

**Before the  
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  
Supplemental Submission**

Rolka Loube Associates LLC  
4423 North Front Street  
Harrisburg, PA 17110  
June 7, 2016

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**Payment Formula and Fund Size Estimate  
Interstate Telecommunications Relay Services (TRS) Fund  
For July 2017 through June 2018**

**I. Introduction**

Rolka Loube Associates LLC (RL), as Interstate Telecommunications Relay Services (TRS) Fund Administrator (the Administrator), herein submits supplemental information regarding the proposed carrier contribution factor for the period July 2017 through June 2018, in accordance with section 64.604 of the Federal Communications Commission's (FCC or Commission) rules.<sup>1</sup> This supplemental filing updates the prior estimated contribution base; updates the estimated fund balance available to offset the Fund Requirements; provides Exhibit no. 4 regarding current Fund year contribution erosion; updates Exhibit 2; and provides the minutes of the Advisory Committee minutes of April 2017.

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<sup>1</sup> 47 C.F.R. §64.604 (c)(5)(iii)(H).

The Administrator projects a revised net fund cash requirement for Fiscal Year 2017-2018 of \$1,137,076,572.

## **II. Contribution Base and Contribution Factor**

Calendar year 2016 interstate and international end user revenues estimated by the Data Collection Agent (“DCA”) were still being gathered and compiled from reporting entities when the recommendation was prepared for submission and contained numerous estimates as placeholders for reports which are not deemed late until after the due date for this Annual Report. We recommended that the Commission use the current best available 499A information from the DCA to calculate the Assessment rate when it becomes available. This recommendation has been calculated using the latest information available at the time of this submission. The best available reported annual 2016 revenues are updated to be \$58,034,785,511 as a replacement for the originally estimated level of \$60,196,083,841. The contribution factor for the 2017-2018 Fund year, derived from the ratio of estimated fund size to prior calendar year revenues, is proposed to be unchanged at 0.01959..

Upon approval by the Commission, the Fund Administrator will begin billing carriers for the 2017 – 2018 funding period in July 2017.

The Commission’s shared funding mechanism for the TRS Fund ensures that the costs of meeting relay service obligations are borne equitably. Interstate telecommunications common carriers contribute to the TRS Fund on the basis of their relative share of interstate and international end user revenues.<sup>2</sup> The TRS funding period

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<sup>2</sup> See 47 C.F.R. §64.604(c)(5)(iii)(A)-(C). Every carrier providing interstate telecommunications services (including interconnected VoIP service providers pursuant to §64.601(b)) and every provider of non-interconnected VoIP service shall contribute to the TRS Fund on the basis of interstate end-user revenues

commences on July 1 and ends June 30 of the following calendar year. For the July 2017 to June 2018 fund year, the Administrator will use the carriers' 2016 interstate and international end user revenues<sup>3</sup> as the basis for calculating carriers' contribution obligations.

### III. Contribution Base Erosion

The contribution base has become smaller each year and the reductions to the contribution base are shown in the following table. The annual reductions have resulted in reported 2016 revenues used for the program year beginning in 2017 that are \$58.035 billion; approximately \$3.4 billion below the level reported at the beginning of the prior Fund year.

**Table 2 Revised DCA Reported Contribution Base**

<b>Program Year beginning</b>	<b>Contribution Base</b>
2004	\$ 81,954,191,761
2005	\$ 80,666,621,324
2006	\$ 80,457,972,602
2007	\$ 77,898,078,806
2008	\$ 79,428,092,243
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

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as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

<sup>3</sup> Revenues are reported on the Telecommunications Reporting Worksheet, FCC Form 499-A, on April 1, 2017, and provided to the Administrator by the Universal Service Administrative Company (USAC), the Revenue Data Collection Agent (DCA). At the time of preparation of this filing the information from the DCA is considered preliminary and updated data will be used for the calculation of carrier contributions.

