

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Purple Communications, Inc's ) CG Docket No. 10-51  
Request for Clarification or Waiver )

**Comments of Convo Communications, LLC**

Convo Communications, LLC (“Convo”) hereby responds to the “Petition for Clarification or Waiver” (hereinafter “Petition”) filed on June 2, 2010 by Purple Communications, Inc (“Purple”). Convo is a non-certified video relay service (VRS) provider that was registered on September 18, 2009 as an Interexchange Carrier within the State of Texas. Convo has a pending application, filed on October 30, 2009, with the Federal Communications Commission (“FCC”) to be certified as a VRS provider. As an applicant for certification, Convo has a vested interest in ensuring its views on matters affecting the provision of VRS services to its customers are made known to the FCC.

In its Petition, Purple sought a clarification, or in the alternative, a waiver, of 47 CFR § 64.613(a) (“Rule 613a”). The rule requires that the TRS Numbering Directory (“iTRS Directory”) “contain records mapping the NANP telephone number of each Registered Internet-based TRS User to a unique Uniform Resource Identifier (URI)” and with respect to records associated with VRS users, “the URI shall contain the users Internet Protocol address.”<sup>1</sup>

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<sup>1</sup> 47 C.F.R. §64.613(a)(1)-(2).

In its Petition, Purple seeks FCC approval to enable it to implement a call forwarding feature it terms “Follow Me”. Purple’s Petition seeks a waiver specifically for point to point (“P2P”) calls , i.e., calls between iTRS-registered videophone users that do not go through a relay service. Purple asserts that in order to implement the call forwarding feature for P2P calls, it would have to provision the iTRS database with a URI containing “the IP address of a Purple server, not the IP address of the consumer’s primary video device.”<sup>2</sup> In essence, Purple is requesting that the FCC allow it to deviate from the industry agreed-upon technical standard for iTRS database configuration that pertains to call routing and handling.

In its Petition, Purple makes the unsupported assertion that it would *have to provision the iTRS Directory with the IP address of its server* [emphasis added] in order for the feature to work. Purple offers no evidence showing that its specific configuration is the only available way to implement a call forwarding feature. In the absence of factual, supporting information from Purple, the FCC should tread most cautiously when faced with requests for waivers or rule exceptions, especially when the rules have been established after long and thoughtful expert review and commentary. The level of caution must also be elevated when the rule waiver may require that other participants make changes on their own VRS platforms to comply with a non-industry standard configuration devised to meet the needs of a single provider.

Convo believes that an effective call forwarding feature could be implemented without the need to employ a provider’s proprietary gateway server IP address in lieu of the phone number/

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<sup>2</sup> Petition at 2.

IP address of the device belonging to the called party. Convo believes that one possible iTRS Directory configuration would involve having the phone number the call is forwarded to be listed as part of the destination field protocol. In a call forwarding procedure, the provider would then further route the call using the forwarded phone number to identify the IP address of the device it represents.

As stated earlier, the iTRS Directory has a field protocol and technical standards all iTRS participants must follow. At present, the Neustar database allows for six possible “entities” to be associated with a TDN: H.323, AIM, Yahoo!, MSN, XMPP and Private.

At present, the Neustar database does not allow for a telephone number to be used as a destination field. In the scenario proposed by Convo above, call forwarding could be achieved by simply allowing for a re-lookup for the IP address as a final destination field for the forwarded number. This would remove the need to provision the iTRS Directory with proprietary gateway server IP addresses and would remove for P2P callers an unnecessary vulnerability.

Convo supports the views expressed by the FCC and various commentators, both providers and consumers, that call-forwarding is a highly desirable feature that should be made available to Internet-based TRS users. Convo strongly believes that call-forwarding is a critical aspect towards full functional equivalency in the use and enjoyment of telecommunications services in the VRS environment, given its widespread availability and acceptance by users of switched and cellular-wireless networked devices. Purple’s proposal would require an addition to the iTRS

Directory destination fields, if call forwarding is to be readily implemented through the Neustar database. This feature addition could require action by various proprietary VRS provider communications networks. Those providers, including Convo, have already expended considerable sums in designing and implementing VRS calling and routing platforms to comply with FCC and Neustar rules that apply the industry standard ENUM protocol to enable mapping between 10 digit U.S. telephone numbers (“TDN”) to IP addresses or screen names. As this may have an impact on VRS providers, Convo requests that the FCC issue a Notice of Proposed Rulemaking (“NPRM”). Purple is not really seeking a clarification but rather a rule exception. Since the rule change should be made available to all, it is only appropriate that the FCC conduct further regulatory and administrative rule-making action in accordance with applicable rulemaking procedures. The proper and fair step for the FCC to take would be to issue a NPRM.

For the above mentioned reasons, Convo opposes the specific approach sought to be utilized by Purple. Convo takes the position that there are other, more relatively efficient and safer methods to implement call forwarding in a manner that benefits the customers all VRS providers. However, at present, in order to entertain other approaches, the FCC should take the further step of issuing a NPRM after gathering comments and reply comments on Purple’s Petition and conducting further information gathering prior thereto. It is very highly likely that efficient and reliable call forwarding features can be made available by all VRS providers if a solution could be found through a thoughtful and effective approach to enabling the iTRS Directory to be used for call forwarding. This may require an addition or change to existing

rules. A NPRM is the most appropriate vehicle for empowering the FCC to make the correct and legitimate decision with respect to achieving functional equivalency via call forwarding.

Respectfully submitted,



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Robin Horwitz  
CEO



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Ed Bosson  
VP of Regulatory Affairs

**CONVO** Because we understand.