

November 12, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
Re: IP-Relay (Filed Electronically via ECFS to Docket 03-123)

Dear Sir or Madam:

I am Todd Elliott and am a VRS consumer. I have used ip-based text relay in the past, but have switched exclusively to Video Relay for my telecommunication needs.

I write to you because of a latest news development involving ip-relay; Purple is exiting the ip-relay market. This is a troubling development as it leaves only one relay provider in this segment, and this surviving provider is currently not accepting new consumers. This leaves Purple's consumers in the lurch, w/o having a relay provider.

This is a disappointing development and I urge the FCC to take swift, protective, and remedial action in ensuring that ip-relay consumers will still have their telecommunication needs met. I am of the opinion that relay provider misfeasance has made a significant contribution to the rapid deterioration of the ip-relay market, and refrain from commenting further on various motives for various provider's exiting the market in the past few years.

Rather, I would like to offer some ideas on how to make the ip-relay market stronger, responsive, and competitive again, all to the benefit of its end users.

Idea #1 – Require a major credit card on file for every ip-relay user. The providers can do a silent charge (similar to what auto rental companies do) to ensure the validity of the user's credit card. This process leverages the credit card's industry in verifying users and their addresses. Users from third world countries, by large, do not have access to modern credit instruments and would have difficulty in signing up for ip-relay.

Optionally, the providers can require a token deposit, say, \$12, for one year. This could be refunded to the user upon a determined period of time in which the provider is assured that this user is a legitimate and verified user of ip-relay. Again, users from third world countries cannot afford this and/or make this an unprofitable endeavor. (i.e., their deposits are forfeited)

Idea #2 – require a complete ecosystem in authenticating users of ip-relay. The providers have to build a complete client/server solution for ip-relay and license its technology for third party development (i.e., Braille interfaces). This system should be able to authenticate legitimate users and block users originating outside of the United States.

I feel that the ip-relay industry reliance on AOL IM and other instant messaging solutions exposes the industry to users originating from third world countries. I'm not too familiar with existing text messaging solutions, but I gather that providers cannot verify and/or authenticate users as they do not control the text messaging software being used for the purposes of ip-relay.

Idea #3 – The FCC is urged to raise reimbursement rates for ip-relay. This is to attract further investment in technologies needed to build and promote a secure relay ecosystem for its users. This is needed to

attract more participants to this relay market. This is needed to compensate for the fall in volume of ip-relay activity due to stringent security measures blocking users from third world countries.

Lastly, I want to stress that I am troubled by privacy implications in the ip-relay sphere. The stories I'm hearing from Purple regarding FCC's insistence in determining call content for reimbursement are alarming. With better identity verification and authentication procedures in place, there should be no need for further inquiry regarding call content in determining call reimbursement.

I remain concerned that such intrusive measures will find its way into all spheres of relay, including Video Relay Services. The Deaf community cannot lose confidence in relay services, and needs an absolute level of trust in accessing them. It is like a virus; a loss of trust in one segment of the relay industry will eventually infect the whole relay ecosystem. I strongly urge the FCC to quickly recognize this, and find alternative ways in combating fraud, misuse, and waste in this industry.

In closing, I am disappointed by this latest turn of events involving Purple and its exiting the ip-relay industry. I strongly urge the FCC to immediately restore public confidence in ip-relay before the resulting damage can metastasize throughout other spheres of relay. Thank you for reading.

-Todd Elliott