

Dana Frix
direct tel (202) 974-5691
dfrix@chadbourne.com

September 21, 2007

Via Electronic Mail and FedEx Overnight

Doc. No. 255895

Honorable Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

filed electronically in docket office on 09/21/07

Re: Data Request No. 1 Regarding the Following Matters:

Docket No. 07-00204 - Joint Petition of Verizon Communications Inc., MCI Communications Services, Inc. d/b/a Verizon Business Services, Verizon Services Corporation, and GoAmerica Relay Services Corp. for Expedited Approval of the Assignment of the Contract to Provide Relay Services from Verizon Services Corporation to GRSC, for GRSC to Utilize Stellar Nordia Services, LLC as a Subcontractor in the Performance of the Contract, and for the Transfer of Related Assets from Verizon Business Services to GRSC (the "Joint Petition")

Docket No. 07-00205 - Application of GoAmerica Relay Services Corp. for a Certificate to Provide Competing Local Telecommunications Services (the "CLEC Application")

Dear Chairman Roberson:

In order to assist the Tennessee Regulatory Authority ("TRA") in its completion of a full analysis in the above-referenced matters, GoAmerica Relay Services Corp. ("GRSC," and together with GoAmerica, Inc., "GoAmerica")) hereby submits the following information to supplement its previous filings therein, as requested by the TRA in Data Request No. 1 in the above-referenced dockets, issued September 14, 2007. Please note that certain information in response to Question 3 below is very competitively sensitive **CONFIDENTIAL INFORMATION** and is being provided separately **UNDER SEAL**.

- 1. When did GoAmerica, the parent company of GoAmerica Relay Service Corp. ("GRSC"), begin providing relay services? The attached SEC Form 10-K indicates late March 2005 while the pre-filed testimony of Mr. Mark L. Stern indicates GoAmerica has been providing relay services since 2004. Please clarify.**

Response: As noted in the pre-filed testimony of Mr. Stern, GoAmerica, Inc. ("GoAmerica") has been in the relay services business since 2004, starting as a technology

subcontractor to another interstate TRS provider. To elaborate on this statement, GoAmerica developed and deployed underlying technology for a wireless relay capability, marketed by Sprint as Sprint Relay Wireless, which enabled users to connect to Sprint's interstate relay service from virtually anywhere using a choice of wireless handheld devices and pagers. GoAmerica derived a share of Sprint's relay services revenue from this technology subcontracting relationship, which ended in 2006.

Both the statement referenced by the TRA from GoAmerica's Form 10-K and Mr. Stern's pre-filed testimony indicate that GoAmerica launched its own interstate relay service, under the i711.com® brand, in 2005. In 2006, at the end of GoAmerica's technology subcontracting relationship with Sprint, the underlying technology for Sprint Relay Wireless was made available to users under the i711.com brand.

2. Provide a list of states in which GRSC has provided or currently provides relay service.

Response: GoAmerica provides interstate relay services in all fifty states of the United States as well as U.S. territories. GRSC has not provided, and does not currently provide, intrastate relay services in any state. As noted in Section 5 of the CLEC Application, GRSC currently has filed petitions or other documentation seeking authority to assume state relay service contracts in California and District of Columbia similar to the contract that GRSC is seeking to assume in the Joint Petition.

3. Have there been any consumer complaints regarding the relay services provided by GoAmerica GRSC, or Stellar Nordia Services, LLC ("Stellar Nordia")? If so, list the date of the complaint, nature of the complaint and how the complaint was resolved. Please provide monthly call center performance reports for states, territories or districts in which Stellar Nordia provided relay services during 2006 and 2007.

Response: As noted in Section 13.C of the CLEC Application, GoAmerica has been subject to very few complaints since it began providing interstate relay services. A copy of GoAmerica's most recent annual consumer complaint log summary for the period June 1, 2006 through May 31, 2007, as filed with the Federal Communications Commission, is attached hereto as Exhibit A. Because GRSC was established specifically to assume, among other things, the Tennessee state relay services contract, it has not yet provided relay services and therefore, no complaints have yet been lodged against it.

Separately provided **UNDER SEAL**, due to the very competitively sensitive **CONFIDENTIAL INFORMATION** contained therein, are monthly call center performance reports for GoAmerica's interstate relay service, as submitted to NECA, for the period June 1, 2006 through May 31, 2007; Stellar Nordia was the subcontractor of technology and call center services for GoAmerica throughout that period.

