



February 7, 2018

VIA ELECTRONIC FILING AND HAND-DELIVERY

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

Re: *Structures and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch,

In accordance with the *Second Protective Order* in the above-captioned proceedings, ZVRS Holding Company (“ZVRS Holding”), the parent of CSDVRS, LLC d/b/a ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”), herein submits Highly Confidential and redacted versions of the attached *ex parte* letter in the above-captioned proceedings.

ZVRS Holding has designated for Highly Confidential treatment the marked portions of the attached documents pursuant to the *Second Protective Order* in CG Docket Nos. 03-123 and 10-51.¹ ZVRS Holding’s *ex parte* letter includes granular data with respect to ZVRS’s and Purple’s numbers of enterprise customers and devices, amount of traffic, and levels and patterns of usage. These materials fall under the following enumerated items in Appendix A of the *Second Protective Order*:

4. Information that provides numbers of customers or devices when broken down by subnational geography, customer type (e.g., business) and/or levels or patterns of VRS usage, or when in a time series.

5. Information that discusses in detail the number or anticipated changes in the number of customers or amount of traffic, including levels or patterns of usage, churn rate data, detailed information about why customers discontinue service, numbering assignments, and customer complaints.

6. Information that provides detailed or granular information about specific end point equipment or network operation, including engineering information and information related to equipment purchases or payments of licensing fees.

¹ *Structures and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Second Protective Order, DA 12-858, 27 FCC Rcd. 5914 (Cons. & Gov’t Affs. Bur. 2012).



Pursuant to the *Second Protective Order* and additional instructions from Commission staff, ZVRS Holding is filing a redacted version of the document electronically via ECFS, one copy of the Highly Confidential version with the Secretary, two copies of the redacted version with the Secretary, and sending copies of the Highly Confidential version to Eliot Greenwald, Robert Aldrich, and Michael Scott of the Consumer and Governmental Affairs Bureau and the TRS Reports mailbox.

Please contact me if you have any questions or require any additional information.

Sincerely,

/s/_____

Gregory Hlibok
Chief Legal Officer
ZVRS Holding Company
Parent company of CSDVRS, LLC d/b/a
ZVRS and Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765

Attachment

cc: Eliot Greenwald
Robert Aldrich
Michael Scott
TRSReports@fcc.gov





February 7, 2018

VIA ELECTRONIC AND HAND 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,

During a January 30, 2018 meeting, for which an *ex parte* notice already has been filed,¹ FCC staff requested information with respect to ZVRS and Purple customers' usage of public and enterprise videophones, along with an assessment of the risks associated with an enterprise log-in requirement.² This letter confidentially provides the information requested at the January 30 meeting.

[* BEGIN HIGHLY CONFIDENTIAL INFORMATION ***]**

[REDACTED]

[REDACTED]

[REDACTED]

¹ See Letter from Gregory Hlibok, Chief Legal Officer, ZVRS Holding Company to Marlene H. Dortch, Secretary, FCC, in CG Docket Nos. 03-123 & 10-51 (filed Feb. 1, 2018).

² 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).



[* END HIGHLY CONFIDENTIAL INFORMATION ***]**

Our primary focus when establishing enterprise integrations is to create a seamless user calling experience that mimics the experience of a hearing user, allowing enterprise users to dial their intended destination without being challenged to provide credentials.

Respectfully submitted,

/s/_____

Gregory Hlibok
Chief Legal Officer
ZVRS Holding Company
595 Menlo Drive
Rocklin, CA 95765

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