



March 8, 2019

VIA ELECTRONIC FILINGS

Marlene H. Dortch, Esq.
Secretary
445 Twelfth Street, S.W.
Washington, DC 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT OF *EX PARTE* PRESENTATION
MezmoCorp (dba InnoCaption)
CG Docket Nos. 03-123 and 13-24

Dear Ms. Dortch:

MezmoCorp (dba InnoCaption), requests highly confidential treatment of certain information contained in the enclosed *Ex Parte* Presentation (“Presentation”). The redacted version has been filed today in CG Docket Nos. 03-123 and 12-24. Pursuant to Exemption 4 of the Freedom of Information Act and the Rules of the Federal Communications Commission, InnoCaption requests confidential treatment for the information which has been labeled confidential in the attached Presentation and redacted in the public version of the Presentation.¹

1. *Identification of the specific information for which confidential treatment is sought.* InnoCaption requests highly confidential treatment of InnoCaption internal usage data, financial impact information, internal staffing requirements, and investment needs. This information is both financial in nature and confidential. Accordingly, this information would not routinely be made available to the public.
2. *Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission.* InnoCaption is submitting this *Ex Parte* Presentation for inclusion in the Commission’s docketed proceeding regarding Telecommunications Relay Services, CG Docket Nos. 03-123 and 13-24.

¹ 5 U.S.C. § 552(b)(4); 47 C.F.R. §§ 0.457(d) and 0.459; *see also* 18 U.S.C. § 1905

REDACTED – FOR PUBLIC INSPECTION

3. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*
The information for which InnoCaption is requesting confidential treatment includes internal and financial information which is company-specific, competitively-sensitive, and confidential. The information provided can be used by competitors and potential competitors to the detriment of InnoCaption. This information is not customarily made available to the public and is protected by the Company.
4. *Explanation of the degree to which the information concerns a service that is subject to competition.* The confidential internal and financial information disclosed in this filing relates to InnoCaption customer usage, and the reimbursement rates for the provision of Internet Protocol Caption Telephone Service (IP-CTS). Disclosure of the confidential information will likely cause irreparable harm to InnoCaption by providing competitors information which may be used to their competitive advantage.
5. *Explanation of how disclosure of the information could result in substantial competitive harm.* This information is financial and confidential in nature and would not be subject to public inspection. The Commission's rules recognize that release of this kind of internal and financial information is likely to produce competitive harm.
6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.* InnoCaption takes precautions to ensure confidential information such as the internal data and financial information included in this document is not released to the public or obtained by competitors and potential competitors through other means.
7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* The confidential internal and financial information is not available to the public. Additionally, the information has not otherwise been disclosed previously to the public.
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.* InnoCaption requests confidential treatment of the redacted information indefinitely, as it is not currently possible to determine a specific date by which the information could be disclosed without risk of harm.
9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* The information provided by InnoCaption is internal data and financial in nature, obtained from a person outside of the government, and confidential. Therefore, the financial and confidential information in question is protected by Exemption 4 of FOIA.²

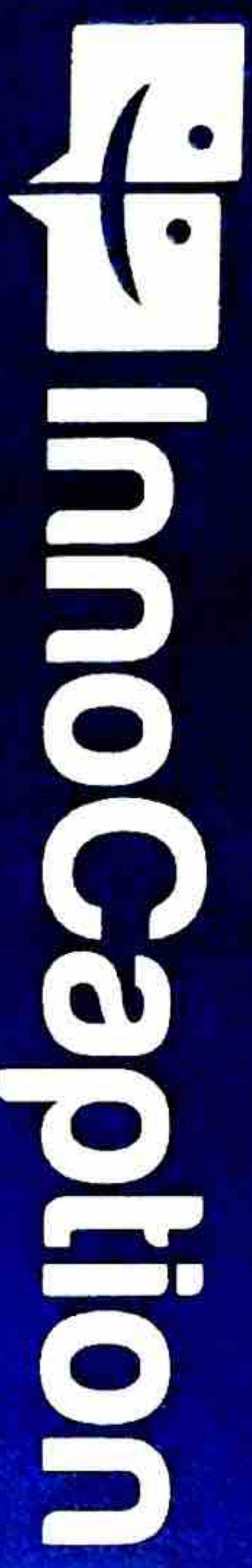
² 5 U.S.C. § 552(b)(4)

Please do not hesitate to contact the undersigned at (703) 865-5553 or
cristinaduarte@innocaption.com with any questions you may have.

