.9421 and \$1.0636, mostly associated with an increase in marketing from 2022 to 2023 and slight increase in indirect<sup>15</sup> costs from 2023 to 2024.

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>16</sup>

For the purposes of calculating a cost per minute for the upcoming program year, the Administrator determined that tariff year expenses more accurately represent the providers' future expenses. To determine tariff year expenses, calendar year expenses were allocated as a factor of the demand generated/projected for each month and then summed for the months July through June. In accordance with the FCC's rules dictating recoverable costs for IP CTS

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<sup>15</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>16</sup> FCC 18-79, Para. 23.

and the addition of a 10% operating margin, the calculated cost for the 2022-2023 tariff year is approximately \$0.9130.

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 non-CA relay center (79%) and marketing (80%) expense categories. The increase in projected costs increases the value of the operating margin.

The Commission has directed the service providers to submit detailed 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 2022-2023 fund year is not only above the calculated tariff year cost of \$0.9130 but also is above the calculated tariff year CA only cost of \$1.1902 for the 2022-2023 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>17</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

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

available in Exhibit 1-4, detailing actual costs for calendar years 2018 through 2022, and projected costs for calendar years 2023 and 2024.

In accordance with the Commission's rules regarding recoverable VRS costs and including a 10% operating margin, the Administrator calculated a cost per minute of \$3.5616 for the 22-23 tariff year. CA-related costs are projected to increase by 26.22% between 2022 and 2023. Additionally, relay center expenses are projected to rise by 114.87% between 2022 and 2023.

## Demand Projection Methodology

To calculate a contribution factor, the Administrator must first calculate a fund requirement equaling the product of the service reimbursement rates and the service demand. The 23-24 fund requirement is calculated as the amount needed to support the minutes serviced between May 2023 and April 2024 with an additional amount included to support the minutes serviced during May and June of 2024.

As the interstate analog service providers are not required to submit demand projections, the Administrator implemented forecasting analysis to project demand for TTY, STS, and CTS services. For TTY and CTS services, analysis shows that actual demand has been decreasing and flat lining. For this reason, logarithmic forecasting methodologies were applied to the historical TTY and CTS demand to project demand for service to be provided from May 2023 through June 2024. For STS service, analysis has shown that the fluctuation in minutes has been minimal but consistent. For this reason, the Administrator calculated STS demand as the average of historical demand from 2017 through 2020.

Conversely, the interstate IP based service providers are required to submit two years of projected demand. Historically, the Administrator has found that utilizing the provider projected totals to estimate the fund requirement has provided reasonably accurate results. With the onset of the COVID 19 pandemic, the Administrator has been sensitive to environmental factors surrounding potential service demand. However, analysis shows that actual demand has been trending down and returning to pre-COVID monthly totals. As a result of this return, for purposes of estimating the fund requirement and contribution factor, the Administrator accepts the

provider projected demand totals for all three IP based services.<sup>34</sup>

## Funding Requirements

As the contribution factors are the quotient of the fund requirements and the contribution bases, the Administrator must calculate fund requirements for the analog services and the IP based services separately. As the product of the forecasted service demand and the reimbursement rates, the analog fund requirement is calculated as \$8,388,159 and the IP based fund requirement is calculated as 1,231,079,145, resulting in a total service requirement of \$1,239,467,304. Historically, the Administrator has recommended that the TRS Fund include an additional component to protect the program from running short of available funds before the end of the und 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>18</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. For the 23-24 fund requirement a reserve of \$203,316,773 has been included to reflect the amount needed to support the demand projected for May and June 2024 service. The Administrator anticipates a total service requirement of \$1,442,784,077.

In addition to TRS services, the TRS fund supports the National Deaf Blind Equipment Distribution Program (NDBEDP). In its August 4, 2016, Order,<sup>19</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>20</sup> Funding for this program has been established at \$10,000,000 per year. As such, \$10,000,000 has been included in the Interstate TRS fund requirement for the 2023-2024 fund year.

Allowances for ongoing TRS research and reforms, database administration, fund administration, data collection agent costs, TRS Fund Advisory Council

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<sup>18</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>19</sup> See FCC 16-101, adopted August 4, 2016, Rel. August 5, 2016.

<sup>20</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.

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 \$55,287,515 are included as other TRS Fund administration costs.

The Administrator anticipates that the total fund requirement is approximately \$1,508,071,592. It is anticipated that there will be a surplus of approximately \$277,430,000 on June 30, 2023, which is deducted from the funding requirement when determining the contribution factor. The Administrator estimates that the net fund requirement will be \$1,230,641,592.

## Contribution Base & Factor Calculation

For the July 2023 to June 2024 fund year, the Administrator used the carriers' estimated 2022 end-user revenues as the basis for calculating carriers' contribution calculations. The interstate contribution base has become smaller each year.<sup>21</sup> RL anticipates an 8.6% reduction in the interstate contribution base for the program year beginning July 1, 2023, for a contribution base of \$34,736,378,482. RL anticipates a decline in the combined intrastate and interstate contribution base of 6.6% from \$84,611,973,314 to \$79,030,990,685 for the program year 2023-2024.

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

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<sup>21</sup> See Exhibit 3 for Contribution Base History.

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 2023-2024 funding period which begins July 1, 2023. 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 during the first three weeks of each month.

RL expects to begin issuing invoices for the 2023-2024 program year beginning the week of July 10, 2023. 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 2023-2024 funding year is estimated to be \$1,230,641,592. Based on the 2023-2024 demand projections and



proposed rates contained herein, coupled with the anticipated calendar year 2022 revenue bases, the Administrator estimates that the contribution factors are 0.00024 for analog services and 0.01547 for IP based 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>22</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.

The members of the advisory Committee met on April 20, 2023, to receive presentations regarding developments at the FCC presented by Eliot Greenwald, Deputy Chief, DRO and Michael Scott, an attorney in the DRO. They also received an overview of the administrator's draft findings to be submitted to the FCC 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, 2023. The minutes of Committee meetings will be provided to the Commission during the anticipated comment period regarding this filing.

### 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 2022 through March 2023. 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.

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<sup>22</sup> 47 CFR § 64.604 (c)(5)(iii)(H).

## 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	2022 State Annual Cost and Demand Filing Instructions
B	2022 Provider Annual Cost and Demand Filing Instructions
C	2022 Advisory Council and RL Staff
D	2022 Fall and Spring 2023 Advisory Council Meeting Minutes – will be submitted in May
E	2022 Fund Status Report as of March 2023
F	2022-2023 Rolka Loube Report – will be submitted in May





 GSA Contract Holder  
47QRAA18D00FA

Interstate TRS Fund  
Annual State Data Request  
***Filing Instructions***

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## 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-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](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.**

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## 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 [TRSDataRequest@rolkaloube.com](mailto:TRSDataRequest@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**.

