



**Request for Extension of
Mandatory Registration
Deadline for IP Text Relay
Services**

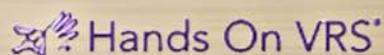
Presentation to FCC

Purple Communications, Inc.

November, 2009

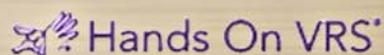
Video Relay Services Registration

- **Deadline extended for VRS from 6/30/09 to 11/12/09**
- **Extension largely successful**
 - Relay equipment: specialized and distributed by providers
 - Specialized equipment = easily identified and registered
 - VRS customers reachable via traditional channels
- **Industry estimates: over 90% of users registered**
- **Extension considered a success**
- **Upcoming deadline will not be a serious hardship**



Text Relay Services Registration

- **Vast majority of text relay customers are still not registered**
- **Recent FCC Workshop: <20% actually registered**
- **Text relay equipment is not provider distributed**
 - Most text devices have already have a PSTN number
 - This causes additional confusion
 - Additional issue for outreach efforts
- **Text relay customers**
 - Different from VRS demographics
 - Not reachable via traditional channels



Registration Confusion

- **Rarely receive incoming calls**
 - Don't see need for registration to receive calls
 - Don't see need for 10# for outbound calls
- **Believe VRS 10# is sufficient for text relay calls**
- **Believe existing 10# tied with cell phone is sufficient**
- **Believe AIM handle is sufficient**
- **Concerned about privacy**

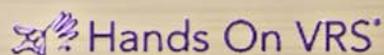
Demographics of text relay users

- May not belong to deaf orgs
- May not attend deaf events/functions
- May not subscribe to deaf community media
- Likely oral, hard of hearing or late-deafened
- Use English as primary language not ASL
- Includes senior citizens and disabled veterans

Traditional deaf community outreach is not as effective for text relay users

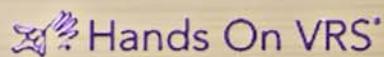
Outreach Efforts

- Purple and other providers have been aggressive
- Lead spot on web pages
- Pre-call messaging
- AIM Bot registration
- 24 hour live help chat
- Weekly email and postal mail campaigns
- Live workshops, tradeshow & personal interactions



Outreach Efforts Are Slowly Succeeding

Week of	i711 Callers	i711 Mins	IP-Relay Callers	IP-Relay Mins
8/23	6.52%	6.79%	8.57%	9.4%
8/30	7.25%	6.94%	9.35%	9.86%
9/6	6.83%	6.73%	9.25%	10.9%
9/13	6.86%	7.47%	10.03%	12.24%
9/20	8.73%	9.78%	13.61%	17.42%
9/27	8.85%	11.3%	13.73%	19.59%
10/4	11.38%	10.97%	15.12%	20.15%
10/11	12.27%	12.69%	16.43%	21.67%
10/18	13.64%	13.56%	17.48%	22.99%
10/25	16.58%	13.24%	19.21%	21.55%



Undermining Registration Successes

- **Text relay users are starting to understand**
 - Requirement applies to all relay services, not just VRS
 - 10# with cell phones does not apply
 - Registration is required even for outbound calls
 - AIM handle is not sufficient
 - Privacy will still be honored and protected
- **November deadline will undermine success**
 - Users will be angry and frustrated when providers are congested
 - Registered and non-registered users will be denied service
 - Confusion will be exacerbated

More Time is Needed to Complete text Relay Registration

- Text relay users are different from VRS users
- Outreach efforts are succeeding
- November deadline will block vast majority of text users
- Providers are on right track in registering users
- Deadline will undermine successes to date

An extension for text relay is necessary and reasonable. We suggest an extension to April 12, 2010 with monthly reporting obligations