4. **If the *Petition* in Docket 07-00204 is approved, where will the call center be located? How many employees will be dedicated to the relay call center? Is there any intention to reduce the number of staff below current levels?**

Response: If the Joint Petition is approved, GRSC intends to maintain the Tennessee Telerelay Call Center ("TRC") at its current location at 1725 N. Shelby Oaks Drive, Memphis, Tennessee 38134. With respect to call center staffing, if the Joint Petition is approved and as noted in Section 5.2.4.6. of the RFP responses attached to the Affidavit of Mark L. Stern in Exhibit B to the Joint Petition, GRSC plans to initially staff the TRC at a level commensurate with current call volumes for Tennessee intrastate relay service traffic. GRSC will also ensure that call volumes are regularly monitored and that TRC staffing is adjusted as necessary to effectuate the appropriate handling of Tennessee-specific relay calls.

5. **Provide a \$20,000 corporate surety bond or irrevocable letter of credit pursuant to T.C.A. § 65-4-125.**

Response: GRSC is in the process of procuring a corporate surety bond or irrevocable letter of credit in the amount of \$20,000 and will provide it to the TRA shortly.

6. **To demonstrate technical ability GoAmerica partially relies on a contract with Stellar Nordia and its experience with Relay Services. Please describe Stellar Nordia's technical ability including backgrounds of key personnel.**

Response: As noted in Section III of the Joint Petition, Stellar Nordia has extensive experience as a call center operator. Stellar Nordia started delivering relay services in 1999 to Bell Canada, which represents approximately 70% of Canadian relay traffic. In 2004, it became a provider of intrastate relay services in California pursuant to a contract similar to the one that GRSC is seeking to assume in the Joint Petition. Stellar Nordia has been successfully serving as a technology and call center contractor for GoAmerica's interstate relay services since 2005. Across all of its business units, Stellar Nordia has 2,200 agents handling approximately 100 million customer interactions a year.

Stellar Nordia has built its own relay service platform called Multimedia Relay Center ("MMRC"), which integrates several different protocols into a single platform, as well as the capability to handle simultaneous calls in multiple locations over a broad geographic area with very high quality and reliability. More than 60 different combinations of relay modalities can be processed through Stellar Nordia's MMRC.

Stellar Nordia has also deployed an infrastructure to ensure very high uptimes and 24/7/365 availability of its relay service platform, with appropriate redundant components and backup power supplies. All components are automatically monitored in real time, and can be scaled to handle growing volumes. Operational experience has proven that MMRC can handle well over a million session minutes of traffic per month.

For its technological achievement in deploying MMRC, Stellar Nordia received, among other awards, the Gold Best of Category award of excellence in 2005 for efficiency and operational improvements from Canadian Information Productivity Awards, Canada's oldest and most prestigious award for excellence in the field of information technology.

For backgrounds of Stellar Nordia's key personnel, see Exhibit B.

- 7. Provide a signed verification from Verizon Communications Inc., verifying that the information contained in the *Petition* submitted in Docket No. 07-00204 is true and correct to its best knowledge, information, and belief.**

Response: Verizon Communications Inc. has provided under separate cover a signed verification attesting to the fact that the information contained in the Joint Petition is true and correct.

- 8. Provide a copy of all contracts between GRSC and Stellar Nordia that pertain to providing relay service in Tennessee.**

Response: The Managed Services Agreement between GRSC (then known as Acquisition 1 Corp.) and Stellar Nordia (the "MSA") is included as Exhibit 10.2 to the Form 8-K that GoAmerica filed with the Securities and Exchange Commission on August 7, 2007. The Form 8-K was provided as Appendix B to the RFP responses attached to the Affidavit of Mark L. Stern in Exhibit B to the Joint Petition and is available (with all Exhibits) at:

<http://www.sec.gov/Archives/edgar/data/1101268/000089109207003406/0000891092-07-003406-index.htm>

The direct link to Exhibit 10.2 to the Form 8-K is:

http://www.sec.gov/Archives/edgar/data/1101268/000089109207003406/e28169ex10_2.txt.

- 9. Provide the status and periodic updates, as necessary, concerning review and approval of the transaction described in Docket No. 07-00204 in other states.**

Response: On August 16, 2007, Verizon filed a petition with the California Public Utilities Commission requesting approval of the transfer of certain assets, including an intrastate TRS contract, from Verizon to GoAmerica. No comments have been filed in that proceeding, and GoAmerica and Verizon are awaiting approval of the petition. On August 13, 2007, Verizon filed a letter request with the D.C. Public Service Commission requesting assignment of a District-issued TRS contract from Verizon to GoAmerica, and the parties are awaiting a response. The parties will continue to update the TRA of material developments in these proceedings.

- 10. Will the transfer of control in Docket No. 07-00204 be submitted to the FCC for approval? If so, provide the docket number and status.**

Response: This transaction does not require FCC approval and, accordingly, no application has been made. GoAmerica is already certified by the FCC as a telecommunications relay service provider.

