



Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765
Tel 800 900 9478

November 3, 2015

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**RE: Ex Parte Notice: CG Docket Nos. 10-51 and 03-123
Purple Communications, Inc.**

Dear Ms. Dortch:

On October 29th, Mike Strecker, Vice President of Regulatory Affairs, Lydia Yomogida, Compliance Director, and John Goodman, Chief Legal Officer, of Purple Communications Inc. ("Purple") participated in separate meetings with the following FCC staff: (1) Edward Smith, Legal Advisor to Chairman Tom Wheeler; and, from the Consumer & Governmental Affairs Bureau - Alison Kutler, Chief; Karen Peltz Strauss, Deputy Chief; and Bob Aldrich, Legal Advisor; (2) Andy Multz, Office of the Managing Director; (3) Office of Strategic Planning - Jonathan Chambers, Chief; and Alok Doshi, Technology and Innovation Advisor; (4) Office of Commissioner Rosenworcel - Travis Litman, Senior Legal Advisor; and Jennifer Thompson, Special Advisor; and (5) Amy Bender, Legal Advisor to Commissioner Michael O'Rielly.

In the meetings, Purple discussed concerns regarding the TRS User Registration Database development process and the potential risks to the ability of providers to receive compensation. Additionally, Purple shared with the Commission concerns we have related to the TRS User Registration Database ("TRS URD"). Purple asked for clarification related to potentially conflicting information regarding the requirements of the TRS URD data collection that providers have received from the Commission and the TRS Fund Administrator. Purple urged the Commission to clarify rules relating to entity-owned and Public Kiosk videophone device validation with the TRS URD and whether or not VRS Providers will be required to check against the TRS URD prior to placing a call for a VRS consumer in an effort to ensure they are registered within the TRS URD. Given the changing nature of the process, Purple urged the Commission to ensure that providers would have sufficient time to implement the required internal capabilities prior to requiring launching the TRS URD, in order to assure that its operational functionality be consistent with the Orders as prescribed.

Purple asked the Commission to support the phone book portability standards currently endorsed by four other providers: CSDVRS, LLC (ZVRS), Hancock Jahn Lee



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& Puckett, LLC (CAAG), ASL Service Holdings, LLC, and Convo Communications LLC and require near-term adoption of the standards by all VRS providers.

Respectfully submitted,

PURPLE COMMUNICATIONS, INC.

/s/ Michael Strecker

Mike Strecker
Vice President of Regulatory Affairs

Cc: Bob Aldrich
Amy Bender
Jonathan Chambers
Alok Doshi
Alison Kutler
Travis Litman
Andrew Multz
Karen Strauss
Edward Smith
Jennifer Thompson