



Jacksonville Human Rights Commission
117 W. Duval Street, Suite 350
Jacksonville, FL 32202

City Of Jacksonville LIMITED ENGLISH PROFICIENCY (“LEP”) PLAN

OVERVIEW

Limited English Proficiency (“LEP”) is a term used to describe individuals who do not speak English as their primary language, and who have a limited ability to read, write, speak, or understand English. In order to continue to receive federal funds, recipient jurisdictions must provide services to LEP individuals, must maintain an LEP Plan which is continuously monitored, and must certify compliance with LEP obligations to various entities of the federal government from which the recipient jurisdiction receives funding.

The following matrix outlines the law and policies relating to obligations owed to LEP individuals:

LEGAL AUTHORITY FOR LEP COMPLIANCE

Title VI of the Civil Rights Act of 1964

- Federal law
- Enacted in 1964
- Considers all persons
- Contains monitoring and oversight requirements
- Factor criteria is required, no numerical/percentage thresholds
- Provides protection on the basis of race, color, and national origin
- Focuses on eliminating discrimination in federally funded programs

LEP Executive Order 13166

- Federal Policy for Executive Branch
- Signed in August 2000
- Considers eligible population
- Contains monitoring and oversight requirements
- Factor criteria is required, no numerical/percentage thresholds
- Provides protection on the basis of national origin
- Focuses on providing LEP persons with meaningful access to services using the “four factor” analysis

The U.S. Department of Justice (“DOJ”) and various federal agencies have developed guidance concerning the responsibility of recipients of federal funds to LEP individuals. The guidance is provided to ensure individuals in the United States are not excluded from participation in programs, services and activities receiving federal funds simply because they face challenges communicating in English.

The intent of the City's LEP Plan is to ensure meaningful access¹ to programs, services and activities provided or funded by the City where substantial numbers of residents do not speak or read English proficiently. The production of multilingual publications and documents, and/or interpretation at meetings or events, will be provided to the degree funding permits based on current laws and regulations.

A. DETERMINING THE NEED TO PROVIDE LEP ASSISTANCE

As a condition of funding, the City department/division or agency which receives federal funds² must take reasonable steps to ensure LEP individuals are afforded meaningful access to the information, programs, services and activities the department/division or agency provides to the public. There are four factors to be considered in determining "reasonable steps":

1. The number and proportion of LEP individuals in the eligible service area;
2. The frequency with which LEP individuals come in contact with the program, service or activity;
3. The importance of the program, service or activity; and
4. The resources available to each department/division or agency and the overall cost of providing LEP services

Federal guidance suggests recipients have substantial flexibility in determining what language assistance is appropriate based on a local assessment of these four factors.

1. The number and proportion of LEP person in the eligible service area:

One important step towards understanding the profile of individuals who could participate in programs, services and activities and information provided by the City is a review of Census data.

U.S. Census Bureau 2012-2016 American Community Survey data, and data on Duval County 9-1-1 calls for which telephone translation services were requested, is attached as Exhibit A, and suggests that Spanish is the predominant language of LEP individuals within the City, with these individuals constituting approximately 42,988 persons, or 37.9% of the City's population. Further review of Census data³ suggests that the next most predominant language for City residents not proficient in English are persons who speak Tagalog (Filipino) and "Other Asian" languages.

Those languages which fall under the category of "Other Asian" languages are listed on Exhibit B, which indicates that in the City the predominant "Other Asian" languages spoken by LEP individuals are Vietnamese, Chinese, Korean and Cambodian.

¹Meaningful access is defined as "...access that is not restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals."

²Whether directly, or as a "pass-through" to other recipients/sub-grantees.

³See Exhibit A and B for percentages and numbers of LEP persons speaking other foreign languages.

In summary, Census data suggests Spanish is the predominant language spoken by LEP individuals in the City, and this prong of the “four-factor analysis” suggests that the City should provide Spanish language resources, with continued monitoring of the need for services in Tagalog (Filipino) and other Asian languages.

2. The frequency with which LEP persons come in contact with the program:

The next factor to analyze is the frequency with which persons who speak languages other than English interact with City departments/divisions or agencies. To help gauge this metric, a preliminary survey of interactions with LEP individuals will be solicited from each department/division and agency which provides “essential” services (see Section 3 below).⁴

As LEP compliance is an ongoing obligation of recipients of federal funds, future surveys will be solicited from all of the City’s departments/divisions and agencies, and other tools will be used to monitor interactions with LEP individuals.

