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October 1, 2012

HIGHLY CONFIDENTIAL VERSION VIA U.S. MAIL
REDACTED VERSION VIA ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Notification of Substantive and Call Center Changes and Request for Confidential Treatment Pursuant to 47 C.F.R. § 0.459**

Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

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Healinc Telecom, LLC reached agreement on September 28, 2012 to transfer its customer and network operations to Purple Communications, Inc. ("Purple"). Both companies have already begun the process of integrating, transitioning and porting customer ten-digit numbers with associated Snap/Healinc Ojo's and VPAD devices and account-related data onto Purple's platform. This transition is being carried out so that there are no voluntary service interruptions requiring advance Commission approval. At present, Healinc and Purple do not license the same automatic call distribution ("ACD") platform with its associated call management features. The FCC is already aware of the specifications for these platforms, having reviewed and granted conditional certification to Healinc and Purple Communications, Inc.

Healinc Telecom customers have been notified of these changes, which mentioned a choice to either transition or port to another VRS provider. Additional customer notices are planned, with posting of all such communications on the websites of both Healinc Telecom and Purple Communications, Inc. This integration process is seamless in nature, designed to combine the best of both companies and position Purple as a continued positive supporter with ongoing innovative and stronger commitment to the provision of excellent and high quality VRS services to satisfy the current and future needs of transitioned Healinc Telecom, LLC and former Snap and Viable customers – with emphasis on stability, high quality video relay and customer service.

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The timetable for final transition from Healinc Telecom, LLC to Purple Communications, Inc is projected for October 1, 2012 – other than handling of VRS traffic by Purple Communications, LLC effective September 30, 2012 at 11:59:59 p.m. (EST). Accordingly, we wish to ensure – with the support of the Commission and the iTRS Fund administrator – that Healinc will be reimbursed for August 9-30, 2012 traffic picked up from Snap in addition to their own, and for the Month of September 2012, thus Purple Communications, Inc will assume the billing from October 1, 2012 at 00:00:01 a.m .and then in full on a monthly basis thereafter.

Healinc Telecom. LLC requests pursuant to 47 C.F.R § 0.459 and Exemption 4 of the Freedom of Information Act, that the Commission withhold from any future public inspection and accord highly confidential treatment to the business-sensitive information related to VRS call centers ("Confidential Information") contained in the unredacted version of this document. All of the Confidential Information has been redacted in this ECFS transmission, with the unredacted version via U.S. Mail.

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In support of this request and pursuant to each of the numbered items within Section 049(b) of the Commission's rules, Healinc Telecom. LLC hereby states as follows:

1. Healinc Telecom, LLC seeks confidential treatment with respect to the Confidential Information in this correspondence, all of which has been redacted in the version filed electronically.
2. Healinc Telecom, LLC is providing the Confidential Information in compliance with Commission rules and regulations.
3. The Confidential Information constitutes sensitive information about Healinc Telecom, LLC call center locations and contact particulars.
4. The Internet-based Telecommunications Relay Service market is highly competitive throughout the U.S.
5. Disclosure of the Confidential Information would result in harm as such would provide Healinc's competitors with insights into its call center operations.
6. Healinc does not make the Confidential Information publicly available.
7. Again, Healinc does not make the Confidential Information publicly available.

In accordance with the Commission's *Second Protective Order* (DA 12-402) released May 31, 2012, this letter along with a redacted version are attached via U.S. Mail and electronic mail to Gregory Hlibok, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, SW, Room 3-B431, Washington, DC 20554.
If there are any questions regarding the above, please do not hesitate to contact me.
Sincerely,

/s/
Lamar G. Stewart,
Chief Operations Officer/Senior Vice President
Healinc Telecom, LLC
212-714-2462 V
lstewart@lifelinks.net

cc: Stanley Schoen, M.D., President, Chief Executive Officer, Healinc Telecom, LLC (via email)
John Ferron, Chief Executive Officer, Purple Communications, Inc. (via email)
John Goodman, Chief Legal Officer, Purple Communications, Inc. (via email)
Andrew Isar, Regulatory Consultant (via email)
Lamar Stewart, Chief Operating Officer, Healinc Telecom, LLC (via email)
David W. Rolka, President, Rolka Loube Saltzer Associates (via email)
Matt Saltzer, Rolka Loube Saltzer Associates (via email)
Gregory Hlibok, Chief, DRO, Consumer & Governmental Affairs Bureau/FCC (via email)