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## 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://www.box.com) and log in with your BOX credentials. If you do not have credentials to BOX, please email [TRSDataRequest@rolkaloube.com](mailto:TRSDataRequest@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 24, 2023.

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

All filing submissions must be named XX\_2022\_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.



Interstate TRS Fund  
Annual Provider Data Request  
***Filing Instructions***

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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](mailto:PRA@fcc.gov).

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## 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 compensable 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, sewage, 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 individually contracted or sole proprietor interpreters and CAs. The FCC prohibits incentives paid to CAs and interpreters 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 two or more individuals providing IP-based TRS services for the provider under a single contract. 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.

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## 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:

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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 compensated conversation minutes and projected compensable 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 employees</li> <li>• Sole proprietor and individually operated LLCs offering CA and interpreter services</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>• Engineering</li> <li>• Research and Development – broken down by platform, software, and CPE; research and development expenses required to meet applicable non-waived</li> </ul>

C. Administrative Expenses	
	<p>mandatory minimum standards and expenses above and beyond meeting mandatory minimum standards shall be broken down into separate amounts.</p> <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> </ul>

E. Other TRS Expenses	
	<ul style="list-style-type: none"> <li>Customer Premises Equipment – sales, installation, and maintenance employees</li> </ul>
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>

F. Capital Investments	
	<ul style="list-style-type: none"> <li>• Form of TRS</li> <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>
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.
2	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.

G. Financial Data	
This information should be supplied at the provider level rather than for each individual service.	
1	Provide the corporate comparative income statement and balance sheet for the provider for the prior two years of actual expenses
2	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.
3	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
4	Provide a list of all debt instruments, including notes, bonds, loans, commercial paper and similar financial obligations

G. Financial Data	
This information should be supplied at the provider level rather than for each individual service.	
5	For each listed debt instrument, provide the following information:
	<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 24, 2023. 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\_2022\_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.



TRF Fund Advisory Council									
(As of April 2023 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@biblefiancial.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. Tallahsee, 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	Michael Strecker	Jul-22	VP Regulatory & Strategic Policy	ClearCaptions, LLC	Tampa, FL	(727) 643-1813	mike.strecker@clearcaptions.com

Rolk Loube		
4050 Crums Mill Road, Suite 303, Harrisburg PA 17112 - (717) 585-3605		
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Anmarie Jezorski	Project Manager	ajezorski@rolkaloube.com
David Kennerly	Director Of Audits	dkennerly@rolkaloube.com

## TRS Fund Status Report

Through April 2023

	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Program Year End
<b>July 22 - June 23 Month End Projections</b>													
Prior Balance	\$567,135,239.16	\$542,933,965.68	\$520,775,229.93	\$496,972,489.10	\$467,753,741.00	\$443,472,302.51	\$413,894,944.90	\$387,654,389.14	\$359,719,411.00	\$329,566,105.58	\$306,305,485.99	\$273,809,363.47	
Contributions	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$81,629,070.09	\$1,546,684,080.24
Payments	(\$105,830,343.57)	(\$103,787,805.84)	(\$105,431,810.92)	(\$110,847,818.19)	(\$105,910,508.58)	(\$111,206,427.70)	(\$107,869,625.85)	(\$109,564,048.23)	(\$111,782,375.51)	(\$104,889,689.68)	(\$114,125,192.61)	(\$107,666,206.34)	(\$1,298,911,853.02)
Balance	\$542,933,965.68	\$520,775,229.93	\$496,972,489.10	\$467,753,741.00	\$443,472,302.51	\$413,894,944.90	\$387,654,389.14	\$359,719,411.00	\$329,566,105.58	\$306,305,485.99	\$273,809,363.47	\$247,772,227.22	\$247,772,227.22
<b>July 22 - June 23 Month End Actuals</b>													
Prior Balance	\$567,135,239.16	\$522,584,385.98	\$531,441,885.06	\$539,922,892.72	\$481,742,670.77	\$462,683,291.40	\$441,122,320.56	\$417,782,826.16	\$394,089,876.95	\$359,224,124.16	\$359,224,124.16	\$359,224,124.16	
Contributions	\$49,304,270.84	\$110,127,448.89	\$110,706,489.12	\$47,964,284.86	\$81,007,834.13	\$82,221,909.60	\$78,466,714.23	\$81,634,399.61	\$75,099,629.96				\$1,283,668,220.40
Payments	(\$93,855,124.02)	(\$101,269,949.81)	(\$102,225,481.46)	(\$106,144,506.81)	(\$100,067,213.50)	(\$103,782,880.44)	(\$101,445,040.09)	(\$105,287,387.23)	(\$109,965,382.75)				(\$924,042,966.11)
Refunds							(\$361,168.54)	(\$39,961.59)					(\$401,130.13)
Balance	\$522,584,385.98	\$531,441,885.06	\$539,922,892.72	\$481,742,670.77	\$462,683,291.40	\$441,122,320.56	\$417,782,826.16	\$394,089,876.95	\$359,224,124.16	\$359,224,124.16	\$359,224,124.16	\$359,224,124.16	\$359,224,124.16
<b>Month End Accruals</b>													
<b>TRS Services</b>													
IP Relay	\$0.00	\$0.00	\$0.00	(\$57,647.21)	\$0.00	\$57,647.21	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
IP CTS	(\$13,712.53)	\$13,679.77	\$21.19	(\$140.14)	(\$1,073.41)	(\$595.40)	\$164.45	(\$971.62)	(\$209.17)	\$1,715.74	\$0.00	\$0.00	(\$1,121.12)
VRS	(\$2,314,617.12)	(\$4,657.84)	(\$1,419.65)	(\$3,907.75)	(\$13,869.88)	(\$3,241.25)	(\$7,651.04)	(\$10,128.32)	(\$61,112.31)	\$57,190.27	\$0.00	\$0.00	(\$2,363,414.89)
<b>NDBEDP</b>													
PY 20-21	(\$729,787.69)	\$0.00	\$0.00	\$729,787.69	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
PY 21-22	(\$3,666,318.78)	\$640,855.44	\$476,417.74	\$1,188,081.81	\$473,728.64	\$16,957.19	\$2,242.25	\$11,363.91	\$94,031.54				(\$762,640.26)
PY 22-23	(\$10,000,000.00)	\$0.00	\$12,500.00	\$12,500.00	\$12,500.00	\$12,500.00	\$473,674.78	\$653,714.47	\$274,130.48	\$2,842,776.11			(\$5,705,704.16)
<b>Month End Variances</b>													
Revenue	(\$32,324,799.25)	\$28,498,378.80	\$29,077,419.03	(\$33,664,785.23)	(\$621,235.96)	\$592,839.51	(\$3,162,355.86)	\$5,329.52	(\$6,529,440.13)	(\$81,629,070.09)	(\$81,629,070.09)	(\$81,629,070.09)	
Expense	(\$11,975,219.55)	(\$2,517,856.03)	(\$3,206,329.46)	(\$4,703,311.38)	(\$5,843,295.08)	(\$7,423,547.26)	(\$6,424,585.76)	(\$4,276,661.00)	(\$1,816,992.76)	(\$104,889,689.68)	(\$114,125,192.61)	(\$107,666,206.34)	
Balance	(\$20,349,579.70)	\$31,016,234.83	\$32,283,748.49	(\$28,961,473.85)	\$5,222,059.12	\$8,016,386.77	\$3,262,229.90	\$4,281,990.52	(\$4,712,447.37)	\$23,260,619.59	\$32,496,122.52	\$26,037,136.25	