We also reviewed requests for telephone translation services received by Duval County’s 9-1-1 system. As may be expected, these requests reinforce Census data showing that Spanish is the language spoken by the majority of LEP individuals who interact with City government, with 3,760 requests for Spanish translation services in 2017.⁵

Anecdotal evidence gleaned from staff of the Jacksonville Human Rights Commission (the “JHRC”) and from colleagues in other City departments/divisions and agencies also suggests that requests for language assistance predominantly come from LEP individuals who speak Spanish.⁶

The JHRC has also received requests for language assistance in American Sign Language (“ASL”)⁷ and Croatian. JHRC uses a third-party vendor, Language Line Solutions, to initially process requests from LEP individuals for immediate service. Language Line Solutions provides language interpretation in over 200 languages. For more in-depth language interpretation services, the JHRC uses Language Services International Corporation. The JHRC has Pre-Interview Questionnaires available in Spanish as well as housing brochures in Spanish, Tagalog (Filipino) and Russian.

In light of the forgoing, we believe this prong of the “four-factor” analysis militates in favor of making City services available in Spanish, with continued monitoring of the need for services in Tagalog (Filipino) and other Asian languages.⁸

⁴See Exhibit C.

⁵See Exhibit D.

⁶The JHRC has one (1) staff member who is fluent in conversational Spanish.

⁷Requests for assistance in ASL are dealt with as requests for reasonable accommodation under the Americans with Disabilities Act (ADA), as amended.

⁸As to further monitoring, see below.

3. The importance of the service provided by the program:

While all departments/divisions and agencies provide valuable services, many departments/divisions and agencies do not provide programs, services or activities that are considered essential – i.e., the program, activity or service provides immediate or emergency assistance, emergency medical treatment, or services for basic needs (like food or shelter). The majority of essential services provided by the City fall under the operations of the Mayor's Office, in particular the Jacksonville Fire and Rescue Department ("JFRD"), and the Jacksonville's Sheriff Office ("JSO"). Perhaps most notable in this regard are emergency management services and emergency medical services, which may truly involve life and death circumstances.

For guidance on hurricane or storm preparation, the City's Emergency Preparedness Division ("EPD") provides 79 language options on its website, JaxReady.com, along with access in those languages to a JaxReady application for persons with special needs.⁹ The Emergency Preparedness Guide is also available on request in Braille through Disabled Services. All postings on JaxReady.com comply with ADA accessibility regulations.

EPD's website is the City's main avenue to quickly disseminate information in a variety of languages. Due to the translation feature on the website, all announcements made through the Joint Information Center leading up to and after the storm are released on the City's website, COJ.net, which features the same translation services mentioned above and are ADA compliant with regard to screen reading technology. Leading up to the storm, JFRD's Call Center functions are transitioned to 630-CITY, which provides the caller with the option to request language translation if needed.

Shelter openings and resource distribution sites are also posted on the City's website. The Red Cross provides interpreters/translators at evacuation shelters. To assist with communication, shelter kits contain picture boards and signs with common images. The EPD's inventory also includes UbiDuo communication devices.¹⁰

The majority of the City's recovery functions are performed through FEMA, which offers support online or by phone in multiple languages. The EPD, along with 630-CITY, provides instructions to contact FEMA for individual assistance when necessary. After the storm, instructions to contact FEMA are posted in Spanish in various publications.

⁹The full text of the 2017-2018 Emergency Preparedness Guide is available for translation into 66 different languages by utilizing the Google translate tab on the left side bar of the website. JaxReady.com also has a language selection tab.

¹⁰The UbiDuo is a communication device that enables deaf, hard of hearing, and hearing impaired people to communicate face to face without any barriers. The device has two keyboards and screen devices that allow a deaf and a hearing person to carry on a conversation.

“Next-level” important programs, services, information and documentation are geared towards the maintenance of home, health and sustenance (and applications to programs and services related thereto), and these, too, mostly fall under the purview of the Mayor’s Office and the Chief Administrative Officer.¹¹

The Duval County Court system has contractually provided language services for most languages, including Spanish and Tagalog (Filipino). The court system uses the iPad virtual translator as a back-up plan when an interpreter is not available. The Duval County Court system has a separate contract to provide ASL interpretation and translation services. In addition, the Duval County Court system is in the process of modifying and upgrading the kiosk located on the ground floor of the courthouse. Upon completion of the project, the kiosk will offer interactive services in the language of the person’s choice. The Duval County Supervisor of Elections also provides language translation services by telephone if a voter or anyone else requests such services.

As the wide span of programs, services and activities offered by each Department/division or agency makes it impossible to include an evaluation of the importance of each program, service and activity in this document, the JHRC will work with each department/division and agency to identify “important services” under the “four factor” analysis.