11. From our initial review, it appears that Stellar Nordia would be providing telecommunications services in Tennessee. Does Stellar Nordia plan to apply for a certificate of convenience and necessity? If not, why?

Response: The parties do not believe that Stellar Nordia will be providing telecommunications services in Tennessee under the arrangements discussed in the Joint Petition. The services in question will be provided by GRSC. They will be branded in all respects as GoAmerica services, and consumers will only be aware of GoAmerica as the provider of the services. From either a consumer or regulatory perspective, Stellar Nordia will simply be a subcontractor of technology and call center services to the identified provider of services – GRSC. Stellar Nordia's relationship to GRSC is explicitly defined in Section 8.1 of the MSA as that of an independent contractor for the technology and call center services to be provided pursuant thereto. The MSA can be viewed at the link in the response to Question 8 above.

* * * * *

If the TRA has any questions about these responses to Data Request No. 1, or if it requires further information to aid in its analysis of the above-referenced matters, please do not hesitate to contact the undersigned at 202-974-5691 or dfrix@chadbourn.com. Thank you very much for your prompt consideration of these matters.

Very truly yours,



Dana Frix

Counsel to GoAmerica, Inc. and
GoAmerica Relay Services Corp.

cc: Melvin Malone, Esq.

Exhibit A

GoAmerica, Inc. 2006-2007 Complaint Log
(as filed with the FCC)



June 29, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, DC 20554

RE: **GoAmerica, Inc.**
CG Docket 03-123
Annual Consumer Complaint Log Summary
June 1, 2006 through May 31, 2007

Dear Ms. Dortch:

GoAmerica, Inc. ("GoAmerica"), respectfully submits its annual summary of consumer complaints for the period June 1, 2006 through May 31, 2007 ("Service Year"). The attached summary of complaints covers GoAmerica's provision of Internet Protocol Relay ("IP relay") and Video Relay Service ("VRS"), as an eligible provider receiving compensation from the Interstate Telecommunications Relay Service ("TRS") Fund. GoAmerica provides these IP relay and VRS services under the i711.com® brand name.

GoAmerica maintains a complete log of all complaints received, in accordance with 47 C.F.R. § 64.604(c)(1)(i). Each complaint received is assigned a ticket identification number and tracked from receipt through issue resolution. During the Service Year, GoAmerica received and logged 189 consumer complaints. The attached summary of complaints is based on this complete log, which is on file at GoAmerica.

In accordance with Federal Communications Commission Public Notice released June 22, 2007, DA 07-2762, this filing is made electronically.

Should any questions arise concerning this submittal, kindly contact the undersigned.

Respectfully yours,

/s/

Mark L. Stern
Vice President, Product Management
and TRS Compliance Officer
GoAmerica, Inc.

cc: Arlene Alexander by e-mail
Consumer & Governmental Affairs Bureau, FCC

GoAmerica Annual Complaint Log for i711.com Relay Services, June 1, 2006 through May 31, 2007

Ticket	Date of Complaint	Nature of complaint	Date of Resolution	Nature of Resolution
88146	06/02/06	CA disconnected call without notifying caller	06/06/06	Requested CA identifier so CA could be coached
88466	06/09/06	Calls disconnected while on hold; asked if this was normal	06/15/06	Informed customer that there is no time limit while on hold; could not reproduce problem
88913	06/21/06	CA was rude and did not allow customer to correct the phone number she typed	06/21/06	Apologized to customer; CA was coached
89027	06/24/06	Could not call a number outside the US	06/29/06	Advised customer that IP relay cannot be used to call numbers from outside the US
89069	06/26/06	CA was slow in responding	06/28/06	Requested CA identifier so CA could be coached
89084	06/27/06	Requested that customer's number be displayed on her called party's Caller ID	06/28/06	Informed customer that it was not technically possible for her number to be displayed
89216	06/29/06	No CA answered call	06/29/06	Informed customer of temporary outage on that date and time; service has since been restored
89239	06/29/06	Session ended right after connecting to service	06/29/06	Informed customer that there was an outage on that date and time
89215	06/29/06	Session ended shortly after connecting	06/30/06	Informed customer that there was an outage on that date and time
89259	06/30/06	Could not call a number in the US while originating from Europe	07/06/06	Advised customer that IP relay cannot be used to call numbers from outside the US
89390	07/05/06	Received relay calls in the middle of the night	07/06/06	Informed customer that we cannot block calls; advised to contact local authorities
89493	07/07/06	Received automated message when trying to make call	07/13/06	Requested automated message text from customer for investigation; customer did not respond
89551	07/09/06	Received relay calls in the middle of the night	07/12/06	Informed customer that we cannot block calls; advised to contact local authorities
89564	07/09/06	Requested identity of caller	07/12/06	Informed customer that we cannot reveal identity of caller
89577	07/10/06	CA was slow and did not relay voicemail properly	07/13/06	Requested CA identifier so CA could be coached
90001	07/17/06	Could not connect to relay service	07/18/06	Apologized to customer; requested more info for further investigation
90003	07/17/06	Received prank calls	07/18/06	Informed customer that we cannot reveal identity of caller
90007	07/17/06	Received threatening calls	07/18/06	Informed customer that we cannot reveal identity of caller
90183	07/21/06	Relay number does not appear on Caller ID	08/09/06	Informed customer that was not possible for her number to be displayed

