

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
PURPLE COMMUNICATIONS, INC.)
)
For re-certification as an eligible IP-CTS,)
IP-Relay and Video Relay Services Provider)
pursuant to FCC Rule Section 64.605(A)(2) to)
receive reimbursement from the TRS Fund)

CGB Docket 03-123

FILED/ACCEPTED

OCT -5 2011

Federal Communications Commission
Office of the Secretary

To: Chief, Consumer and Governmental Affairs Bureau
Relay (VRS, IP Relay & IP CTS) Certification Application

AMENDMENT TO APPLICATION
FOR RE-CERTIFICATION
AS AN ELIGIBLE RELAY PROVIDER

Purple Communications, Inc., (referred to herein as the "Company") submits this amendment to its March 8, 2011 application for re-certification demonstrating the company is eligible to receive reimbursement from the Telecommunications Relay ("TRS") Fund as a provider of relay services. All applicable statements in Company's Application for Certification, as supplemented, continue to apply. The Company amends its application with the following:

1. Certification for all forms of relay services

In addition to its application for re-certification as a VRS and IP Relay service provider, the Company also incorporates herein a request that its existing certification as an Internet Protocol Captioned Telephone Service Provider (IP CTS) be renewed for a new term of five years concurrent with its for VRS and IP Relay.

On November 14, 2008, the FCC granted Company a certification as a provider of IP CTS eligible for compensation from the Interstate Telecommunication Relay Service (TRS) Fund. This certification is in effect for a period of five years, expiring November 14, 2013. For administrative efficiency in future certification processes, the Company hereby requests that its certification for IP CTS be renewed to run concurrently with its VRS and IP Relay certifications.

IP CTS is a telecommunications relay service that permits an individual who can speak but who has difficulty hearing over the telephone to use a telephone and an Internet Protocol-enabled device via the Internet to simultaneously listen to the other party and read captions of what the other party is saying. With IP CTS, the connection carrying the captions between the relay service provider and the relay service user is via the Internet, rather than the public switched telephone network.

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The Company hereby incorporates by reference its March 8, 2011 application, with statements therein being deemed to apply to this current application for IP CTS, including:

1. How the Company will meet all non-waived mandatory minimum standards
2. How the Company will ensure compliance with all applicable TRS rules
3. The Company's complaint procedures
4. How the Company meets all non-waived mandatory minimum standards
5. How the Company will continue to file annual compliance reports.

2. VRS Centers Details

Attached in Appendix A is information for each call center as required by §64.604(c)(5)(iii)(N)(2)

3. Corporate Stakeholders, Structure and Officers.

Attached in Appendix B is a description of Corporate Stakeholders, Structure and Officers

4. Sponsorship Arrangements

Attached in Appendix C is a list of sponsorship arrangements that the Company has entered into.

5. Representative Deeds or Leases for VRS Centers

Attached in Appendix D are copies of a representative sampling of deeds or leases for VRS centers.

6. List of the Number of Employees involved in TRS Operations

Attached in Appendix E is a list of the number of applicant's full-time and part-time employees involved in TRS operations.

7. Additional Mandatory Minimum Standards

Attached in Appendix F is a description of how the Company will meet new mandatory minimum standards.

8. Description of Technology and Equipment

Attached in Appendix G is a description of the technology and equipment used to support VRS call center functions.

9. Proofs of Purchases, Leases or License Agreements

Attached in Appendix H are proofs of purchases, leases or license agreements for all technology and equipment used to support call center functions.

Conclusion

The Company's role in the industry is important as a trusted provider of services to deaf consumers. The Company continues to innovate on behalf of its customers and is today the only provider of IP-Relay services with a dedicated software application for the T-Mobile Sidekick, the iPhone and iPad operating system and the Android operating system. Additionally, in VRS, the company is the second largest provider and continues to bring new services to its customers, including its recent announcements in support of consumers who use iPhone, Mac, and Android operating system devices, and an array of convenience calling features created based on consumer feedback. The Company is an innovator of new technology for the provision of IP CTS and is proud of its record in bringing telecommunication access to those individuals who have previously been unable to use the telephone effectively.

The Company will meet or exceed all non-waived operational, technical and functional minimum standards contained in the rules unless there are extenuating circumstances that would disrupt compliance. The Company will also continue to ensure appropriate procedures and remedies for ensuring ongoing compliance with the Commission's rules.

The Company is a qualified VRS, IP Relay and IP CTS provider. The Company therefore requests that the Commission grant it re-certification to provide all forms of relay service. Should the Bureau require any additional information, kindly contact one of the undersigned.

Respectfully submitted,
Purple Communications, Inc.

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October 4, 2011

REDACTED, FOR PUBLIC INSPECTION



November 18, 2011

Gregory Hlibok, Chief
Disability Rights Office
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: For re-certification as an eligible IP-CTS, IP-Relay and Video Relay Services Provider pursuant to FCC Rule Section 64.605(A)(2) to receive reimbursement from the TRS Fund. CGB Docket 03-123.

Dear Mr. Hlibok:

Consistent with rules approved by the Office of the Management and Budget¹, Purple Communications hereby adds to its October 5, 2011 amended application for recertification to include a certification from an officer regarding the accuracy and completeness of the application itself.

Please accept and add the following attachment, Appendix I, to the October 5, 2011 application.

Also attached is a revised copy of Appendix B outlining corporate stakeholders, structure and officers. The revised version makes note of the possibility that Purple will be undergoing structural changes for accounting and other purposes.

Sincerely,

/s/

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

cc: Joel Gurin, Chief, Consumer and Governmental Bureau

¹ Approved October 20, 2011, Published in the Federal Register November 3, 2011.

Appendix I

Certification of Officer