4. The resources available to each department/division or agency and overall cost:

Proper analysis of this prong of the “four factor” analysis should address both the available resources and overall costs to each department/division or agency in providing services in languages other than English.

As to resources, each department/division or agency has their own annual budget to draw upon for LEP compliance.

Resources other than financial are also considered. Here, too, each department/division or agency will have different human resources available to provide services to LEP individuals. The City will supplement the resources of each department/division or agency by providing a list of employees who can assist with translation/interpretation for LEP individuals.

As it relates to costs, analysis of this prong requires exploring those measures which can be taken to mitigate the costs associated with providing services to LEP individuals. For instance, all departments/divisions or agencies can achieve economies of scale by collectively sourcing vendors to provide live, telephonic, and video translation services.¹²

Technology improvements continuously drive down the cost of providing translation services, and for non-vital communications designed to impart general information, use of tablet or smart phone based applications may prove sufficient.

¹¹Most services are provided through the City’s Neighborhoods Department; the Parks, Recreation and Community Services Department; the Kids Hope Alliance, and the Jacksonville Journey.

¹²An ancillary benefit of having a single provider for such services is the relative ease of obtaining metrics relating to the second prong of the “four factor” analysis – i.e., the frequency with which LEP persons come into contact with a City program, service or activity. For more information regarding this, see below.

Balancing all of these considerations, the City's representatives believe that the departments/divisions and agencies currently have sufficient resources to provide information and programs, services and activities in Spanish to LEP individuals.

B. MEETING THE NEED TO PROVIDE LEP SERVICES

Once a department/division or agency with LEP obligations has identified "important services" in consultation with the JHRC, they will then need to make resources available to serve LEP individuals. Resources which may need to be employed include (but are not limited to):

- Assistance from readily available and present staff who speak the requested language;
- Assistance from other staff who speak the requested language and can be made available;¹³
- Assistance with translation/interpretation from the person accompanying the LEP individual seeking access to the program, service or activity (to the extent authorized by the LEP individual seeking access to the program, service or activity, with consideration being given to the complexity of the information to be communicated);
- Translation applications/programs available on-line, or on tablets or "smart phones"¹⁴;
- Partnerships with the Mayor's Hispanic Advisory Board, the Mayor's Asian Advisory Board, as well as other community and faith based resources;
- "I speak" flash-cards as used by the Census Bureau¹⁵; and
- "Language Line" type telephonic or internet based translation services.

The appropriateness of using any of the above resources will, of course, depend upon the context and importance of the program, service or activity the LEP individual seeks from the City. We believe that the use of a "Language Line" type service will be of particular benefit for several reasons, including, but not limited to the following:

- Immediate initial assessment of the reason the LEP individual is seeking a City program, activity or service;

¹³In this regard, the City's Employee Services Department (i.e., Human Resources) will work with 630-CITY to update and maintain a list of languages spoken by employees of each department/division or agency.

¹⁴Such as "Google Translate," with recognition of the concerns use of such programs engender as detailed in the federal guidance found at <https://www.digitalgov.gov/2012/10/01/automated-translation-good-solution-or-not/>. While the City recognizes the concerns found at this guidance, we also recognize that the decision whether to use such programs depends on the importance of the information to be conveyed, as well as the continued improvements made to such programs since the issuance of the above guidance on October 1, 2012.

¹⁵See Exhibit E.

- Provision of information/assistance without delay, with future provision of information/assistance or services in the language spoken by the LEP individual, as warranted; and
- Ability to track the frequency of interactions with LEP individuals in order to continuously perform the “four factor” analysis.¹⁶

It is important to underscore that providing services to LEP persons does not mandate immediate translation of all documentation and information in all languages spoken by LEP individuals seeking service. Rather, relevant federal guidance is clear that readily available translated documentation and information is only required of “vital” documents for those languages identified through application of the “four factor” analysis (which, as indicated above, suggests Spanish is currently the sole language).

Federal guidance also sets forth examples of what constitutes “vital” documents¹⁷30, which includes (but is not limited to):

- Administrative complaints, release, or waiver forms;
- Claim or application forms;
- Letters of findings;
- Public outreach or educational materials (including web-based material);
- Letters or notices pertaining to statutes of limitations, referrals to other federal agencies, a decision to decline to investigate a case or matter, or closure of an investigation, case or matter;
- Written notices of rights, denial, loss, or decreases in benefits or services;
- Forms or written material related to individual rights;
- Notices of community meetings or other case-related community outreach;
- Notices regarding the availability of language assistance services provided by the component at no cost to LEP individuals; and
- Certain consent orders, decrees, Memoranda of Agreement, or other types of pleadings or litigation materials, within the discretion of the department/division or agency (or

¹⁶In order to continuously monitor the frequency of interactions between LEP persons and each department/division or agency, the JHRC will implement a procedure for tracking and quarterly reporting of language requests.