Actual
Estimates

Exhibit 1-1

TTY Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 0.9400	143,386.0			\$ 134,789.05
\$ 1.3500	45,416.0	155,326.0	C	\$ 61,311.60
\$ 1.5500	142.0	526.0	C	\$ 220.10
\$ 1.5500	1,239.0	3,540.0	C	\$ 1,920.45
\$ 1.6000	187,949.0	611,420.0	C	\$ 300,718.40
\$ 1.9000	2,815.0	5,968.6	C	\$ 5,348.46
\$ 1.9300	30.0	392.0	C	\$ 57.90
\$ 2.0200	2,214.0	8,613.0	C	\$ 4,472.28
\$ 2.1500	173,510.0	351,737.0	C	\$ 373,046.50
\$ 2.5200	28,740.1	61,711.9	C	\$ 72,425.13
\$ 2.5440	39,565.0			\$ 100,654.60
\$ 2.6000	64,527.3	81,362.7	C	\$ 167,771.01
\$ 2.8400	18,056.9	43,783.9	C	\$ 51,281.68
\$ 2.8696	11,230.0			\$ 32,225.67
\$ 2.9133	128,920.0	245,481.0	S	\$ 375,585.93
\$ 2.9200	19,689.0	116,615.0	C	\$ 57,491.88
\$ 2.9853	3,229.0			\$ 9,639.46
\$ 3.0068	28,438.0	61,517.0	S	\$ 85,508.63
\$ 3.1037	3,011.0			\$ 9,345.13
\$ 3.2569	1,915.0			\$ 6,236.97
\$ 3.3000	23,942.0	100,920.0	C	\$ 79,008.60
\$ 3.3900	2,967.8	10,877.5	C	\$ 10,060.84
\$ 3.4500	22,389.0	53,209.0	C	\$ 77,242.05
\$ 3.4800	79,388.4	151,153.0	C	\$ 276,271.49
\$ 3.6081	15,516.5	24,235.7	S	\$ 55,984.47
\$ 3.6120	21,790.0	33,209.0	S	\$ 78,705.33
\$ 3.6700	3,408.2	13,494.1	C	\$ 12,508.09
\$ 3.7100	12,532.0	31,354.0	C	\$ 46,493.72
\$ 3.7222	11,065.0			\$ 41,186.07
\$ 3.7500	18,874.2	83,932.9	C	\$ 70,778.06
\$ 3.7500	19,445.8	40,964.2	C	\$ 72,921.75
\$ 3.7500	32,835.5	66,078.4	C	\$ 123,133.20
\$ 3.8249	10,378.0			\$ 39,695.00
\$ 3.8600	20,104.3	36,723.3	C	\$ 77,602.60
\$ 3.8800	18,104.0	79,687.0	C	\$ 70,243.52
\$ 3.9516	58,772.0			\$ 232,241.05
\$ 3.9993	15,554.0	37,700.0	S	\$ 62,205.00
\$ 4.1000	384,828.0	865,377.5	C	\$ 1,577,794.84
\$ 4.1978	1,969.0	4,920.0	S	\$ 8,265.60
\$ 4.4369	101,388.0			\$ 449,849.95

STS Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 0.9400	1,732.0			\$ 1,628.15
\$ 1.3500	3,971.0	12,909.0	C	\$ 5,360.85
\$ 1.6000	6,335.0	22,423.0	C	\$ 10,136.00
\$ 2.0200	2.0	11.0	C	\$ 4.04
\$ 2.0436	4,009.0	5,894.0	S	\$ 8,192.66
\$ 2.0600	1,474.3	3,211.6	C	\$ 3,037.04
\$ 2.1500	1,832.0	5,572.0	C	\$ 3,938.80
\$ 2.5200	24.1	185.6	C	\$ 60.68
\$ 2.5440	293.0			\$ 745.40
\$ 2.8400	4,415.0	9,544.0	C	\$ 12,538.60
\$ 2.8696	58.0			\$ 166.44
\$ 2.8847	9,183.7	12,437.7	S	\$ 26,492.22
\$ 2.9200	723.0	2,043.0	C	\$ 2,111.16
\$ 2.9470	5,590.0	10,767.0	S	\$ 16,473.51
\$ 2.9853	1,780.0			\$ 5,313.79
\$ 3.0035	4.5	5.9	S	\$ 13.61
\$ 3.1037	16.0			\$ 49.66
\$ 3.3000	9,167.0	18,068.0	C	\$ 30,251.10
\$ 3.4500	5.0	43.0	C	\$ 17.25
\$ 3.4800	24,290.8	37,014.9	C	\$ 84,531.95
\$ 3.6111	14,723.0	24,277.0	S	\$ 53,166.63
\$ 3.6706	7,856.8	10,681.2	S	\$ 28,839.35
\$ 3.7100	2,906.0	7,748.0	C	\$ 10,781.26
\$ 3.7222	353.0			\$ 1,313.93
\$ 3.7500	90.2	170.1	C	\$ 338.14
\$ 3.7500	17,711.6	27,588.5	C	\$ 66,418.54
\$ 3.7500	465.7	699.3	C	\$ 1,746.38
\$ 3.7565	69.0	162.0	S	\$ 259.20
\$ 3.8249	2.0			\$ 7.65
\$ 3.8600	113.8	269.8	C	\$ 439.27
\$ 3.8800	28.0	310.0	C	\$ 108.64
\$ 3.9434	545.0	811.0	S	\$ 2,149.15
\$ 3.9516	1.0			\$ 3.95
\$ 4.1579	57.0	100.0	S	\$ 237.00
\$ 4.2766	1,823.0	2,835.0	S	\$ 7,796.25
\$ 4.4369	3,978.0			\$ 17,650.05
\$ 4.6007	970.0	1,468.0	S	\$ 4,462.72
\$ 4.9029	212.7	453.4	S	\$ 1,042.89
\$ 4.9042	6.0			\$ 29.43
\$ 4.9500	4,016.0	10,977.0	C	\$ 19,879.20