90322	07/25/06	CA discussed previous call made by user to another caller	07/26/06	Apologized to customer; CA was coached
90334	07/25/06	No CA answered call	07/26/06	Informed customer of temporary outage on that date and time; service has since been restored
90386	07/26/06	CA hung up on caller	07/26/06	Apologized to customer; CA was coached
90350	07/26/06	Could not connect to relay service	07/26/06	Informed customer of temporary outage on that date and time, indicating that issue has been resolved
90443	07/27/06	Received nuisance calls	07/28/06	Informed customer that we cannot reveal identity of caller
90670	08/02/06	Request for a different CA was not honored	08/03/06	Apologized to customer; CA was coached
90707	08/02/06	Received harrassing calls and requested caller to be blocked	08/03/06	Informed customer that we cannot block calls; advised to contact local authorities
90827	08/07/06	Received threatening calls	08/09/06	Informed customer that we cannot block calls; advised to contact local authorities
90960	08/08/06	Could not make international call	08/09/06	Advised customer that IP relay cannot be used to call numbers outside the US
90958	08/08/06	Did not like CA's tone	08/09/06	Apologized to customer; CA was coached
90980	08/09/06	Could not call someone in Canada	08/10/06	Advised customer that IP relay cannot be used to call numbers outside the US
91105	08/10/06	CA interrupted caller and told him to wait for GA	08/16/06	Apologized to customer; CA was coached
91306	08/11/06	Received inappropriate calls	08/24/06	Informed customer that we cannot block calls; advised to contact local authorities
91353	08/12/06	Received inappropriate calls	08/16/06	Informed customer that we cannot reveal identity of caller
91571	08/16/06	Could not connect to relay service	08/17/06	Requested IP info, etc. from customer for further investigation
91839	08/18/06	Received unwanted calls	08/21/06	Informed customer that we cannot block calls; advised to contact local authorities
92325	08/25/06	CA did not relay call verbatim	09/05/06	Apologized to customer; CA was coached
94919	10/01/06	Did not like CA's attitude	10/08/06	Apologized to customer; CA was coached
94955	10/02/06	Received obscene phone call	10/07/06	Informed customer that we cannot reveal identity of caller
95110	10/03/06	Could not connect to relay service	10/07/06	Apologized to customer; requested more info for further investigation
95136	10/04/06	CA was rude and typed too slowly	10/07/06	Apologized to customer; CA was coached
95791	10/11/06	Received harrassing and obscene phone calls	10/14/06	Informed customer that we cannot reveal identity of caller
95898	10/13/06	Received harrassing phone calls	10/13/06	Informed customer that we cannot reveal identity of caller
96238	10/18/06	Received prank calls	10/19/06	Informed customer that we cannot reveal identity of caller
96247	10/19/06	Could not connect to relay service	10/20/06	Requested IP info, etc. from customer for further investigation

