



# ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

---

Via Overnight Delivery

October 30, 2019

Ms. Marlene H. Dortch,  
Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: ASL Services Holdings, LLC Annual Compliance Report, 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 Secretary Dortch:

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") submits the following as its annual compliance report demonstrating and certifying compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Telecommunications Relay Service Fund ("Fund") eligible Internet-based video relay services ("VRS"), as set forth in Sections 64.604 *et seq.* of the Commission's rules, 47 C.F.R. §§64.604 *et seq.* Pursuant to Section 64.5109(e) of the Commission's rules, 47 C.F.R. § 64.5109(e), GlobalVRS also submits its annual Customer Proprietary Network Information ("CPNI") regulatory compliance certification.

**Annual Compliance Report.** On March 29, 2019, GlobalVRS submitted its *Application of ASL Services Holdings, LLC dba GlobalVRS for Full Certification to Provide Video Relay Service* ("Application") to the Commission. GlobalVRS's Application *inter alia* sets forth a comprehensive description and evidence of the Company's compliance with the Commission's MMS for the provision of Fund eligible VRS.<sup>1</sup> The veracity of the Application was certified by Angela Roth, GlobalVRS's President and Chief Executive officer. GlobalVRS's compliance, as addressed in its recent Application remains unchanged. GlobalVRS incorporates those portions of its Application governing the Company's MMS compliance herein by reference as its annual report, accordingly, rather than reiterating the Company's compliance through a separate report.

---

<sup>1</sup> See, Application pages 5 through 36.

Ms. Marlene H. Dortch  
October 30, 2019  
Page 2

Since submission of its Application, GlobalVRS has continued to diligently coordinate with the Commission's Enforcement Bureau and has timely complied the entirety of its immediate *Consent Decree*<sup>2</sup> obligations to date, including submission of all reports and data, submission of comprehensive Operations, Compliance and Accounting manuals, submitted training slides, and conducted extensive training for all employees, among other functions. GlobalVRS is unaware of any subsequent issues or questions raised by the Enforcement Bureau regarding the Company's compliance with the Consent Decree or otherwise.

GlobalVRS notes that its Application remains pending, and respectfully requests that the Commission give expedited consideration to its Approval and grant the Company's Application.

**Annual CPNI Certification.** GlobalVRS also submits to the Commission its attached CPNI certification signed by an officer of the Company. Company employees have received additional CPNI training as part of the extensive training employees have and will continue to receive.

An original and one (1) copy of this letter and attachment are enclosed. Two copies of this letter and attachment 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.

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

Sincerely,

ASL SERVICES HOLDINGS, LLC DBA GLOBALVRS  
  
Gabrielle Joseph  
Chief Operations Officer

Attachments

cc: [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov)  
Mr. Eliot Greenwald (via electronic delivery)

---

<sup>2</sup> In the Matter of ASL Services Holdings, LLC dba GlobalVRS, File No. EB-TCD-15-00020482, Order, DA 19-28 adopting *Consent Decree* (February 1, 2019) [*Consent Decree*]

**Annual 47 C.F.R. §64.5105 et seq. CPNI Certification**

Annual Customer Proprietary Network Information ("CPNI") Certification covering the period January 1, 2018 through December 31, 2018, pursuant to 47 C.F.R. §64.5109(e).

Date Filed: October 30, 2019

Name of Company covered by this Certification: ASL Services Holdings, LLC dba Global VRS

Name of Signatory: Gabrielle Joseph

Title of Signatory: Chief Executive Officer

Certification: I, Gabrielle Joseph, do hereby certify under penalty of perjury that I am an officer of ASL Services Holdings, LLC dba Global VRS, and acting as an officer and agent of the Company, that I have personal knowledge that the Company has established comprehensive operating procedures and training that ensure compliance with the Commission's CPNI regulations for Internet-based Telecommunications Relay Service Providers in 47 C.F.R. §§64.5101 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.5105 et seq. of the Commission's rules as applicable.

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed by a company at either state commissions, the court system or the Commission against data brokers) against data brokers in the past year. The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 19 of the U.S. Code and may be subject to enforcement action.

ASL SERVICES HOLDINGS, LLC DBA GLOBALVRS  
  
Gabrielle Joseph  
Chief Operations Officer

3700 Commerce Boulevard, Suite 216  
Kissimmee, Florida  
Telephone: 407.518.7900

**Annual 47 C.F.R. §64.5105 et seq. CPNI Certification**  
**Attachment 1, Statement Concerning Company Procedures**

ASL Services Holdings, LLC dba Global VRS ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any individual not directly involved in the provision of service, subject to disciplinary action and termination of employment. All individuals receive an initial and annual CPNI protection training. All individuals and the Company's automatic call distribution vendor partner and its employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those individuals with a "need to know" for purposes of serving Registered Users and users. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with Registered Users and users is documented through retention of electronic notes and retained for a minimum of three years, as set forth in 47 C.F.R. §64.5109. Such notes are accessible solely by designated individuals responsible for customer care, their supervisors and managers and senior management. All sales or marketing campaigns initiated by the Company require approval of the Compliance Officer who is responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2018, the Company took no action against data brokers. In calendar year 2018, the Company received no consumer complaints regarding CPNI issues.