



TARGETED ACCESSIBILITY FUND OF NEW YORK, INC.

4 TOWER PLACE, 2ND FLOOR, ALBANY, NY 12203
TELEPHONE: (518) 443-2808 • FAX: (518) 443-2809
WWW.TAFNY.ORG

March 10, 2026

ELECTRONIC FILING

Honorable Michelle Phillips, Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case 21-C-0570 - Targeted Accessibility Fund of New York- New York State
Relay Service - Proposed Award

Dear Secretary Phillips:

Pursuant to the authority delegated to the Targeted Accessibility Fund of New York, Inc. (TAFNY) by the Commission, and the conditional request for proposal issued on January 23, 2026, TAFNY respectfully submits its recommendation for the award to provide Telecommunications Relay Service (TRS) in the State of New York beginning July 1, 2026. The basis for TAFNY's recommendation is set forth below.

The (Conditional) Bidding Process for a TRS Provider to Offer Service Beginning July 1, 2026

In 2025, with the consent of the Commission, TAF and T-Mobile executed a Second Amendment to the existing T-Mobile contract to provide TRS in NYS. As described in the next section entitled “Conditional Nature of Award to Provide TRS”, T-Mobile’s option to renew contains provisions allowing T-Mobile to withdraw its exercise of its first renewal option under certain circumstances. Accordingly, the award to provide TRS effective July 1, 2026, is conditioned upon T-Mobile withdrawing its option to renew.

In 2025, TAFNY submitted to the Commission a Conditional Proposed Request for Proposal (RFP) to offer TRS in the State of New York. The Commission approved that RFP on January 22, 2026 and TAFNY issued the RFP to prospective bidders on January 23, 2026. The RFP contained the following language:

CONDITIONAL NATURE OF AWARD TO PROVIDE TRS

THE CONTRACT TO BE AWARDED FOR TRS SERVICE COMMENCING ON JULY 1, 2026, IS CONDITIONED ON THE EXISTING VENDOR, T-MOBILE, USA INC. (T-MOBILE) WITHDRAWING ITS OPTION TO CONTINUE PROVIDING TRS AFTER HAVING EXERCISED ITS FIRST RENEWAL OPTION.

T-Mobile's current provisioning of TRS is done pursuant to the Commission's Order Approving Targeted Accessibility Fund Recommendations issued June 17, 2022, in Case 21-C-0570 (the 2022 Order). The Initial Term of the T-Mobile contract to provide TRS expires on June 30, 2026. However, that contract also authorized a first renewal extension option of two years.

That contract specified, in accordance with Section 92-a of Public Service Law, that the TRS Relay Service Center be located within the municipality of Syracuse, New York, and that the minimum of 80% of all calls utilizing TRS must be routed to and through that relay service center in Syracuse (the Syracuse Requirement).

T-Mobile has formally exercised its option for a first renewal of the TRS contract for a period of one year, commencing on July 1, 2026, and terminating on June 30, 2027, together with a further extension option of two years (July 1, 2027-June 30, 2029). T-Mobile also specified it would have an option for two additional one-year extensions. TAF deemed this exercise of these extension options consistent with the current contract for TRS service which had been approved by the Commission in the 2022 Order. The formal T-Mobile exercise of its first renewal option is set forth in the contract to provide TRS, dated November 24, 2025.

T-Mobile's exercise of its first extension options, formalized in the Second Amendment, was conditioned on two possible events, the occurrence of either of which would permit T-Mobile to withdraw its exercise of the first renewal option and be excused from the provision of Relay Service:

1. T-Mobile could terminate the contract for convenience without penalty if (i) the existing provisions of Section 92-a of the Public Service Law requiring the primary call center to be physically located in Syracuse (the Syracuse Requirement), and the associated in-state calling requirement that 80% of all calls utilizing TRS be routed through that call center, were not eliminated at least 90 days prior to June 30, 2026 and (ii) T-Mobile's subcontractor does not extend its subcontract with T-Mobile. Such termination would have to be given upon 120 days prior written notice to TAF, which notice could be given at any time following execution of the contract renewal (the Second Amendment) which occurred on November 24, 2025.
2. T-Mobile has also specified that its exercise of its renewal option will not take effect unless T-Mobile and TAF agree to revised rates, to be paid to T-Mobile for TRS services and to be incorporated in the renewed contract, no later than 30 days prior to June 30, 2026.