2015	\$ 64,129,341,109
2016	\$ 61,424,520,446
2017	\$ 58,034,785,511

#### **IV. Program Year Erosion**

The Data Collection Agent (“DCA”) also provides updates to the data reported by Carriers’ throughout the program year to reflect a variety of changed contributor circumstances such as out of business, no telecommunications revenues, bankruptcies, mergers and acquisitions. The contribution base changes from year to year and also changes over the course of the program year. Changes to the contribution base reported to the TRS Administrator by the DCA during the first nine months of the current year, when used for invoicing purposes, with the fixed contribution factor, have resulted in a reduced available funding level of approximately \$8.64 million.<sup>4</sup> This erosion of funding is one of the factors considered when estimating the size of two month budgetary reserve allowance.

Carriers report their prior calendar year revenues annually on the FCC Form 499-A, Telecommunications Reporting Worksheet, due on April 1, to the Data Collection Agent (DCA). The DCA provides the Interstate TRS Fund Administrator with the 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 TRS Fund 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 2016 499A submissions is

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<sup>4</sup> See Exhibit 4 for details regarding monthly erosion of the contribution base as reported throughout the program year by the DCA to the TRS Fund Administrator.

provided to the TRS Administrator on or about April 25<sup>th</sup>. Each subsequent month USAC provides updated information, to include information received from contributors that did not file by April 1<sup>st</sup>. There are substantial adjustments to the contribution base derived from the first edition of the reported 2016 499A submissions through the first several months of the program year followed by fewer and smaller adjustments as yearend approaches<sup>5</sup>. The TRS Fund Administrator indicated that it may submit a revised contribution factor to the Commission for consideration in response to the Public Notice regarding this submission. This submission provides the revised contribution base, noting that the changed contribution base does result in a revised contribution factor.

Upon approval of the contribution factor by the Commission, the Administrator will promptly bill carriers for the 2017 – 2018 funding period which begins July 2017.

Per minute compensation rates will also be effective for minutes of service beginning July 1<sup>st</sup>, assuming approval of the proposed rates by the Commission. Timely submitted provider requests for reimbursement must be processed within two months<sup>6</sup> following the submission of the request for reimbursement. The Administrator has been able to reduce the processing time required for those submissions to less than 30 days as new systems are developed to perform validation testing prior to the release of payments. For example, minutes handled by providers in July 2017 are expected to be reported

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<sup>5</sup> See Exhibit 4.

<sup>6</sup> See 47 C.F.R. 64.604(C)(5)(iii)(L)

between August 10 and 15, 2017, and providers will then receive compensation for those minutes at the new rates, on September 8, 2017.<sup>7</sup>

## **V. Contribution Factor Calculation**

The total projected net funding requirement for the 2017-2018 funding year is estimated to be \$1,137,076,572. The component parts of the projected funding requirement are displayed in Exhibit 2 Revised.

The Administrator estimates that the contribution factor will need to be 0.01959 based on the 2017-2018 demand projections, and the proposed rates coupled with the calendar year 2016 revenue base. This is a changed contribution factor recommendation.

### **Exhibits:**

- Exhibit 2 Revised----** Displays the proposed Interstate TRS Fund Size and Contribution Factor for the July 2017 through June 2018 Fund Year.
- Exhibit 4** Displays the erosion of the contribution base during the current program year.

### **Appendix:**

- Appendix D** Minutes of the April 2017 Advisory Committee Meeting

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<sup>7</sup> See Exhibit 3 Anticipated Reporting and Disbursement Schedule. The reporting and disbursement schedule is subject to modification based on exogenous circumstances.