96376	10/20/06	Disconnected after a few minutes	10/21/06	Apologized to customer; requested more info for further investigation
96574	10/23/06	Disconnected after a few minutes	11/01/06	Apologized to customer; requested more info for further investigation
96577	10/23/06	Disconnected after a few minutes	11/01/06	Apologized to customer; requested more info for further investigation
96565	10/23/06	Received obscene phone call	10/26/06	Informed customer that we cannot reveal identity of caller
96673	10/25/06	Disconnected after a few minutes	10/26/06	Apologized to customer; requested more info for further investigation
96770	10/25/06	Disconnected calls	11/01/06	Apologized to customer; requested more info for further investigation
96916	10/27/06	Disconnected calls	10/27/06	Apologized to customer; requested more info for further investigation
96928	10/27/06	Disconnected calls	10/27/06	Apologized to customer; requested more info for further investigation
96977	10/28/06	Requested male CA and was connected to female CA	11/01/06	Informed customer that male CAs were not available due to temporarily high call volume; advised to wait longer for a male CA
97115	10/31/06	CA hung up on caller	11/02/06	Apologized to customer; CA was coached
97116	10/31/06	CA hung up on caller	11/01/06	Apologized to customer; CA was coached
97107	10/31/06	Disconnected calls	11/01/06	Apologized to customer; requested more info for further investigation
97122	10/31/06	Disconnected calls	11/01/06	Apologized to customer; requested more info for further investigation
97182	11/02/06	CA did not confirm having left customer's message before hanging up call	11/21/06	Apologized to customer; CA was coached
97184	11/02/06	CA stopped responding; caller eventually hung up	11/03/06	Apologized to customer; indicating that issue was under investigation
97251	11/02/06	Call window froze; no response from CA	11/04/06	Apologized to customer; requested more info for further investigation
97384	11/06/06	CA did not see special instructions	11/10/06	Informed customer that problem was being resolved
97348	11/06/06	Received obscene calls	11/09/06	Informed customer that we cannot reveal identity of caller
97461	11/07/06	Special Instructions box no longer available	11/08/06	Informed customer that issue was known and currently being addressed
97560	11/08/06	CA hung up on caller	11/10/06	Apologized to customer; CA was coached
97599	11/08/06	Received prank calls and harrassing calls	11/10/06	Informed customer that we cannot reveal identity of caller
97794	11/11/06	Received prank calls and harrassing calls	11/14/06	Informed customer that we cannot reveal identity of caller

98096	11/19/06	Disconnected calls	11/19/06	Apologized to customer; requested more info for further investigation
98141	11/20/06	Call window froze; no response from CA	11/20/06	Acknowledged customer; indicated that issue was under investigation
98152	11/20/06	Unspecified call problems	11/21/06	Requested detailed information from customer; customer did not respond
98257	11/24/06	Received obscene calls	11/27/06	Informed customer that we cannot reveal identity of caller
98323	11/28/06	Received prank calls	11/28/06	Informed customer that we cannot reveal identity of caller
98365	11/29/06	CA did not inform caller when line was disconnected or on hold, etc.	11/29/06	Apologized to customer; acknowledged technical difficulties and that issue would be addressed
98531	12/04/06	Received obscene call	12/04/06	Informed customer that we cannot reveal identity of caller
98574	12/05/06	Received prank calls	12/05/06	Informed customer that we cannot reveal identity of caller
98777	12/06/06	Did not successfully connect when receiving inbound relay call	12/07/06	Acknowledged customer; indicated that issue was under investigation
98866	12/07/06	Received obscene calls	12/08/06	Informed customer that we cannot reveal identity of caller
99007	12/08/06	CA did not properly greet inbound callers and acted unprofessionally	12/13/06	Apologized to customer; CA was coached
99055	12/10/06	Received abusive calls	12/11/06	Informed customer that we cannot reveal identity of caller
99150	12/11/06	Received threatening and obscene calls	12/12/06	Informed customer that we cannot reveal identity of caller
100029	12/20/06	Callers reached customer's "voicemail" even though customer was available to take call	12/20/06	Acknowledged customer; indicated that issue was under investigation
100237	12/21/06	CA told customer that his caller hung up when the caller actually didn't	12/22/06	Apologized to customer; CA was coached
100271	12/22/06	Received threatening calls	12/22/06	Informed customer that we cannot reveal identity of caller
100640	12/27/06	Calls disconnected without warning	12/27/06	Apologized to customer, indicating that issue was under investigation
100644	12/27/06	Calls disconnected without warning	12/27/06	Apologized to customer, indicating that issue was under investigation
100678	12/27/06	CA stopped responding	12/27/06	Informed customer that problem was under investigation
100681	12/27/06	CA stopped responding	12/27/06	Informed customer that problem was under investigation
100667	12/27/06	Received prank calls	12/27/06	Informed customer that we cannot reveal identity of caller
100675	12/27/06	CA stopped responding	12/27/06	Requested more information from customer in order to investigate; customer did not respond
100758	12/28/06	Received emails about missed calls	12/28/06	Acknowledged customer; indicated that issue was under investigation
100861	12/31/06	Received prank calls	01/02/07	Informed customer that we cannot reveal identity of caller
100880	01/02/07	Received threatening calls	01/02/07	Informed customer that we cannot reveal identity of caller