The Second Amendment contains the above provisions.

The award to provide TRS service, effective July 1, 2026, will be conditional upon T-Mobile withdrawing its recently exercised option to renew its existing contract. TAF intends to award a conditional contract to provide TRS based on the submissions in response to this RFP. However, the winner of that contract will have the right to provide TRS only in the event T-Mobile revokes its first option to renew under the terms of the Second Amendment. As such, the awardee of the conditional contract to provide TRS may not be aware of its entitlement and obligation to provide TRS service until shortly before the service commencement date of July 1, 2026.

Because it is not certain whether the requirement to utilize a relay center in Syracuse, New York (the Syracuse Requirement) will be in effect on July 1, 2026, bidders were authorized to submit bids under two separate scenarios: (1) If the existing requirement to utilize the relay center in Syracuse, NY remains in effects on July 1, 2026, and (2) if such requirement does not remain in effect on that date. The bidders also had the option to bid under either or both scenarios. To reiterate, the award will be conditional in nature, to be implemented only if T-Mobile withdraws its exercise of its renewal option on one of the two contingencies discussed above.

The contract between the successful bidder and TAFNY will provide that during the Initial Term and any Renewal Term, compliance with the Syracuse Requirement will be terminated should applicable law not require Relay to be provided in accordance therewith, and that the Relay Service may be provided without respect thereto.

At the close of the bid date, February 25, 2026, TAFNY had received only one bid from one prospective TRS provider – Hamilton Relay, Inc. The bid received would apply only if the “Syracuse Requirement” were removed. Therefore, Hamilton’s bid states no TRS traffic will route through any facilities in Syracuse, NY or any location in NYS.

Following receipt of the bid, TAFNY thoroughly reviewed Hamilton’s proposal to determine consistency with the requirements of the RFP; compliance with all requirements of state and federal law; technical and financial qualifications of bidders; the nature of the pricing proposal; and the overall interest of the State, the telecommunications industry, and the user of TRS in this State. During its review TAFNY did have a few clarifying questions on the bid document. TAFNY had a call with representatives from Hamilton Relay and all questions asked were satisfactorily answered. The bid amounts offer various pricing options and optional add-ons. All options are based on the current billed method, which is on conversation minutes used.

The following reasons are why TAFNY recommends that the award for providing TRS go to Hamilton relay.

- Relay service is a valuable and necessary service for the hard of hearing, hard of speaking and deaf residents of NYS.
- By awarding the conditional contract to Hamilton Relay, it would avoid the possibility of delay or service interruptions for its users.
- Hamilton Relay is the current provider in NYS for Captioned Telephone services.
- Hamilton Relay provides Traditional Relay and Captioned Telephone services in 33 states and territories and has been providing these services for over 35 years.

In accordance therewith, TAFNY respectfully recommends the Commission approve the conditional award of the RFP for TRS to Hamilton, for the reasons described above and assuming T-Mobile withdraws its option to renew their current contract.

Critically, TAFNY notes that since Hamilton's bid is to provide TRS only if the "Syracuse Requirement" is removed and since TAFNY has separately been notified by T-Mobile that it will not provide TRS service if the "Syracuse Requirement" is not removed, there is likelihood no TRS provider will be in place after June 30, 2026 should the requirement remain in effect.

Should the Commission desire to review the actual bid evaluated by TAFNY and/or the estimated costs that TAFNY will incur, TAFNY would be pleased to file it under a request for trade secret protection.

Sincerely,



Karen Borovich

Director of Operations

Targeted Accessibility Fund of New York

cc: TAF Board of Directors