RL Recommendations with retroactive reimbursement to January 2016		Methodology	Prior Year Demand balance (May & June)	May & June of Prior year Rate	Projected Demand	Projected Rate	Projected Requirement	Fund Requirement
Traditional TRS	MARS		330,058	\$ 2.6245	1,527,999	\$ 2.9186	\$ 5,325,855	
Speech to Speech	MARS		25,198	\$ 2.6245	132,364	\$ 2.9186	\$ 452,451	
STS outreach			25,198	\$ 1.1310	132,364	\$ 1.1310	\$ 178,203	
Caption Telephone	MARS		819,544	\$ 1.9058	3,650,048.75	\$ 1.9467	\$ 8,667,436	
IP Caption Telephone	RL Recommended Tiers		57,492,943	\$ 1.9058	238,961,602	\$ 1.7535	\$ 528,589,219	
					89,155,485	\$ 0.8773	\$ 78,216,107	
Subtotal MARS:								\$ 621,429,270
IP Relay 5/2017 & 6/2017			910,655.39	\$ 1.3000			1,183,852	
IP Relay 7/2017 to 12/2017			0		2,958,533	\$ 1.3350	\$ 3,949,642	
IP Relay 1/2018 to 4/2018			0		1,960,226	\$ 1.3350	\$ 2,616,902	
Subtotal Price Cap:								\$ 7,750,396
Retroactive January 2016 - April 2016			Demand	Net Revenue Requirement				
Emergent @ \$5.29 vs \$5.06		TRS Fund Advisory Council Recommendation	1,034,887	\$ 238,024.08				
Tier I @ \$4.06 vs. \$4.06			6,000,000	\$ -				
Tier II @ \$4.06 vs. \$4.06			5,004,773	\$ -				
Tier III @ \$2.83 vs. \$3.49			31,221,602	\$ (20,606,257.06)				
Emergent Retroactive Subtotal:			43,261,262	\$ (20,368,232.98)				\$ 238,024
Emergent Companies [May -June 2017]	TRS Fund Advisory Council Recommendation		608,530	\$ 5.2900	-		\$ 3,219,124	
Emergent Companies [July - Dec 2017]			-	\$ -	1,995,539	\$ 5.2900	\$ 10,556,401	
Emergent Companies [Jan - April 2018]			-	\$ -	1,494,600	\$ 5.2900	\$ 7,906,434	
Tier 1 [May & June 2017]	RL recommendation based on first 2,500,000 minutes		5,378,239	\$ 4.0600	-		\$ 21,835,650	
Tier 1 [July - Dec 2017]			-	\$ -	16,060,167	\$ 4.1700	\$ 66,970,896	
Tier 1 [Jan - April 2018]			-	\$ -	10,749,405	\$ 4.1700	\$ 44,825,019	
Tier 2 [May & June 2017]			3,407,175	\$ 4.0600	-		\$ 13,833,131	
Tier 2 [July - Dec 2017]		-	\$ -	10,478,906	\$ 4.1700	\$ 43,697,038		
Tier 2 [Jan - April 2018]		-	\$ -	6,747,630	\$ 4.1700	\$ 28,137,617		
Tier 3 [May & June 2017]	RL recommendation based on minutes above 2,500,000 minutes		12,315,316	\$ 3.4900	-		\$ 42,980,453	
Tier 3 [July - Dec 2017]			-	\$ -	36,510,246	\$ 2.8300	\$ 103,323,996	
Tier 3 [Jan - April 2018]			-	\$ -	25,585,273	\$ 2.8300	\$ 72,406,323	
Subtotal VRS:			21,709,260.00		109,621,766.00			\$ 459,930,106
Projected Provider Payments				131,331,026.00				\$ 1,089,109,772
Deaf Blind Equipment Distribution Program							\$ 10,000,000	
VRS Reform Implementation							\$ 9,600,000	
Service Provider Audits							\$ 1,000,000	
**TRS Fund Administration							\$ 1,700,000	
TRS Number Administration							\$ 1,005,000	
Investment Fees							\$ 190,000	
* Data Collection Agent							\$ 88,800	
independent financial audit							\$ 65,000	
Bankruptcy / legal representation							\$ 50,000	
Council Meeting Expenses							\$ 50,000	
IPERIA Plan & testing							\$ 250,000	
Two Average month provider Payment Reserve							\$ 181,518,000	
Non-Provider Subtotal:								\$ 205,516,800
Grand Total Requirements:								\$ 1,294,626,572
estimated fund balance at 6/30/2017								\$ 157,100,000
estimated interest on fund investments								\$ 450,000
Net Fund Requirements:								\$ 1,137,076,572
*Estimated Contribution Basis:								\$ 58,034,785,511
Assessment Rate:								0.01959

\* based on data reported by USAC updated through 4/2017

\*\* Estimated TRS Administration

demand included data for May & June 2017; and the first 10 months of 2017-2018 demand.