Respectfully Submitted,

/s/ Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)

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Business Progress Update

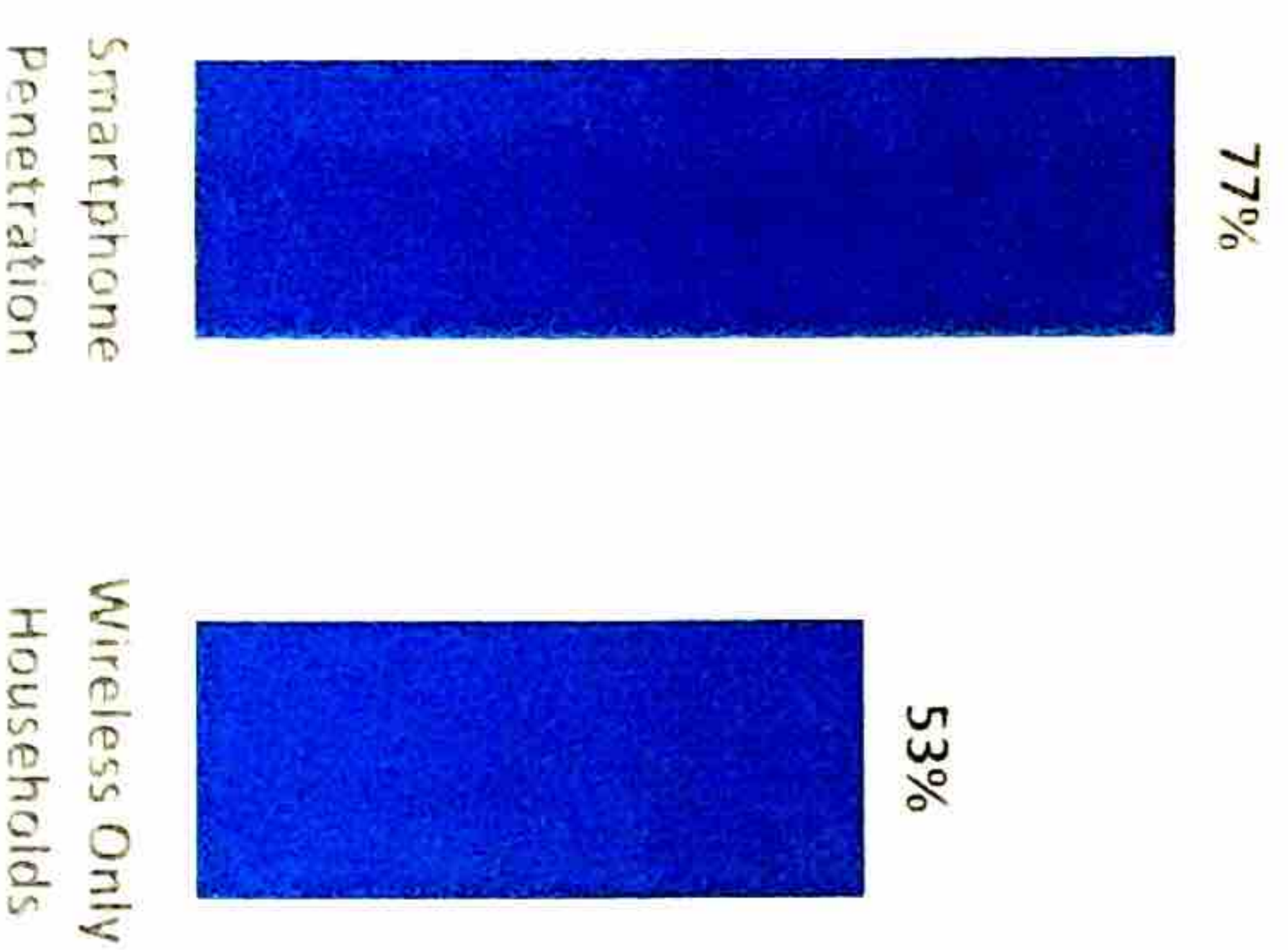
March 6, 2019

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InnoCaption's Purpose

In an increasingly mobile-centric world, InnoCaption provides the deaf and hard of hearing community with the only complete mobile app-based IP-CTS communication solution