100894	01/02/07	Received harassing phone calls	01/02/07	Informed customer that we cannot reveal identity of caller
101186	01/05/07	Calls disconnected without warning	01/05/07	Informed customer that problem was under investigation
101468	01/10/07	Received inappropriate calls	01/11/07	Informed customer that we cannot reveal identity of caller
101610	01/11/07	Received inappropriate calls	01/12/07	Informed customer that we cannot reveal identity of caller
101966	01/15/07	Received inappropriate calls	01/16/07	Informed customer that we cannot reveal identity of caller
102017	01/15/07	Received threatening calls	01/16/07	Informed customer that we cannot reveal identity of caller
102388	01/20/07	Received "Cannot make call outside US" error message, even though customer wanted to make US-to-US call	01/22/07	Acknowledged customer; indicated that issue was under investigation
102432	01/21/07	Received threatening calls	01/23/07	Informed customer that we cannot reveal identity of caller
102467	01/22/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	01/23/07	Acknowledged customer; indicated that issue was under investigation
102551	01/23/07	Received inappropriate calls	01/24/07	Informed customer that we cannot reveal identity of caller
102512	01/23/07	Received prank calls and inappropriate calls	01/23/07	Informed customer that we cannot reveal identity of caller
102574	01/24/07	Requested identity of caller	01/25/07	Informed customer that we cannot reveal identity of caller
102653	01/25/07	Disconnected calls	01/26/07	Apologized to customer; requested more info for further investigation
102671	01/26/07	Received calls from wrong numbers	01/26/07	Informed customer that there is no way to prevent these type of calls
102723	01/26/07	Received calls from wrong numbers	01/26/07	Informed customer that there is no way to prevent these type of calls
102728	01/26/07	Received calls from wrong numbers	01/26/07	Informed customer that there is no way to prevent these type of calls
102791	01/28/07	Received "not available" recording when calling customer who was actually online on AIM	01/31/07	Sent customer instructions on how to resolve problem
102851	01/29/07	Received threatening calls	01/30/07	Informed customer that we cannot reveal identity of caller
103026	02/01/07	CA was rude	02/10/07	CA was coached
103121	02/02/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/02/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
103151	02/02/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/05/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
103214	02/05/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/05/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated

103282	02/06/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/06/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
103378	02/07/07	Could not call doctor who does not accept "private" calls where number is not displayed on Caller ID	02/07/07	Informed customer that was not possible for number to be displayed
103460	02/08/07	Could not make relay calls as server was down	02/08/07	Informed customer that problem was under investigation
103839	02/14/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/15/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
103987	02/16/07	Requested info on relay call made via service	02/26/07	Informed customer that we cannot reveal identity of caller
104113	02/20/07	Did not receive caller's message, although caller's name and number was relayed	02/22/07	Acknowledged customer; indicated that issue was under investigation
104138	02/20/07	Requested identity of caller	02/27/07	Informed customer that we cannot reveal identity of caller
104139	02/20/07	Requested identity of caller	02/27/07	Informed customer that we cannot reveal identity of caller
104232	02/22/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/23/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
104236	02/22/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	02/23/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
104645	02/28/07	Experienced trouble using service, but did not provide any details as to the exact problem	03/02/07	Requested more info from customer on problem; customer did not respond
104683	03/01/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	03/02/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated
104737	03/02/07	CA told caller that customer was not available, even though customer was online	03/06/07	Informed customer that if she does not reply to AIM, CA informs caller that she is not available
104735	03/02/07	Requested female CA but connected to male CA	03/07/07	Informed customer that, if a female CA is not available due to temporarily high call volume, a male CA will take the call
104952	03/05/07	Could not connect to relay service	03/06/07	Informed customer that problem was under investigation
104927	03/05/07	Reported that two CAs responded when connecting to service	03/12/07	Requested conversation text from customer so that problem could be investigated further; customer did not respond
105295	03/10/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	03/13/07	Requested more info from customer on IP address, phone number, etc., so problem could be investigated