¹⁷See, e.g., the United States Department of Justice’s LEP Plan available at: <https://www.justice.gov/sites/default/files/open/legacy/2012/05/07/language-access-plan.pdf>.

subordinate department).

As there are no uniform standards which would be applicable to all City departments/divisions and agencies, the JHRC will assist each department/division or agency with identifying “vital” documents. In so doing, initial efforts will focus on providing summary information of available services for in-person inquiries, and improved accessibility of online information as to services available for remote access. Identification of “vital” documents will occur in parallel with these efforts.

C. SAFE HARBOR PROVISIONS

Federal law provides a “safe harbor” stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty.

A “safe harbor” means that if a recipient has created a plan for the provision of written translations under a specific set of circumstances, this will be considered strong evidence of compliance with written translations obligations under Title VI.

Strong evidence of compliance with the recipient’s written translation obligations under the “safe harbor” provision includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of eligible persons to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

The “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable to provide.

Working with a liaison to each department/division or agency, the JHRC will consult with the department/division or agency on the advisability of the City availing itself of these “safe harbor” provisions.

D. OTHER CONSIDERATIONS

In conjunction with this LEP compliance plan, the JHRC will work with a liaison to each department/division or agency to ensure dissemination of this LEP compliance plan in Spanish, as well as in languages individually requested.

Dissemination will include, at a minimum, posting of this plan, in English and Spanish, on the JHRC’s website and distribution of hard copies to departments/divisions, agencies and community and faith based organizations.¹⁸

¹⁸This will include making this LEP plan immediate available in Spanish, Tagalog (Filipino) and other Asian languages to the Mayor’s Hispanic Advisory Board and the Mayor’s Asian Advisory Board.

In short, the City will make all reasonable efforts to effectively disseminate information relating to the rights of LEP individuals under this LEP compliance plan.

A draft of this LEP compliance plan will also be submitted to the Mayor's Office for approval and to the Office of General Counsel ("OGC") for their review for legal sufficiency.

Upon final approval of this LEP compliance plan by the Mayor's Office and OGC, the LEP compliance plan will be distributed and discussed with all departments/divisions and agencies at a meeting of the same as soon as practical.

E. COMPLAINT PROCESS

The City has implemented a "Title VI Policy and Complaint Procedures."¹⁹ This policy will be made available on-line in Spanish. Additionally, hard copies of this policy, in English and Spanish, will be provided to the liaison for each department/division or agency for further dissemination upon request.

F. FURTHER INFORMATION

Questions, concerns, or comments relating to this LEP compliance plan may be directed to:

Charlene Taylor Hill, Executive Director
Jacksonville Human Rights Commission
117 W. Duval Street, Suite 350 Jacksonville, FL 32202
E-mail: CHARLENE@coj.net
Phone: (904) 630-4901
TTY: (904) 630-4125
Fax: (904) 630-4918.

¹⁹ The City's Title VI Policy and Complaint Procedures may be accessed at <http://www.coj.net/jhrc>.

Exhibit

A

Subject	Duval County, Florida					
	Percent speak English only or speak English "very well" Estimate	Margin of Error	Percent of specified language speakers speak English less than "very well" Estimate	Margin of Error	Percent speak English less than "very well" Estimate	Margin of Error
Population 5 years and over	94.9%	+/-0.3	42,988	+/-2,313	5.1%	+/-0.3
Speak only English	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	62.1%	+/-1.8	42,988	+/-2,313	37.9%	+/-1.8
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	62.1%	+/-2.8	19,523	+/-1,620	37.9%	+/-2.8
5 to 17 years old	75.6%	+/-5.1	2,052	+/-470	24.4%	+/-5.1
18 to 64 years old	60.6%	+/-3.1	15,192	+/-1,325	39.4%	+/-3.1
65 years old and over	48.8%	+/-6.5	2,279	+/-320	51.2%	+/-6.5
Other Indo-European languages	67.7%	+/-2.9	8,843	+/-1,165	32.3%	+/-2.9
5 to 17 years old	87.2%	+/-5.1	499	+/-216	12.8%	+/-5.1
18 to 64 years old	67.7%	+/-3.5	6,604	+/-953	32.3%	+/-3.5
65 years old and over	43.6%	+/-8.3	1,740	+/-406	56.4%	+/-8.3
Asian and Pacific Island languages	68.4%	+/-3.4	11,897	+/-1,184	43.6%	+/-3.4
5 to 17 years old	73.9%	+/-10.2	866	+/-387	26.1%	+/-10.2
18 to 64 years old	56.1%	+/-3.6	8,853	+/-909	43.9%	+/-3.6
65 years old and over	43.1%	+/-6.8	2,178	+/-265	56.9%	+/-6.8
Other languages	62.5%	+/-5.2	2,725	+/-633	37.5%	+/-5.2
5 to 17 years old	83.4%	+/-13.1	194	+/-169	16.6%	+/-13.1
18 to 64 years old	60.7%	+/-6.2	2,087	+/-537	39.3%	+/-6.2
65 years old and over	43.8%	+/-13.3	444	+/-180	56.2%	+/-13.3
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	96.9%	+/-0.2	20,268	+/-1,324	3.1%	+/-0.2
Speak only English	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	69.3%	+/-1.8	20,268	+/-1,324	30.7%	+/-1.8
Spanish	70.6%	+/-2.4	9,174	+/-815	29.4%	+/-2.4
Other languages	68.2%	+/-2.4	11,094	+/-925	31.8%	+/-2.4