Majority of US households no longer have a landline phone¹



Examples of situations where our users need mobile voice communications

- Receive a client call for work
- Make an outbound call to a colleague
- Participate in phone interviews
- Call doctor's office
- Dial 911 emergency
- Receive call from child's school
- Book or confirm restaurant reservation
- Call family and friends on the go

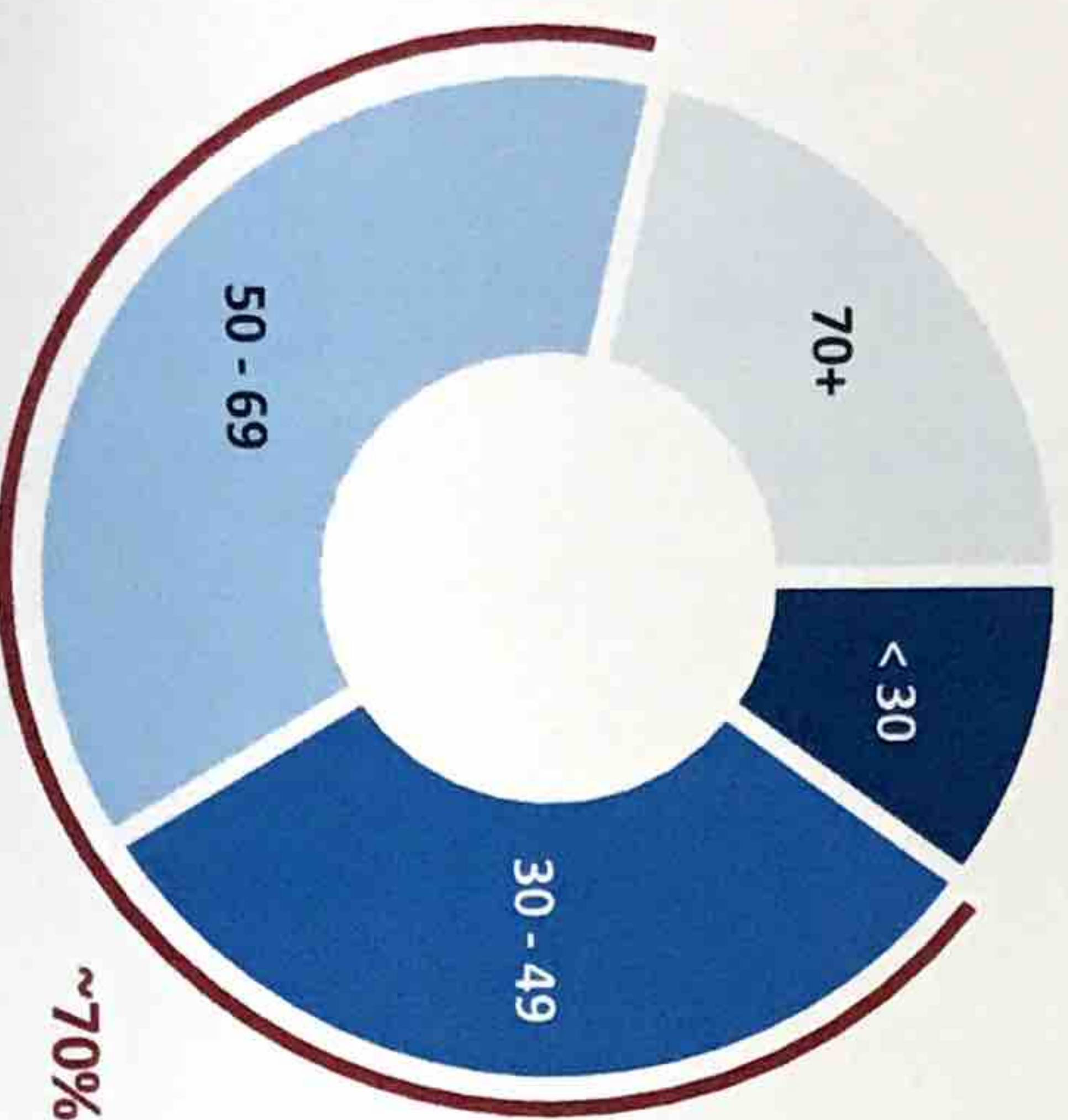
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¹ Source: Pew Research Center, "Smartphone Ownership, 2011-2014," August 2014. <http://www.pewresearch.org/factbook/entry/2014/08/01/smartphone-ownership/>

