



March 10, 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, *Structure and Practices of the Video Relay Services Program*, CG Docket 10-51.

Dear Ms. Dortch:

Purple Communications, Inc. (“Purple”) submits this letter regarding the Petition for Waiver of VRS international travel registration rules filed by Sorenson Communications, Inc. (“Sorenson”).¹ In the Petition Sorenson requests a waiver to (a) allow verified VRS users to register for international travel after they have left the United States, as long as they comply with the Commission’s rules, and (b) extend the allowable time period during which verified VRS users may place VRS calls to the United States from international locations to up to 60 days. The Commission currently allows up to four weeks for registered customers to place these VRS calls to the United States from international locations.²

Purple supports the Petition. Purple respectfully requests that if the Commission grants the Petition that the waiver apply to all VRS providers.

In addition, Purple respectfully requests that the Commission grant an exemption to the four week, or 60 day, limitation to verified VRS users who are deployed abroad by our government, such as military personnel, diplomats, and other government workers. They should not lose basic civil rights granted by the Government when serving that very same government on overseas assignments. As the National Association of the Deaf states in their *Position Statement on Functionally Equivalent Telecommunications for Deaf and Hard of Hearing People*:

...Such restrictions unduly limit the capabilities of Americans who pursue studies or careers abroad, such as those who work for the U.S. Government in embassies or military bases. Care must be taken to balance the telecommunication needs of Americans against the security

¹ Petition for Waiver of Sorenson Communications, Inc., CG Docket Nos. 10-51, 03-123 (Feb. 20, 2015).

² See *Structure and Practices of the Video Relay Services Program*, CG Docket No. 10-51, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 5545, 5564, n. 105 (2011).

precautions to prevent abuse of the relay system by individuals seeking to engage in criminal activities.³

Sincerely,

PURPLE COMMUNICATIONS, INC.

/s/

John Goodman
Chief Legal Officer

³ *Position Statement on Functionally Equivalent Telecommunications for Deaf and Hard of Hearing People*, National Association of the Deaf (Dec. 21, 2014), available at <http://nad.org/position-statement-functionally-equivalent-telecommunications-deaf-and-hard-hearing-people>.