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using 2013 data or multi-year data containing data from 2013. For more information, see: Language User Note.

While the 2012-2016 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Exhibit B

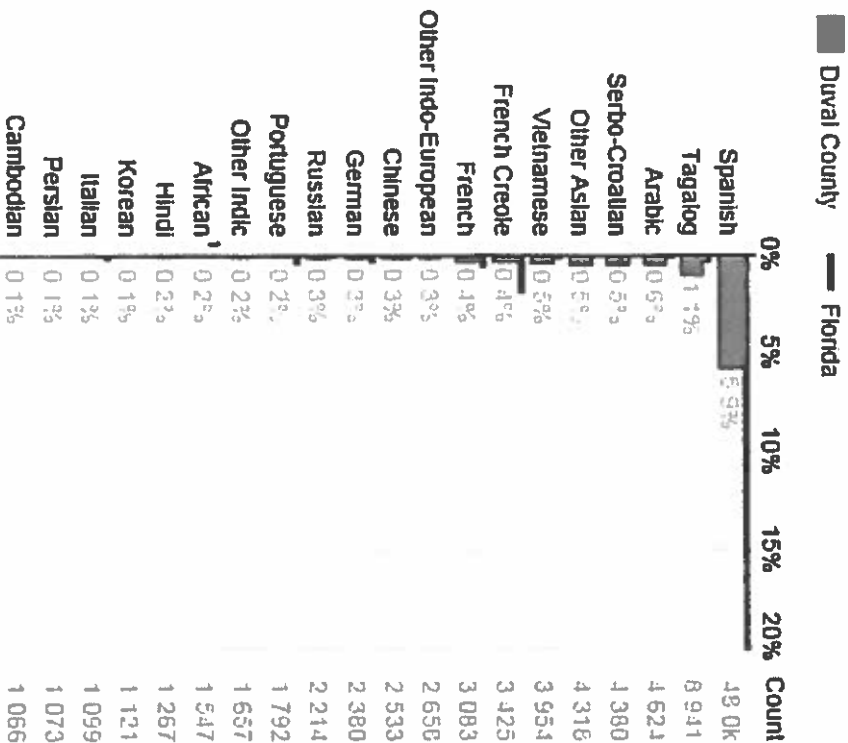
Languages in Duval County, Florida

Language Spoken At Home

#1

Percentage of the total population living in households in which a given language is spoken at home

