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Federal Communications Commission
Office of the Secretary

October 21, 2010

Gregory Hlibok, Senior Staff Attorney
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554*Via Email Attachment*

Dear Mr. Hlibok:

Pursuant to our meeting last week, Purple seeks expedited clarification regarding the Commissions' rules on interoperability and point-to-point requirements. . As we discussed at the meeting, we have identified three general categories of end-point access methods.

- 1) Provider distributed equipment,
- 2) Provider based software, and
- 3) Current and future off the shelf software and hardware.

It is abundantly clear from the interoperability and numbering orders that the Commission values the principles of interoperability and the ability to make point-to-point calls, and we believe these requirements clearly apply to provider distributed equipment. Our specific questions are as follows:

- 1) Are browser-based end points for video relay services a permissible 'end point' if it is unable to allow for dial around functionality to other providers and does not allow for point-to-point calls?
- 2) Is the integration of a third party end point, such as FaceTime on various Apple products, into our services a permissible end point if it is unable to allow for dial around functionality to other providers and does not allow for point to point calls to legacy relay end points?

If browser-based endpoints and third party end points are permissible, we would like clarification from the Commission so that all providers are on notice as to what is permissible, and we can compete on a level playing field with the other providers. Similarly, as other providers have done, we have designed browser-based end points and enabled thirty-party endpoint integration and would like to make them widely available. Further clarification from the Commission is critical at this juncture.

We believe this is an exciting time for the deaf community with many new, and previously unimagined, possibilities in terms of how to use the telephone in a functionally equivalent manner. In order to foster new developments in technology Purple, along with its industry peers, would benefit greatly from expedited and clear guidance in the area, both now, and as new issues emerge with new technologies.

If you have any further questions, please let me know.

Sincerely,

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

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CC: Karen Peltz Strauss, CGB Deputy Chief
Michael Pendergast, General Counsel, Purple Communications