

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|  |   |                      |
|--|---|----------------------|
| In the Matter of   | ) |                      |
|  | ) |                      |
| Structure and Practices of the Video Relay<br>Service Program  | ) | CG Docket No. 10-51  |
|  | ) |                      |
| Telecommunications Relay Services and<br>Speech-to-Speech Services for Individuals with<br>Hearing and Speech Disabilities | ) | CG Docket No. 03-123 |
|  | ) |                      |

**REPLY COMMENTS OF ZVRS HOLDING COMPANY, ZVRS, AND PURPLE  
COMMUNICATIONS IN RESPONSE TO SORENSON PETITION**

ZVRS Holding Company, parent company of ZVRS and Purple Communications (collectively, the “Companies”), hereby replies to the comments in response to the petition (“Petition”) filed by Sorenson Communications, LLC (“Sorenson”) in the above-captioned proceedings.<sup>1</sup> In its Petition, Sorenson requests that the Commission or the Consumer & Governmental Affairs Bureau (“Bureau”) reconsider the decision to require Video Relay Service (“VRS”) providers to comply with the Relay User Equipment (“RUE”) Profile for communications with end-points using the Accessible Communications for Everyone (“ACE”) App.<sup>2</sup>

The Companies reiterate that, as discussed in their initial comments, requiring VRS providers to comply with the RUE Profile for communications with end-points using the ACE App would divert invaluable time, resources, and investment away from the ongoing, vital work towards achieving interoperability through implementation of the VRS Interoperability Profile

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<sup>1</sup> Sorenson Communications, LLC, Petition for Partial Reconsideration, or in the Alternative, Suspension of the RUE Implementation Deadline, CG Docket Nos. 10-51 & 03-123 (filed May 30, 2017) (“Petition”).

<sup>2</sup> Petition at 2-3.

and xCard XML Format.<sup>3</sup> We also wish to clarify the position outlined in our initial comments to make clear that the Commission should eliminate the RUE Profile requirement for ACE App communications and similar third-party endpoints, and not for all provider-distributed endpoints as previously stated. The Companies recognize that implementation of the RUE Profile standards for all provider-distributed endpoints is not currently a requirement, as the appropriateness of such a requirement remains an outstanding issue. We therefore clarify that the Companies agree with Sorenson that the Commission should eliminate the implementation of the RUE Profile standards for ACE App communications and similar third-party endpoints.

Moreover, the Companies agree with GlobalVRS that Sorenson's Petition underscores that there remain many unresolved issues with respect to the RUE Profile, and that these issues should be addressed by the Commission before further action on implementing the RUE Profile is even considered.<sup>4</sup> In addition, we support GlobalVRS's recommendation that the Commission should treat the RUE Profile as a guideline, rather than a requirement, consistent with recommendations that have been made by all providers.<sup>5</sup>

Respectfully submitted,

/s/  
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<sup>3</sup> See Comments of ZVRS and Purple in Response to Sorenson Petition, CG Docket Nos. 10-51 & 03-123, (filed Aug 7, 2017).

<sup>4</sup> See Comments of ASL Services Holdings, LLC d/b/a GlobalVRS, CG Docket Nos. 10-51 & 03-123, (filed Aug 7, 2017) ("GlobalVRS Comments").

<sup>5</sup> Global VRS Comments at 2.