



Federal Communications Commission  
Washington, D.C. 20554

January 27, 2017

**Via U.S. Postal Service and Email: [mike.strecker@purple.us](mailto:mike.strecker@purple.us)**

Michael Strecker  
Vice President of Regulatory and Strategic Policy  
Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765

**Re: CG Docket No. 03-123  
Notice of Transfer of IP CTS Certification from Purple Communications, Inc. to  
ClearCaptions LLC**

Dear Mr. Strecker:

On December 29, 2016, Purple Communications, Inc. (Purple) filed a notification with the Federal Communications Commission (FCC or Commission), effectively immediately, that Purple was transferring its conditional certification as a provider of Internet protocol captioned telephone service (IP CTS) to ClearCaptions LLC (ClearCaptions), a wholly-owned subsidiary of Purple.<sup>1</sup> Purple has been in possession of a conditional certification for the provision of IP CTS, which was granted by the Commission's Consumer and Governmental Affairs Bureau (CGB) on November 7, 2014.<sup>2</sup>

This letter is to acknowledge receipt of Purple's notification of non-substantial assignment of Purple's conditional certification to provide IP CTS to ClearCaptions, effective December 29, 2016. ClearCaptions will continue to be subject to the conditions included in the certification granted by CGB, and as such, will remain subject to further assessment of its IP CTS operations, as necessary, to ensure that it is in compliance with all applicable Commission rules and orders, including the Commission's telecommunications relay service (TRS) minimum standards. Among other things, to assist it in reaching a final determination as to ClearCaptions's qualifications for certification, CGB may conduct one or more unannounced on-site inspections of ClearCaptions's facilities and request additional documentation relating to ClearCaptions's provision of IP CTS and compliance with applicable rules and orders.<sup>3</sup>

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<sup>1</sup> Letter from Michael Strecker, Vice President of Regulatory and Strategic Policy, Purple Communications, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, CG Docket No. 03-123 (filed Dec. 29, 2016).

<sup>2</sup> *Notice of Grant of Conditional Certification for Purple Communications, Inc. to Provide Internet Protocol Captioned Telephone Service*, Public Notice, 29 FCC Rcd 13728 (2014) (*Purple IP CTS Conditional Certification Public Notice*); see also *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program; Purple Communications, Inc. Application for Certification to Provide Internet Protocol Captioned Telephone Service*, Order, 29 FCC Rcd 14889 (2014) (suspending the requirement in the *Purple IP CTS Conditional Certification Public Notice* that Purple discontinue the provision of IP CTS through its web and wireless applications).

<sup>3</sup> In the *iTRS Certification Order*, the Commission reserved the right, after initial review of an application, to conditionally grant certification to an applicant, subject to one or more subsequent on-site inspections of the applicant's facilities, where the Commission, upon initial review of the application, determines that the application facially meets the certification requirements, but the Commission needs to verify some of the information contained

Ultimate conversion to full certification will be granted if, based on on-site inspections and our review of documentation and other relevant information, the Commission finds that ClearCaptions is in compliance with the Commission's rules and orders and that ClearCaptions is qualified to receive compensation from the Interstate TRS Fund for the provision of IP CTS. If, at any time during the period in which ClearCaptions is operating pursuant to this conditional certification, the Commission determines that ClearCaptions has failed to provide sufficient supporting documentation for any of the assertions in ClearCaptions's application, determines that any of those assertions cannot be supported, or finds evidence of any apparent rule violation, fraud, waste, or abuse, the Commission will take appropriate action, which may include the denial of ClearCaptions's application. In the event of such denial, ClearCaptions's conditional certification will automatically terminate thirty-five (35) days after such denial. If, however, the Commission grants full certification, ClearCaptions, like all Internet-based TRS providers, must continue to operate in compliance with all applicable Commission rules and orders.

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (844) 432-2275 (videophone), or (202) 418-0432 (TTY).

Sincerely,

Karen Peltz Strauss  
Deputy Chief  
Consumer and Governmental Affairs Bureau

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in the application. *Structure and Practices of the Video Relay Service Program*, Second Report and Order and Order, 26 FCC Rcd 10898, 10914, para. 37 (2011) (*iTRS Certification Order*); *Structure and Practices of the Video Relay Service Program*, Memorandum Opinion and Order, Order, and Further Notice of Proposed Rulemaking, 26 FCC Rcd 14895, 14906-07, paras. 26-28 (2011) (*iTRS Certification Clarification Order*) (confirming that such inspections may be unannounced). The Commission noted that such visits would "better enable the Commission to verify the information provided in a certification application, and help us to better assess an applicant's ability to provide service in compliance with our rules." *iTRS Certification Order*, 26 FCC Rcd at 10914, para. 36; *see also* 47 CFR § 64.606(a)(3).