

dishNET Wireline CVAA Compliance Policy

EXECUTIVE SUMMARY

Section 255 of the Telecommunications Act and Part 6 of the FCC's rules require telecommunications service providers to ensure that their services are accessible and usable by individuals with disabilities, if readily achievable. If not, then the provider must ensure that the service is compatible with existing peripheral devices or specialized customer premises equipment commonly used by persons with disabilities. In 2011, the law was amended to require the FCC to establish recordkeeping and enforcement procedures for covered entities such as equipment manufacturers and other carriers. dishNET must file an annual certification **by April 2013** indicating that the carriers has "established operating procedures that are adequate to ensure compliance with recordkeeping rules ... and that records are being kept in compliance with the FCC's requirements.

COVERED SERVICES

The residential telephone service provided by dishNET is a telecommunications service covered by Section 255. dishNET's DSL service, and its dishNET branded modems, are not covered by Section 255. For purposes of the FCC reporting requirements, dishNET must only consider its telephone services. However, since dishNET relies upon its underlying carrier partners, its compliance obligations are nominal.

POLICY IMPLEMENTATION

Beginning on Nov. 1 of each year, dishNET will contact the following organizations to confirm that there are no complaints or concerns with dishNET's services. dishNET should also ask about any specialized CPE or other solutions used by those with disabilities to access traditional voice telecommunications services. This list is illustrative and other organizations may be contacted:

1. American Association of People with Disabilities: www.aapd.com
2. American Association of the Deaf-Blind: www.aadp.org
3. American Council of the Blind: www.acb.org
4. American Foundation for the Blind: www.afb.org.
5. Association of Late-Deafened Adults www.alda.org
6. California Coalition of Agencies Serving the Deaf and Hard of Hearing: www.dcara.org
7. Coalition of Organizations for Accessible Technology: www.coataccess.org

8. Deaf and Hard of Hearing Consumer Advocacy Network:
www.dhhcan.wordpress.com
9. Hearing Loss Association of America: www.hearingloss.org
10. National Association of the Deaf: www.nad.org
11. Technology Program, Gallaudet University (TAP) www.tap.gallaudet.edu
12. Telecommunications for the Deaf and Hard of Hearing www.tdi.online.org
13. Trace R&D Center, University of Wisconsin-Madison: www.trace.wisc.edu

When contacting the organizations, dishNET should describe the services it provides and its geographic area. ***dishNET must keep records of its contacts and any feedback it receives.*** Any responses should be saved as pdf documents and filed in the CVAA Compliance Folder found at: **L: Government Affairs/W.Hunt/FCC/CVAA Compliance.** This policy will also be posted on the policy page of the dishNET internal regulatory website

Records of the contact must be kept for two years after the company ceases providing the services.

In addition to contacting the agencies above, dishNET should secure language in all of its contracts with its underlying network partners and other equipment vendors that their services comply with the CVAA.

FCC Contact

The FCC rules require the Company to designate a contact person for complaints or other information. Bill Hunt has been designated.