

Re: Request for confidential and highly confidential data pursuant to DA 18-751 Order and Third Protective Order

Dear Mr. Scott:

The FCC requested comments from stakeholders and interested parties in its proposed rule IP CTS Modernization and Reform Order. 47 CFR Part 64, [CG Docket Nos. 13-24 and 03-123; FCC 18-79]. As you know the TRS Advisory Council (Council) is tasked with advising the TRS Fund Administrator and the Federal Communications Commission (FCC) regarding the appropriateness of the annual costs for the provision of TRS services to the deaf and hard of hearing community. While the TRS Advisory Council welcomes the opportunity to provide meaningful comments to assist the FCC's consideration of its rulemaking, because they have not been given access to provider cost submissions for these services, the Council is unable to provide meaningful advice without having all of the relevant information to analyze and consider.

Consequently, the Council respectfully seeks access to all confidential and highly confidential provider cost data information contained in provider filings, pursuant to the Third Protective Order, Docket 03-123, released July 20, 2018. The TRS Advisory Council established a subcommittee to review the IP CTS annual provider cost submissions and agrees to hold this information in the strictest of confidence. They have prepared non-disclosure agreements which members of the Council's subcommittee will execute for each provider. Innocaption and Clear Caption have agreed to provide their data and have agreed to accept the non-disclosure agreements to be executed by Council subcommittee members in exchange. Sprint has said it will not agree. Hamilton and Sorenson want the subcommittee membership limited, to include only Ron Bibler, BJ Gallagher and Zainab Alkebsi who have also agreed to mutually acceptable non-disclosure agreements. Hamilton and Sorenson have requested that those three subcommittee members sign Appendix C of the Third Protective Order.

The Council also seeks a waiver of the 5 day rule, set forth in the IP CTS Order in an effort to expedite the proceedings.

Attached please find a fully executed copy of Appendix C as required by the Third Protective Order.

Very Truly Yours,



Ron Bibler
Chairman, TRS Advisory Council

cc: Robert Aldrich