

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Telecommunications Relay Services And) CG Docket No. 03-123
Speech-to-Speech Services for Individuals)
with Hearing and Speech Disabilities)

To: The Commission

COMMENTS ON PUBLIC NOTICE PROPOSING 2009-10 TRS RATES

Purple Communications, Inc., hereby comments on the Public Notice portion of the Commission’s May 14, 2009 *Public Notice and Notice of Proposed Rulemaking*, FCC 09-39 (“PNNPRM”)¹ and shows the following.

The Public Notice portion of the PNNPRM seeks comment on NECA’s proposed rates for Interstate Telecommunications Relay Services (“TRS”) and the proposed funding requirement and carrier contribution factor necessary to properly fund TRS services. As shown below, NECA’s proposed rates for Interstate TRS services should be adopted as well as its proposed funding requirement and carrier contribution factor.

Review of NECA’s rate filing suggests that it has appropriately determined proposed rates for the various TRS services based upon Commission precedent, including the FCC’s November 2007 Rate Order. *Telecommunications Relay Services*, 22 FCC Rcd 20140 (2007). Likewise, it appears that NECA’s proposed funding requirement and carrier contribution factors have been appropriately calculated. Accordingly, the FCC

¹ Purple’s comments on the *Notice of Proposed Rulemaking* portion of the PNNPRM will be submitted at a later date. See *Telecommunications Relay Services*, FCC DA 09-1255 (June 3, 2009) (extending comment date to July 6, 2009).

should adopt NECA's proposed Interstate TRS rates, funding requirement and carrier contribution factor for the 2009-10 fund year.

Respectfully submitted,

PURPLE COMMUNICATIONS, INC.

By: _____ /s/

George L. Lyon, Jr.
Director, Regulatory Compliance

Purple Communications, Inc.
1650 Tysons Blvd., Suite 1500
McLean, Virginia 22102
(202) 828-9472
george.lyon@purple.us

Kelby Brick
Vice President, Regulatory and Strategic Policy
Purple Communications, Inc.
2118 Stonewall Road
Catonsville, MD 21228

Kelby.brick@purple.us

June 4, 2009