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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch,

On January 30, 2018, Sherri Turpin, Chief Executive Officer, and Gregory Hlibok, Chief Legal Officer for ZVRS Holding Company, parent company of CSDVRS, LLC, d/b/a ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”), along with their outside counsel Jennifer Richter, Shea Boyd and Gregory Simon, met via teleconference with Karen Peltz Strauss, Eliot Greenwald, Robert Aldrich, and Michael Scott of the Consumer and Governmental Affairs Bureau, and David Schmidt and Andrew Multz of the Office of the Managing Director. During the meeting, the parties discussed the Commission’s proposal to require Video Relay Service (“VRS”) providers to establish log-in procedures for VRS users of public and enterprise videophones.¹ In particular, FCC staff inquired about the technical feasibility and level of effort necessary for ZVRS and Purple to implement the proposed log-in requirements. FCC staff also requested additional information with respect to ZVRS and Purple customers’ usage of public and enterprise videophones, along with an assessment of the companies’ risks of an enterprise log-in requirement.² ZVRS and Purple are currently gathering data to respond to the FCC’s requests and will submit it under confidential cover.

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¹ See *Structure and Practices of the VRS Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436, paras. 119-20 (2017).

² Sorenson Communications, LLC recently submitted information regarding usage of public and enterprise videophones in response to a similar request by FCC staff. See Letter from John T. Nakahata, Counsel to Sorenson Communications, LLC to Marlene H. Dortch, Secretary, FCC, in CG Docket No. 03-123 (filed Jan. 26, 2018).



Respectfully submitted,

/s/
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cc: Karen Peltz Strauss
Eliot Greenwald
Robert Aldrich
Michael Scott
David Schmidt
Andrew Mulitz