105317	03/11/07	Received error message on AIM when receiving inbound relay call	03/15/07	Apologized to customer; indicated that issue was under investigation
105320	03/11/07	Received error message on AIM when receiving inbound relay call	03/16/07	Apologized to customer; indicated that issue was under investigation
105325	03/12/07	Received error message on AIM when receiving inbound relay call	03/14/07	Apologized to customer; indicated that issue was under investigation
105554	03/14/07	Could not connect to relay service	03/20/07	Apologized to customer, indicating that issue was under investigation
105743	03/16/07	Received "missed call" message even though customer was online on AIM	03/19/07	Informed customer that if she does not reply on AIM, she will get a "missed call" message
106758	03/28/07	CA did not communicate call status, connection, etc.	03/29/07	Apologized to customer; CA was coached
107018	03/30/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	04/03/07	Removed AIM block on customer's screen name
107303	04/02/07	Received "missed call" message even though customer was online on AIM	04/04/07	Informed customer that if she does not reply on AIM, she will get a "missed call" message
107352	04/03/07	Received message that caller would be charged \$20 per minute for the call	04/06/07	Informed customer that there was no charge to receive a relay call
107435	04/04/07	Did not receive a response from CA when trying to make a relay call	04/05/07	Apologized to customer; tested service and confirmed that service was operational
107410	04/04/07	Received "missed call" message even though customer was online on AIM	04/05/07	Informed customer that if she does not reply on AIM, she will get a "missed call" message
107478	04/04/07	Received prank calls	04/06/07	Informed customer that we cannot reveal identity of caller
107562	04/05/07	Received obscene call	04/06/07	Informed customer that we cannot reveal identity of caller
107662	04/06/07	Disconnected calls	04/09/07	Apologized to customer; requested more info for further investigation
108167	04/11/07	Received obscene call	04/18/07	Informed customer that we cannot reveal identity of caller
111284	04/13/07	CA did not relay call verbatim	04/19/07	Apologized to customer; CA was coached
111386	04/18/07	Could not reach two particular phone numbers via relay	04/20/07	Informed customer that issue was unrelated to relay service, as same voice announcements were presented when calling outside of relay
111443	04/18/07	Received obscene call	04/20/07	Informed customer that we cannot reveal identity of caller
111518	04/18/07	Could not make relay calls due to block	04/20/07	Requested more info from customer in order to investigate; customer did not respond
111605	04/19/07	Received "missed call" messages while logged into AIM (in invisible mode)	04/30/07	Informed customer that he would have to make himself visible to avoid getting "missed call" messages

111554	04/19/07	Could not make relay calls from some offices	04/30/07	Sent customer info on making relay calls
111683	04/21/07	Received prank calls	04/24/07	Informed customer that we cannot reveal identity of caller
111799	04/24/07	CA was rude and hung up on caller	04/26/07	Apologized to customer; CA was coached
111830	04/24/07	Received threatening calls	04/24/07	Informed customer that we cannot reveal identity of caller
111811	04/24/07	Received "Cannot place relay call outside US" error message, even though customer attempted to place US-to-US call	04/26/07	Requested more info from customer; customer did not respond
111952	04/25/07	CA disconnected call without notifying caller	04/27/07	Apologized to customer; CA was coached
112144	04/27/07	Reported that AIM service showed as offline	05/01/07	Apologized to customer for the inconvenience due to a temporary service outage
112121	04/27/07	Reported AIM block after attempting to use relay service once while outside of the US	05/01/07	Removed AIM block on customer's screen name
112167	04/28/07	Received prank calls	05/01/07	Informed customer that we cannot reveal identity of caller
111196	04/29/07	Received harrassing calls	05/01/07	Informed customer that we cannot reveal identity of caller
112396	05/02/07	Received harrassing calls	05/03/07	Informed customer that we cannot reveal identity of caller
112437	05/02/07	Received unwanted calls	05/03/07	Informed customer that we cannot reveal identity of caller
112519	05/03/07	Reported long hold times for video interpreter	05/03/07	Apologized to customer
112555	05/03/07	Rushed into replying by CA	05/10/07	Apologized to customer; requested CA number so that CA could be coached
112482	05/03/07	Received harrassing calls	05/08/07	Informed customer that we cannot reveal identity of caller
112525	05/03/07	Received unwanted calls	05/07/07	Informed customer that we cannot reveal identity of caller
112455	05/03/07	Reported that there were no CAs for three days in a row	05/07/07	Requested more details from customer as whether she was using text relay, VRS, etc.; customer did not respond
112748	05/04/07	Experienced long wait for CA	05/07/07	Apologized to customer for long wait time due to temporarily high call volume; requested more info for further investigation
112804	05/06/07	CA hung up before caller was finished typing	05/08/07	Apologized to customer for inconvenience; suggested asking CA to hold while typing long messages
113049	05/10/07	CA hung up on caller	05/10/07	Apologized to customer; CA was coached
113207	05/11/07	Received prank calls	05/14/07	Informed customer that we cannot reveal identity of caller
113374	05/14/07	CA did not offer customer to make another call when first call ended	05/15/07	Apologized to customer; CA was coached
113372	05/14/07	Could not connect to relay service	05/15/07	Requested IP info, etc. from customer for further investigation
113517	05/16/07	Experienced blank screen while typing	05/17/07	Acknowledged customer; indicated that issue was under investigation

