

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)	
)	
E911 Requirements for IP-Enhanced)	WC Docket No. 05-196
Service Providers)	

To: The Commission

***COMMENTS IN SUPPORT OF PETITION FOR EMERGENCY STAY AND
REQUEST TO RETURN TO THE STATUS QUO ANTE***

Purple Communications, Inc., hereby comments in support of Telecommunications for the Deaf and Hard of Hearing, Inc.'s and other consumer organizations' November 12, 2009, Supplement to Petition for Emergency Stay; Request to Return to the Status Quo Ante.

Purple fully supports the Petition and the Stay for reasons outlined in the filing. We concur with Consumer Groups that there are "ample justification for stay because of the high likelihood of success on the merits of the underlying Petition for Expedited Reconsideration filed by CSDVRS, LLC on September 10, 2009...."

Purple also provides the following information as evidence for immediate action on the part of the Commission to grant the Petition and Request. We are now experiencing a significantly high number of abandoned calls on a daily basis as a result of misrouted toll-free numbers. Those misrouted toll-free numbers occur when consumers using hardware or software videophones distributed by Purple attempt to dial a toll-free

number associated with a videophone distributed by a different VRS provider.

Those consumers expecting to connect with another videophone user become confused or frustrated when they are either placed in the VRS queue or are connected with a video interpreter. Because of the FCC’s public notice requiring the deletion of toll-free numbers from the Neustar database and those toll-free now appear to be “voice” numbers and thus routed to our video interpreters.

There have been very little (if any) outreach or education efforts on the part of the Commission or those providers distributing toll-free numbers to explain to consumers why they can no longer connect with their friends or loved ones by dialing toll-free numbers. As a result, consumers blame providers for failing to route their numbers appropriately—and we are thus subject to their wrath for their misrouted calls.

We have initiated education and outreach efforts to help customers understand why they can no longer dial toll-free numbers associated with videophones distributed by a different provider. In the meantime, we urge the Commission to grant the Petition and Request—and undertake significant outreach activities to help customers understand why their videophones are no longer interoperable with videophones distributed by other providers.

Respectfully Submitted,

PURPLE COMMUNICATIONS, INC

By _____/s/_____

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