REDACTED – FOR PUBLIC INSPECTION

ASL SERVICES HOLDINGS, LLC.
GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *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, Semi-annual Call Center Report

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(N)(2), enclosed for submission to the Commission is ASL Services Holding, LLC dba GlobalVRS' ("GlobalVRS") semi-annual *Call Center Report*. GlobalVRS reports no change in its call centers. The call center data required pursuant to Section 64.604(c)(5)(iii)(N)(2) submitted in its March 31, 2016 *Call Center Report* remains unchanged with the exception of the number of interpreters at each call center.

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,[1] and "Exemption 4" of the Freedom of Information Act,[2] GlobalVRS respectfully requests that identified sections of its *Call Center Report* be deemed confidential and protected, accordingly.

GlobalVRS' *Call Center Report* constitutes a "trade secret" as set forth in Section 0.457 of the Commission's rules,[3] in that the information reveals specific composition of the Company that would be useful to competitors. Further, the Company's *Call Center Report* contains highly confidential information not intended for public consumption. GlobalVRS would not otherwise make this information publically available under any circumstance. Release of this information the public could cause GlobalVRS irreparable and inestimable harm. GlobalVRS requests that the redacted sections be withheld from public inspection, accordingly. Should disclosure of the

[1] 47. C.F.R §0.459.

[2] 47 C.F.R.§0.457(d). *See National Parks and Conservation Assn.* v. *Morton,* 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851,1860 (1998).

[3] 47 C.F.R. §0.457.

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redacted *Call Center Report* be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, GlobalVRS states as follows:

1. Identification of the specific information for which confidential treatment is sought.

GlobalVRS requests confidential treatment of its *Call Center Report*.

2. Identification of the circumstances giving rise to the submission.

GlobalVRS is providing confidential information as a compliance requirement.

3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.

The confidential information constitutes highly confidential operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

4. Explanation of the degree to which the information concerns a service that is subject to competition

The confidential information involves video relay services, a highly competitive service.

5. Explanation of how disclosure of the information could result in competitive harm.

Disclosure of confidential information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete.

6. Identification of any measures taken to prevent unauthorized disclosure.

GlobalVRS treats its *Call Center Report* information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.

GlobalVRS does not make the redacted information to the public or to third parties. Confidential information has been provided to the Commission.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

This information is being submitted by GlobalVRS. GlobalVRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to Global VRS.

In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

Thank you for your attention to this matter. Questions may be directed to the undersigned.
Sincerely,

ASL SERVICES HOLDINGS, LLC

Gabrielle Joseph
Vice President

Attachment

cc: TRSreports@fcc.gov