Scope: population of Florida and Duval County



Count: number of people speaking given language at home

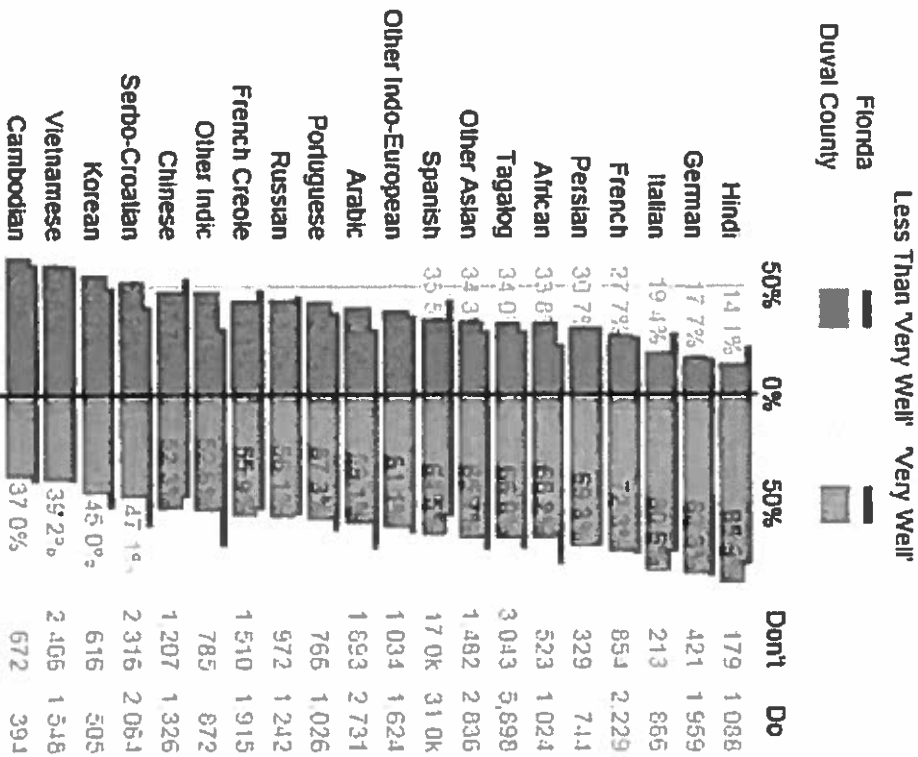
* Amharic, Ibo, Twi, Yoruba, Bantu, Swahili, Somali

Speaking English 'Very Well'

#2

Percentage of people living in households in which a given language is spoken at home

Scope: population of Florida and Duval County



Don't: number of people that don't speak English 'Very Well'

Do: number of people that do speak English 'Very Well'

Exhibit C

City of Jacksonville
LIMITED ENGLISH PROFICIENT (LEP) INDIVIDUALS
Preliminary Checklist

Please complete and return to: Johnny A. Reese, Equal Opportunity Manager at Reesej@coj.net