TTY + STS Combined	
Conversation Minutes	Revenue
30.0	\$ 57.90
142.0	\$ 220.10
144.9	\$ 1,458.50
1,239.0	\$ 1,920.45
2,216.0	\$ 4,476.32
787.0	\$ 4,507.20
2,815.0	\$ 5,348.46
1,915.0	\$ 6,236.97
1,402.0	\$ 6,553.45
314.0	\$ 6,700.00
1,988.0	\$ 8,373.12
3,027.0	\$ 9,394.79
2,967.8	\$ 10,060.84
3,408.2	\$ 12,508.09
5,009.0	\$ 14,953.25
1,405.4	\$ 15,650.00
323.0	\$ 20,833.34
4,494.0	\$ 21,436.38
3,109.9	\$ 24,070.82
4.0	\$ 27,600.00
11,288.0	\$ 32,392.10
1,089.0	\$ 33,500.00
3,103.0	\$ 34,797.00
10,380.0	\$ 39,702.65
1,568.0	\$ 40,200.00
6,614.0	\$ 40,345.36
4,420.0	\$ 41,424.65
11,418.0	\$ 42,500.00
6,916.0	\$ 47,500.00
1,171.0	\$ 52,083.35
1,509.0	\$ 52,083.35
15,521.0	\$ 55,998.08
3,569.0	\$ 57,000.00
15,438.0	\$ 57,274.98
11,745.0	\$ 57,600.00
20,412.0	\$ 59,603.04
15,557.0	\$ 62,294.10
22,472.0	\$ 63,820.28
49,387.0	\$ 66,672.45
13,832.0	\$ 67,206.53

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
\$ 1.2940	58.7	65.5	S	\$ 76
\$ 1.6700	150,155.0	164,425.0	C	\$ 250,758.85
\$ 1.6839	49,169.6	53,418.0	S	\$ 82,797.90
\$ 1.6900	34,597.0	37,920.0	C	\$ 58,468.93
\$ 1.7685	35,040.4	36,886.1	S	\$ 61,969
\$ 1.8000	1,709.3	1,902.6	C	\$ 3,077
\$ 1.8218	53,054.9	58,580.6	S	\$ 96,658
\$ 1.8500	87,066.9	95,119.6	C	\$ 161,074
\$ 1.8500	408,136.7	443,140.3	C	\$ 755,052.90
\$ 1.9027	17,981.0	19,662.0	S	\$ 34,212
\$ 1.9500	40,378.0	43,611.4	C	\$ 78,737
\$ 1.9533	13,867.0	15,048.0	S	\$ 27,086.40
\$ 1.9771	41,331.0	46,167.0	S	\$ 81,716
\$ 1.9800	965,277.0	900,982.0	C	\$ 1,911,248.46
\$ 1.9809	140,229.0	154,318.3	S	\$ 277,773
\$ 1.9827	3,704.0	4,080.0	S	\$ 7,344.00
\$ 1.9830	10,619.0	11,830.0	S	\$ 21,057
\$ 1.9840	25,190.0	28,236.0	S	\$ 49,978
\$ 1.9929	60,129.0	65,842.0	S	\$ 119,832
\$ 1.9937	59,336.0	63,946.0	S	\$ 118,300
\$ 2.0000	130,446.6	140,566.1	C	\$ 260,893.24
\$ 2.0121	51,466.0	57,213.0	S	\$ 103,556
\$ 2.0240	204.0	256.5	S	\$ 413
\$ 2.0407	14,201.5	15,497.6	S	\$ 28,980
\$ 2.0457	85,938.0	94,014.0	S	\$ 175,806
\$ 2.0477	36,550.2	38,382.2	S	\$ 74,845
\$ 2.0500	149,328.0	160,129.0	C	\$ 306,122.40
\$ 2.0645	12,808.9	14,141.5	S	\$ 26,445
\$ 2.0689	116,476.0	126,832.6	S	\$ 240,981.88
\$ 2.0800	6,653.0	7,274.0	C	\$ 13,838
\$ 2.0800	954.0	1,150.0	C	\$ 1,984
\$ 2.0800	283,459.0	300,756.0	C	\$ 589,594.72
\$ 2.0913	1,283.0	1,542.0	S	\$ 2,683
\$ 2.1246	5,430.0	6,236.0	S	\$ 11,537
\$ 2.1300	9,275.0	11,186.0	C	\$ 19,755.75
\$ 2.1400	20,430.0	21,979.0	C	\$ 43,720.20
\$ 2.1400	152,956.0	167,685.0	C	\$ 327,325.84
\$ 2.1410	42,379.0	45,825.0	S	\$ 90,734
\$ 2.1500	12,013.1	12,643.1	C	\$ 25,828.17
\$ 2.1600	102,072.2	109,597.0	C	\$ 220,476

## Exhibit 1-2 Cont.

CTS Service				
Rate	Conversation Minutes	Session Minutes	Session or Conversation Minutes	Revenue
\$ 2.1600	69,492.0	74,063.0	C	\$ 150,103
\$ 2.1600	11,715.0	13,558.7	C	\$ 25,304.40
\$ 2.1656	20,175.0	21,737.0	S	\$ 43,691
\$ 2.2200	19,769.1	22,968.8	C	\$ 43,887.34
\$ 2.2229	32,700.0	38,057.0	S	\$ 72,689
\$ 2.2370	90,686.0	98,956.2	S	\$ 202,860.17
\$ 2.2451	3,433.8	4,259.3	S	\$ 7,709
\$ 2.2561	2,488.5	2,807.2	S	\$ 5,614
\$ 2.2600	10,683.6	12,573.5	C	\$ 24,144.94
\$ 2.3082	174,827.0	194,007.0	S	\$ 403,535
\$ 2.3100	160,141.0	174,367.0	C	\$ 369,925.71
\$ 2.3227	20,534.0	22,392.0	S	\$ 47,695
\$ 2.3300	97,966.0	106,648.0	C	\$ 228,261
\$ 2.3500	31,121.0	35,817.0	C	\$ 73,134.35
\$ 2.3525	32,211.0	35,913.0	S	\$ 75,776
\$ 2.3960	2,785.0	2,979.0	S	\$ 6,673
\$ 2.4000	9,719.2	10,395.6	C	\$ 23,326.13
\$ 2.6000	41,607.7	46,934.9	C	\$ 108,180.07
\$ 2.6500	67,721.3	73,752.0	C	\$ 179,461.34
\$ 2.7376	15,341.9			\$ 42,000.00
\$ 2.8696	23,560.0			\$ 67,607.90
\$ 2.9853	9,730.0			\$ 29,046.75
\$ 3.1037	5,028.0			\$ 15,605.21
\$ 3.1098	198,922.0			\$ 618,600.00
\$ 3.2569	5,761.0			\$ 18,763.03
\$ 3.6219	74,839.0	82,640.0	S	\$ 271,059
\$ 3.8249	24,575.0			\$ 93,997.35
\$ 3.8388	12,271.2	13,420.6	S	\$ 47,106.34
\$ 3.9852	60,147.0			\$ 239,700.00
\$ 3.9852	60,147.0			\$ 239,700.00
\$ 4.5954	25,460.0			\$ 117,000.00
\$ 4.8633	70,305.2	77,532.2	S	\$ 341,916.91
\$ 5.5080	16,340.0			\$ 90,000.00
\$ 6.4182	5,796.0			\$ 37,200.00
\$ 7.8077	179.3			\$ 1,400.00
\$ 7.9929	94,584.0			\$ 756,000.00
\$ 8.7998	318.2			\$ 2,800.00
\$ 10.0642	144.9			\$ 1,458.50
\$ 13.8095	2,100.0			\$ 28,999.98
	<b>5,036,678.9</b>	<b>4,743,864.9</b>		<b>\$ 11,914,666.62</b>

