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****END CONFIDENTIAL****

2) Is it possible to achieve functional equivalence at upcoming rates?

Please see our response to Question 1 regarding interpreter hiring.

Absent the Commission’s release of a clearly defined standard of what “functional equivalence” means in the context of VRS, a concise answer to this question remains impossible. Purple does not believe that the general standard of functional equivalence has ever been clearly defined by the Commission. However, Purple believes that the Commission, VRS Providers, and consumers all understand and appreciate that certain core functions of the VRS that define the quality of the experience – such as answer speed, video quality, software functionality, end point choices, feature sets, and interpreting quality – are able to be delivered at higher levels and/or performed better at higher VRS funding levels. The converse is also true – as VRS rates continue to decline, so too shall VRS providers’ ability to deliver on these performance measures. For instance – reduced VRS rates means Purple has no choice but to reduce investment in new or differentiating technologies to ensure that VRS service and functionality keeps pace with rapidly evolving telecommunications technologies. Purple would also have no choice but to continue to shift its hiring patterns to regions and interpreter qualifications that can

4) How long do positions stay open today versus 2 years ago?

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[REDACTED]

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5) What do you hope to learn from the trial?

This question is addressed in the VRS providers' joint filing.

6) What is the market rate for interpreters with various skills versus generalist interpreters? How much will the trial of skills-based routing increase costs?

This question is addressed in the VRS providers' joint filing.

7) What percent of calls would be skills-based routed?

This question is addressed in the VRS providers' joint filing.

8) What does the 80/45 proposal mean in terms of an average?

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Respectfully submitted,

/s/

John Goodman
Chief Legal Officer
Purple Communications, Inc.

Date: April 21, 2015