2016 - 2017 Program year Contribution Base monthly changes					
For period ended	Amount	Change from prior period	contribution factor	Invoiced Fund Revenue	Change from prior period
7/31/2016	\$ 61,435,800,309.97	\$ (2,364,236,742.63)	0.01862	\$ 1,143,934,601.77	\$ 100,803,995.97
8/31/2016	\$ 61,433,455,036.84	\$ (2,345,273.13)	0.01862	\$ 1,143,890,932.79	\$ (43,668.99)
9/30/2016	\$ 61,379,577,796.17	\$ (53,877,240.67)	0.01862	\$ 1,142,887,738.56	\$ (1,003,194.22)
10/31/2016	\$ 61,328,184,049.03	\$ (51,393,747.14)	0.01862	\$ 1,141,930,786.99	\$ (956,951.57)
11/30/2016	\$ 61,325,690,638.34	\$ (2,493,410.69)	0.01862	\$ 1,141,884,359.69	\$ (46,427.31)
12/31/2016	\$ 61,251,201,236.51	\$ (74,489,401.83)	0.01862	\$ 1,140,497,367.02	\$ (1,386,992.66)
1/31/2017	\$ 61,250,107,244.13	\$ (1,093,992.38)	0.01862	\$ 1,140,476,996.89	\$ (20,370.14)
2/28/2017	\$ 61,374,090,458.62	\$ 123,983,214.49	0.01862	\$ 1,142,785,564.34	\$ 2,308,567.45
3/31/2017	\$ 61,384,038,978.22	\$ 9,948,519.60	0.01862	\$ 1,142,970,805.77	\$ 185,241.43
4/30/2017	\$ 61,253,833,382.22	\$ (130,205,596.00)	0.01862	\$ 1,140,546,377.58	\$ (2,424,428.20)
5/31/2017	\$ 60,969,279,972.49	\$ (284,553,409.73)	0.01862	\$ 1,135,247,993.09	\$ (5,298,384.49)
				YTD Erosion:	\$ (8,686,608.68)

Interstate TRS Advisory Council  
Meeting Minutes for April 4, 2017  
Washington D.C.

ATTENDEES

Mark Tauscher, Chair, TRS Providers  
Ron Bibler, Vice Chair, TRS users  
Linda Vandeloop, Secretary, Interstate Telecommunications Providers/Contributors  
Steve Stovall, State Representative  
Al Sonnenstrahl, Deaf and Hard of Hearing Community  
Jeff Rosen, TRS Providers  
Shannon Smith, Deaf and Hard of Hearing Community  
Brenda Kelly-Frey, State Relay Administration  
Phillip Hupf, Interstate Telecommunications Providers/Contributors  
BJ Gallagher, Hearing/Speech Disability Community  
Zainab Alkebsi, Deaf and Hard of Hearing Community  
Honorable Sarah Hofmann, State Representative  
Steve Peck, NASRA  
B. J. Gallagher, Individuals with Speech Disabilities

RLSA

Dave Rolka  
Joy McGrath  
Kelly Kearn  
Andy Morrow  
Bob Loube  
Danielle Hulock

FCC

Karen Peltz Strauss  
Eliot Greenwald  
Michael Scott

CONVENE

Chairperson Tauscher greeted audience and called to order the Spring meeting of the TRS Advisory Council at 9:06 a.m. The chair noted that the April 2016 minutes had already been reviewed and approved and asked for additional corrections. No one had additions or revisions.

## FCC PRESENTATION

Michael Scott provided several updates:

- In September 2016, the Disability Advisory Committee (DAC) adopted recommendations on IPCTS quality metrics and VRS call handling and processing. In December, the DAC adopted recommendations on VRS videomail and on porting IP-enabled relay services numbers. On 3/21/17 the first meeting of the second term of the Disability Advisory Committee was held.
- On 12/16/16 the FCC released the Real-Time Text Report and Order and FNPRM adopting RTT as a permitted replacement for TTY technology for wireless services.
- On 1/18/17 CGB and WCB released an Order and Declaratory Ruling allowing VTCSecure to access the TRS Numbering Directory for direct video calling in customer service centers.
- On 1/17/17 CGB released a Report and Order and FNPRM on VRS Interoperability.