<b>Additional Costs Paid To Providers</b>	<b>\$ 1,492,281.51</b>
<b>Total Costs</b>	<b>\$ 13,406,948.13</b>
<b>Rate</b>	<b>\$ 2.6619</b>

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

### Exhibit 1-3

IP CTS Cost Trend Data								
Expense Category	Historical					Projected		22-23 Tariff Year
	2018	2019	2020	2021	2022	2023	2024	
Facilities	\$ 0.0230	\$ 0.0222	\$ 0.0224	\$ 0.0346	\$ 0.0331	\$ 0.0270	\$ 0.0230	\$ 0.0290
CA Related	\$ 0.2725	\$ 0.2560	\$ 0.3128	\$ 0.2679	\$ 0.1291	\$ 0.1044	\$ 0.1895	\$ 0.1091
Non-CA Relay Center	\$ 0.0520	\$ 0.0486	\$ 0.0869	\$ 0.0685	\$ 0.0308	\$ 0.0551	\$ 0.0698	\$ 0.0420
Indirect	\$ 0.1836	\$ 0.1627	\$ 0.1885	\$ 0.2008	\$ 0.2019	\$ 0.2059	\$ 0.2344	\$ 0.2037
Depreciation	\$ 0.0253	\$ 0.0282	\$ 0.0311	\$ 0.0237	\$ 0.0224	\$ 0.0206	\$ 0.0169	\$ 0.0206
Marketing	\$ 0.0811	\$ 0.0645	\$ 0.0598	\$ 0.0643	\$ 0.0697	\$ 0.1256	\$ 0.1612	\$ 0.0951
Outreach	\$ 0.0339	\$ 0.0372	\$ -	\$ 0.0010	\$ 0.0002	\$ 0.0002	\$ 0.0002	\$ 0.0002
Other <sup>1</sup>	\$ 0.5437	\$ 0.4990	\$ 0.2394	\$ 0.2028	\$ 0.3376	\$ 0.3177	\$ 0.2720	\$ 0.3304
Operating Margin	\$ 0.1215	\$ 0.1118	\$ 0.0941	\$ 0.0863	\$ 0.0825	\$ 0.0856	\$ 0.0967	\$ 0.0830
<b>Total Cost</b>	<b>\$ 1.3366</b>	<b>\$ 1.2302</b>	<b>\$ 1.0350</b>	<b>\$ 0.9498</b>	<b>\$ 0.9074</b>	<b>\$ 0.9421</b>	<b>\$ 1.0636</b>	<b>\$ 0.9130</b>
CA & Other Related	\$ 0.8162	\$ 0.7550	\$ 0.5522	\$ 0.4707	\$ 0.4667	\$ 0.4221	\$ 0.4616	\$ 0.4395
All Others	\$ 0.5204	\$ 0.4752	\$ 0.4828	\$ 0.4791	\$ 0.4407	\$ 0.5199	\$ 0.6021	\$ 0.4736
<b>Total:</b>	<b>\$ 1.3366</b>	<b>\$ 1.2302</b>	<b>\$ 1.0350</b>	<b>\$ 0.9498</b>	<b>\$ 0.9074</b>	<b>\$ 0.9421</b>	<b>\$ 1.0636</b>	<b>\$ 0.9130</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		22-23 Tariff Year
	2021	2022	2023	2024	
Facilities	\$ 0.0392	\$ 0.0477	\$ 0.0626	\$ 0.0537	\$ 0.0565
CA Related	\$ 0.3074	\$ 0.2285	\$ 0.3429	\$ 0.6950	\$ 0.2814
Non-CA Relay Center	\$ 0.0733	\$ 0.0424	\$ 0.1237	\$ 0.1421	\$ 0.0772
Indirect	\$ 0.1784	\$ 0.1802	\$ 0.2460	\$ 0.2681	\$ 0.2194
Depreciation	\$ 0.0253	\$ 0.0244	\$ 0.0282	\$ 0.0150	\$ 0.0279
Marketing	\$ 0.0506	\$ 0.0422	\$ 0.0774	\$ 0.0958	\$ 0.0581
Outreach	\$ 0.0012	\$ 0.0003	\$ 0.0003	\$ 0.0003	\$ 0.0003
Other <sup>1</sup>	\$ 0.2314	\$ 0.4430	\$ 0.3543	\$ 0.2486	\$ 0.3612
Operating Margin	\$ 0.0907	\$ 0.1009	\$ 0.1235	\$ 0.1519	\$ 0.1082
<b>Total Cost</b>	<b>\$ 0.9974</b>	<b>\$ 1.1096</b>	<b>\$ 1.3589</b>	<b>\$ 1.6706</b>	<b>\$ 1.1902</b>
CA & Other Related	\$ 0.5387	\$ 0.6716	\$ 0.6972	\$ 0.9436	\$ 0.6426
All Others	\$ 0.4587	\$ 0.4380	\$ 0.6618	\$ 0.7270	\$ 0.5477
<b>Total:</b>	<b>\$ 0.9974</b>	<b>\$ 1.1096</b>	<b>\$ 1.3589</b>	<b>\$ 1.6706</b>	<b>\$ 1.1902</b>