Our User Profile

InnoCaption is a powerful enabler for a largely working age, technologically savvy user base. [REDACTED]

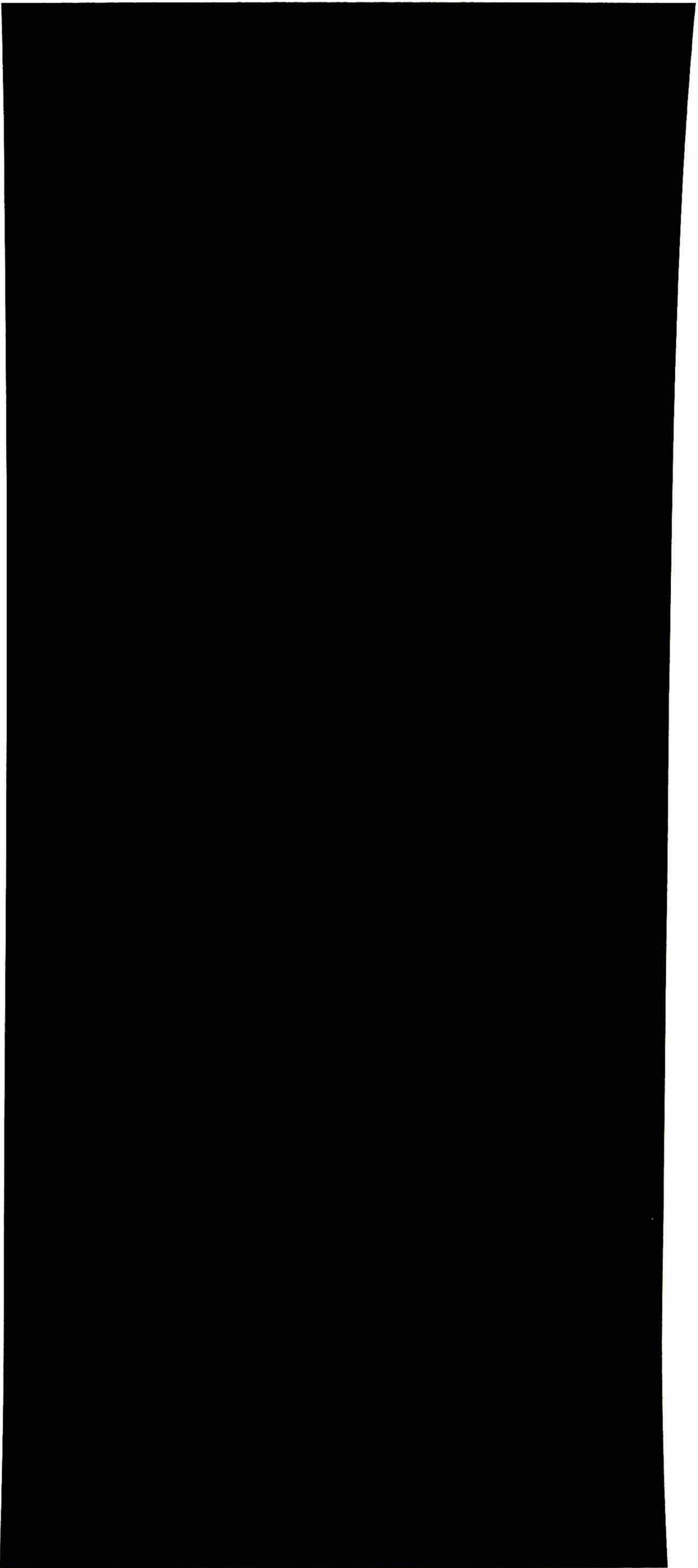
Users by Age Group



Source: Company user data as of December 2018; InnoCaption User Survey completed in December 2018
Confidential

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What are InnoCaption users saying?

