



October 18, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of Ex Parte Conference
Telecommunications Relay Service ("TRS") & Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities
CG Docket No. 10-51

Dear Ms. Dortch:

On October 14, representing Purple, CEO Dan Luis, VP of Technology Tony LaRosa, Director, Product Development David Rein, VP of Technical Program Management Mark Stern and the undersigned met with Nicholas Alexander of the Wireline Competition Bureau, Paul de Sa of the Office of Strategic Planning and Policy Analysis, Gregory Hlibok and Diane Mason of the Disability Rights Office. Richard Hovey of the Public Safety and Homeland Security Bureau participated in portions of the meeting by phone.

We discussed various components of VRS architecture ranging from end points used by consumers to place VRS calls to VRS platform functionalities.

We discussed differences among three categories of end-point access methods:

- 1) Provider distributed equipment such as the Ojo, VP-200, MVP, and certain Z-hardware,
- 2) Provider distributed software such as the P3, Z4, and Convo Anywhere,
- 3) Current and future off the shelf software and hardware such as the iPhone Facetime, Skype, iChat and Cisco ūmi.

We sought clarification as to whether interoperability and point-to-point rules apply to each of those end point categories. We also had a discussion on emerging technologies and how this will impact the future of VRS, increase choices by consumers, and necessitate clarification from the Commission as to the requirements of providers when desiring to support new technologies, particularly in situations where VRS providers do not control the technology of off-the-shelf solutions.

We discussed the functionalities of Purple's video communication service platform and how it interacts with various video technologies, and confirmed how Purple's platform handles point to point and VRS call processing including interactions with the iTRS database, video mail, call routing and firewall traversal, queuing and transferring, geographical blocking, billing, 911 and other enhanced Purple services.

We also discussed the supply and demand of sign language interpreters and their role within the service platform and potential enhanced features that could be offered through the VRS platform in conjunction with interpreter skill sets.

Sincerely,

Kelby Brick, Esq.
Vice President, Regulatory & Strategic Policy