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



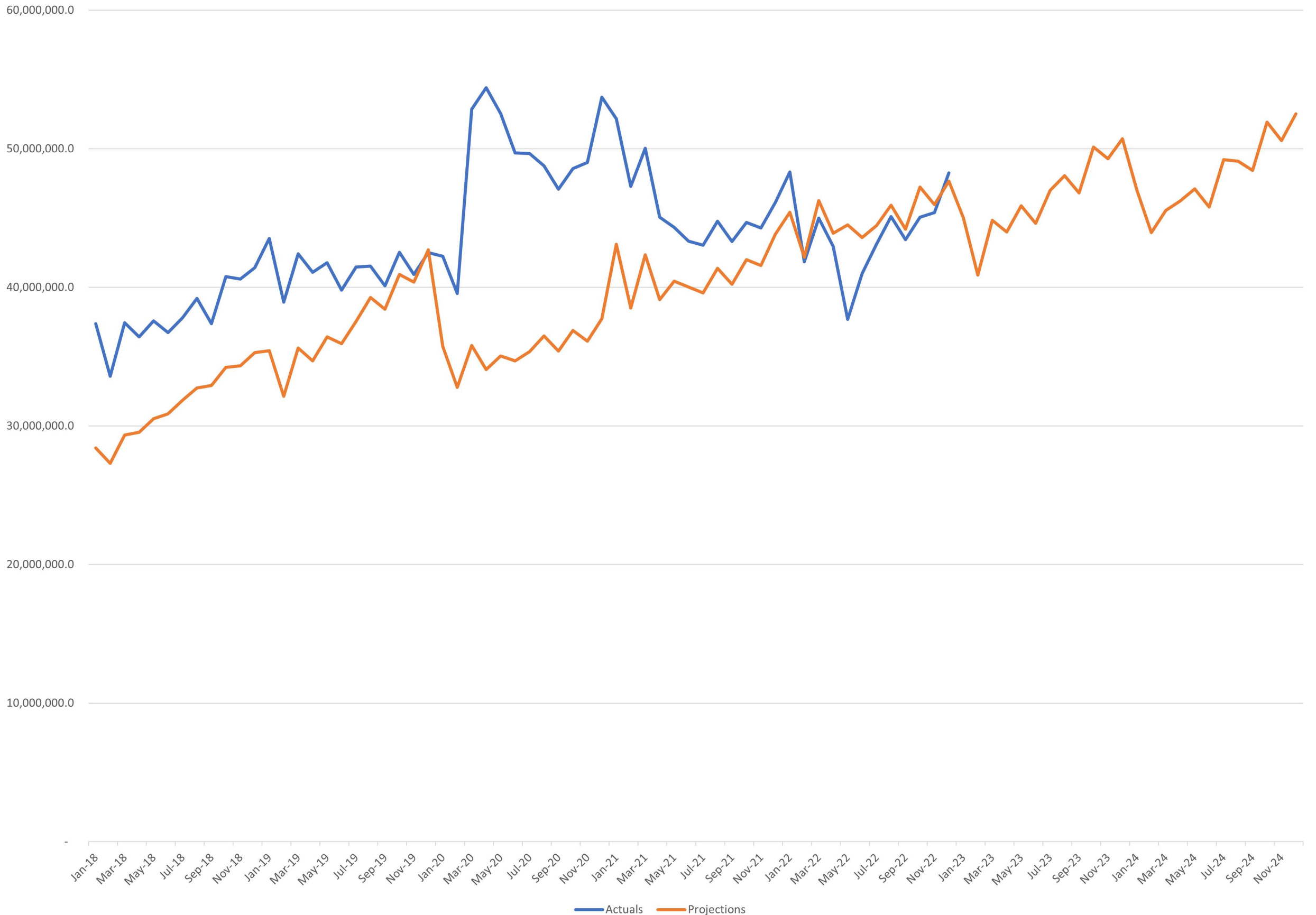
### Exhibit 1-3.b

Expense Category	IP CTS ASR Cost Trend Data				
	Historical		Projected		22-23 Tariff Year
	2021	2022	2023	2024	
Facilities	\$ 0.0035	\$ 0.0142	\$ 0.0114	\$ 0.0114	\$ 0.0115
CA Related	\$ -	\$ -	\$ -	\$ -	\$ -
Non-CA Relay Center	\$ 0.0354	\$ 0.0158	\$ 0.0250	\$ 0.0427	\$ 0.0197
Indirect	\$ 0.3527	\$ 0.2300	\$ 0.1884	\$ 0.2217	\$ 0.1938
Depreciation	\$ 0.0123	\$ 0.0199	\$ 0.0172	\$ 0.0176	\$ 0.0160
Marketing	\$ 0.1569	\$ 0.1054	\$ 0.1467	\$ 0.1857	\$ 0.1185
Outreach	\$ -	\$ 0.0001	\$ 0.0002	\$ 0.0002	\$ 0.0002
Other <sup>1</sup>	\$ 0.0091	\$ 0.2008	\$ 0.3017	\$ 0.2808	\$ 0.3110
Operating Margin	\$ 0.0570	\$ 0.0586	\$ 0.0690	\$ 0.0760	\$ 0.0671
<b>Total Cost</b>	<b>\$ 0.6269</b>	<b>\$ 0.6449</b>	<b>\$ 0.7595</b>	<b>\$ 0.8360</b>	<b>\$ 0.7377</b>
CA & Other Related	\$ 0.0091	\$ 0.2008	\$ 0.3017	\$ 0.2808	\$ 0.3110
All Others	\$ 0.6177	\$ 0.4441	\$ 0.4578	\$ 0.5552	\$ 0.4267
<b>Total:</b>	<b>\$ 0.6269</b>	<b>\$ 0.6449</b>	<b>\$ 0.7595</b>	<b>\$ 0.8360</b>	<b>\$ 0.7377</b>

<sup>1</sup> 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

Expense Category	Historical					Projected		22-23 Tariff Year
	2018	2019	2020	2021	2022	2023	2024	
Facilities	\$ 0.1800	\$ 0.1827	\$ 0.1509	\$ 0.1897	\$ 0.2146	\$ 0.1951	\$ 0.2170	\$ 0.2049
CA Related	\$ 1.3910	\$ 1.3884	\$ 1.3435	\$ 1.3505	\$ 1.5652	\$ 1.9757	\$ 2.2672	\$ 1.7679
Non-CA Relay Center	\$ 0.3099	\$ 0.2849	\$ 0.2233	\$ 0.1747	\$ 0.1517	\$ 0.1519	\$ 0.1454	\$ 0.1516
Indirect	\$ 0.5404	\$ 0.5636	\$ 0.6035	\$ 0.6363	\$ 0.8628	\$ 0.9247	\$ 0.9727	\$ 0.8931
Depreciation	\$ 0.0910	\$ 0.0700	\$ 0.0802	\$ 0.1222	\$ 0.0914	\$ 0.0850	\$ 0.0853	\$ 0.0885
Marketing	\$ 0.0940	\$ 0.1051	\$ 0.0907	\$ 0.0950	\$ 0.1118	\$ 0.1513	\$ 0.0801	\$ 0.1318
Other <sup>1</sup>	\$ -	\$ -	\$ -	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.0000
Operating Margin	\$ 0.2606	\$ 0.2595	\$ 0.2492	\$ 0.2569	\$ 0.2997	\$ 0.3484	\$ 0.3768	\$ 0.3238
<b>Total Cost</b>	<b>\$ 2.8669</b>	<b>\$ 2.8542</b>	<b>\$ 2.7413</b>	<b>\$ 2.8254</b>	<b>\$ 3.2971</b>	<b>\$ 3.8321</b>	<b>\$ 4.1444</b>	<b>\$ 3.5616</b>
CA & Other Related	\$ 1.3910	\$ 1.3884	\$ 1.3435	\$ 1.3505	\$ 1.5652	\$ 1.9757	\$ 2.2672	\$ 1.7679
All Others	\$ 1.4759	\$ 1.4658	\$ 1.3978	\$ 1.4749	\$ 1.7319	\$ 1.8564	\$ 1.8773	\$ 1.7937
<b>Total:</b>	<b>\$ 2.8669</b>	<b>\$ 2.8542</b>	<b>\$ 2.7413</b>	<b>\$ 2.8254</b>	<b>\$ 3.2971</b>	<b>\$ 3.8321</b>	<b>\$ 4.1444</b>	<b>\$ 3.5616</b>