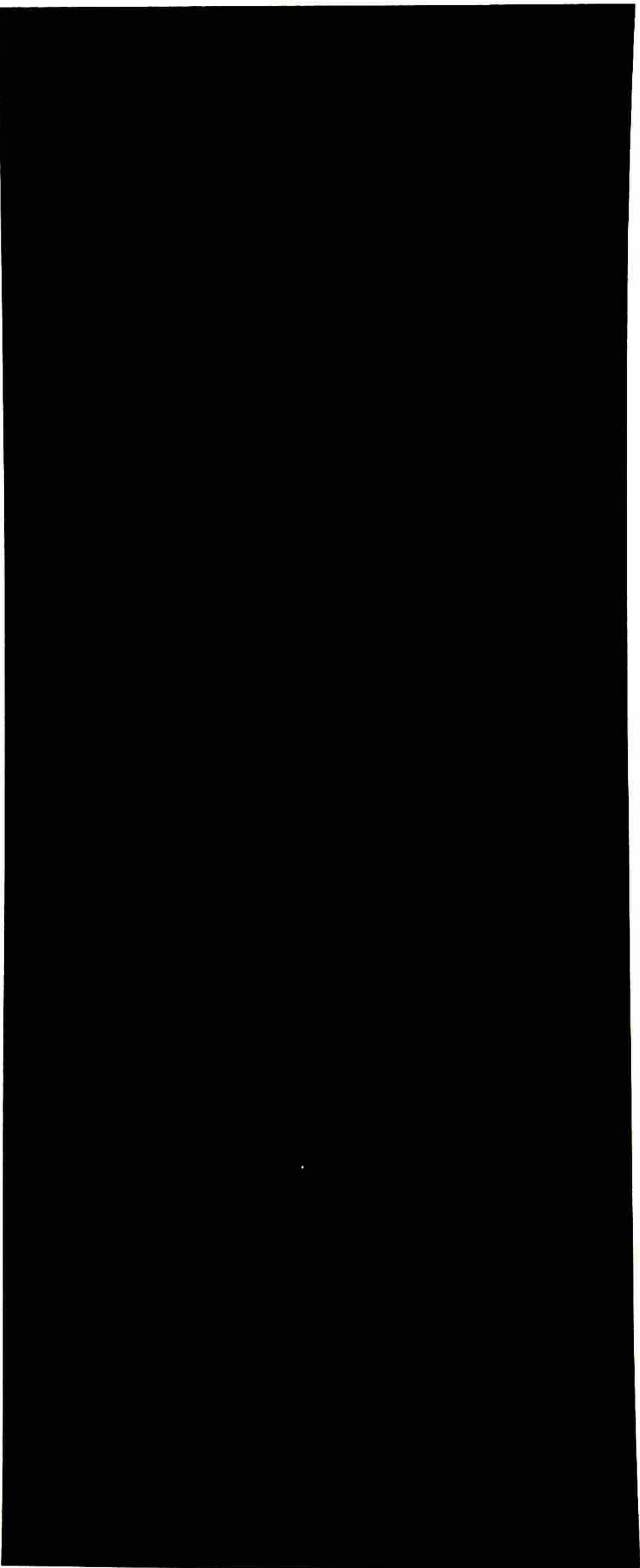


Source: InnoCaption User Survey completed in December 2018
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Traction to Date