Department: _____

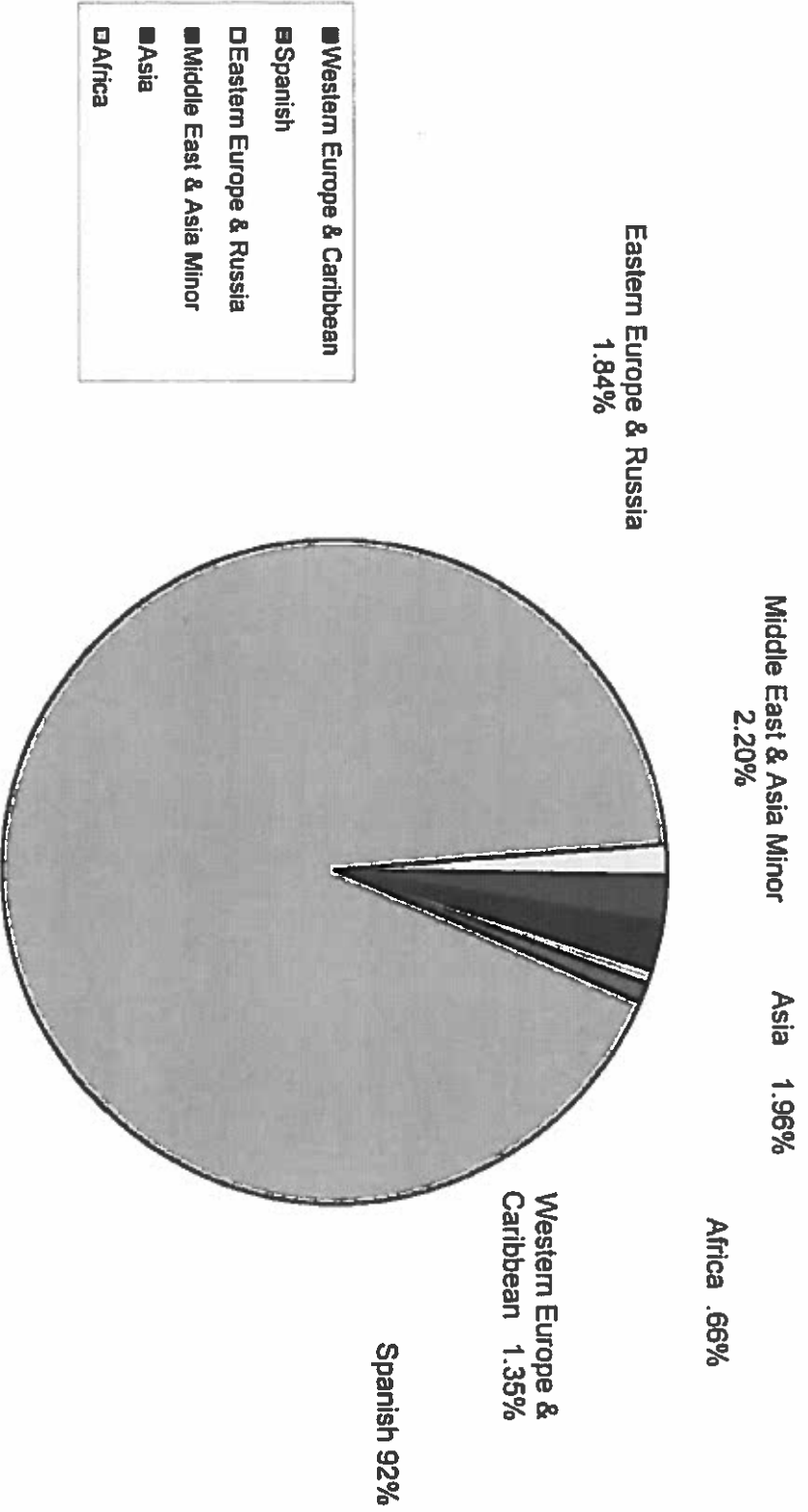
Name of Person Completing Form: _____

Email of Person Completing Form: _____

<p>1. Does your department interact or communicate with the public or are there individuals who interact or communicate or might interact or communicate with individuals with LEP?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. Please describe the manner in which your department interacts with the public or LEP individuals <i>to include the number served</i>.</p>	<p><input type="checkbox"/> In Person _____ <input type="checkbox"/> Telephonically _____ <input type="checkbox"/> Electronically (email or website) _____ <input type="checkbox"/> Via correspondence _____ <input type="checkbox"/> Other (Please specify): _____</p>
<p>3. How does your department identify individuals with LEP?</p>	<p><input type="checkbox"/> Assume limited English Proficiency if communication seem impaired <input type="checkbox"/> Respond to individual request for language assistance services <input type="checkbox"/> Self-identification by the non-English speaker of being individual with LEP <input type="checkbox"/> Ask open-ended questions to determine language proficiency on the telephone or in person <input type="checkbox"/> Use of "I Speak" language cards or posters <input type="checkbox"/> Based on written material submitted to the agency (e.g. complaints) <input type="checkbox"/> We have not identified non-English speakers or individuals with LEP <input type="checkbox"/> Other (Please specify): _____</p>
<p>4. Does your department have a process to collect data on:</p> <p style="padding-left: 40px;">a. The number of LEP individuals that you serve?</p> <p style="padding-left: 40px;">b. The primary languages spoken by LEP individuals that you serve?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Exhibit D