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

# Exhibit 1-4.a

## VRS Demand Actuals vs Provider Projections

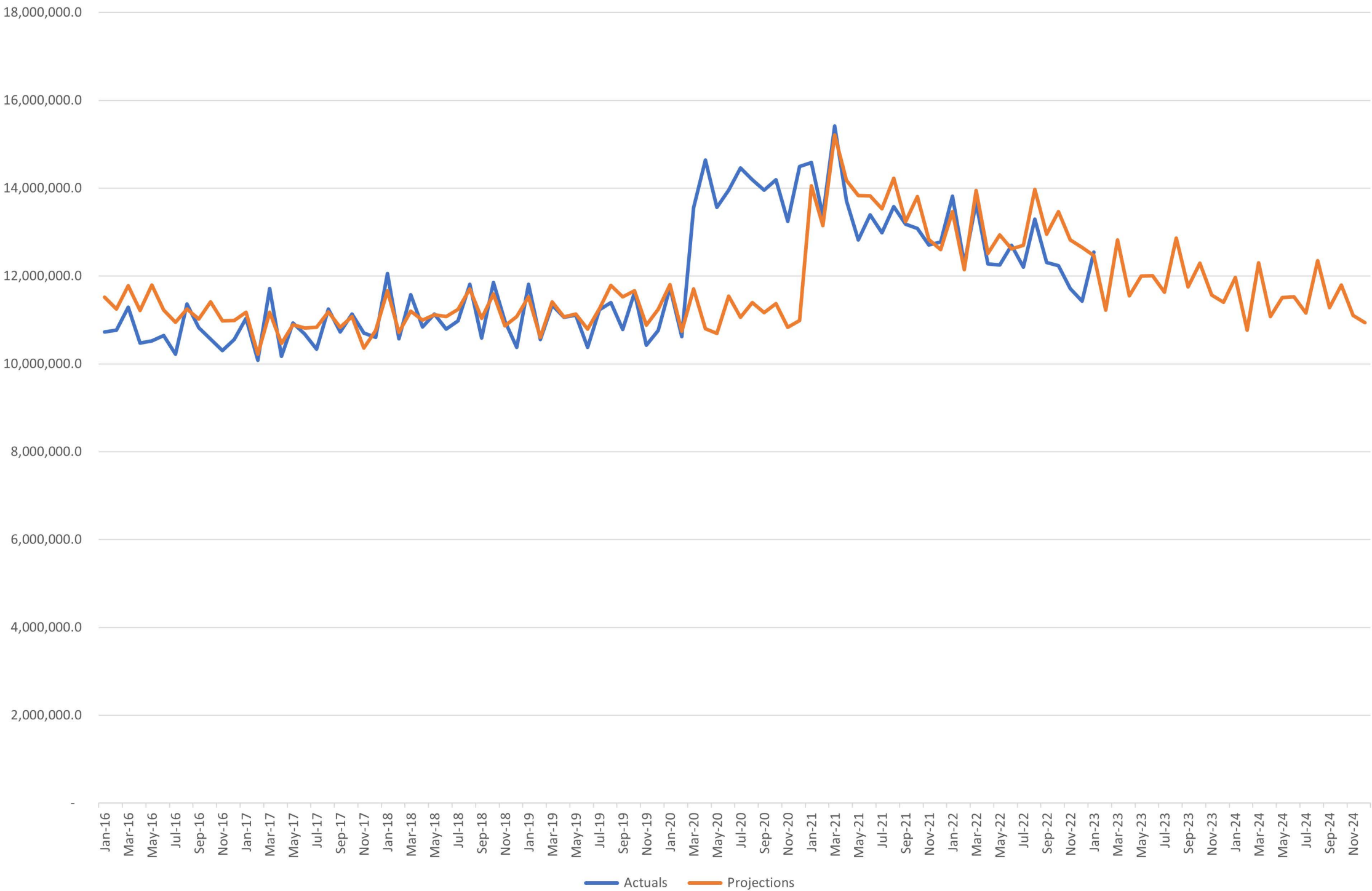
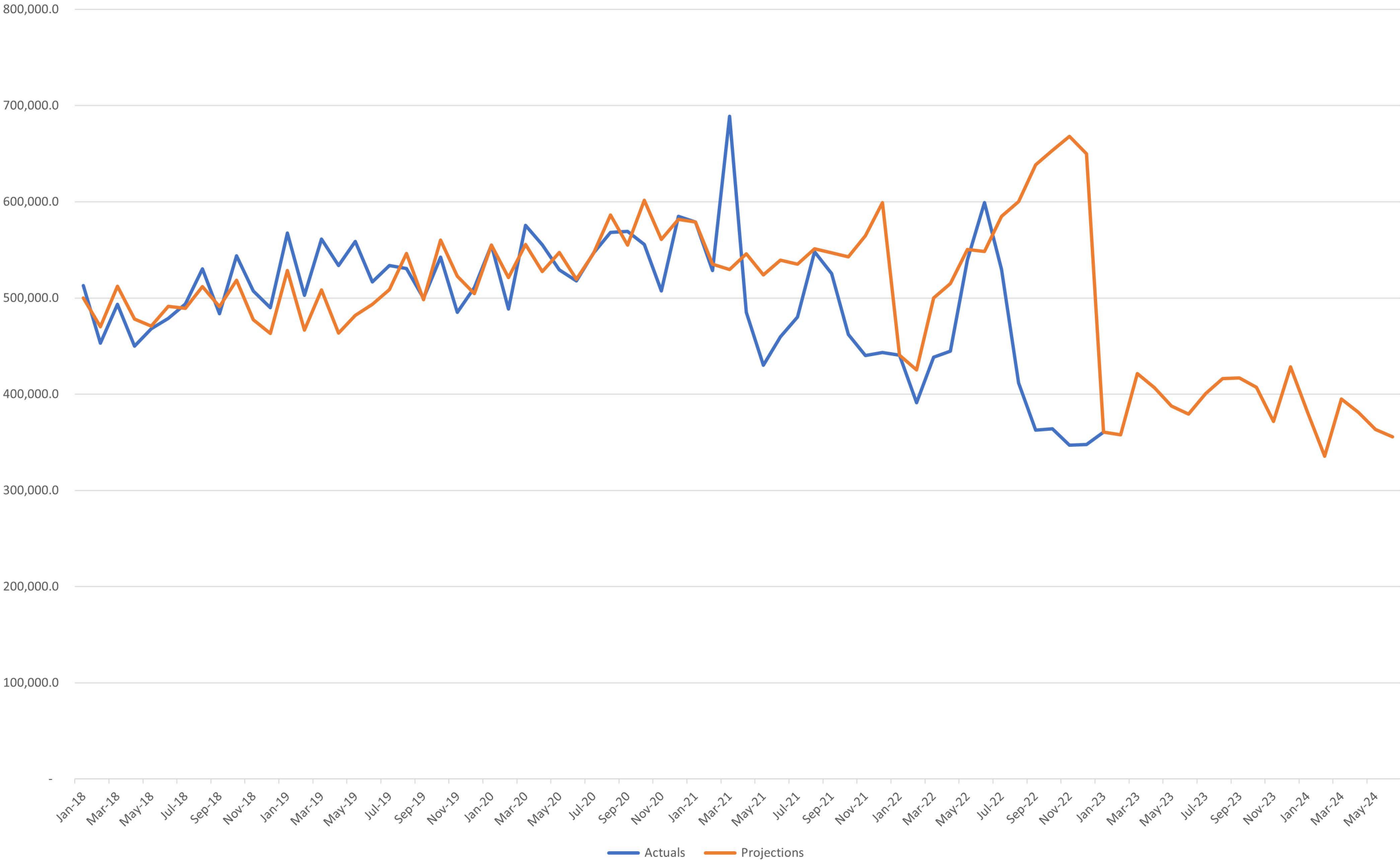


