



July 30, 2009

Attn: Ms. Susan Johnson
Senior Vice President
AT&T

Attn: Mr. Tom Kiely
CEO
Snap Telecommunications, Inc.

Attn: Ms. Julie Miron
Executive Director
Communications Access Center

Attn: Mr. Pat Nola
CEO
Sorenson Communications

Attn: Ms. Dixie Ziegler
Director of Relay Services
Hamilton Relay

Attn: Mr. Mike Ellis
National Director, Relay
Sprint

Attn: Mr. Wesley N. Waite, Sr.
Chief Operating Officer
Lifelinks

Attn: Mr. Sean Belanger
CEO
Z-VRS

[Addresses included on page 4]

Re: Open Letter to Certified Relay Providers – Industry Compliance Invitation

Dear Certified Providers of iTRS;

Despite our competitive differences, I believe we can agree that in addition to clarifications from the FCC on several matters, it is essential for providers to adopt a common set of guidelines to strengthen our collective commitment to regulatory compliance and to bolster consumer confidence in the industry. Soon, Purple will formally request that the FCC adopt rules to clarify various relay policies which we think will help bring much needed clarity and will ultimately benefit the industry.

Like many of you, over the years Purple has implemented various compliance activities and has added staff and processes specifically devoted to this effort; however, I do not recall relay providers gathering as a group to develop a common set of best practices specific to the issue of compliance. My recommendation is that we take the opportunity to do this now by designating one or more representatives from our companies to serve as part of a working group with a charter of developing a set of “Best Practices” in the area of compliance. The working group would seek input from consumers, interpreters, and the FCC to ensure guidelines that reflect the views of all stakeholders with the end product being something we can each tailor for our individual implementation.

I am sure many of you have programs, processes or ideas that could be shared in a collaborative manner which would serve to strengthen our entire industry.

Purple offers some of its approaches to compliance and ideas for what our teams might consider, the details of which could be expanded upon by the working group.

Purple intends to move forward with this effort and we welcome your company's participation if you are so inclined. If you are interested in supporting this initiative, please let me know who on your team would serve as a possible member of this working group.

I know many of us will be at the TDI conference this week or have representatives at the event. We can advance these ideas by having informal discussions while there. I think we all stand to benefit, as do consumers, from a collaborative regulatory compliance effort.

Respectfully,

A handwritten signature in cursive script that reads "Dan Luis".

Dan Luis, CEO
Purple

cc: Kelby Brick, Vice President Regulatory & Strategic Policy
cc: George Lyon, Director, Regulatory Compliance
cc: Angela Trull, Director, Interpreter Methodology and Process



ATTACHMENT – PURPLE EXAMPLE FOR WORKING GROUP CONSIDERATION

The guidelines below reflect Purple’s efforts to continually refine its approach to regulatory compliance to ensure operational integrity. To stimulate the industry’s collective thinking, Purple submits these measures as one possible approach to “Best Practices” for regulatory compliance:

1. **Designated Compliance Officer.** Each provider (certified and non-certified) must identify an employee to serve as that company’s Compliance Officer. The Compliance Officer will establish and enforce regulatory compliance procedures that ensure that the company and its employees adhere to the FCC’s rules and policies.
2. **Internal Compliance Requirement.** Each provider (certified and non-certified) must implement a formal internal compliance review process of all marketing and outreach activities, including promotional programs, advertising, sponsorships, surveys, and the use of third party contractors in the implementation of any of the above. Prior to the execution of any program, there must be a written review and sign off by the company’s designated Compliance Officer.
3. **Mandatory Compliance Training for Employees and Contractors.** Each provider (certified and non-certified) must conduct regulatory compliance training among its management staff and signify completion through the signing of a regulatory compliance training certificate held on file by relay providers and subject to routine FCC audit. Consideration can be made whether this requirement should be extended to all employees, including interpreters and independent contractors.
4. **Technical Compliance Requirement.** For technical compliance and to reduce human error, each provider should have automated call timer termination immediately upon hang up by either end of the live conversation.
5. **Quarterly FCC Meetings.** All Compliance Officers must meet quarterly as a group with the FCC’s Disability Rights Office to discuss best practices and to educate providers and the FCC on trends or issues present in the industry. These meetings should also include representatives of the Deaf, Hard of Hearing and Speech-Disabled Communities. The meetings would enable the FCC and the industry, and the user communities to discuss ways to spread innovative TRS services to the Deaf, Hard of Hearing and Speech Disabled Communities while ensuring compliance with the FCC’s rules and policies.
6. **Annual Compliance Summit.** All Compliance Officers must meet annually as a group with the Chief of the Consumer and Governmental Affairs Bureau, senior staff from the Bureau and representatives of the Deaf, Hard of Hearing and Speech-Disabled Communities. The FCC Commissioners of their staffs may wish to participate in the meetings as well. Similar to annual educational conferences held by professional associations and regulatory agencies, an annual compliance summit in Washington DC with required attendance by all certified and non-certified providers would help further align the industry, while ensuring FCC input from the highest levels.

Certified Provider Addresses

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