**Duval County 9-1-1
Languages used through
Telephone Translator Services 2017
(4087 calls)**



**Duval 911 Calls
Languages requiring
Telephone Translator Service
2017**

Area	Country/Language	2010	2011	2012	2013	2014	2015	2016	2017	Percent of Calls (2017)	Percent of Calls (2017)
Western Europe & Caribbean	French/French Canadian	10	9	12	26	72	11	16	10	0.245%	1.35%
	German/Flemish	1	2	0	1			2	0	0.000%	
	Greek	2	0	1	0			0	0	0.000%	
	Haitian/Creole	17	15	20	23		12	28	7	0.171%	
	Italian	1	0	1	3		2	1	3	0.073%	
	Portuguese	16	22	17	22		9	14	35	0.856%	
Spanish	Spanish	2127	2098	1951	1917	2403	3275	3950	3760	91.999%	92.00%
Eastern Europe & Russia	Albanian	6	10	11	10		5	5	11	0.269%	1.84%
	Bosnian	29	19	13	23	55	21	15	16	0.391%	
	Bulgarian	0	0	0	0			0	0	0.000%	
	Croatian	3	6	0	10		1	1	1	0.024%	
	Czechoslovakian	1	3	0	1			0	0	0.000%	
	Hungarian	0	0	0	0		2	2	7	0.171%	
	Macedonia - Yugoslavia	0	0	1	0		1	2	0	0.000%	
	Polish	1	1	0	0		3	2	4	0.098%	
	Romanian	1	2	0	1		1	1	4	0.098%	
	Russian / Ukrainian	20	29	14	21		19	19	32	0.783%	
Serbian	0	1	0	3			1	0	0.000%		
Middle East & Asia Minor	Arabic (Dinka, Nuer)	26	17	20	18	76	63	78	79	1.933%	2.20%
	Bengali (Bangladesh)	0	1	3	0			1	0	0.000%	
	Dan / Pashto (Afghanistan)	0	0	0	0			1	2	0.049%	
	Farsi (Iran) Persian	4	6	1	17		10	14	5	0.122%	
	Hebrew	0	0	0	0			0	0	0.000%	
	Hindi/Punjabi/Nepali (India)	5	2	7	16		5	4	4	0.098%	
	Urdu (Pakistan)	0	1	0	0			0	0	0.000%	
	Kurdish (N Iraq/SW Turkey)	0	0	0	0		1	0	0	0.000%	
	Turkish /Assyrian	0	1	3	0		2	6	0	0.000%	
	Armenian	0	0	0	0			0	0	0.000%	
Asia	Burmese- Karen - chin - zo	20	12	15	15	86	14	30	19	0.465%	1.96%
	Cambodian /Khmer	5	1	1	0		1	7	2	0.049%	
	Cantonese (Hong Kong)	1	3	0	0			1	0	0.000%	
	Chinese/Taiwanese/Mandarin	25	23	28	25		18	23	21	0.514%	
	Japanese	2	3	0	0		2	2	2	0.049%	
	Korean	5	5	8	5		5	6	6	0.147%	
	Laotian/Hmong	1	1	3	0			4	0	0.000%	
	Tagalog (Philippines)	0	3	7	6		8	9	7	0.171%	
	Thai	0	0	0	0			3	1	0.024%	
	Vietnamese	29	26	27	47		36	32	22	0.538%	
Africa	African - (Gujarati - Somali - Swahili - Yoruba)	6	8	3	19	9	13	12	5	0.122%	0.66%
	Ethiopian-Amharic-Oromo-Tigrinya	4	12	13	0		3	5	16	0.391%	
	Nigeria Rwanda Ghana - Ibo - Akan - Kundi	0	0	3	0		7	4	5	0.122%	
	Senegal- Mandingo Krio	0	0	0	0			0	1	0.024%	
Other											
TOTAL CALLS		2368	2345	2183	2229	2701	3550	4301	4087	100.0%	100.00%
TOTAL LANGUAGES			37	31			38				

Exhibit

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|---|-------------------------------|
| <input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p> | <p>1. Arabic</p> |
| <input type="checkbox"/> <p>Խնդրում ենք նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:</p> | <p>2. Armenian</p> |
| <input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p> | <p>3. Bengali</p> |
| <input type="checkbox"/> <p>ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាច ឬនិយាយភាសា ខ្មែរ ។</p> | <p>4. Cambodian</p> |
| <input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p> | <p>5. Chamorro</p> |
| <input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p> | <p>6. Simplified Chinese</p> |
| <input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p> | <p>7. Traditional Chinese</p> |
| <input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p> | <p>8. Croatian</p> |
| <input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p> | <p>9. Czech</p> |
| <input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p> | <p>10. Dutch</p> |
| <input type="checkbox"/> <p>Mark this box if you read or speak English.</p> | <p>11. English</p> |
| <input type="checkbox"/> <p>اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.</p> | <p>12. Farsi</p> |

- | | | |
|--------------------------|--|--------------------|
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français. | 13. French |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | 14. German |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | 15. Greek |
| <input type="checkbox"/> | Make kazye sa a si ou li oswa ou pale kreyòl ayisyen. | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। | 17. Hindi |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | 18. Hmong |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet. | 19. Hungarian |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | 20. Ilocano |
| <input type="checkbox"/> | Marchi questa casella se legge o parla italiano. | 21. Italian |
| <input type="checkbox"/> | 日本語を読んだり、話せる場合はここに印を付けてください。 | 22. Japanese |
| <input type="checkbox"/> | 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | 23. Korean |
| <input type="checkbox"/> | ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືຢາກພາສາລາວ. | 24. Laotian |
| <input type="checkbox"/> | Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish |

- Assinale este quadrado se você lê ou fala português. 26. Portuguese
- Însemnați această căsuță dacă citiți sau vorbiți românește. 27. Romanian
- Пометьте этот квадратик, если вы читаете или говорите по-русски. 28. Russian
- Обележите овај квадратих уколико читате или говорите српски језик. 29. Serbian
- Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. 30. Slovak
- Marque esta casilla si lee o habla español. 31. Spanish
- Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. 32. Tagalog
- ให้กาเครื่องหมายลงในช่องดำท่านอ่านหรือพูดภาษาไทย. 33. Thai
- Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. 34. Tongan
- Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. 35. Ukrainian
- اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ 36. Urdu
- Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. 37. Vietnamese
- באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. 38. Yiddish