



February 6, 2015

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket 03-123, *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket 13-24.

Dear Ms. Dortch:

Purple Communications, Inc. submits this letter regarding the Petition for Interim Waiver of the requirements in Sections 64.604(c)(5)(iii)(C)(2)(v) and (vi) of the Commission's rules filed by Hamilton Relay, Inc. and Sprint Corporation.¹ These rules require IP CTS service providers to report the captioned telephone's ten-digit number on all call detail records submitted to the TRS Fund Administrator for compensation. As the Petition explains, these rules are technically impossible to follow for incoming telephone numbers originating from IP CapTel phones. This is because there is no telephone line connection between the IP CapTel phone and the IP CTS provider, so there is no PSTN telephone network information available for the call. Purple supports the Petition and respectfully requests that if the Commission grants the Petition that the waiver apply to all similarly situated IP CTS providers.²

Sincerely,

PURPLE COMMUNICATIONS, INC.

/s/

John Goodman
Chief Legal Officer

¹ Petition for Interim Waiver of Hamilton Relay, Inc. and Sprint Communications Company, L.P., CG Docket Nos. 10-51, 03-123 (filed July 25, 2012) ("Petition"); *see also* 47 C.F.R. 64.604(c)(5)(iii)(C)(2)(v), (vi).

² *See* Petition at fn. 4 (requested interim waiver should be granted to all similarly situated IP CTS providers); *see also* Letter of Walter E. Anderson, Counsel for CaptionCall, LLC to Marlene Dortch, Secretary, FCC, CG Docket Nos. 03-123, 13-24 (filed Jan. 29, 2015).