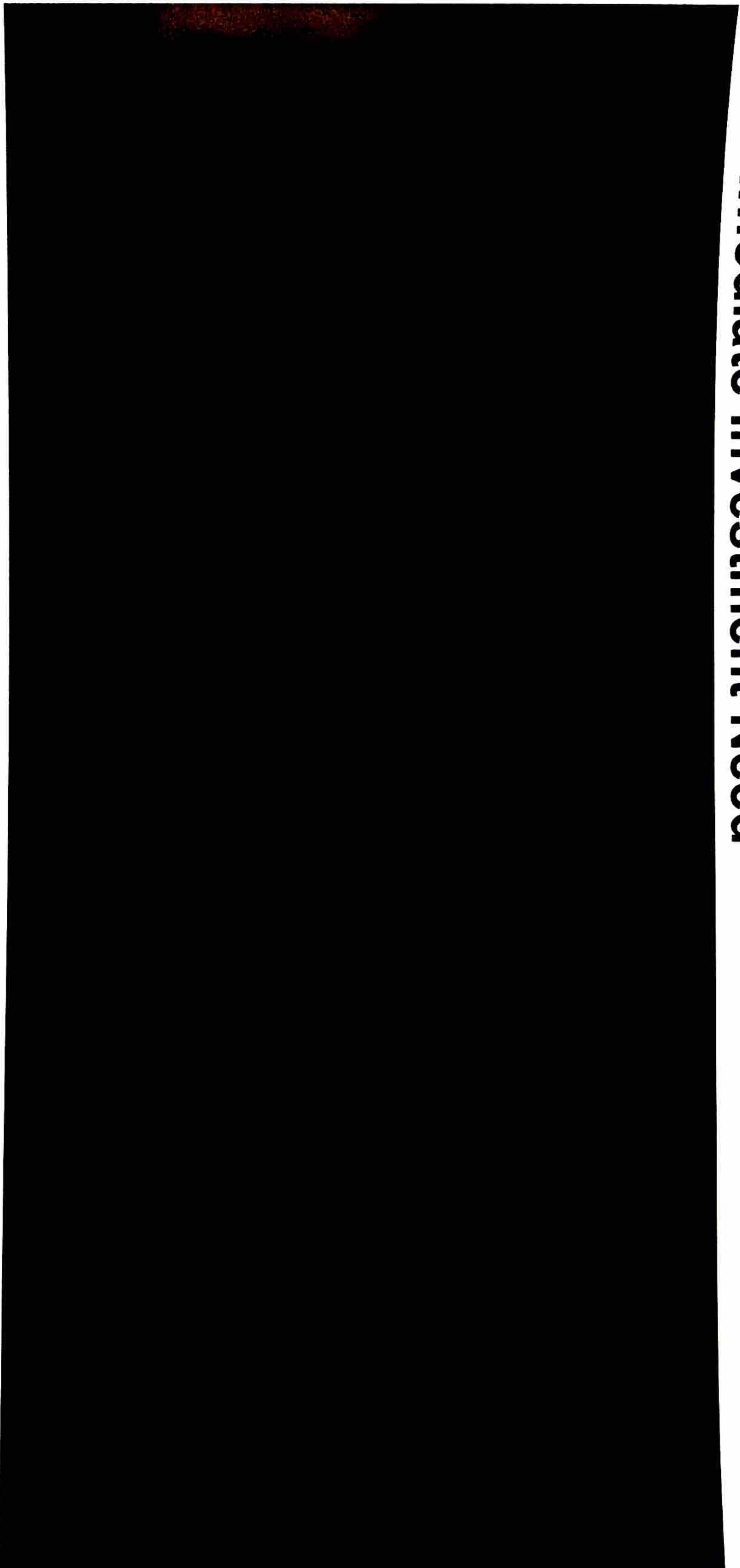
We have come a long way since 2016 and our steady growth in call volumes and positive direct feedback from users demonstrates our value and quality of our service



Source Company data as of February 2019. InnoCaption User Survey completed in December 2018
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Immediate Investment Need