Exhibit 1-5  
IP Relay Actuals vs Provider Projections



## Exhibit 2

<b>PROJECTED 2022-2023</b>	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
TTY	149,582	\$ 4.5098	727,262	\$ 5.7204	142,227	\$ 5.7204	\$ 4,834,817	\$ 813,593
Subtotal TTY:		674,586		4,160,231		813,593	\$ 4,834,817	\$ 813,593
STS	22,334	\$ 4.5098	111,669	\$ 5.7204	22,334	\$ 5.7204	\$ 739,514	\$ 127,759
STS outreach	22,334	\$ 1.1310	111,669	\$ 1.1310	22,334	\$ 1.1310	\$ 151,558	\$ 25,260
Subtotal STS:		125,981		765,091		153,018	\$ 891,072	\$ 153,018
CTS	178,810	\$ 2.3419	842,825	\$ 2.6619	160,562	\$ 2.6619	\$ 2,662,270	\$ 427,401
Subtotal CTS:		418,755		2,243,515		427,401	\$ 2,662,270	\$ 427,401
<b>Total Analog Payments</b>		<b>1,219,322</b>		<b>7,168,837</b>		<b>1,394,012</b>	<b>\$ 8,388,159</b>	<b>\$ 1,394,012</b>
							<b>\$ 9,782,171</b>	
IP Relay	766,962	\$ 1.9576	3,933,520	\$ 2.0927	719,027	\$ 2.0927	\$ 9,733,082	\$ 1,504,708
Subtotal IP Relay:		1,501,405		8,231,677		1,504,708	\$ 9,733,082	\$ 1,504,708
Emergent Tier	819,125	\$ 5.2900	4,149,652	\$ 5.2900	851,839	\$ 5.2900	\$ 26,284,829	\$ 4,506,229
Tier 1	4,000,000	\$ 4.8200	20,000,000	\$ 4.8200	4,000,000	\$ 4.8200	\$ 115,680,000	\$ 19,280,000
Tier 2	6,000,000	\$ 3.9700	30,000,000	\$ 3.9700	6,000,000	\$ 3.9700	\$ 142,920,000	\$ 23,820,000
Tier 3	13,192,720	\$ 2.6300	63,467,891	\$ 2.6300	12,184,111	\$ 2.6300	\$ 201,617,408	\$ 32,044,213
Subtotal VRS:		82,130,026		404,372,211		79,650,442	\$ 486,502,237	\$ 79,650,442
CA IP CTS	27,864,994	\$ 1.3000	135,781,925	\$ 1.3000	25,804,534	\$ 1.3000	\$ 212,740,994	\$ 33,545,894
ASR IP CTS	62,638,522	\$ 1.3000	338,979,041	\$ 1.3000	67,093,628	\$ 1.3000	\$ 522,102,832	\$ 87,221,717
Subtotal IP CTS:		117,654,570		617,189,256		120,767,611	\$ 734,843,826	\$ 120,767,611
<b>Total Digital Payments</b>		<b>201,286,001</b>		<b>1,029,793,145</b>		<b>201,922,761</b>	<b>\$ 1,231,079,145</b>	<b>\$ 201,922,761</b>
							<b>\$ 1,433,001,906</b>	

**Exhibit 2 cont.**

<b>Grand Total Service Requirements:</b>	202,505,322	1,036,961,982	203,316,773	<b>\$ 1,239,467,304</b>	<b>\$ 203,316,773</b>
<b>Grand Total Service Requirements:</b>				<b>\$ 1,442,784,077</b>	
Two Month Analog Percentage				0.69%	
Two Month Digital Percentage				99.31%	
					Analog                      Digital
Deaf Blind Equipment Distribution Program			\$ 10,000,000	68,564	9,931,436
TRS Fund Administration costs			\$ 55,287,515	379,071	54,908,444
Subtotal:			<b>\$ 65,287,515</b>	447,634	64,839,881
<b>Grand Total Service Requirements:</b>			<b>\$ 1,508,071,592</b>		
Estimated Fund Balance at 6/30/2023			\$ 277,430,000	1,902,159	275,527,841
Analog Requirement			\$ 10,229,805		
Net Analog Requirement			\$ 8,327,647		
Digital Requirement			\$ 1,497,841,787		
Net Digital Requirement			\$ 1,222,313,945		
<b>Net Requirement</b>			<b>\$ 1,230,641,592</b>		
Estimated Analog Requirements			\$ 8,327,647		
*Estimated Analog Contribution Base			\$ 34,736,378,482		
<b>Analog Contribution Factor</b>				<b>0.00024</b>	
Estimated Digital Requirements			\$ 1,222,313,945		
**Estimated Digital Contribution Base			\$ 79,030,990,686		
<b>Digital Contribution Factor</b>				<b>0.01547</b>	

\* based on data reported by USAC updated through 5/2023

\*\* based on data reported by USAC updated through 5/2023

### 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	\$ 38,016,240,188	\$ 84,674,334,338
2023	\$ 34,736,378,482	\$ 79,030,990,685