



ASLSERVICES HOLDINGS, LLC.
3700 COMMERCE BLVD., SECOND FLOOR,
KISSIMMEE, FL 34741
WWW.GLOBALVRS.COM

Via Electronic Comment Filing Submission (ECFS) and Overnight Delivery

March 29, 2019

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

ATTN: Mr. Patrick Webre, Chief, Consumer and Governmental Affairs Bureau

RE: Application of ASL Services Holdings, LLC dba GlobalVRS for Full Certification to Provide Video Relay Services and Request for Confidential Treatment; CG Docket Nos. 10-51 and 03-123

Dear Secretary Dortch:

Pursuant to Section 64.606(a)(2) of the Commission's rules, 47 C.F.R. §64.606(a)(2), and paragraph 21(a) of the Commission's February 1, 2019 *Consent Decree* in File EB-TCD-15-00020482, ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") hereby applies for full certification to provide Video Relay Services ("VRS") eligible for compensation from the interstate Telecommunications Relay Service Fund ("Application"). GlobalVRS currently operates under conditional certification.¹

GlobalVRS' Application is submitted in confidential and redacted public inspection versions. The redacted version of the Application has been filed electronically via the Commission's Electronic Comment Filing System in the above-referenced proceedings.

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,² and Exemption 4 of the Freedom of Information Act,³ GlobalVRS respectfully requests confidential treatment of company-specific, highly sensitive and proprietary commercial information contained in its Application. The confidential sections of GlobalVRS' Application constitute "trade secrets" as set forth in Section 0.457 of the Commission's rules,⁴ in that the information reveals specific strategic and technical actions taken by the Company that would be useful to competitors. Further, confidential sections of the

¹ See, *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, *Public Notice* DA 1902 (November 15, 2011).

² 47 C.F.R. §0.459.

³ 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).

⁴ 47 C.F.R. §0.457.

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Company's Application 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.

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 regarding the proprietary information redacted from the version of the application filed electronically with the Commission

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

GlobalVRS is applying for full certification as a VRS provider eligible for compensation from the TRS Fund, pursuant to 47 C.F.R. § 64.606(a)(2) and as required by the Commission's February 1, 2019 *Consent Decree* in File EB-TCD-15-00020482.

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 technical and 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 redacted 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 the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

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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 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.

Sincerely,

ASL Services Holdings, LLC dba GlobalVRS



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Attachments

cc: Mr. Eliot Greenwald (via electronic delivery)
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Sharon Lee (via electronic delivery)
Philip Priesman (via electronic delivery)
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