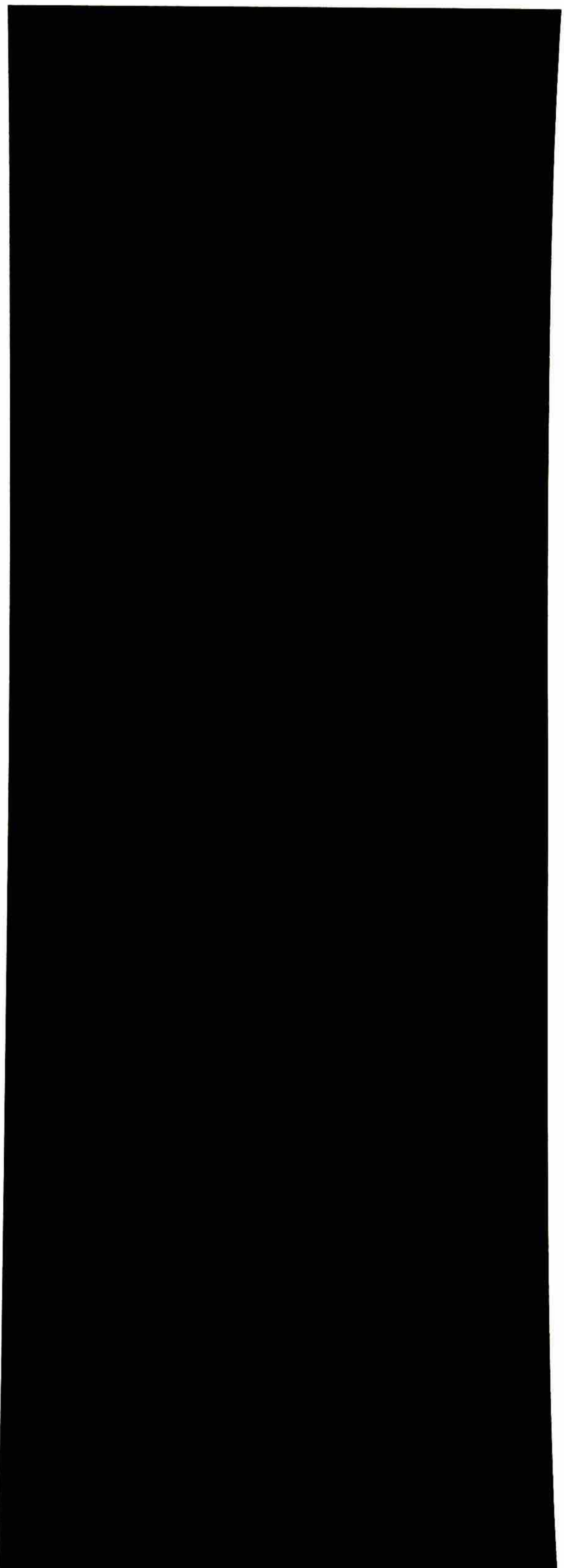


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Impact of IP-CTS Rate Cuts

Despite our rapid growth and efficiency gains the unexpected cuts to IP-CTS rates make it extremely difficult for us to make these necessary investments to professionalize and stabilize our organization



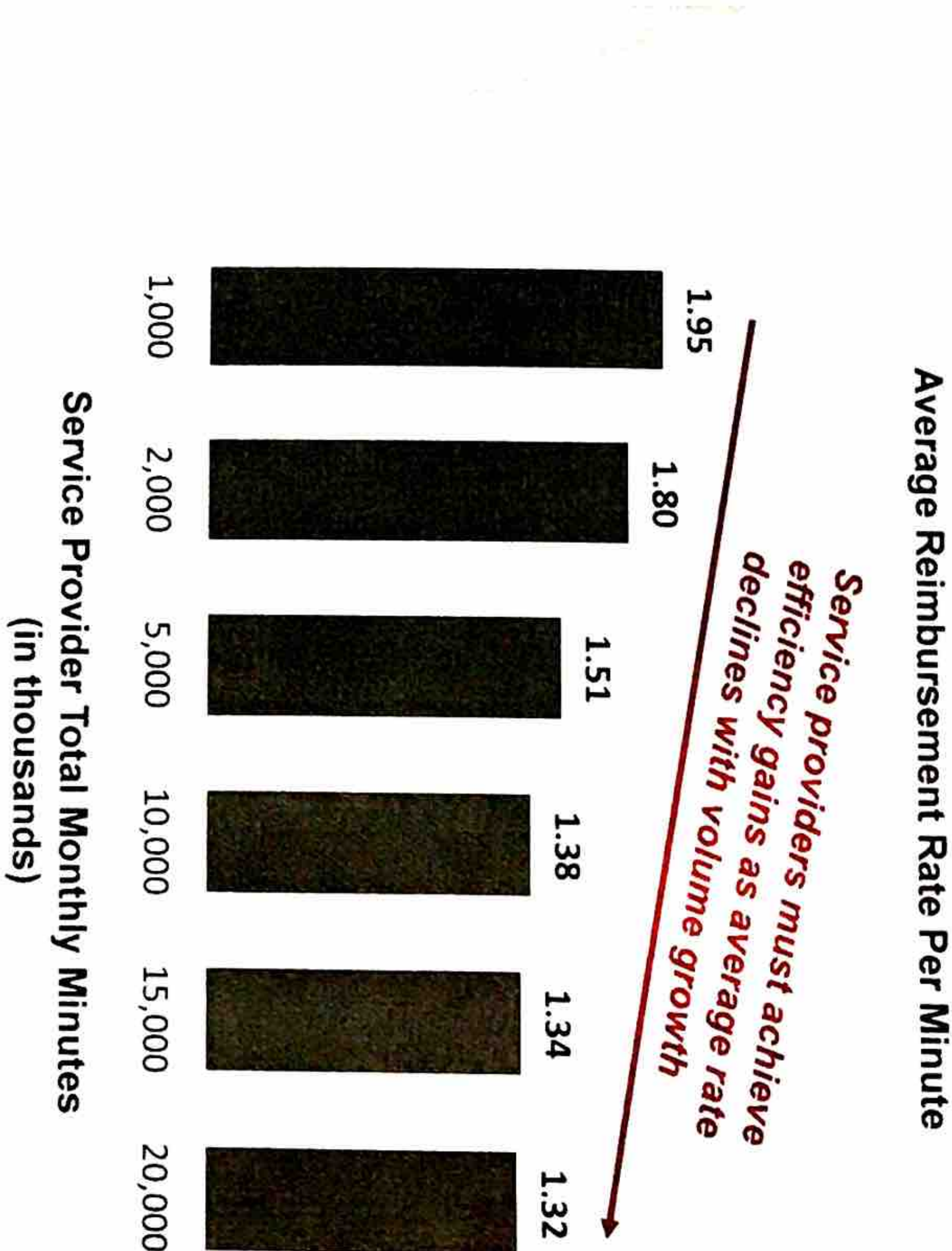
¹ Fully loaded cost represents planned cost structure for the organization under a reasonable business plan (actual costs were lower due to below market salaries for staff and delayed hires)

