

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

In re )  
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Telecommunications Relay Services and Speech to ) CGB Docket 03- 123  
Speech Relay Services for Individuals with Hearing ) WC Docket 05-196  
and Speech Related Disabilities )

To: The Commission

**COMMENTS ON PETITION REGARDING ASSIGNMENT OF GEOGRAPHICALLY  
APPROPRIATE NORTH AMERICAN NUMBERING PLAN TELEPHONE NUMBERS**

Purple Communications, Inc., hereby comments on the Commission’s August 11, 2009 Public Notice, DA 09-1789 seeking comments on how to handle assigning NANP telephone numbers to relay users when a relay provider is unable to obtain telephone number from that user’s rate center.

Purple concurs that it is not economically or operationally feasible for Internet enabled relay service providers to obtain telephone numbers in every rate center. Accordingly, Purple concurs that the Commission should establish a policy of providing users a temporary geographically approximate number<sup>1</sup> from a nearby rate center when a default IP Relay or VRS provider is unable to provide a geographically appropriate number.

In the interests of brevity, Purple will not repeat the reasons behind this position as they have already been presented by the originating petitioner, other than to note that the Commission should not restrict relay users to a specific rate center which is arbitrarily assigned by the Incumbent Local Exchange Carrier for simple reason of determining local calling toll rates between users. As an Internet based service there are no toll charges for these types of calls

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<sup>1</sup> The appropriate term would be a temporary geographically approximate number rather than a “guest number” which would be considered an endorsement of the marketing strategy of the dominant provider.

between relay users.

However, the Commission should make it clear that neither toll free numbers nor proxy numbers are to be used in cases where an end user does not obtain a local 10 digit telephone number from their local area. Any enabling of toll free numbers or proxy numbers instead of geographical NANP numbers will undermine the value of the ten-digit numbering program put in place by the Commission and disrupt the transition process to ensure that every relay user is assigned a real local phone number. Furthermore, any enabling of toll free numbers or proxy numbers as a substitute for the requirement of assigning real local telephone numbers will serve to facilitate the original petitioner's dominant position by reinforcing its marketing strategy of retaining or expanding its closed network.

It is critical to note that Internet-based e911 solutions are not restricted to only certain numbers in certain rate center (which is the case for legacy wireline phone services). Internet-based providers have been allowing users to associate any phone number to their 911 service address so that their 911 calls will be routed to the correct 911 PSAP regardless of what area code or rate center the phone number is from. This is the same type of situation that exists for both cellular customers and VoIP customers.

Respectfully Submitted

**PURPLE COMMUNICATIONS, INC.**

By: \_\_\_\_\_/s/\_\_\_\_\_

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