113485	05/16/07	Received prank calls	05/16/07	Informed customer that we cannot reveal identity of caller
113607	05/17/07	Switching video interpreters is too disruptive	05/22/07	Informed customer that we are working to make the switching process quicker and less disruptive
113749	05/18/07	Reported long hold times for a Spanish-speaking CA	05/21/07	Apologized to customer for long hold times; requested more info from customer for further investigation; customer did not respond
113778	05/19/07	Received harrassing calls	05/21/07	Informed customer that we cannot reveal identity of caller
113778	05/19/07	Received harrassing calls	05/21/07	Informed customer that we cannot reveal identity of caller
113795	05/20/07	Received harrassing calls	05/21/07	Informed customer that we cannot reveal identity of caller
113858	05/21/07	Could not sign into service profile	05/22/07	Provided customer with password
113934	05/22/07	Received no response when answering incoming call	05/23/07	Acknowledged customer; indicated that service was working fine now
114092	05/23/07	Requested info on connecting from behind firewall	05/24/07	Informed customer that we cannot reveal identity of caller
114189	05/24/07	Requested female CA but call was not completed	05/25/07	Informed customer that a female CA was not available due to temporarily high call volume, and customer did not authorize a male CA to take the call instead
114193	05/24/07	Received prank calls	05/25/07	Informed customer that we cannot reveal identity of caller
114258	05/25/07	Requested source of a call	05/25/07	Informed customer that we cannot reveal identity of caller
114298	05/26/07	CA was rude and did not relay call accurately	05/29/07	Apologized to customer; CA was coached
114528	05/30/07	CA hung up before caller was finished typing	05/31/07	Apologized to customer, and requested CA identifier so that CA could be coached
114534	05/31/07	Received threatening calls	05/31/07	Informed customer that we cannot reveal identity of caller

Exhibit B

Stellar Nordia Key Personnel

Backgrounds of Key Personnel at Stellar Nordia

Bernard Durocher - Chief Executive Officer, Nordia Inc.

Bernard Durocher has been Chief Executive Officer at Stellar Nordia since June 2006. In addition to leading start-up operations for Stellar Nordia's relay business unit, Durocher has a proven professional record of more than 20 years of general management and contact center experience, including 17 years with Bell Canada. Prior to his appointment as CEO, Durocher was Executive Vice President, then President of Stellar Nordia. In these positions, he was responsible for client relationship management, contract negotiation and management, operating budget management, and profitability from service operations.

Pierre Grimard - Vice-President, Information Technology

Pierre Grimard has been Vice President of Information Technology at Stellar Nordia since January 2004. With 20 years of experience in technology, Grimard has worked in various service-related industries holding senior executive IT positions. He led the development and delivery of Multimedia Relay Center, an award-winning technology platform that enabled Stellar Nordia to provide relay services in the United States, while ensuring geographic transparency. In addition, he led the migration of Stellar Nordia's call center technology to VoIP and implemented CRM and ERP solutions in the Canadian and international markets.

Martin Beaulac – Vice-President, Finance and Chief Financial Officer

Martin Beaulac, CGA, has been Vice President, Finance and Chief Financial Officer at Stellar Nordia since September 2004. He is responsible for all financial and accounting functions at Stellar Nordia. Beaulac began his employment with Stellar Nordia in 1999, as financial controller. Prior to working at Stellar Nordia, Beaulac held several accounting management roles in manufacturing, telecommunications, and service companies since 1990.

Jean-Pierre Duclos - Vice-President, Human Resources & Communications

Jean-Pierre Duclos has been Vice President, Human Resources & Communications at Stellar Nordia since February 2007. An expert and senior practitioner in human resources and telecommunications management, Duclos has extensive experience in areas of compensation, labor relations, strategic planning and organizational development applied to the private, para-governmental and public sectors. He has held various positions as a consultant and as a senior executive for leading companies including Connexim, an outsourcing company operating in the telecommunications industry, Hydro-Québec, the City of Montreal and Via Rail.

Anne Rousseau – Director, US Client Relations & Sales

Anne Rousseau is currently Director of Client Relations and Sales at Stellar Nordia for the American market and acting manager for the California Relay Service contract. She initiated the U.S. relay business in 2001 at Stellar Nordia and participated in the integration of the Bell Relay Service. She has also held the positions of IT Manager, Quality Manager and Project Manager. A business expert in relay services, Rousseau implemented the California Relay Service project. She has more than 15 years of experience specializing in call center management and implementation.

Loretta Federico – Director, Montreal/Crémazie Customer Contact Center

Loretta Federico has been the Director of the Crémazie Call Center at Stellar Nordia since January 2006. Her responsibilities include the call center management of the California Relay Service and GoAmerica's i711.com Relay Service. Federico began her career at Stellar Nordia in September 2004 as Operations Manager of the California Relay Service, becoming in July 2005, Director of the Côte-Vertu Call Center for ExpressVu and Prepaid Services. A customer service and results oriented manager, she has 18 years of experience in the call center industry in areas of superior customer service, workforce and budget management.