Proposed Tiered Rates

A tiered rate structure (similar to VRS rates) would allow smaller, innovative players to quickly scale and build out basic infrastructure, while investing for long-term efficiency gains. We have developed our own cost curve projection to form the basis of the following proposed tiered rate structure

Monthly Mins	Rate Per Minute
0 to 1 million	Tier 1 [REDACTED] \$1.95
1 to 2.5 million	Tier 2 [REDACTED] \$1.65
> 2.5 million	Tier 3 [REDACTED] \$1.25

**Proposal assumes all service providers would be subject to same tiered rates regardless of size*



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Further Investment Need

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] We request the FCC's support in continuing these efforts

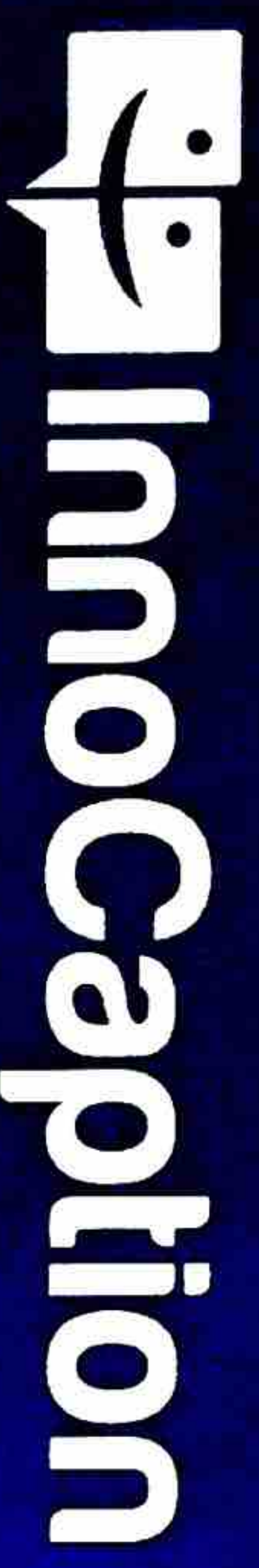
[REDACTED]

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Conclusion

- We estimate that our tiered rate structure would save the TRS Fund an estimated \$170+ million based on 2018/19 call volume projections and would help drive efficiency gains across the industry
- InnoCaption seeks the Commission's support for a tiered rate structure that will enable us to continue bringing innovative new technology solutions for the benefit of our deaf and hard of hearing users and for the long-term sustainability of the TRS Fund

▪ [REDACTED]



Thank you!

For any questions regarding this presentation, please contact:

Cristina Duarte
Director of Regulatory Affairs
cristinaduarte@innocaption.com

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