Karen Peltz Strauss discussed the VRS Reform order

- On 3/23/17 the FCC released a Report and Order, NOI, FNPRM and Order on VRS Reform.

Eliot Greenwald discussed pending IP CTS, IP Relay and Speech to Speech issues.

- The issues from the US Court of Appeals remand remain pending and include whether to require third-party certification or some other type of verification to confirm user eligibility and whether to require a button, key or icon to turn captions off.
- The issues pending from the 2013 FNPRM include whether to migrate IP CTS to state TRS programs, whether to centralize registration and verification in the TRS-URD, whether to adopt minimum service quality requirements and whether to require provider websites to have notifications regarding prohibited use by hearing individuals.
- Other pending IP CTS issues include updating 911 calling rules for web and wireless IPCTS, whether to permanently allow alternatives to collection the last 4 digits of SSN for those with no SSN, and addressing the IDT petition on whether to include intrastate revenues in the TRS Fund contribution base.
- Pending IP Relay issues include whether to adopt enhanced registration, certification and verification procedures, per call validation procedures, application of the TRS-URD to IP Relay; reviewing alternative ways to restructure IP Relay, the ratemaking methodology for this service; determining the needs of deaf-blind users; whether to permanently eliminate the “guest user” procedure for calls to 911; when to disconnect an idle call and whether to prohibit more than 2 simultaneous calls by the same user.

- Pending Speech-to-Speech issues include whether to establish a national STS outreach program; registration, certification and verification requirements for STS; whether certain TRS mandatory minimum standards for TTY are inapplicable for STS; the minimum wait time before terminating a call; minimum training standards; whether to require providers to allow STS users to create profiles; Video Assisted STS; and IP STS.

There was discussion about the contribution base and how to get the results of the USAC audits of contributors. Generally, that information is not public; however, there is some information on the FCC's wireline competition industry analysis division website. Karen Peltz Strauss agreed to look into the contribution base issues and whether there are ramifications for TRS.

Bob Loube provided the TRS Administrator update:

Calculating the May 1, 2017 rate using the traditional MARS methodology, results in rate increases for TRS, Speech to Speech, Caption Telephone and IP Caption Telephone. The MARS methodology takes the average of the state contract rates and multiplies that times the conversation minutes to get the total revenue. If the state uses session minutes, it is necessary to convert to conversation minutes.

Demand trends for each service show

- Decrease for traditional TRS
- Initial decrease then increase for STS
- Decrease for CTS
- Significant increase for IP CTS

Analysis of the IP CTS cost trend show that the cost per minute is around \$1.30 - \$1.40, much lower than the \$1.93 MARS rate. The \$1.30 is an average of all providers so some may have higher or lower costs. But a \$0.63 cent average profit is excessive. There are alternatives to the MARS methodology.

The VRS tiers are changing – the emergent tier stays the same at less than 500,000 minutes per month but tiers 1, 2 and 3 increase to 1 million, 2.5 million and greater than 2.5 million respectively. The cost categories are Facilities, CA Related, Non-CA Relay Center Expenses, Indirect Expenses Depreciation Expense, Marketing Expense, Other Expense and Return on Investment. Outreach and CPE are not included as allowable expenses.

There was a discussion about why subcontractors were not allowed for VRS and allowed for IP CTS. One reason is that there was previous fraud in VRS and there has been no evidence of fraud in IP CTS, mainly because the rate is calculated using the MARS methodology. If a new methodology is adopted for IP CTS, the potential for fraud should be evaluated.

It was noted that the increase in the CA Related costs for 2017 and 2018 should be investigated and information will be provided to the council in the future. The rate of return will be dropping in the future but that won't have a significant impact because this is not a capital-intensive industry.

Dave Rolka gave an overview of the TRS Fund Requirement for 2017-2018. The 2016-2017 fund size is \$1,144 Million. The range for 2017-2018 is \$1,035 Million, low estimate to a \$1,373 high estimate. The difference is reflected in the Other Low and Other High categories which includes the administrative overheads.

Kelly Kearn provided an update on the URD. The March 23<sup>rd</sup> Order and NPRM included some additions to the URD. For those not already included in the process, it will take approximately 60 days to add those fields. Currently, Rolka Loubé is running hourly processing for any test file received from VRS providers. Files are being submitted via a secure box and files are processed and results returned within an hour. Testing will continue until the FCC notice is issued for the 60-day window opening registration submissions of VRS users and devices. Once the process goes live, the provider will submit a user file to Box via secure two factor identification. Rolka Loubé confirms file format is compliant. If compliant, Rolka Loubé sends file back to provider via Box confirming that the file was successfully accepted and processed in the data base. If not compliant, the provider will need to correct and resubmit. There are 26 risk codes that may prevent entrance to the URD and additional validation will be required. If the submission is not accepted the provider can submit an appeal. The device process is less complicated but similar.

The Chair called for a motion for approval of the September 2016 minutes. Al moved the minutes be approved and Brenda seconded. There was no opposition. Minutes were approved. The Chair called for a motion for approval of the November 2016 minutes. Al moved the minutes be approved and Brenda seconded. There was no opposition. Minutes were approved.

Subcommittee reports on the Contribution Base and the VRS Rate Proposal:

Zainab started with a report on the Contribution Base. The sub-committee is continuing its work and hopes to have a recommendation soon. Zainab then presented on the VRS rate recommendation to the full council for discussion and vote.

The recommendation is as follows: The advisory council recommends four-year annual price changes for tiers one through three rather than the six-month rate decreases proposed in the FNPRN. The council recommends that the emergent rate will remain the same over the four-year period and that no subsidiary of a parent VRS provider will be eligible to take advantage of the emergent rate except as described below. Specifically, the council recommends adoption of the four tiers proposed in the FNPRM retroactive to January 2017. The emergent tier is no more

than 500 thousand minutes per month. The first-year rate will be \$5.29 cents a minute. Tier one, which is zero to one million minutes a month, the rate is recommended to be \$4.82 a minute. For Tier 2, which is one million to two million 500 thousand minutes per month, we are recommending \$4.35 per minute. For Tier 3, more than 2.5 million minutes per month, we are recommending \$2.83 per minute. The council is concerned that without compensation, the providers will have little interest involuntarily trialing skills based routing. The council recommends that providers be compensated for minutes during the trial at the emergent rate, conditioned on the provider submitting a plan and how they will ensure that only the minutes associated with the trial will be compensated at the higher rate. The council recommends that the eight-month clock start when the processes are in place to conduct the trial.

Zainab made a motion that the council approve the recommendation. Ron Bibler seconded the motion. No opposition to the motion. Jeff Rosen, the VRS provider, and Al Sonnenstrahl abstained. The motion was approved.

There was a request to identify the VRS providers who signed the non-disclosure agreement and provided the subcommittee data but it was decided that that information should be kept private.

The fall meeting will be held in Golden, Colorado on September 10<sup>th</sup> with a presentation to the council the day before.

There was discussion of the council membership and terms of service but Dave Rolka concluded that the list needed to be updated and it was decided this topic could be revisited after the list was updated.

There was no new business.

Public Comment:

Mike representing True Captions asked how many of the IP-CTS providers were above versus below the average that was provided earlier. Bob Loube said that one was above and the others were below. Mike also suggested that it was important to also focus on the good that the program was doing and not just focus on the growth of the fund.

Grant Beckman from Sorenson Communications asked the subcommittee if there was any consideration of factors such as the historical and future interpreter cost as well as the non-allowable cost. Zainab said that the subcommittee did consider many factors and that the subcommittee is continuing to review and will make a longer-term recommendation.

The meeting was adjourned at 2:27 pm.

